

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 wrongful or unlawful.

Scope

This policy is applicable to the L & L Products entities worldwide.

Policy Statement

L&L Products is committed to create 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, raised a concern.

Retaliation is any negative action taken against a person because he/she made a good faith report. Such actions may include threats, intimidation, exclusion from team events, harassment, discrimination, limiting career opportunities, reassignment, negative performance feedback independent of actual performance deficiencies, or termination.

L&L Products does not tolerate retaliation against anyone who reports in good faith a concern about safety or compliance issues. 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 he/she has been retaliated against after he/she reported an issue, or if an employee is a witness to retaliation against another L&L Products employee, he/she should immediately report the situation either to his/her Manager, HR department, Legal Department, the Speak Up Line or at the email address: speakup@llproducts.com. L&L Products will investigate and 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 that a potential issue exists. A good faith report is typically – but not necessarily – made by someone who directly witnessed an issue.

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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, discrimination, harassment, conflict of interest, information breaches, covering up situations that should be reported, not following safety rules and other unethical 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

First Effective Date: 30 May 2018
Last Review: 15 October 2020
Next Review: 15 October 2022

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Christophe Carré
CEO

