

Privacy Notice on Reporting and Investigating Concerns

Version: 2.0

Date: November 2023

Status: FINAL

1. Introduction

This privacy notice describes how information relating to an identified or identifiable person (“Personal Data”) is processed within the EthicsPoint Confidential Call Line as well as during following investigations (together “the Service”) by Barry-Wehmiller Group, Inc., and its subsidiaries, affiliates and related companies (“Barry-Wehmiller”).

The EthicsPoint Confidential Call Line is operated by NAVEX Global, on behalf of Barry-Wehmiller. The primary “Data Controller” is the Barry-Wehmiller legal entity that employs the team member, intends to employ the candidate, or has the customer/vendor relationship or other corresponding relationship with the individual or their employer. The list of Barry-Wehmiller Group, Inc.’s subsidiaries and affiliates, and relevant contact details can be found here: www.barry-wehmiller.com/business

2. Purpose of this Service

The purpose of the Service is to provide team members within Barry-Wehmiller, as well as Barry-Wehmiller partners, customers, suppliers and other third parties, a channel to confidentially report (to the extent permitted by applicable law) suspected violations of applicable laws, regulations, the Barry-Wehmiller Code of Conduct, and other company policies, and to allow Barry-Wehmiller to appropriately investigate these concerns and to take appropriate action.

The reported concerns may relate to team member relations; inappropriate behaviour; improper business dealings; health, safety and work environment; theft, fraud or embezzlement; falsification of documents and records; or any other matters that can be reported under applicable legislation.

3. Categories of Personal Data

NAVEX Global and Barry-Wehmiller may collect or process Personal Data of

individuals who report concerns, as well as Personal Data of individuals to whom the concern relates to. Personal Data may be collected during the initial report from the team member or third party raising the concern, as well as during the following investigation. During the investigation, Personal Data may be collected from various sources, including employment related databases in Barry-Wehmiller, when necessary to appropriately investigate the concern.

Categories of Personal Data may include name, contact details, role title, job location, description of the concern (including information about individuals related to it), or any other type of information that is necessary in order to investigate the concern appropriately.

4. Access and Transfer

Personal Data may be accessed and processed, when necessary for the purposes described above, by the relevant Barry-Wehmiller team members, including those from the People Team (HR), Legal, Finance, and division and corporate leadership, as well as external advisors (e.g. legal advisors), the police and/or other enforcement or regulatory authorities if necessary or, in limited circumstances, by technical staff at NAVEX Global.

Personal Data may be stored, transferred to, and processed in any country where Barry-Wehmiller has facilities or in which it engages service providers, including the United States. The list of Barry-Wehmiller Group, Inc.'s subsidiaries and affiliates and relevant contact details can be found here: www.barry-wehmiller.com/business

Barry-Wehmiller implements appropriate safeguards (e.g., Standard Contractual Clauses) to protect Personal Data as required when transferred. Transfers of Personal Data to third countries in the context of the activities of an establishment of a Data Controller or a Data processor in the European Union will be mainly based on either adequacy decision under art. 45 EU Reg. n. 2016/679 (https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en) and/or standard data protection clauses under art. 46.2. (c) EU Reg. n. 2016/679 (https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.)

5. Legal basis, Retention

The legal bases for the processing include the following: compliance with a legal obligation, ensuring the protection of vital interests of a person, and other legitimate interests of the company.

Personal Data will be retained in accordance with applicable Barry-Wehmiller records retention policies, or as long as reasonably necessary for the purposes in accordance with applicable law, whichever is longer.

6. Security

Barry-Wehmiller implements and maintains industry standard technical and organizational measures to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access. Barry-Wehmiller makes reasonable efforts to ensure a level of security appropriate to the risk of the processing, taking into account the costs of implementation and the nature, scope, context and purposes of processing of Personal Data.

7. Privacy Rights and More information

Team members and third parties can contact Barry-Wehmiller for more information on how their Personal Data is used. Depending on the applicable legislation, team members and third parties may also have the right to lodge a complaint with a supervisory authority regarding how their Personal Data is used.

Individuals may exercise the following privacy rights, subject to applicable legislation:

- obtain confirmation from Barry-Wehmiller as to whether or not Personal Data concerning them are being processed, and, where that is the case, obtain access to the Personal Data (right to access);
- update, amend and/or correct their Personal Data (right to rectification);

- obtain from Barry-Wehmiller the erasure of Personal Data concerning them without undue delay (right to erasure);
- where applicable, receive the personal data concerning them, provided to Barry-Wehmiller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the company to which the personal data have been provided (right to portability);
- withdraw their consent at any time, where provided.

Individuals in the context of the activities of an establishment of a Data Controller or a Data Processor in the European Union or in the UK may also have the right to:

- object to the processing on grounds relating to their particular situation (right to object). Individuals can always object to the processing carried out on the basis of the legitimate interest of Barry-Wehmiller.
- obtain from Barry-Wehmiller the restriction of the processing, if applicable e.g. where the accuracy of personal data is contested or the processing is unlawful (right to restriction on processing);
- lodge a complaint with a supervisory authority in the Member State of their habitual residence or place of work regarding how their Personal Data is used by Barry-Wehmiller. The contact details of the supervisory authorities can be found here: https://edpb.europa.eu/about-edpb/board/members_en and here: [https://ico.org.uk/.](https://ico.org.uk/)

More information on how Personal Data is processed by Barry-Wehmiller can be found in the following documents:

- Barry-Wehmiller Team Member Privacy Notice, available in the internal Barry-Wehmiller sharepoint.
- Barry-Wehmiller Privacy Notice for customers, vendors and other stakeholders, available here: <https://www.barrywehmiller.com/policies/privacy> , as well as on all other external websites of Barry-Wehmiller companies.
- Barry-Wehmiller Career Privacy Notice, available here: <https://www.barrywehmiller.com/workday/privacy-notice> .

Contact details for more information and for the exercise of the privacy rights described above:

By email: dataprotection@barry-wehmiller.com

By post:

Group Data Protection Officer
Legal Team
Barry-Wehmiller Group
8020 Forsyth Blvd, Saint Louis 63105
United States of America

8. Changes to this Privacy Notice

Barry-Wehmiller may update this Privacy Notice from time to time. Any changes will be posted on this page.