

HUBER+SUHNER

SpeakUp Guidelines for External Stakeholders

HUBER+SUHNER is committed to conducting its business responsibly and to managing the risks in its supply chain. We regard sustainability and corporate responsibility as an integral part of our business and we have committed ourselves to running our business in an environmentally and socially responsible manner. We expect our supply chain and business partners to adopt the same commitments. Our underlying business and ethics principles are set forth in the HUBER+SUHNER “[Code of responsible business conduct](#)” (the Code) and in the “[HUBER+SUHNER Supplier Code of Conduct](#)” (the Supplier Code).

Speaking up is essential to sustain our reputation, success and ability to operate. We encourage all our external stakeholders worldwide to report any concerns they may have about compliance with the principles and commitments set for in the Code and in the Supplier Code. For this purpose, HUBER+SUHNER provides SpeakUp, a platform operated by the external provider People Intouch. People Intouch, based in Amsterdam, the Netherlands, runs its SpeakUp platform on its own servers and meets the highest European data protection standards.

Purpose

The purpose of the HUBER+SUHNER SpeakUp Guidelines (the Guidelines) is to explain when, how and where stakeholders can report suspected misconduct.

HUBER+SUHNER employees worldwide are referred to the HUBER+SUHNER Trustline, which is also operated by People Intouch but strictly separated from the SpeakUp platform for external stakeholders. The corresponding HUBER+SUHNER Trustline guidelines can be found on the HUBER+SUHNER intranet.

These guidelines for external stakeholder also describe the possible steps that will be taken after a SpeakUp report has been filed and what response a reporter is entitled to receive.

Which concerns can be raised

The SpeakUp platform should be used to disclose following facts (SpeakUp report)

- Suspected, actual or proven breaches (including attempts to conceal such breaches) of the Code and the Supplier Code
- A criminal activity
- A breach of national, European and international laws
- A situation that may pose a threat to or harm public interests
- Violation or risk of violation of human rights
- Environmental, health and safety issues
- Price agreements with competitors

A SpeakUp report must concern facts related to HUBER+SUHNER or its supply chain. The information provided must be factual and directly related to the subject matter.

How to speak up

The SpeakUp platform can be used in the local languages of 28 different countries via phone or online. The contact information can be found on <https://www.hubersuhner.com/en/company/corporate-responsibility/report-misconduct>. Upon starting the reporting process, the reporter will receive a unique case number, which can be used to check the status of the reported concern, add information, and access the reply from HUBER+SUHNER.

How are complaints dealt with, confidentiality, anonymity

Upon filing a SpeakUp report, the external platform host will translate the message and pass it to the HUBER+SUHNER SpeakUp Steering Committee without disclosing the identity of the reporter. It will not disclose voice files, IP addresses or phone numbers to HUBER+SUHNER, unless it is established that a report was made in bad faith or the report itself is a criminal offence.

The SpeakUp Steering Committee will determine whether the SpeakUp report qualifies as a misconduct falling under these Guidelines and whether to investigate further. Through the SpeakUp platform, the reporter will receive confirmation of receipt of the SpeakUp report within seven working days and, if necessary, follow-up questions. Further, always through the SpeakUp platform, the reporter will be informed upon the admissibility of her or his concern within three months at the latest.

The SpeakUp Steering Committee has the right to decline to investigate a concern when it is foreseeable that there is no reasonable possibility to gain sufficient information for an adequate investigation or if it is established that the report was made in bad faith.

If the SpeakUp report qualifies as admissible, an investigation will be opened. Depending on the nature, complexity, urgency and potential impact of the report, a suitable independent investigation team may be appointed. The SpeakUp Steering Committee and any appointed external or internal investigation team always work under strict confidentiality. The person or the company officially under investigation will be notified of the investigation as soon as the investigation permits and without disclosing the identity of the reporter.

The SpeakUp Steering Committee is responsible for the reporting process and has the oversight responsibility to make sure that complaints are dealt with independently and in an unbiased manner. In the event that any member of the SpeakUp Steering Committee is personally involved in or has a conflict of interest regarding the reported concern, he/she will withdraw and the remaining members will appoint a substitute.

All parties involved, including the accused, are entitled to confidentiality, so no information related to the investigation can be disclosed to any third party without the prior approval of the SpeakUp Steering Committee. If the reporter decides to disclose her or his identity to the investigators, it will remain confidential during and after the investigation and will be shared only on a need-to-know basis or if required by the applicable law.

Once the investigation is finalized, the SpeakUp Steering Committee will determine the validity of the complaint and advise to the relevant management on any measure(s) to be taken. With the closure of the case, the reporter will be informed through the SpeakUp platform about the out-

come. Please note: For reasons of confidentiality and the privacy of all parties concerned, a fully detailed account of the outcome of the case and measures taken may not always be provided.

If a reporter does not agree with the SpeakUp Steering Committee's decision about the admissibility of a report, a reporter can report this through the SpeakUp platform and the compliant will be reported by the external service provider directly to the Group Compliance Officer.

Reporter Protection

HUBER+SUHNER encourages a speaking up culture and any person speaking up or any person who has been involved in the handling of a SpeakUp report is protected. Reporters protection is also extended to facilitators (i.e. any individual or private, non-profit legal entity that helps the reporter to speak up), individual associated with the reporter, legal entities. Retaliation refers to all unjustified and/or harmful actions taken against a reporter, facilitator witness or any person connected to the reporter. No form of threat or retaliation for speaking up will be tolerated.

Reporter protection is granted under the condition that a SpeakUp report meets following conditions:

- A SpeakUp report must be made without financial counterparty
- A SpeakUp report is made by an individual who has had personal knowledge of the facts
- A SpeakUp report must be made in good faith. Good faith means that the reporter had reasonable grounds to believe that the information reported was true at the time of the reporting
- A SpeakUp report itself shall not be a criminal offence
- A person falling under protection may contact the SpeakUp Steering Committee if any retaliation is feared.

Protection of personal data

HUBER+SUHNER is committed to protecting the privacy of everyone involved in the SpeakUp process and/or investigation and will take all reasonable measures to safeguard personal data from unauthorized access and processing. Any personal data obtained as part of a SpeakUp process will be processed in line with the applicable data protection laws and internal data protection policies and will be used only for the purposes explained in these guidelines or to comply with the law or an important public interest.

Concerns that are found unsubstantiated will be removed as soon as possible and, at latest, two months after closure of the investigation. In the event that disciplinary measures are taken or court proceedings initiated following a bad faith complaint, such data will be removed after two months of the completion of the disciplinary measure or ruling of the highest court.

Validity

These Guidelines are effective as of 20 July 2023.

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