

EMPLOYEE GRIEVANCE PROCEDURES

DeepShield Systems, Inc.

Effective Date: January 1, 2024

Document Version: 2.0

1. PURPOSE AND SCOPE

1. This Employee Grievance Procedure ("Procedure") establishes the formal process for addressing and resolving workplace complaints and grievances at DeepShield Systems, Inc. ("Company").
2. This Procedure applies to all full-time, part-time, and temporary employees of the Company, including those working at corporate headquarters, remote locations, and field operations centers.

2. DEFINITIONS

1. "Grievance" means any work-related concern, problem, or complaint that an employee believes to be unfair, inequitable, or a violation of Company policy.
2. "Grievant" refers to the employee filing the grievance.
3. "Responding Party" means the individual(s) or entity against whom the grievance is filed.
4. "Working Days" means Monday through Friday, excluding Company-recognized holidays.

3. INFORMAL RESOLUTION

1. Employees are encouraged to first attempt to resolve workplace issues informally through direct communication with their immediate supervisor or the involved parties.
2. The Human Resources Department is available to facilitate informal discussions and provide guidance on conflict resolution.

4. FORMAL GRIEVANCE PROCEDURE

1. Step One - Initial Filing
 - a) Employees must submit grievances in writing using the Company's Official Grievance Form within ten (10) working days of the incident.
 - b) The form must be submitted to Human Resources and include:

- Detailed description of the grievance
- Specific policy violations, if applicable
- Desired resolution
- Supporting documentation

2. Step Two - Initial Review

- a) Human Resources will acknowledge receipt within two (2) working days
- b) A preliminary review will be conducted within five (5) working days
- c) HR will determine if the grievance warrants investigation

3. Step Three - Investigation

- a) If warranted, HR will initiate a formal investigation within five (5) working days
- b) The investigation may include:
 - Interviews with relevant parties
 - Document review
 - Site inspections
 - Technical consultations for cybersecurity-related grievances

4. Step Four - Resolution

- a) HR will issue a written decision within fifteen (15) working days of investigation completion
- b) The decision will include:
 - Findings of fact
 - Conclusions
 - Recommended actions
 - Appeal rights

5. APPEAL PROCESS

1. Employees may appeal the initial decision within five (5) working days
2. Appeals must be submitted in writing to the Chief People Officer
3. The Appeal Committee shall consist of:
 - Chief People Officer or designee
 - Department Head not involved in the grievance

- Senior Technical Director for cybersecurity-related matters

4. Appeal decisions will be issued within ten (10) working days and are final

6. CONFIDENTIALITY AND NON-RETALIATION

1. All grievance proceedings will be kept confidential to the extent possible
2. The Company strictly prohibits retaliation against any employee for filing a grievance
3. Violations of confidentiality or acts of retaliation will result in disciplinary action

7. DOCUMENTATION AND RECORD KEEPING

1. HR will maintain all grievance records for seven (7) years
2. Records will be stored in accordance with the Company's data security protocols
3. Access to grievance records will be strictly limited to authorized personnel

8. SPECIAL PROVISIONS FOR CYBERSECURITY MATTERS

1. Grievances involving cybersecurity protocols, access rights, or system operations require review by the Chief Security Architect
2. Technical grievances may have expedited timelines based on operational risk

9. AMENDMENTS AND UPDATES

1. This Procedure may be amended by the Company as needed
2. Employees will be notified of any substantive changes

10. ACKNOWLEDGMENT

The undersigned acknowledges these procedures have been reviewed and approved.

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Robert Kessler

Chief Financial Officer

Date: January 1, 2024

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Dr. Elena Rodriguez

Chief Security Architect

Date: January 1, 2024

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