

Cellebrite Training Code of Ethics and Professional Standards Policy

Global Training Division

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Approval Date: 7 August, 2018
Approved by: Certification Body
Effective Date: 10 August 2018
Document Control Number: GTD-CCP-Ver 1.1

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Purpose

The purpose of this policy is to identify the ethical and professional standards of conduct required of those holding a Cellebrite certification and for those applicants seeking Cellebrite certification. This policy establishes the requirements for all Cellebrite certificants and establishes the guidelines for the conduct of investigations into violations of this Code of Ethics and Professional Standards.

Definitions

Applicant

A person seeking professional training certification through an approved training certification program offered by Cellebrite. An applicant is considered a candidate once the application for certification has been submitted and accepted by the Certification Body.

Assessor

An Assessor is a Cellebrite employee assigned to a Certification Committee who reviews the knowledge-based and / or practical exercise components of the Cellebrite CCME Certification Examination. Assessors report directly to the Chairman of the assigned Certification Subcommittees.

Candidate

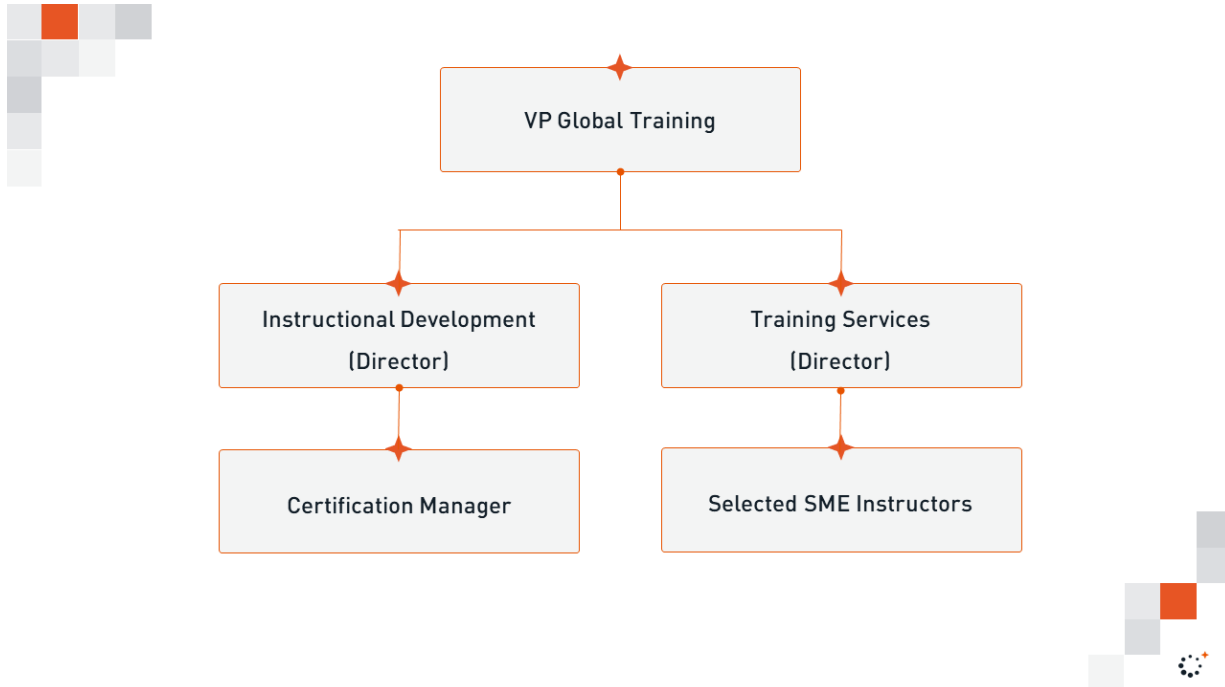
Any person who is qualified to enter the Cellebrite certification program.

Certificant

A person who has satisfactorily completed the Cellebrite certification track and possess a valid Cellebrite designated certification.

