

Corporate Anti Retaliation Policy



Purpose

The purpose of this Anti-Retaliation Policy is to promote a work environment that encourages employees to report any activity they believe in good faith to be improper, harmful, or unlawful.

Scope

This policy is applicable to all L & L Products employees, both permanent and temporary, worldwide.

Policy Statement

L&L Products is committed to creating an environment where people can freely share concerns especially regarding safety issues and illegal or unethical behaviors without fear of retaliation. L&L Products provides multiple channels to employees to report concerns and prohibits retaliation against anyone who, in good faith, raises a concern.

Retaliation is any negative action taken against a person because they made a good faith report. Such actions may include without limitation: threats, intimidation, harassment, discrimination, limiting career opportunities, demotion, bullying activities, negative performance feedback independent of actual performance deficiencies, or involuntary termination.

L&L Products does not tolerate retaliation against anyone who reports in good faith a concern about any misconduct or non-compliance with the laws, regulations, or company rules and policies. Employees are encouraged to report such concerns to their Manager, HR Department or Legal Department. Alternatively, employees may report issues through the Speak up Line (intranet) or send an email at: speakup@llproducts.com to initiate an investigation to address the issue.

If an employee believes they have been retaliated against after they reported an issue, or if an employee is a witness to retaliation against another L&L Products employee, they should immediately report the situation either to their Manager, HR department, Legal Department, the Speak Up Line or at the email address: speakup@llproducts.com. L&L Products will investigate and, where needed, take corrective action to address this issue and may take disciplinary actions up to dismissal of the person who retaliated.

This Policy aims to protect employees who make good faith reports. A good faith report is a report made with the genuine belief at the time of the report that a potential issue exists.

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The report may relate to non-compliance with laws and regulations, with an internal policy or procedure or with the Employee Code of Ethics. For example: fraud, theft, bribery, corruption, extortion, antitrust issue, money laundering, discrimination, harassment, bullying, conflict of interest, information breaches, confidentiality issue, covering up situations that should be reported, not following safety rules and other unethical or illegal behaviors.

For details on how to report an issue, please refer to the last page of the Employee Code of Ethics.



Questions

Questions about this Policy can be addressed to your Human Resources Department or Legal Department

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Last Review: 06 February 2023
Next Review: 06 February 2025

Christophe Carré
CEO

