

**POLICY SCOPE**

This policy applies to all employees of Brand Industrial Services, Inc. and all subsidiaries and affiliates (“Company” or “BrandSafway”) except where prohibited, superseded or modified by a collective bargaining agreement (CBA) or by applicable local laws or regulations in which case such CBA or local laws or regulations shall supersede or supplement this policy as permitted by law.

**PURPOSE**

This Whistleblower Protection Policy is intended to establish and maintain a culture of ethics and transparency, as well as to encourage and enable Stakeholders to raise Concerns without fear of Retaliation so that the Company can address and correct inappropriate conduct and actions.

**DEFINITIONS**

**“Concern”** – Concern means knowledge or belief, including reasonable, good faith suspicions, of actual or potential violations of our Code of Conduct, Company policies and/or laws or regulations or knowledge or reasonable, good faith belief that anyone is attempting to conceal or destroy evidence of actual or potential violations of our Code of Conduct, Company policies and/or laws or regulations committed by others.

**“Retaliation”** – Retaliation means any direct or indirect act or omission which occurs in a work-related context, that is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the reporting person including but not limited to suspension, lay-off, dismissal or equivalent measures; demotion or withholding of promotion; transfer of duties, change of location of place of work, reduction in wages, change in working hours; withholding of training; a negative performance assessment or employment reference; imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; coercion, intimidation, harassment or ostracism; discrimination, disadvantageous or unfair treatment; failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment; failure to renew, or early termination of, a temporary employment contract; harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry; early termination or cancellation of a contract for goods or services; cancellation of a license or permit; and psychiatric or medical referrals.

**“Stakeholders”** - Stakeholders mean and include, but is not limited to, all current employees, workers, job applicants, former employees, interns (paid or unpaid), trainees, volunteers, contractors, persons having self-employed status, shareholders and persons belonging to the administrative, management or supervisory body of BrandSafway, including non-executive members, any persons working under the supervision and direction of BrandSafway's contractors, subcontractors and suppliers, supporters of the reporting person or persons who are connected with the reporting persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting persons; and legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context, and journalists.

**POLICY**

All Stakeholders are encouraged to report, in good faith, alleged or suspected violations of BrandSafway's Code of Conduct, its policies or of law or regulations which govern our operations. If there is any practice or behavior that you reasonably believe to be contrary to our Code of Conduct, our policies or that constitutes an unlawful activity, please report those Concerns as discussed herein. Reporting such Concerns will not adversely affect your employment or business relationship with BrandSafway. The

Company and employees are required to comply with all applicable laws and regulations regarding the reporting of ethics and compliance Concerns such as the EU Whistleblower Protection Directive (Directive (EU) 2019/1937) as it is implemented by an EU member state.

**Open Door Reporting.** BrandSafway has a Global Open Door Policy that is intended to be read in conjunction with this policy. Through the Global Open Door Policy employees are also encouraged to share their questions, Concerns, ideas or suggestions with their supervisor or local Human Resources representative. If you are not comfortable speaking with your supervisor or local Human Resources representative, you are encouraged to speak with a higher level manager including a member of the Legal Department or the Chief Compliance Officer. Supervisors and managers are required to report complaints or Concerns about suspected ethical or legal violations to Human Resources. Human Resources has the responsibility to assess reports received by supervisors and, when appropriate, log those Concerns in the central record of Concerns maintained under the direction of the Chief Compliance Officer.

**Reports.** Reports covered by this policy include, but are not limited to, ethics and compliance reports including alleged violations of our Code of Conduct, company policies or the law. This policy also covers reports about inappropriate or illegal conduct, including financial irregularities, tax fraud, money laundering, competition law, environmental protection, public health and consumer protection, public procurement and protection of privacy and personal data, security of network and information systems and alleged acts of harassment, discrimination, and Retaliation.

**Hotline.** BrandSafway maintains an ethics and compliance hotline that is administered by a third party. The hotline is operated 24 hours a day, 7 days a week. Reports can be made verbally by telephone or in-writing online. Reports can be made in a variety of languages. Information regarding reports and investigations is confidential. Anonymous reporting is available where not restricted or precluded by law.

