Building an Ethical Workplace Together

# ETHICS HOTLINE POLICY

**SCOPE:**

This policy applies to all Montauk Energy Holdings, LLC employees worldwide, including part time, temporary and contract employees.

**PURPOSE:**

Montauk Energy Holdings, LLC is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and Montauk Energy Holdings, LLC commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.  However, if an employee feels that their anonymity is not required then they should follow our existing grievance procedure.

**POLICY:**

The whistleblowing policy is intended to cover serious concerns that could have a large impact on Montauk Energy Holdings, LLC, such as actions that:

• May lead to incorrect financial reporting;
• Are unlawful;
• Are not in line with company policy, including the Code of Business Conduct; or
• Otherwise amount to serious improper conduct.

Regular business matters that that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

**SAFEGUARDS:**

**Harassment or Victimization**
Harassment or victimization of individuals submitting hotline reports will not be tolerated.

**Confidentiality**
Every effort will be made to protect the reporter's identity by our hotline vendor.  Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by our company into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known to us during the course of our investigation.

**Anonymous Allegations**
The policy allows employees to remain anonymous at their option.  Concerns expressed anonymously will be investigated, but consideration will be given to:
- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

**Malicious Allegations**
Malicious allegations may result in disciplinary action.

**PROCEDURE:**

**Reporting**
The whistleblowing procedure is intended to be used for serious and sensitive issues.  Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

- **Website:**  www.lighthouse-services.com/montaukenergy

- **Anonymous Reporting App: montaukenergy**
    - Detailed instructions here
- **Telephone:**
    - **English speaking USA and Canada: 833-222-3934**
    - Spanish speaking USA and Canada: **800-216-1288**

- o  Spanish speaking Mexico: **01-800-681-5340**
- o  French speaking Canada: **855-725-0002**

- **E-mail:** reports@lighthouse-services.com (must include company name with report)

- **Fax:** (215) 689-3885 (must include company name with report)

Reporters to the hotline will have the ability to remain anonymous if they choose.  Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation because of the information you have provided.   Reports are submitted by Lighthouse to Montauk Energy Holdings, LLC or its designee, and may or may not be investigated at the sole discretion of our company.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor or Human Resources Manager, Amanda Murray @ 412-747-8705.

**Timing**
The earlier a concern is expressed, the easier it is for us to take action.

**Evidence**
Although you are not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

## HOW THE REPORT WILL BE HANDLED:

The action taken will depend on the nature of the concern. The Audit Committee of the Montauk Energy Holdings, LLC receives a copy of each report and follow-up reports on actions taken by the company.

**Initial Inquiries**
Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

**Feedback to Reporter**
Whether reported directly to Montauk Energy Holdings, LLC personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:
- *  Acknowledging that the concern was received;
- *  Indicating how the matter will be dealt with;
- *  Giving an estimate of the time that it will take for a final response;
- *  Telling them whether initial inquiries have been made;
- *  Telling them whether further investigations will follow, and if not, why not.

**Further Information**
The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

**Outcome of an Investigation**
At the discretion of the company and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.

*Montauk Energy Holdings, LLC reserves the right to modify or amend this policy at any time as it may deem necessary.*

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**Welcome to the Anonymous Reporting App from Lighthouse Services**

This app can be downloaded to your phone and will enable you to submit new anonymous reports and follow up on anonymous reports related to an issue at your company or organization.

In order to use the app:

First, download it to your phone and install it.

- If your phone is an iPhone, download the app here  or scan this code



- If your phone is not an iPhone, download the app here or scan this code



- If you are not currently reading this on your phone, use your phone to go to the Apple App Store (https://www.apple.com/ios/app-store) or the Google Play store (https://play.google.com/store) and search for "Anonymous Reporting".

**MAKING A NEW REPORT**

When you open the app, it will present you with a field containing the words "Enter Keyword". The keyword should be provided by your employer or other organization that subscribes to the Lighthouse service. Once you enter it, click "Save". This will save that keyword in "Your Keywords".

