

	CORPORATE POLICY	Whistleblower Policy	
Approved by	People Operations	Revision	February 2025

**Purpose:**

In the spirit of *Value Reputation* Walker-Miller Energy Services (W-M) is committed to lawful and ethical behavior in all its activities and requires all team members to act in accordance with applicable laws, regulations, and policies.

W-M has an open-door policy and encourages team members and individuals of the public to share their questions, concerns, suggestions or complaints with their People Leader, People Operations (HR), any member of the leadership team or report through our anonymous AllVoices portal. If a team member or individual is not comfortable going to their People Leader, People Operations (HR) or Leadership, they should submit their complaint through AllVoices at <https://wmes.allvoices.co>.

Should an individual or team member have a reasonable belief that a team member or W-M has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the team member or individual is encouraged to immediately report such information to the AllVoices portal in writing. Team members and leadership are required to report complaints or concerns regarding suspected ethical and legal violations in writing to the AllVoices portal for investigation of reported complaints.

Team members must exercise sound judgment to avoid baseless allegations. Also, a team member substantiated for intentionally filing a false report of wrongdoing will be subject to discipline up to and including termination.

### **Scope:**

This policy applies to all full-time, part-time, and temporary team members, including workforce development cohorts, interns, co-ops, and individuals who do business with Walker-Miller Energy Services.

### **Definition:**

**Individual:** is defined by this policy as a person who engages in business with W-M. This includes a client, contractor, work force development cohorts, interns, co-ops, and vendors.

**Ombudsperson:** This policy defines an impartial mediator.

**Team Member:** is defined by this policy as a person employed for wages or salary by W-M.

**Whistleblower:** is defined by this policy as a person who reports to a member of W-M or an individual who engages in business, an activity that they consider to be illegal, dishonest, unethical, or otherwise improper in relation to Walker-Miller Energy Services (W-M).

Examples of violations include but are not limited to:

- violation of W-M Code of Ethics and Business Conduct, and other policies and procedures
- violation of a state, federal, or municipal law, regulation, or ordinance and/or;
- danger to public health or safety or W-M.

### **Reporting:**

The whistleblower is not responsible for investigating the alleged illegal or dishonest activity, or for determining fault or corrective measures; The W-M Ombudsperson, Vertrice Fortune ([vfortune@wmenergy.com](mailto:vfortune@wmenergy.com) or Office: (313) 366-8535, Ext.109 or Mobile: (586) 250-5939)) in partnership with People Operations (HR) are charged with these responsibilities.

- Team members and individuals who do business with W-M must exercise sound judgment to avoid baseless allegations.

- Team members who knowingly submit false reports of wrongdoing will be subject to disciplinary action if the report is found to be intentionally misleading and unsubstantiated.

When a team member has knowledge of or a concern of illegal or dishonest/fraudulent activity, the team member has three (3) options for reporting:

1. Report the concern to the W-M Ombudsperson via the AllVoices portal <https://wmes.allvoices.co>
  2. [HRsupport@wmenergy.com](mailto:HRsupport@wmenergy.com)
  3. Your people leader or any member of leadership
- All reports or concerns of suspected wrongdoing and dishonest activities should be promptly submitted to the Ombudsperson via AllVoices at <https://wmes.allvoices.co>. The Ombudsperson is responsible for investigating and coordinating any necessary corrective action. Any concerns involving the Chief People & Culture Officer should be reported to the Chief Operations Officer.
  - Reports of suspected wrongdoing should contain the names of the individuals involved, dates, and a description of the actions believed to be suspected wrongdoing.
  - Once the Ombudsperson is notified of the complaint, he/she will respond to the complainant within 24 business hours confirming receipt.
  - The Ombudsperson will submit any verbal complaints to AllVoices for case tracking and review.
  - The Ombudsperson will assign an investigator to conduct the investigation. W-M will do everything ethically possible to complete an investigation within two (2) weeks, but the period can vary depending on the complexity of the allegations and the amount of evidence involved. W-M strives to have the investigation completed within 30 days. The complainant will receive status updates of the investigation via AllVoices until its conclusion.

- Upon completion of the investigation, the investigator will notify the complainant in writing of the investigation's conclusion. The investigator will close the case in AllVoices upon completion.

When allegations of wrongdoing involving team members of W-M are substantiated, team member(s) are subject to corrective action up to termination. When allegations of wrongdoing involving individuals who conduct business with W-M are substantiated, those individuals are subject to legal action by W-M.

### **Acting in Good Faith:**

Anyone filing a complaint concerning a violation or suspected wrongdoing must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the W-M Code of Ethics and Business Conduct, and other policies and procedures, state, federal, or municipal law, regulation, or ordinance and/or danger to public health or safety or W-M. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offense.

### **Confidentiality:**

Violations or suspected violations may be submitted confidentially by the complainant or anonymously via AllVoices. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Program Responsibility:**

All reports of illegal and dishonest activities will be promptly submitted to the Ombudsperson who will be responsible for investigating and coordinating corrective or legal action. Team members or individuals who conduct business with W-M with any questions or concerns regarding this policy should contact AllVoices or a member of the leadership team.

### **Whistleblower Protections:**

Whistleblower protections are provided in two (2) areas: 1) confidentiality, and 2) against retaliation. As far as possible, the confidentiality of the whistleblower will be maintained. However, identity may

have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals with their legal rights of defense. If the team member or whistleblower is identified, W-M HR and/or senior leadership will communicate to those made aware that, 1) under no circumstance should there be any retaliation; and 2) this information is to remain confidential. Where necessary, additional steps such as transfer to a new department, role or people leader will take place to ensure that there is no retaliation.

### **No Retaliation Clause**

W-M and its representatives will not retaliate against a whistleblower. This includes but is not limited to protection from retaliation in the form of an adverse employment action such as termination, demotion, compensation decreases, poor work assignments/performance reviews and threats of physical harm.

Any whistleblower who believes they are being retaliated against must contact HR, the CEO, any member of the leadership team or submit a case via AllVoices immediately. AllVoices submissions are monitored by the Ombudsperson and escalated to the CEO, President, and COO.

While a whistleblower is protected against retaliation, this does not include immunity from any personal wrongdoing on their part that is discovered during the investigation.

W-M reserves the right to amend, suspend or alter the program with or without notice at any time.

### **Contact Information:**

**Vertrice Fortune, W-M Ombudsperson**

Email: [vfortune@wmenergy.com](mailto:vfortune@wmenergy.com)

Office: (313) 366-8535, Ext.109 or Mobile: (586) 250-5939

**AllVoices:** <https://wmes.allvoices.co>

**HR Support:** [HRsupport@wmenergy.com](mailto:HRsupport@wmenergy.com)

<b>Document Control</b>			
<i>Version</i>	<i>Approved by</i>	<i>Approved Date</i>	<i>Description of Changes</i>
<i>1.0</i>	<i>C. Bryant</i>	<i>March 2020</i>	<i>Initial Release</i>
<i>2.0</i>	<i>C. Bryant</i>	<i>February 2025</i>	<i>Updated with the process for all to report through AllVoices</i>