

Whistleblower & Complaints Policy

Abnormal Security Corporation (“Abnormal Security” or “Abnormal”) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Abnormal Security, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Abnormal Security can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of Abnormal Security’s code of ethics or suspected violations of law or regulations that govern Abnormal Security’s operations.

No Retaliation

It is contrary to the values of Abnormal Security for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Abnormal Security. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

Abnormal Security has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with your Executive Leader. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Abnormal Security’s Head of Legal, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may submit their concerns: (1) in writing directly to their supervisor or the Executive Leader or the organization’s Head of Legal, or (2) to the Abnormal Security Ethics Portal located at ethics.abnormalsecurity.com, including via anonymous submission.

Head of Legal

Abnormal Security’s Head of Legal is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Head of Legal will advise the CEO and VP of Operations and Finance of all complaints and their resolution and any reported issues will be presented to the Board on at least an annual basis.

Accounting and Auditing Matters

The Abnormal Security VP of Operations and Finance shall immediately notify the Board of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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 disciplinary offense. Acting in good faith means that the report is made with sincerity and honesty; it does not matter whether the report proves true or not.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Abnormal Security will make every effort to safeguard the confidentiality (and, if applicable, the anonymity) of any persons reporting potential misconduct.

Handling of Reported Violations

Abnormal Security's Head of Legal will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

More Information

Anyone in violation of this policy is subject to the sanctions as described in the Disciplinary Actions Policy. This policy is owned by the Legal team. Contact us at legal@abnormalsecurity.com.