

## **MacLean-Fogg Company Whistleblower Non-Retaliation Policy**

EFFECTIVE DATE: February 1, 2018  
REVISED DATE: June 20, 2022

OWNER: Corporate Compliance

POLICY NUMBER: MF-LC3.01-P-20180201-WHISTLEBLOWER NONRETALIATION

### **OUR STANDARD:**

All employees have a responsibility to understand and follow our Company's policies, procedures and applicable laws. Likewise, all employees of the Company are required to report any suspected actual or potential violations of the Company's ethics, safety or other policies or applicable legal or regulatory requirements (collectively, "Violations").

### **1. PURPOSE**

This Policy helps ensure that employees, contractors, customers and suppliers of the Company have a safe, fair and ethical environment in which they can expect to perform their daily duties. Should any misconduct, violation of law or violation of Company policy occur, a mechanism exists to report the incident in a safe and secure manner without fear of retaliation.

### **2. SCOPE**

This Policy applies to all officers, directors, employees, agents and third parties acting on MacLean-Fogg's behalf.

### **3. POLICY**

The Company requires employees who reasonably believe that violations have occurred or are occurring to report those concerns.

#### **A. Reporting of Violations**

Employees may report concerns to their immediate supervisor, Local Human Resources Department, the Chief Compliance Officer or any of the other contacts listed in the Company's Code of Business Conduct and Ethics (the "Code of Conduct"), including Internal Audit, Corporate Human Resources and the Compliance Department. Refer to the Appendix for contact information.

Employees may also communicate their concerns by contacting the Company's Ethics and Compliance Helpline, ComplianceLine, an independent reporting service available in multiple languages that allows you to communicate your concerns anonymously and confidentially, 24 hours a day, 7 days a week. The Helpline can be accessed toll-free in

North America by dialing 1-800-243-0140 or on the internet at <https://app.mycompliancereport.com/report?cid=MF>.

Employees located outside of North America can access ComplianceLine via the website previously listed. ComplianceLine is operated by specially-trained third party representatives. Reports made through the Helpline can be made anonymously where permitted by local law (i.e., some countries permit anonymous reporting while others prohibit it). The Company will treat all reports confidentially to the extent permitted by law.

Employees should expect to include sufficient detail concerning the reported violation to allow for the Company to conduct an appropriate investigation. It is important to provide information about the names of the people involved in or witness to the incident(s); the dates and times of the incident(s) (approximate or exact); where the incident(s) occurred; and why the person believes the incident(s) should be reported.

### **B. Receipt and Investigation of Reported Violations**

All reports of violations will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law, rules and regulations. All employees and supervisors have a duty to cooperate in the investigation of reported violations, or of discrimination, retaliation or harassment resulting from the reporting or investigation of such matters. Employees shall be subject to disciplinary action, including the termination of their employment, if such employee fails to cooperate with an investigation or deliberately provides false information during an investigation.

### **C. Oversight**

The Chief Compliance Officer provides regular reports regarding any violations to the MacLean-Fogg Compliance Committee, Executive Management and the Audit Committee of the Board of Directors. These reporting procedures are intended to prevent, deter and remedy any violation of applicable laws and regulations. If MacLean-Fogg concludes, after reasonable investigation, that there is a reasonable basis to believe that a federal, state, local or foreign law or regulation has been violated, it will then make a determination as to whether it must report that matter or any individual who engaged in unlawful conduct to the appropriate authorities and, if so, will make efforts to report in a timely manner.

### **D. Retaliation**

MacLean-Fogg prohibits retaliation against any employee who makes a good faith report of an alleged violation or participates in an investigation. Suspected retaliation should be reported immediately to the Human Resources Department, Chief Compliance Officer or the Ethics and Compliance Helpline.

Examples of potential retaliation include, but are not limited to, denial of hiring or promotion opportunities, threats or reprimands, negative performance evaluations and giving negative job references.

Anyone, regardless of position or title, whom MacLean-Fogg determines has engaged in retaliatory conduct will be subject to discipline, up to and including termination of employment.

Any employee who believes that they have suffered retaliation due to their reporting a violation or participating in an investigation should report the alleged retaliation through one of the reporting channels specified above under “Reporting of Violations.”

## Appendix 1: Contact Information

### Chief Compliance Officer

Stephen Young (847) 837-3522

### Corporate Human Resources

Kristin Malbasa 847- 837-3732

Tim White 847- 970-4639

### Environmental Health & Safety

Brian Duffy 847- 837- 2040

### Ethics and Compliance Helpline

<https://app.mycompliancereport.com/report?cid=MF>

Brazil 0800-200-3534

Canada 1-800-243-0140

China 400-120-0593

Germany 0-800-1860238

India 000-800-320-1517

Japan 0120-974-845

Thailand 1800014554

United States 1-800-243-0140