Legal Services Policy

Document Governance

Function Owner	Department	Content Review Cycle	Date Last Revised
Chief Executive Officer	Office of the CEO	Annual	November 2023

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1. Policy Statement

CRDF Global will strictly comply with all applicable laws in the jurisdictions in which we conduct business. Given the global reach of our activities and the complexity of our activities, CRDF Global relies on expert legal counsel to provide guidance and advice in ensuring this compliance. To this end, CRDF Global has engaged an external law firm to serve as our General Counsel and provide overall legal guidance and support for our general business activities.

The General Counsel will provide guidance and advice in all business disputes with other organizations including but not limited to contract disputes, bid protests, governmental bodies, liability claims, and any other civil or criminal matters that may arise in relation to CRDF Global's business operations. As appropriate this guidance and advice may be protected by attorney-client privilege. All legal work conducted on our behalf will be performed by or at the specific direction of the General Counsel. Employees will abide by all legal guidance and direction provided by the General Counsel or authorized supplemental counsel including with regard to attorney-client privilege.

Employee responsibilities:

- Employees who identify potential legal risks shall submit requests for legal services or advice to the General Counsel in accordance with established Legal Services Procedures.
- No employee shall engage outside legal services or attorneys without prior authorization by the General Counsel or the Chief Executive Officer, except as provided in Section 5 below.
- Employees who receive inquiries from attorneys not employed by CRDF Global shall promptly refer them to the General Counsel for information and action. No employee is authorized to release CRDF Global information to such outside attorneys without coordination with and express approval of the General Counsel.
- Employees who receive indication of potential process action or legal action against CRDF Global shall report such matters to the General Counsel immediately.

Process actions by/against CRDF Global shall be handled as follows.

- Any service of process action by CRDF Global with the United States must be coordinated in advance with the General Counsel.
- Any service of process against CRDF Global in the United States must be served on CRDF Global via our Registered Agent. CRDF Global employees in the United States shall not accept hand-delivered service of process unless delivered by a U.S. Government Official or as required by statute.
- Any service of process against CRDF Global outside the United States shall be reported to and coordinated with the General Counsel as soon as CRDF Global receives such service of process in any location outside the United States or as soon as CRDF Global receives notice that such service of process may be imminent.

2. Purpose

This policy establishes a structure to ensure that identified legal and compliance risks and issues are identified and addressed by legal counsel in a timely and effective manner and to ensure attorney-client privilege protections are invoked as necessary. Through this policy we manage our global legal and compliance responsibilities in a consistent, scalable, timely, professional, and efficient manner in accordance with all U.S., local, and international laws.

3. Definitions

Attorney-Client Privilege	The attorney-client privilege maintains the confidentiality of certain communications, made between attorneys and their clients, for the purpose of seeking or providing legal advice. The privilege protects communications made orally or in writing, in person or over the telephone, in letters or in emails.
General Counsel	The primary legal counsel/attorney for the company.
Registered Agent	A person or entity that serves as a business's legal point of contact and receives official mail, legal documents, and service of process on behalf of the business.
Service of Process	The formal process of delivery of notice of a legal action such as a subpoena, summons, writ, or other legal note.
Supplemental Counsel	Attorneys engaged, in addition to the General Counsel, by CRDF Global to provide specialized legal services in support of a specific geography, function, or transaction.

4. Scope

This policy applies to all employees and activities of CRDF Global regardless of geographic location.

5. Exclusions

Given the complexity of the legal issues we encounter in the course of business, CRDF Global employs Supplemental Counsels to support specific functions and geographic locations with the appropriate expertise and support to effectively manage issues such as local labor laws and registrations, country-specific regulations, and similar matters. For existing supplemental counsels, these services will be supervised by the individual Regional Directors or functional head (e.g. Talent Management). The General Counsel will periodically coordinate a review of all such supplemental services with the Regional Directors and functional heads to ensure services provided are effective and aligned with CRDF Global's evolving business needs.

6. Additional Content

Attorney-Client Privilege

The privilege belongs to CRDF Global and only protects those communications that were made for the *purpose of seeking or providing legal advice.*

- *The use of a "privilege" label does not automatically establish the privilege where it otherwise would not exist.*
- *Email communications are not covered by the privilege simply because the General Counsel or supplemental counsel is copied on the email. The privilege only applies if the communication has a* substantial purpose of seeking legal advice from counsel.

The privilege may be lost if the client discloses the communication or shares protected documents with third parties. If employees received advice from the General Counsel or supplemental counsel, employees must consult the General Counsel before sharing or forwarding such advice in order to preserve privilege. Employees with questions about the scope of the privilege, please contact General Counsel.

7. Related Documents

CRDF Global Policies, Processes, and Procedures

Related Policies	Related Processes	Related Procedures
Export Control Compliance Policy	Legal Services Request Process	Legal Service Request Procedure
Anti-Corruption and Anti-Bribery Policy		
Data Privacy Policy		
Evidence Preservation Policy		
Corporate Insurance Management Policy		

External References

External Reference	Description