

SpeakingUp

Our SpeakUp Policy as part of the Code of Conduct and our Ethics & Culture program

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First and foremost

Carlo Gavazzi is committed to maintaining a workplace environment that encourages ethical behavior, transparency, and accountability. This "Speak Up" policy is established to provide a confidential and secure channel for employees, contractors, and stakeholders to report any concerns about unethical or illegal activities within the organization.

We understand that it takes courage to speak up, so therefore we are committed to providing you with an easy and safe way to raise your concerns. Speaking up is an essential part that enables us to protect our people, our company values, our stakeholders and society as a whole. No one should be alone when dealing with an ethical dilemma. In this document (our SpeakUp Policy) we clearly explain what your options are and how you can raise your concerns.

Scope

This SpeakUp policy describes how you can speak up about suspected breaches of the Code of Conduct. Furthermore, it describes the process, so that you know what to expect, and the ways you will be protected when speaking up (confidentiality, anonymity, non-retaliation). The SpeakUp policy applies to all employees and other key stakeholders.

When do I speak up?

As soon as possible, or as soon as you suspect that there has been a violation of the Code of Conduct or company values. We do not expect you to have all the answers, and encourage you to use what is described in this policy as a reference point to determine if something is not right.

What should I speak up about?

We encourage you to speak up about suspected breaches of the Code of Conduct, or, when in doubt, about anything that does not constitute ethical, compliant or lawful behavior.

How do I speak up?

You can speak up, provide feedback or ask your questions in a variety of ways. For many matters, it can be a good first step to talk to the person involved directly. Thus, speak up should not entirely replace the direct dialogue that forms the foundation of our transparent company culture. However, we recognize that this is not always easy to do.

If this is not possible, or if you do not feel comfortable doing so, please turn to the SpeakUp channels as described below:

1. Speak up to your manager or your manager's manager.
If this is not possible, or you do not feel comfortable doing so,
2. Speak up to your local HR, Compliance or Ethics office.
If this is not possible, or you do not feel comfortable doing so,
3. Speak up via the "SpeakUp" system.

The SpeakUp system is operated by an independent service provider and is available 24/7.

Via the SpeakUp system you can speak up or ask questions directly to the SpeakUp office based at HQ. At our SpeakUp office, we have highly qualified specialists handling reports. You can speak up in your own language, via phone or via internet. Qualified colleagues will handle your report internally. You can decide to remain anonymous.

Reporting outside the company?

If, after careful consideration, you do not feel comfortable to speak up within the company, it is possible to raise your concern outside the company. To understand all conditions involved, please see the website of the competent authorities in your country of residence.

Whenever you are considering such a significant step, we strongly recommend you to seek advice and not do this alone. Above all, we encourage you to speak up within the company. This way you can hand the burden over to us, and we have the opportunity to look into the matter immediately.

I spoke up. Now what?

If you submit a report, the SpeakUp Office will send you an acknowledgement of receipt within seven days. Your report will be evaluated and assessed, and the appropriate course of action will be determined. Sometimes you will be asked follow-up questions. You will receive feedback within (ultimately) three months after the acknowledgement of receipt. You will be informed on the status of the complaint. Please note that we may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the involved parties.

All parties involved, including the accused, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

Please note that not all issues raised will automatically lead to a formal investigation.

Sometimes following another course of action is better for all parties involved (e.g. mediation).

Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information.

Protecting you, speaking up

Protecting your right to speak up is essential. Protecting you as a reporter is one of the main purposes of this policy. Below, some key principles are highlighted:

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. Depending on the purpose of sharing, the SpeakUp Office will (further) anonymise the information prior to sharing it. Information will only be shared outside of this group if we are required to do so by law or an important public interest is at stake.

In principle, we are obliged to inform any person under investigation that he or she is the subject of a report being investigated as soon as possible (this may be delayed if there is a substantial risk that this notification jeopardizes the investigation or the gathering of evidence.). Your identity will not be disclosed.



Regardless of all measures taken to protect your confidentiality, it can never be fully guaranteed that in a course of an investigation you will never be implicated by subjects.

Solid Investigation procedures

The SpeakUp Office is responsible for solid, confidential and precise fact-finding. Procedures are in place.

Anonymous

You can share information anonymously by using the SpeakUp Line. This offers you the best protection. Please note that the SpeakUp Office has – in addition – also the responsibility to anonymise any information that comes in, in order to protect your identity. The SpeakUp Line makes safe dialogue possible in an anonymous way. An anonymous letter does not offer any possibility of further correspondence, hence any anonymous letter or e-mail outside the SpeakUp line will – in principle – not be handled.

Safeguarding your Privacy

Our Company is committed to protecting the privacy of everyone involved in the SpeakUp process. We will do everything within reason to safeguard personal data from unauthorized access and processing. Any personal data obtained will be processed in line with our privacy policy and will only be used for the purposes explained in this policy or to comply with the law or an important public interest.

Non-retaliation

We encourage speaking up and any person that speaks up is protected. The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be tolerated. Any form of threat or retaliation aimed at those speaking up may lead to disciplinary measures. If you notice or experience any retaliation, you can report this via one of our SpeakUp channels.

Protecting you, as the accused

A person who is subject to a concern needs our utmost protection. The presumption of innocence is a leading principle. The SpeakUp Office is responsible for protecting the rights of anyone who is accused - or otherwise involved – in any issue.

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

Solid Investigation procedures

The SpeakUp Office is responsible for solid, confidential and precise fact-finding. Procedures are in place to make sure this is achieved.

Information Rights

When a person is officially under investigation, they need to be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

Right to Defend and Appeal

After the facts are determined, the accused receives an opportunity to not only give a statement (responding to the accusations) but also have the right to comment on the draft findings.

The subject has the right to appeal against the fact that he or she is subjected to during the time that the report is being investigated.

Speakup: a Dialogue

We selected the SpeakUp system as it allows for anonymous dialogue with the reporter. The SpeakUp Office has the right not to proceed with a case due to limited information. A procedure is in place for this.

The SpeakUp Office

The SpeakUp Office consists of qualified professionals from the organisation.

The SpeakUp Office is responsible for the execution of this SpeakUp policy and the handling of questions and SpeakUp reports. All reports coming in through the SpeakUp Line and all reports via other channels will be made available to the SpeakUp Office. The SpeakUp Office registers, monitors and is responsible for solid, confidential and precise fact-finding. Procedures are in place to ensure this.

The EVP Compliance is accountable for the SpeakUp policy overall. The SpeakUp Office reports to the EVP Compliance and has a direct escalation line towards the Chairman of the Supervisory Board. All members of the SpeakUp Office are protected against non-retaliation themselves.

The SpeakUp Office will provide a (anonymised) report to the EVP Compliance and the Supervisory board. Explicitly included in the report are issues raised on non-retaliation and complaints on the handling of the issue by the SpeakUp Office.

Misuse of the policy

We take the practice of reporting in bad faith or any other form of misuse of this policy very seriously. This act is considered to be a serious breach of the Code of Conduct and disciplinary actions will be taken.

Not satisfied with the SpeakUp process

If you believe your concern has not been handled in accordance with this policy, if you are not satisfied with the follow-up and/or the outcome of your report, or if you do not feel protected, please report this directly to the SpeakUp Office or through the SpeakUp Line.