Certification Body

The Certification Body is responsible to develop, implement and oversee the Cellebrite certification program. The Certification Body is comprised of the Vice President of Cellebrite's Global Training Division, the Instructional Development (Manager), Training Services (Manager), the Certification Manager, and select Subject Matter Expert (SME) Instructors. [4.2.1]



Certification Committee

The Cellebrite Certification Committee is an ad-hoc group of people assembled at the direction of the Certification Manager to facilitate the special needs of the Instructional Development (Director) to include but not limited to the resolution of complaints, appeals and disputes. [4.2.9]

At the direction of the Certification Manager, a Certification Committee may be empaneled to assist in the administration of the Cellebrite Certification Program. In these instances, the Committee shall be composed of a Committee Chairman and Certification Committee Assessors who have not been involved in any of the prerequisite certification-based training for the candidate.

CCME

A capstone certification program titled Cellebrite Certified Mobile Examiner.

Complaints

Any alleged violation of the Cellebrite Training Code of Ethics and Professional Standards.

Finding

A finding is the subjective opinion of the Certification Director or Certification Committee with regard to the outcome of an investigation. Although subjective, the investigative findings will be based upon a preponderance of evidence with the following outcome:

- 1 Sustained:
 A preponderance of evidence exists that the alleged violation(s) occurred.
- 2 Not Sustained:
 There is insufficient evidence to support the alleged violation(s).
- 3 Unfounded:
 The alleged violation under investigation did not occur as alleged.

Investigative Team

An ad-hoc Ethics and Professional Standards (EPS) Committee, under the leadership of a Committee Chairman, assembled by the Director of Certification to investigate alleged violation(s) of this policy.

Preponderance of Evidence

The threshold used to establish if an alleged violation of this policy occurred. This preponderance is based on the veracity, accuracy and nature of available evidence.

Subcommittee Chairman

A subcommittee Chairman is appointed by and reports directly to the Director of Certification. [4.2.9]

Code of Ethics and Professional Standards

Cellebrite certificants are expected to conduct themselves in accordance with the highest standard of integrity and ethical behavior, both in their professional capacity and as individuals. As a means of promoting high ethical and professional conduct among its certificants, Cellebrite has developed this Code of Ethics and Professional Standards.

1. Cellebrite certificants will be honest and ethical when dealing with each other or other Cellebrite certificants.
2. Cellebrite certificants must adhere to the directives of this policy and the Director of Certification with respect to their Cellebrite certification(s).
3. Cellebrite certificants must not discriminate against, libel, slander, or harass others. All persons are to be afforded equal opportunity, regardless of age, race, sex, sexual preference, color, creed, religion, national origin, marital status, veteran's status, handicap or disability.
4. Cellebrite certificants must never misrepresent their credentials, employment, education, training, or experience.
5. Cellebrite certificants must not commit any act of professional dishonesty.
6. Cellebrite certificants must not issue public statements appearing to represent Cellebrite without specific written authority from the Cellebrite Vice President of Global Training.
7. Cellebrite certificants may not knowingly submit, aid or abet the submission of plagiarized or any non-uniquely authored piece of work during any phase of a Cellebrite certification/recertification process or examination.
8. Cellebrite certificants have an obligation to report violations of this policy committed by other Cellebrite certificants.
9. Cellebrite certificants must not commit criminal acts.
10. Cellebrite certificants must fully and honestly cooperate with any investigation conducted at the direction of the Certification Director or members of a Certification Committee or Investigative Team.
11. Candidates are admonished not to disclose the examination content to anyone or discuss matters with outside sources. If caught, the candidates are dismissed from the Certification Program and all Cellebrite certifications are subject to revocation. It is important to note that Cellebrite does not release the answer key to anyone and examination answers are not public nor are they made available to anyone other than CCME Certification Body and Committee members (Director of Certification and reviewers/assessors).
12. Any Cellebrite certificant violating any of the provisions of the Code of Ethics and Professional Standards or who fails to fully and honestly cooperate with any investigation may be subject to disciplinary action, including: [5.5.2b]

- a. Written admonishment.
- b. Suspension of certifications.
- c. Revocation of certifications.