**No Retaliation.** BrandSafway absolutely prohibits Retaliation or threat or attempt at Retaliation against Stakeholders who in good faith report a Concern or who cooperates with a Company investigation. No disciplinary or other action will be taken against a Stakeholder who reports a Concern in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. Any BrandSafway employee, including anyone belonging to the administrative, management or supervisory body of BrandSafway, who directly or indirectly Retaliates against a Stakeholder who reports a Concern may be subject to disciplinary action up to termination of employment.

**Duty to Cooperate.** In the course of an investigation, employees are expected to cooperate with investigators, including truthfully and fully answering investigation questions and providing requested information and documentation. This duty to cooperate may be shaped or limited by applicable local law or labor agreements. Failure to appropriately cooperate may result in disciplinary action up to termination of employment.

**False Statements.** Knowingly making false accusations, providing false information, or intentionally concealing or destroying material information or evidence (i) in an attempt to conceal an unreported actual or potential violation of our Code of Conduct, Company policies or laws or regulations; or (ii) during an investigation is a violation of this Whistleblower Protection Policy and our Code of Conduct and may result in disciplinary action up to termination of employment.

**Investigations.** BrandSafway takes investigations seriously. The Chief Compliance Officer, with the Compliance Committee acting in an advisory capacity, has the primary responsibility for investigations. Reports shall be fully, effectively, and confidentially investigated in a timely manner in accordance with this policy and local laws. All assigned investigators will conduct the investigations under the direction of the Chief Compliance Officer, the Compliance Committee, and/or the Legal Department, including external legal counsel as appropriate. Investigations will be assigned to investigators who are competent in the

subject area and who are impartial and have no conflicts of interest in conducting the investigation.

Investigations will normally involve making internal inquiries, interviews, or document reviews to establish facts. This may include access to Company books and records, personnel files, and email systems or accounts. Investigations shall be diligent, confidential, and accurate. Specifically, the identity of the reporting Stakeholder should be kept confidential and the identity of those implicated in the report should be protected as appropriate or required by law while the investigation is ongoing. As approved by the Chief Compliance Officer, masked or aggregated data may be shared internally for legitimate business purposes or with appropriate third parties for legitimate business purposes or as required by law or regulation.

Within seven days of receiving a report covered by this policy, the reporting Stakeholder may (or shall where required by law) receive an acknowledgment of receipt of the report by the Company. Within three months from the receipt of the initial report, the reporting person may (or shall where required by law) receive feedback regarding the investigation including actions that were taken or will be taken and reasons for that decision. Upon conclusion of an investigation and when appropriate, the Company may (or shall where required by law) also provide a follow-up statement to an employee or business partner who is the subject of a report investigation.

A central record of reports covered by this policy will be maintained under the direction of the Chief Compliance Officer. Reports received through the hotline will automatically populate the central record of reports. Reports covered by this policy made outside of the hotline, such as reports made to supervisors or Human Resources representatives shall be manually entered into the central record by Human Resources. It is the responsibility of the individual investigators, under the direction of legal counsel, to prepare investigation reports and findings and to properly and timely update the central record with investigation information. Preliminary investigation reports shall also be given by the investigation team to the Compliance Committee upon request, except if an investigation involves a member or members of the Compliance Committee, in which case those member(s) shall be recused from the investigation and findings. The Compliance Committee is responsible for deciding whether to seek the prosecution of criminal charges by referring the investigation results to law enforcement and/or regulatory agencies for independent investigation.

### **RESPONSIBILITY FOR ADMINISTRATION**

The Chief Compliance Officer, with the Compliance Committee acting in an advisory capacity, is responsible for the administration, revision, interpretation, and application of this policy. The Chief Compliance Officer shall direct the maintenance of a reporting hotline and a central record for reported Concerns. Concerns reported through the hotline will be automatically entered into the central record. All managers, supervisors, and company leaders receiving a verbal or written report of a Concern shall report the Concern to Human Resources. Human Resources shall enter all reported Concerns received outside of the hotline into the central record. Functional teams such as Human Resources and Internal Audit Department will be responsible for conducting investigations (under the direction of legal counsel), updating the central record, and sending approved and appropriate feedback to the reporting Stakeholder. This policy will be reviewed annually and revised as needed.