



VERRA  
MOBILITY

# **VERRA MOBILITY**

## **LEGAL & COMPLIANCE POLICIES**

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**Reporting Violations and Complaints**



# LEGAL AND COMPLIANCE POLICIES

## Reporting Violations and Complaints

<b>Policy #</b>	LC-002	<b>Effective Date</b>	01/01/2023	<b>Control Family</b>	
<b>Version</b>	1.4	<b>Policy Owner</b>	Contracts and Compliance Director	<b>Policy Approver</b>	Chief Legal Officer

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### Purpose

One of our Company’s most valuable assets is its integrity. Protecting this asset is the job of everyone in the Company. We have established a Code of Business Ethics and Conduct (“the Code”) to help our employees comply with the law and to maintain the highest standards of ethical conduct.

The purpose of this policy is to supplement the Code by establishing procedures regarding the reporting, receipt, retention and treatment of any suspected violations or concerns as to compliance with the Code or other Company policies, or any complaints or concerns regarding the Company’s accounting, internal accounting controls, or auditing matters, or any concerns regarding any questionable accounting or auditing matters.

### Scope

This policy applies to all employees, officers and directors of the Company.

Separate policies regarding the reporting of suspected misconduct may be established as supplements to this policy when required to comply with country or other jurisdictional or customer requirements that exceed the scope of this policy.

## Policy

### 1. Obligation to Report Suspected or Actual Violations

- **Reporting Generally** - It is every employee's obligation to report any instance, occurrence or practice that they, in good faith, believe is inconsistent with, or in violation of, the Code or any policies referenced therein, including any suspected violations of the laws and rules that govern the reporting of the Company's financial performance or any complaints or concerns regarding the Company's accounting, internal accounting controls, or auditing matters, or any concerns regarding any questionable accounting or auditing matters ("**Covered Matter**"), pursuant to the procedures set forth in the Code. Reports of violations of other Company policies that do not constitute a Covered Matter should be reported as instructed by the applicable policy.

If an employee is not comfortable discussing an issue with his or her supervisor or believes that it would be inappropriate to do so, the employee should contact a member of the Company's Compliance and Ethics Committee (the "**Compliance Committee**").

- **Anonymous Reporting** - Alternatively, if an employee wishes to report any Covered Matter anonymously, he or she may do so via the web at [ethicsline.verramobility.com](https://ethicsline.verramobility.com) or via a toll-free number 844-927-2814 (available 24 hours a day, seven days a week).<sup>1</sup>

### 2. Treatment and Retention of Complaints and Reports

Each supervisor and manager who receives a report of any suspected violation, concern or complaint regarding a Covered Matter must promptly notify the Compliance Committee to assure proper treatment and retention of the report.

### 3. Statement of Non-Retaliation

The Company **will not permit** any form of intimidation or retaliation by any officer, employee, contractor, subcontractor or agent of the Company against any employee because of any lawful act done by that employee to:

- provide information or assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of the Company's Code of Business Ethics and Conduct, or any Company policies; or
- file, testify, participate in, or otherwise assist in a proceeding relating to a violation of any law, rule or regulation.

***Any such action is a violation of Company policy and should be reported immediately under this policy.***

### 4. Statement of Confidentiality

The Company will, to the extent reasonably possible, keep confidential both the information and concerns reported under this policy, and its discussions and actions in response to these

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<sup>1</sup> Toll free numbers are also available to employees in Australia, Spain and the United Kingdom. These numbers can be obtained via [ethicsline.verramobility.com](https://ethicsline.verramobility.com). Employees in other countries should make their EthicsLine report online.

reports and concerns. In the course of its investigation, however, the Company may find it necessary to share information with others on a “**need to know**” basis.

## Definitions

**Company** – Verra Mobility Corporation, including all its direct and indirect subsidiaries

**Compliance Committee** – The Compliance Committee is comprised of the Chief Financial Officer, the Chief Legal Officer, the Chief People Officer, the Chief Technology Officer, the Deputy General Counsel (Government Solutions) and the Director of Contracts and Compliance.

## References

Verra Mobility Compliance and Ethics Committee Charter

## Related Documents

Code of Business Ethics and Conduct

## Approval and Ownership

Owner	Title	Date	Signature
Paul Richardson	Contracts & Compliance Director	01/01/2023	On File
Approved By	Title	Date	Signature
Jon Keyser	Chief Legal Officer	01/01/2023	On File

## Revision History

Version	Description	Revision Date	Approver Name
1.0	Original version	10/17/2018	Rebecca Collins
1.1	Update to format only	05/10/2019	Rebecca Collins
1.2	Add reference to supplemental policies and formatting changes	01/13/2022	Rebecca Collins
1.3	Update the Membership of the Compliance & Ethics Committee	07/07/2020	Rebecca Collins
1.4	Update Approver Name and Title	01/01/2023	Chief Legal Officer