Code of Ethics and Professional Standards Committee

1. The Cellebrite Training Code of Ethics and Professional Standards (EPS) Committee shall consist of an ad-hoc group of Cellebrite Certified Instructors (CCI) appointed by the Director of Certification to investigate alleged violations of the Cellebrite Training Code of Ethics and Professional Standards.
2. The Director of Certification shall determine the number of members serving on the EPS Committee and appoint a Chairman of the EPS Committee to preside over the EPS Committee.
 - a. In the event of an allegation against the Certification Director, the Vice President of Global Training shall select members to and oversee the actions of the EPS Committee until resolved.
3. The purpose of the EPS Committee is to receive and investigate allegations of violations of the Cellebrite Training Code of Ethics and Code of Professional Standards policy and provide an Investigative Summary to the Director of Certification.
 - a. Alleged violations of Code of Ethics and Professional Standards must be submitted in accordance with this policy.
 - b. Allegations will be reviewed by the Director of Certification to determine whether Sufficient credible information exists, upon which to initiate and investigation assemble the EPS Committee.
 - c. The selection of Committee members will include screening to ensure Committee members have no conflict of interest in the allegation(s) or person(s) under investigation.
 - d. The EPS Committee, under the direction of the Committee Chair, will complete a report containing the results of their investigation. The completed report of investigative findings will be forwarded to the Director of Certification as soon as practicable.
 - e. Members of the EPS Committee will be indemnified from any official actions arising on behalf of their investigative involvement, provided their actions are reasonable and adhere to the scope of this policy.
 - f. Any expenses expected to be incurred by the EPS Committee in the performance of their investigation must first be approved by the Director of Certification.

Submission of Complaints

Complaints or allegations of violations of the Cellebrite Training Code of Ethics and Professional Standards will be reported to the Director of Certification in writing, in person or via phone.

Investigations

The Director of Certification is responsible for the initiation of investigations based upon the existence of credible complaint(s). Once established, investigations will be referred to the EPS Chairman for resolution. Once the EPS Committee has concluded its investigation, the EPS Committee Chairman will forward an Investigative Summary to the Director of Certification regarding the alleged violation of Code of Ethics or professional standards.

Complaints

1. Complaints must include sufficient detail to clearly identify the specific violation(s), party or parties involved, and circumstances surrounding the alleged violation(s).
2. Complaints lacking sufficient details or that fail to identify a violation of the EPS policy may be summarily dismissed by the Director of Certification.
3. Complaints will not be acted upon until received by the Director of Certification.
4. Complaints involving the Director of Certification will be submitted to the Vice President of Global Training.
5. Anonymous complaints will be reviewed for veracity and credibility prior to a determination as to whether sufficient credible information exists upon which to initiate an investigation.
6. Complainants received in the absence of a signed complaint will be treated as anonymous in nature.

Initial Review

Once a complaint has been received and reviewed, the Director of Certification may initiate an investigation or may refer the complaint to the EPS Committee for an assessment of the facts in the complaint.

1. Complaints will be reviewed by the Director of Certification (or designee) within 72 business hours (three business days) of receipt.
2. The Director of Certification will complete an initial review within five business days of receipt and initiate one of the following courses of action on the complaint. The Director of Certification may:
 - a. Refer the complaint to the EPS Committee for investigation.
 - b. Refer the complaint to the EPS Committee for development of additional evidence in support of the alleged violation(s).
 - c. Render a decision that the complaint is to be summarily dismissed based on the absence of sufficient credible evidence. In these instance, the decision will be forwarded to the VP of Global Training for review and concurrence.
3. For complaints that are referred to the EPS Committee for investigation, notification will be made to the accused certificant informing them they are the subject of an investigation into alleged violations of the Code of Ethics and Professional Standards Policy. Notifications pursuant to this requirement will be made via Registered U.S. Mail. For accused certificants outside the United States an alternate means of delivery will be used.
4. Whenever warranted, an EPS Committee will be empaneled by the Director of Certification and assigned to investigate the complaint(s). The Committee may conduct interviews, request the production of and review supporting evidence and present an Investigative Summary to the Director of Certification.
5. Investigations will be conducted with absolute discretion while maintaining the confidentiality of the investigation and participants. Investigative details will not be discussed with anyone outside of the EPS Committee without the prior approval of the Director of Certification.
6. The EPS Committee Chairman will provide appropriate and timely updates on the investigation to the Director of Ethics.
7. The Certification Director will provide appropriate updates on the investigation to the VP of Global Training.
8. A detailed record of the investigation and any investigative notes not incorporated into the Investigative Summary will be provided to the Director of Certification.

