

# Business Integrity Line Employee Frequently Asked Questions

At the core of Wesco's commitment to conducting business with the highest degree of honesty and integrity is the expectation that all employees are allowed to speak up and report any violations of the Wesco Code of Business Conduct, related company policies or laws and regulations.

As stated in Wesco's Code of Business Conduct ("Code of Conduct"), if you ever feel pressured to do something that conflicts with our Code of Conduct or related policies, believe a colleague is violating the Code of Conduct or otherwise have any questions or concerns, you should feel comfortable talking to any manager, the Wesco ethics and compliance office, a Regional Compliance Officer, or someone in our human resources, internal audit or legal departments. You may also submit a report directly to the <u>Business Integrity Line</u>.

Below are answers to questions employees frequently raise when deciding whether to report noncompliance with Wesco's Code of Business Conduct or policies. We hope the answers to these questions make you feel safe to speak about suspected ethics or compliance issues.

## Can reports to the Business Integrity Line remain truly anonymous?

The Business Integrity Line is operated and staffed by EthicsPoint, an independent third party, and allows individuals to submit a report via telephone or internet anonymously. EthicsPoint does not use caller identification technology and will not collect your name unless you voluntarily provide it. Calls made to the Business Integrity Line are not recorded. In the U.S. and most other locations, calls to the Business Integrity Line may be made anonymously, but local laws in some countries discourage or prohibit anonymous reporting.

Anonymous reports are often more challenging to investigate. For this reason, Wesco encourages anyone submitting a report through the Business Integrity Line to provide their name and contact information so that the ethics and compliance office can contact them for additional information when necessary. All information, including the reporter's name, is handled with strict confidentiality and is disclosed to others only as needed to investigate and implement any corrective actions.

Wesco also has implemented technical and organizational safeguards to ensure that the information collected in initial reports and subsequent investigations is treated in accordance with all applicable data privacy laws and regulations, including privacy by design and privacy by default rules.

#### Will I face retaliation for making an ethics complaint?

No. Wesco does not tolerate any form of retaliation against anyone who, in good faith, discloses a concern regarding possible violations of the Code of Business Conduct, policies or illegal or unethical

activities or who cooperates with an investigation. If you believe that you have been retaliated against for making a report or participating in an investigation or proceeding regarding illegal or unethical activities, promptly alert the ethics and compliance office, a Regional Compliance Officer or a member of the legal or human resources departments.

#### If I report a suspected ethics or compliance issue, will my claim be ignored?

No. All good faith reports of suspected ethics or compliance issues are promptly reviewed to determine the proper course of action. Not all claims require a formal investigation, but Wesco responds to every report involving a suspected ethics or compliance issue.

### If I report a suspected ethics or compliance issue, who will be assigned to investigate the report?

The ethics and compliance office will coordinate with human resources, internal audit, and legal departments to determine who is best to investigate a complaint involving a suspected ethics or compliance issue. When appropriate, the ethics and compliance office coordinates with those who have subject matter expertise to investigate the report and may turn to outside investigators in appropriate situations. Sometimes multiple groups may investigate an issue. For example, the internal audit department may work with the human resources department on an investigation involving an employee who engaged in an alleged conflict of interest.

#### How can I find out the status of my report?

When you submit a report, you will receive a 10-digit Report Key and will be asked to create a unique password that allows you to follow up on a report by phone or online.

#### Am I being disloyal to my co-workers by speaking up?

If you suspect an ethics or compliance violation, it's always better to speak up than not. It's important to remember that anyone who engages in unethical behavior is hurting themselves and their colleagues and putting Wesco at risk. Reporting a concern can bring that to an end.

#### If my report is substantiated, will the employee be disciplined?

Employees, regardless of rank, will be disciplined when appropriate, up to and including termination, for violating the Code of Business Conduct or policies.

#### Will I be informed of the outcome of any investigation into any suspected violations I reported?

Wesco thoroughly and carefully investigates each reported violation and takes appropriate corrective action, including dismissal or other disciplinary actions. Generally, Wesco does not discuss case specifics or disciplinary actions with anyone other than the employees involved. Local law may require Wesco to disclose limited information about the results of investigations and corrective or disciplinary actions taken. Any information we provide will be limited to ensure we protect the privacy of the subject of an investigation and the reporter and others who may have cooperated in any investigation.

#### If I raise a concern, will my manager or co-worker find out that I made the report?

Whether your claim is anonymous or not, every effort is made to maintain the confidentiality of your report and to disclose only to the extent necessary to investigate and resolve the matter effectively.

#### If the matter doesn't involve me, should I get involved?

Even if you believe you are not involved, looking the other way is not a good idea. The Code of Business Conduct and related ethics and compliance policies require you to report actions that appear inconsistent with our ethical business practices. Asking questions and raising concerns protects you and Wesco.

# If I have a question about a possible ethics issue, but I am not sure that I want to make a formal complaint, what can I do?

Whether you want to report a suspected ethics or compliance issue or just ask an ethics question, you have several options:

- You can contact local management
- You can contact any member of senior management
- You can contact the human resources, internal audit or legal departments
- You can contact your Regional Compliance Officer or the Wesco ethics and compliance office
- You can submit a question online to the <u>Business Integrity Line</u> or by calling 1.866.873.2376 for the U.S. and Canada (phone numbers for other countries are available on the Business Integrity Line site)
- You can send an email to <a href="mailto:ethics@wesco.com">ethics@wesco.com</a>

To contact the ethics and compliance office or a Regional Compliance Officer, see "Contact Us" on the <u>ethics and compliance office</u> SharePoint site on Compass.