

WHISTLEBLOWER PROTECTION POLICY

DeepShield Systems, Inc.

Effective Date: January 15, 2024

1. PURPOSE AND SCOPE

1. DeepShield Systems, Inc. (the "Company") is committed to maintaining the highest standards of business conduct and ethics. This Whistleblower Protection Policy (the "Policy") establishes procedures for reporting and investigating suspected misconduct while protecting individuals who report such concerns from retaliation.

2. This Policy applies to all employees, officers, directors, contractors, consultants, and agents of the Company (collectively, "Covered Persons").

2. DEFINITIONS

1. "Protected Disclosure" means any good faith communication that discloses information that may evidence:

- a) Violations of federal, state, or local laws or regulations
- b) Breaches of cybersecurity protocols or unauthorized access to industrial control systems
- c) Financial improprieties or fraud
- d) Violations of the Company's Code of Ethics
- e) Dangers to public health, safety, or security
- f) Environmental violations
- g) Retaliation against whistleblowers

2. "Reporting Person" means any Covered Person who makes a Protected Disclosure.

3. REPORTING PROCEDURES

1. Reporting Channels

Covered Persons may submit Protected Disclosures through any of the following channels:

- a) Direct report to immediate supervisor
- b) Report to the Chief Compliance Officer
- c) Confidential Ethics Hotline: (888) 555-0123

- d) Secure online reporting portal: whistleblower.deepshield.com
- e) Written submission to the Audit Committee

2. Required Information

Protected Disclosures should include:

- a) Detailed description of the concern
- b) Relevant dates and locations
- c) Names of individuals involved
- d) Supporting documentation (if available)
- e) Witness information (if applicable)

4. INVESTIGATION PROCEDURES

1. The Chief Compliance Officer shall:

- a) Log all Protected Disclosures within 24 hours of receipt
- b) Conduct initial assessment within 72 hours
- c) Determine appropriate investigation scope and methodology
- d) Assign qualified investigator(s)
- e) Maintain confidentiality throughout the process

2. Investigations shall be completed within 60 days unless circumstances require additional time.

3. The Company shall maintain records of all investigations for a minimum of seven (7) years.

5. CONFIDENTIALITY AND ANONYMITY

1. The Company will maintain the confidentiality of Reporting Persons to the fullest extent possible, consistent with the need to conduct an adequate investigation.

2. Anonymous reports will be accepted and investigated with the same diligence as identified reports.

3. The identity of a Reporting Person shall not be disclosed without their explicit consent, except as required by law or regulatory authority.

6. PROTECTION AGAINST RETALIATION

1. The Company strictly prohibits any form of retaliation against Reporting Persons, including:

- a) Termination or threat of termination
- b) Demotion or adverse employment action
- c) Harassment or intimidation
- d) Discrimination
- e) Any other form of adverse treatment

2. Any person who engages in retaliation shall be subject to disciplinary action, up to and including termination of employment.

7. ROLES AND RESPONSIBILITIES

1. Chief Compliance Officer

- Oversee implementation of this Policy
- Maintain reporting channels
- Coordinate investigations
- Report quarterly to Audit Committee

2. Audit Committee

- Review significant Protected Disclosures
- Oversee major investigations
- Ensure Policy effectiveness
- Recommend Policy updates

8. FALSE AND MALICIOUS ALLEGATIONS

1. The Company will treat all Protected Disclosures seriously and in good faith.
2. Any Covered Person who knowingly makes false or malicious allegations shall be subject to disciplinary action.

9. POLICY REVIEW AND UPDATES

1. This Policy shall be reviewed annually by the Audit Committee.
2. Updates shall be communicated to all Covered Persons within 30 days of adoption.

10. ACKNOWLEDGMENT

1. All Covered Persons must acknowledge receipt and understanding of this Policy through the Company's compliance portal within 30 days of employment or engagement.

11. CONTACT INFORMATION

Chief Compliance Officer:

Email: compliance@deepshield.com

Phone: (555) 123-4567

Ethics Hotline: (888) 555-0123

Online Portal: whistleblower.deepshield.com

Approved by the Board of Directors

DeepShield Systems, Inc.

Date: January 15, 2024