Completion of Investigation by EPS Committee

Once an investigation has been completed, the EPS Committee Chairman will submit the Investigative Summary to the Director of Certification.

1. The Investigative Summary will be restricted to details pertinent to the investigation.
2. The Investigative Summary will not normally include recommendations for subsequent action, unless directed by the Director of Certification.

Final Review - Director of Certification

Once an investigation has been completed, the Director of Certification will review the Summary of Investigation provided by the EPS Committee and prepare a “Recommendation Summary” for the VP of Global Training.

1. The Recommendation Summary will be restricted to details pertinent to the investigation.
2. The Recommendation Summary will include recommendation(s) for resolution.

Cooperation with Entities with Statutory Authority

Cellebrite investigations for violation(s) of the code of Ethics and professional standards may result in an investigation by an entity with statutory authority, such as a department's Internal Affairs or Office of Professional Responsibility.

1. In these instances, proprietary Cellebrite documents may be released to the requesting agency upon receipt of an official written request.
2. Upon receipt of a valid legal requirement (e.g. subpoena or search warrant), Cellebrite will release any requested material in its possession.
3. The Director of Certification may discuss the matter under investigation with the requesting entity's representative, for the purpose of defining what material is needed by the requesting agency and to identify any written request under consideration.
4. Upon receipt of a valid legal request, the Director of Certification will oversee preparation and delivery of the material sought.
5. Material provided pursuant to a valid legal request will be provided to the requesting agency via trackable shipment (UPS, FedEx, USPS). If the recipient is outside the United States, an appropriate means of delivery comparable to UPS, FedEx, USPS trackable shipments will be used.

Final Disposition

1. The Director of Certification will provide a copy of the completed investigation to the VP of Global Training.
2. In the event the matter(s) under investigation is an alleged criminal conviction of an Cellebrite certificant, a certified copy of the journal entry of conviction and sentence, or in the case of a court outside the United States of America, the equivalent proof of conviction and sentencing shall constitute sufficient evidence upon which the Director of Certification may take administrative and/or disciplinary action.
3. Once any final action has been taken, the complainant will be notified of the disposition of the complaint.
4. Once any final action has been taken, the accused Cellebrite certificant will be notified via Registered U.S. Mail. If the recipient is outside the United States, an appropriate means of delivery comparable to Registered U.S. Mail will be used.

Appeal Process

1. Pursuant to an investigation by the EPS Committee, the subject(s) of a sustained violation of the The Code of Ethics and Professional Standards may appeal the findings of the Director of Certification, subject to the following conditions:
 - a. Only a sustained violation can be appealed.
 - b. Only the subject of a sustained violation can file an appeal.
 - c. The appeal must be supported by evidence in the appellants possession.
 - d. The evidence in question:
 - i. Must be pertinent and/or compelling evidence that would mitigate the previous findings.
 - ii. Was not previously known to, or considered by, the EPS Committee.
 - iii. Must be provided to the Director of Certification in written form no later than thirty calendar days from the date the subject was notified of the outcome of the investigation.
2. The VP of Global Training will review evidence submitted in support of the appeal and render one of the following decisions:
 - a. Confirmation of the original Finding.
 - b. Matter returned to the EPS Committee for consideration of the new evidence.
3. Once a decision has been made, the appellant will be notified of the status of their appeal.