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Shoe Manufacturing Inc.

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LFI WHISTLEBLOWER POLICY

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LACROSSE FOOTWEAR, INC. WHISTLEBLOWER POLICY







LFI Whistleblower Policy

Modified Date: 3/10/2022

I. <u>Overview</u>

LaCrosse Footwear, Inc. (LFI) employees must follow the ethical standards set forth in the Code of Ethics Policy and are obligated to report, in a timely fashion, any possible violations of our ethical standards that they may witness. Doing so is not an act of disloyalty, but an action that shows your sense of responsibility and fairness to your fellow employees, our customers, supplies, and shareholders. Reporting possible ethical violations by others will not subject you to reprisal. LFI employees are expected to read this policy carefully, but we do not expect this statement to answer every possible question an employee my have in the course of employment.

II. Get More Help or To Report a Problem

A good basis for deciding when to seek advise is to ask yourself whether the conduct might be embarrassing to the Company, or the employees involved if the details were fully disclosed to the public. If it might, the employee should seek clarification.

LFI expects its employees to understand and obey all legal requirements governing the Company's business. The Company provides ongoing education concerning applicable laws and regulations, and employees needing more information should talk with their supervisor, or the Human Resources Department.

LFI has established the following procedures for employees to receive help with a potential issue or to report a problem. First, you should direct your inquiry to your immediate department head and/or Human Resources. They should be able to quickly resolve most inquiries. But, if you need additional guidance because the matter is unclear or particularly sensitive (for example, the matter involves department or facility management), you have options:









Through an independent administrator, you can anonymously report possible violations of the company's ethics standards. The toll-free hotline, which is handled by an independent message call center, gives you a way to simply alert LFI to a potential situation without having to disclose your name. Within 24 hours, the information will be confidentially shared with the appropriate LFI authorities, who will sensitively investigate the matter. This service is available for all employees, regardless of their location, 24 hours/day and 7 days/week at: (888) 332-3573.

III. How LFI Will Handle Your Questions and Reports

All reports and inquiries are handled confidentially to the greatest extent possible under the circumstances. You may choose to remain anonymous, though, in some cases that could make it more difficult to follow up and ensure resolution of your inquiry. If you prefer to send your inquiry via the mail, please direct it to:

LaCrosse Footwear, Inc Attn: Human Resources 17634 NE Airport Way Portland, OR 97230

In addition, all prospective employees will agree, as a condition of employment, that if they are employed by LFI, they will comply with the Company's ethics policy. Lastly, new employees will be provided with information on the Company's ethical principles and values, as well as the recommended process for addressing ethical issues.

Once again, we expect LFI employee to report possible violations of our ethical principles whenever you see them or learn about them.





