



## Corporate Policy Speak Up Policy

LE-AC-206  
(Supersedes LE-AC-204)

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### SCOPE

This policy applies to Constellation directors, officers, and employees, Constellation subsidiaries, third parties with which we do business, such as consultants, agents, lobbyists, sales representatives, distributors, vendors, suppliers, contractors, and independent contractors, unless subject to the Supplier Code of Conduct. This Policy will be applied consistently with any country and state-specific laws that apply to whistleblowers, retaliation, and disciplinary proceedings. To the extent there are conflicts amongst this policy and any business unit specific policy, this policy governs except to the extent that local policy is stricter to comply with local laws or regulations.

### PURPOSE

Integrity is at the core of our reputation. Speaking up when you need help understanding or following a policy, asking questions, and reporting potentially inappropriate behavior are all part of a healthy culture and the responsibility of all employees. You are encouraged to ask questions and raise concerns. Constellation will not tolerate retaliation against employees or others because they make good faith reports and cooperate fully with investigations.

### POLICY STATEMENT

You are encouraged to discuss all issues, concerns, problems, and suggestions with your immediate supervisor or other managers without fear of retaliation because you speak up.

You are required to speak up if you suspect someone with whom you work or the Company contracts or does business is violating our Code of Business Conduct, our Supplier Code of Conduct, our policies, or the law. You are also required to understand your obligations explained in this policy, make good-faith reports, cooperate fully with investigations, get help from the [Ethics and Compliance Office](#) if you have questions, and ensure you never participate in any retaliatory conduct against employees because they raise good faith concerns or cooperate fully with investigations. Failure to comply with this policy may result in disciplinary action up to and including termination. In all cases, this policy will be applied consistently with applicable laws.

Anytime you suspect a violation, you should contact the [Ethics and Compliance Office](#) or use the [Ethics Help Line](#) to share your observations and any facts, records, or context that may help to investigate the concern. Examples of possible concerns include, but are not limited to:

- Fraud, waste, theft or abuse of Constellation or government resources, including confidential information
- Bribery or attempts to inappropriately influence public officials or other decisionmakers

- Conflicts of Interest
- Fair treatment, respect, belonging, diversity, and inclusion
- Harassment and discrimination
- Retaliation against individuals because they speak up in good faith
- Workplace violence
- Environmental safety (spills, releases, etc.)
- Workplace safety and health
- Money laundering
- Human rights violations, including human trafficking
- Anti-competitive behavior
- Accounting improprieties, internal accounting controls or auditing matters
- Other issues involving potential violations of the Code of Business Conduct or related company policies, contractual requirements, or any local, state or federal laws or regulations
- Disclosure or misuse of confidential information
- Inadequate or inaccurate financial or non-financial record keeping
- Suspicious behavior by third parties with whom we conduct business

When deciding whether to speak up, err on the side of caution. **When in doubt, speak up!**

## Things to Consider

- Speaking up includes seeking guidance and asking questions when you are not sure of your own actions or the actions of others.
- When you think inappropriate conduct may have occurred, you do not need to be sure of your suspicions or have “proof” before speaking up.
- You should speak up even if you think someone else already has.
- You should not attempt to investigate concerns yourself. The Company has experienced investigators to conduct investigations, as appropriate.
- We take allegations and concerns of inappropriate conduct seriously and disposition such reports based on the unique circumstances of each report. When investigations are warranted, they are conducted fairly and confidentially as appropriate with efforts to protect the identity of involved parties and confidentiality to the extent reasonably possible.

The Ethics Help Line should not be used for:

- Emergency situations that present an immediate physical risk – contact local authorities or emergency services and then, if able, contact the Constellation Corporate Security Operations Center (“SOC”) at 1-888-414-2762
- Questions or concerns related to your employment that should be handled by Human Resources
- Cyber incidents or other IT-security or IT issues – please contact the Constellation SOC at 1-888-414-2762 or +001-667-218-7400 (Internationally)
- Making false allegations. Reports made other than in good faith can be harmful to the Company, distracting, and inefficient. A party who knowingly and intentionally submits a false report or provides false or deliberately misleading information in connection

with an investigation may face disciplinary action, up to and including immediate termination of employment.

## How to Report a Concern

[The Ethics Help Line](#) is available for all reporters 24 hours a day, every day of the year. Both the online reporting form and the telephone service have an anonymous reporting option. The Ethics Help Line is a dedicated resource for asking ethics and compliance questions, raising ethics and compliance concerns, and reporting actual or suspected violations of the Code, company policies, and the law.