Click the keyword to submit your report. After submitting a report, you will be provided with a case number. You can store this case number in the app by copying the case number provided, clicking on the edit icon for the keyword and pasting it into the 'Enter Case Number' field. If you provided a PIN during report submission, check the 'This case number has a PIN' checkbox.  There is no field to save your PIN; you will still need to remember it. Select 'Save' to store the case number.

**FOLLOWING UP ON A PREVIOUS REPORT**

To follow up on a specific report, select the case number below the keyword on the dashboard page.

If a PIN was required during report submission, the Case Management System portal page will be displayed with the case number pre-populated.  You'll need to enter the report's PIN to access the report through the portal.

If a PIN was not required during report submission, your company's or organization's anonymous web reporting page will be displayed.   On that page, click the submit button labeled "Don't have a PIN" under the 'Already Made a Report Selection'. This will take you to your organization's web reporting page. Scroll down and click "Don't have a PIN" under "Already Made a Report?"


**MANAGE KEYWORDS**

To manage keywords, select the gear icon in the lower right of the dashboard page.  The Manage Keywords page will allow you to enter additional keywords or delete existing keywords.  Note, when a keyword is deleted all associated case numbers will be deleted on the app only. This does not delete the reports themselves.

**Bienvenido a la App de Reportes Anónimos de Servicios Lighthouse**

Esta app puede ser descargada en su teléfono móvil y le habilitará para enviar nuevos reportes anónimos o hacer seguimiento a reportes anónimos relacionados con algún problema en su compañía u organización.

Para usar la app:

Primero, descárguela en su teléfono móvil e instálela:

- Si su teléfono es un iPhone, descargue la app aquí o escanee este código



- Si su teléfono no es iPhone, descargue la app aquí o escanee este código



- Si no está leyendo esto desde su teléfono, use su teléfono para ir a la Apple App Store (https://www.apple.com/ios/app-store) o a la Google Play Store (https://play.google.com/store) y busque "Reportes Anónimos".

**HACIENDO UN NUEVO REPORTE**

Cuando usted abra la app, podrá observar un campo con las palabras "Ingrese Palabra Clave". La palabra clave debe ser proporcionada por su empleador o por la otra organización que se suscribe al servicio de Lighthouse. Una vez que entre, haga click en "Guardar". Eso guardará la palabra clave en "Sus palabras clave".

Haga click en la palabra clave para enviar su reporte. Después de hacerlo, se le asignará un número de caso. Usted puede guardar ese número de caso en la app copiando el número proporcionado, haciendo click en el ícono editar para la palabra clave y pegándolo en el campo 'Ingrese Número de Caso'. Si usted proporcionó un PIN durante el envío del reporte, marque la casilla 'Este número de caso tiene un PIN'. No hay ningún campo para guardar su PIN; usted deberá recordarlo. Seleccione 'Guardar' para almacenar su número de caso.

**HACIENDO SEGUIMIENTO A UN REPORTE PREVIO**

Para hacer seguimiento a un reporte específico, seleccione el número de caso debajo de la palabra clave en la página del panel.

Si un PIN le fue solicitado durante el envío del reporte, la página del portal del Sistema de Gestión de Casos se mostrará con el número de caso precargado. Usted necesitará ingresar el PIN del reporte para acceder al reporte a través del portal.

Si no se le solicitó un PIN durante el envío del reporte, la página web de reportes anónimos de su compañía u organización se mostrará. En esa página, haga click en el botón enviar identificado con "No tengo PIN" debajo de 'Ya Hice una Selección de Reporte'. Esto le redirigirá a la página web de reportes de su compañía. Vaya hacia abajo y haga click en "No tengo PIN" debajo de "¿Ya hizo un Reporte?"


**GESTIÓN DE PALABRAS CLAVE**

Para gestionar palabras clave, seleccione el ícono del engranaje en la parte de abajo a la derecha en la página del panel. La página de Gestión de Palabras Clave le permitirá ingresar palabras clave adicionales o borrar las palabras clave existentes. Tenga en cuenta que cuando una palabra clave se borra, todos los números de caso asociados se borrarán solo en la app. Esto no borra los reportes como tal.