

INVESTIGATION POLICY AND PROCEDURE		
Policy No: LGL-INT.INV-PR-0011	Revision Number: 3	Revision Date: 5-8-15
Effective Date: 5-23-12	Revision Summary: Update Policy Form, Titles	
Responsible Official: VP-Legal Affairs	References: Complaint/Grievance Form, Whistleblower Policy, Record Retention Policy	

1. PURPOSE

This document establishes the procedure for investigating and responding to reports or complainants by employees, customers, vendors, members of the public, or other stakeholders about actions, situations or circumstances that appear to be inappropriate, illegal, or inconsistent with company policy, or that may threaten company employees or assets.

2. SCOPE

This Procedure applies to complaints, reports, and inquiries about matters that appear to be inappropriate, illegal, or inconsistent with company policy, or that may threaten company employees or assets. It does not apply to routine, differences of opinion, or workplace matters the complainant merely does not like or with which the complainant simply disagrees, or matters related to employee performance management or appraisal.

3. PROCEDURE

- 3.1. **General:** AMK9 shall conduct appropriate inquiries into covered matters reported to the company as provided in this procedure.
- 3.2. **Covered Matters:** Employees, customers, vendors, members of the public, or other stakeholders may report any matter that appears to be inappropriate, illegal, or inconsistent with company policy, or that may threaten company employees or assets under any applicable law, regulation, order, policy, or procedure.
- 3.3. **How to Report:**
 - A. Reports about routine workplace issues, ordinary differences of opinion, or performance management or reviews, or other matters should be reported and managed through the complainant’s management chain unless the matter involves the complainant’s management chain, a whistleblower complaint, discrimination, or some other significant matter for which a specific policy or procedure is in effect. Such complaints should be handled according to the Company policy and procedure prescribed for them, or if no particular policy or procedure applies, then to the Vice President-Legal Affairs.
 - B. Reports or complaints may also be addressed to:

American K-9 Detection Services, LLC
 ATTN: Vice President-Legal Affairs
 1791 O.G. Skinner Drive Suite A
 West Point, GA 31833
 USA

Complaints may also be sent electronically to Legal@amk9.com

3.4. **Form of Reports:**

- A. Complaints, reports, and inquiries about covered matters may be made in any reasonable manner that sufficiently identifies the alleged wrong and supplies sufficient information from which a reasonable inquiry may be made.
- B. Complaints, reports, and inquiries about covered matters from internal sources should be made on the Complaint/Grievance Form, Form № F.HR-309 which is available in PMIS on the Company intranet.

3.5. **Confidentiality:** If requested, the Company shall to the greatest possible extent keep confidential the identity of anyone making a report or complaint and those providing information in the course of investigating a report. Disclosure shall be made only to those with a compelling need to know in order to investigate, remedy, or respond to the complaint.

- A. The Company cannot make absolute guarantees that a complainant's identity will remain confidential because disclosure may be required by law or in the event of litigation, subpoena, or other compulsory process.

3.6. **Special Handling Requirements:** All verbal or written complaints, reports, and inquiries involving the following matters shall be immediately reported to the Vice President-Legal Affairs and Vice President-Human Resources, and thereafter be managed in accordance with applicable policy and procedure, or in lieu thereof, as the Vice President-Legal Affairs shall determine:

- A. Any claim of sexual harassment or sexual assault.
- B. Any claim of harassment or discrimination based on age, ancestry, citizenship, color, creed, disability, marital status, national origin, nationality, parental or familial status, pregnancy, race, religion, sex, sexual orientation, veteran status, or other characteristic protected by federal, state, or local law.
- C. Any claim of criminal activity, fraud, or dishonesty involving company or customer funds, resources, or assets.
- D. Any matter alleging illegal violence against or abuse of outside individuals in connection with one's duties on behalf of the company.
- E. Any matter involving workplace violence or a threat of workplace violence by an employee in the workplace, not including threats of violence against which the Company is hired to help protect (explosives, attacks while deployed, etc.)
- F. Any claim labeled by a reporting employee as a "whistleblower complaint."
- G. Any matter alleging retaliation for filing any good faith complaint or cooperating in the

investigation.

- H. Any matter involving an outside attorney, law firm, law enforcement agency, or government regulator, or where litigation is more than casually threatened.
- 3.7. With the consent of the Vice President-Legal Affairs, outside vendors may be retained to assist with the investigation. The expenses shall be allocated to the cost center from which the issue originated.
- 3.8. In providing responses to complainants, information regarding any disciplinary action against other employees may be disclosed only with the consent of the Vice President-Human Resources in consultation with the Vice President-Legal Affairs.

4. COMPLAINT HANDLING

Investigations shall be conducted appropriately and timely using reasonable prudence, and shall at all times facilitate the Company's core values.

- 4.1. **Investigations by Managers:** Managers should review issues brought to them by their employees, conduct a reasonable inquiry into the matter, and provide a meaningful response to the employee within a reasonable time.
- A. Managers should consult with their higher management, the Human Resources Department, and/or the Legal Department.
 - B. In determining discipline, supervisors should observe the Progressive Discipline Policy unless there is clear and compelling reason not to do so.
 - C. Investigations should be properly documented to support any management action, and appropriately retained where they can be accessed if later needed by the company.
 - D. If the complaint or report alleges any matter in Section 3.6 above, the supervisor shall immediately notify his/her supervisor, the Vice President-Human Resources, and the Vice President-Legal Affairs. The Chief Executive Officer or President may restrict the authority to investigate and respond to such matters to the Human Resources or the Legal departments.
- 4.2. **Investigations by the Human Resources Department:** Matters not reported to management or the Legal Department may be reported to the Human Resources Department.
- A. The Human Resources Department shall receive a complaint or report and investigate the matter as the Vice President-Human Resources deems appropriate, or if appropriate, refer the issue to the responsible manager or the Legal Department.
 - B. The Vice President-Human Resources shall consult with the Legal Department on investigations managed by Human Resources.
 - C. After thoroughly reviewing the issue and consulting with the responsible manager(s), the Vice President-Human Resources shall recommend to executive management an

appropriate response to the matter.

D. Within a reasonable time, the Vice President-Human Resources shall ensure a response is provided to the complainant indicating the status of matters reported to HR.

4.3. **Investigations by the Legal Department:** Matters not reported to management or the Human Resources Department may be reported to the Legal Department.

A. The Legal Department shall receive a complaint or report and investigate the matter as the Vice President-Legal Affairs deems appropriate, or if appropriate, refer the issue to a responsible manager or the Human Resources department.

B. The Vice President-Legal Affairs shall consult with the Vice President-Human Resources on investigations involving human resources or employment-related matters managed by the Legal department.

C. After thoroughly reviewing the issue and consulting with the responsible manager(s), the Vice President-Legal Affairs shall take or recommend to executive management an appropriate response to the matter.

D. Within a reasonable time after the conclusion of the investigation, the Vice President-Legal Affairs shall ensure a response is provided to the complainant indicating the status of matters reported to the Legal Department.

4.4. **RECORD RETENTION**

All investigations shall be properly documented to support any management action. Records regarding all information reported and internal investigations shall be appropriately forwarded to or held by the Legal Department in accordance with the company's records retention policies.