All calls to the Ethics Help Line are answered by an independent third-party vendor that offers multilingual service. Caller ID is not used and no attempt is made to identify a caller who wishes to remain anonymous. A report of each call is forwarded to the Ethics and Compliance Office for assessment and appropriate follow-up action.

All Ethics Help Line reporters are issued a case number and a confidential PIN number that allows the reporter to follow up on a report, even if the reporter has chosen to remain anonymous. During a follow up, a reporter can access responses from the Ethics and Compliance Office, including requests for additional information that may be required before an effective investigation can occur.

The Ethics Help Line (with anonymous reporting option) can be reached:

- By phone: 1-844-927-2282
- Via Web: On your Constellation Compass home page, in the tool bar, click the drop down in the “Resource Library” and then, under “Helpful Resources,” click the “Ethics Help Line” tab and follow the prompts, or enter the following into your browser:  
<https://secure.ethicspoint.com/domain/media/en/gui/82357/index.html>

You may also contact the Ethics and Compliance Office via email at [EthicsOffice@Constellation.com](mailto:EthicsOffice@Constellation.com).

## Assessment

The Company takes complaints of inappropriate conduct seriously and assesses whether the allegation(s) raise a factual question about whether there has been inappropriate conduct in potential violation of the Code, company policy, or law, and determines appropriate next steps for addressing under the circumstances. Some matters are better addressed by subject matter experts or through standard operating company, department, or personnel performance management practices and review. These matters are referred to the appropriate channel and the reporter is notified of that referral. When an investigation is warranted, the Company conducts a thorough investigation based on the circumstances and takes appropriate corrective action where warranted.

## Confidentiality of Investigations

Reports of violations or suspected violations will, where appropriate, be kept confidential to the extent reasonably possible, consistent with the need to conduct a thorough investigation, determine corrective actions, and in accordance with applicable law. Where legally permitted, all complainants, subjects, witnesses, interviewees, and other employees with knowledge of an investigation are expected to maintain the confidentiality of the investigation.

At the conclusion of an investigation, and at times during the investigation, the Company will inform complainants and subjects about the status of the investigation and its outcome. The need for confidentiality, privacy, and other reasons may prevent the Company from providing specific details relating to the outcome, including any disciplinary and other corrective action taken. In most cases, feedback to employees who were interviewed or consulted as part of an investigation is not given.

## Disclosure to Government Entities

Note that Constellation may have obligations to timely report to the Government whenever, in connection with the award, performance, or closeout of a government contract, Constellation has credible evidence that any principal, employee, agent or subcontractor committed a violation of federal law involving fraud, conflict of interest, bribery, or gratuity violations, or a violation of the False Claims Act.

Nothing in this policy or any other Constellation policy prohibits or limits any employee from filing a claim or charge with, reporting possible violations of law or regulation to, providing information directly to, responding to any inquiry from, participating in any investigation or proceeding by, providing testimony before, or otherwise communicating with Congress, the Department of Justice, any Inspector General, any other self-regulatory organization or any other governmental, law enforcement, or regulatory authority, including but not limited to the Equal Employment Opportunity Commission, National Labor Relations Board, Federal Energy Regulatory Commission, Nuclear Regulatory Commission, or Securities Exchange Commission, regarding any suspected violations of law or regulation. Employees do not need to notify or seek permission from the Company before engaging in any such activity. However, in connection with any such activity, employees must inform such authority if the information that they are providing is confidential. Additionally, the ability to disclose information may be limited or prohibited by applicable law. The Company does not consent to disclosures that would violate applicable law.

## We Do Not Tolerate Retaliation

Speaking up can take courage and sometimes feel uncomfortable. This is why the Company does not tolerate retaliation of any kind for making good-faith reports or cooperating in an investigation. Retaliation can occur when a manager, supervisor, or another person takes adverse action against an employee because that employee reported a potential violation of the Code of Business Conduct, policy, or law or other inappropriate conduct or cooperated in

an investigation. Adverse actions under the Code of Business Conduct may include changing assignments, demotion or termination, harassment, or other actions that create harm to the employee, regardless of whether such actions are adverse under the law.

Retaliation can be both obvious and subtle. If you experience retaliation or know someone else being subjected to retaliation, please report it immediately. An employee who retaliates against someone because they made a report in good faith or cooperated with an investigation will be subject to discipline, up to and including termination of employment.

## **REFERENCES**

Constellation Code of Business Conduct, LE-AC-23

Supplier Code of Conduct