

Taylor Made Glass and Systems Limited Whistleblower Policy

Taylor Made Glass and Systems Limited (the “**Company**”) has Guidelines for Business Conduct which require directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All directors, officers and employees of the Company must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations. Therefore, this Whistleblower Policy – which comes into force upon publication subject to Section 11 – has been prepared, which sets out the applicable laws and regulations.

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1. General

The purpose of this Whistleblower Policy is to set forth the policies and procedures established by the Audit Committee of the Board of Directors of LCI Industries, the ultimate parent entity of the Company (the “**Ultimate Parent**”), as amended to reflect the specific rules and regulations applicable to the Company for reports made by current and former employees and other Stakeholders (defined in Addendum 1) of the Company, on a confidential and (if desired) an anonymous basis, regarding (each of these reports is a “**Report**”, and the underlying subject of Report is a “**Reportable Wrongdoing**”, the act of making a Report, is considered “**Reporting**” or “**Reported**”, as applicable, and a person who makes a Report, is considered a “**Reporter**”):

- an “**Abuse**”, which is defined as:
 - i. a violation or risk of violation of European Union law (“**Union law**”). A violation of Union Law is an act or omission that (i) is unlawful and relates to Union acts and specific policy areas falling within the scope of the European Directive (2019/1937) (“**Directive**”), such as, for example, protection of the environment or privacy and personal data, or (ii) undermines the purpose or application of the rules covered by Union acts and the policy areas which fall within the scope of the Directive. The entire list of breaches falling within the scope of the Directive can be consulted in Article 2 of the Directive; or
 - ii. an act or omission involving the public interest in: (a) violation of or a risk of violation of a legal provision or internal rules of the Company, such as questionable matters related to accounting or auditing, internal control, violation of laws and regulations and illegal practices, or (b) a danger to public health, the safety of persons, to the degradation of the environment or the proper functioning of the Company as a result of improper acts or omissions;
- a “**Relevant Wrongdoing**” (as defined in Addendum 1, Section B); and
- a “**Suspected Abuse**”, which is defined as the reasonable suspicion of a Reporter that within the organization in which he/she works or has worked, or at another organization, when he/she has come into contact with this organization through his/her work, an Abuse or Relevant Wrongdoing is taking place, insofar as the suspicion is based on reasonable grounds arising from the knowledge that the Reporter has acquired at the workplace.

This Whistleblower Policy also set forths the Company’s policies and procedures regarding the following:

- receiving, recording, storing, and handling Reports received by the Company; and

- the protection of employees from retaliatory actions for Reporting.

2. Reports covered by this Whistleblower Policy

Reports should be made about Reportable Wrongdoings that come to the attention of the Reporter in a work-related context. Insofar as the improper acts or omissions to be Reported are not Reportable Wrongdoings (*see above and in Addendum 1*), the following improper acts or omissions should also be Reported:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintenance of financial records of the Company;
- deficiencies in, or non-compliance with, the Company's internal accounting controls;
- misrepresentation or false statement to or by a (senior) officer or accountant of the Company regarding any matters contained in the financial records or any financial or audit reports of the Company;
- deviation from full and fair reporting of the Company's financial condition;
- substantial and specific threat to public health, environmental degradation or safety of persons;
- information, including reasonable suspicion, about actual or potential violations of applicable law or regulations applicable to the business activities of the Company, that have occurred or are reasonably likely to occur, including Union Law rules applicable to the Company;
- insider trading, or the dissemination of material non-public information;
- violation of any other standards set forth in the Guidelines for Business Conduct, Insider Trading Policy or other policies adopted by the Company or adopted by any parent entity of the Company and applicable to the Company from time to time (collectively, the "**Applicable Policies**"); or
- altering, destroying or concealing a document, or attempting to do so, with the intention to restricting access to the documents for use in an official proceeding, or otherwise obstructing, influencing or impeding any official proceeding, in violation of any applicable law or regulation.

The Company highlights that the above instances may not always constitute a Reportable Wrongdoing for the purposes of the Protected Disclosures Acts 2014-2022, but it encourages the sharing of information relating to such topics nonetheless.

Note: Employment related matters, other than those described above, should continue to be reported through normal supervisory or Human Resource channels. Please see the Company's Grievance and Disputes Procedure and/or Policy on Preventing / Dealing with Bullying / Harassment at Work. If a Reporter is unsure whether something is within the scope of this Whistleblower Policy, they should seek advice from a member of the Whistleblowing Committee.

3. No Retaliation by internal or external reporting

Even though Reports may be made directly to the appropriate competent authorities, this Whistleblower Policy is intended to encourage and enable employees and other Stakeholders to make Reports for investigation and appropriate action *within* the Company. With this goal in mind, no employee making a Report under this Whistleblower Policy with reasonable belief that the Report contains factually correct information which has come to their attention in a work-related context shall be subject to retaliation, Penalisation (as defined in Addendum 1) or other adverse employment consequences because of making such Report. In addition, no employee shall be Penalised or adversely affected because he/she refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of any applicable law or regulation. A director, officer or employee who Penalises someone who has made a Report with reasonable belief that the Report contains factually correct information which has come to their attention in a work-related context is subject to discipline up to and including dismissal from their position or termination of employment and may be guilty of a criminal offence.

The Company also prohibits retaliation for filing, testifying, participating in, providing information to, or otherwise assisting in a proceeding or investigation related to a Report made with reasonable belief that the Report contains factually correct information which has come to their attention in a work-related context, including but not limited to any proceeding or investigation initiated by:

- a regulatory authority or a law enforcement agency;
- any person with supervisory authority over a director, officer or employee; or
- any person with authority to investigate, disclose and/or terminate the activity of the Company which is the subject of the Report.

Although the Company's preference is for a Reporter to make a Report within the Company (i.e. internally), it could be that a Reportable Wrongdoing must be reported externally, for example if:

- internal Reporting cannot reasonably be requested of an employee, for example

because his colleagues are in acute danger or the highest-ranking person within the organization of the Company is involved in the abuse;

- the Report is not properly handled internally; although the Company hopes that the Reporter - if he/she has the feeling that a Report is not properly handled or dealt with - will bring this to the attention of the Company before a Report is made externally; or
- an external Reporting obligation applies.

Examples of external Reporting are to people such as a prescribed person (such as a regulator) or the Protected Disclosures Commissioner (within the Office of the Ombudsman).

4. Confidentiality and nondisclosure

Reports can be made anonymously (see Section 9 below), directly to the persons listed in Section 8 herein, without disclosing the identity of the Reporter.

Anyone who is involved in the Reporting or investigation of a Reportable Wrongdoing or information about a violation of contract, and has access to information of which he or she knows (or can reasonably be expected to know) is confidential, is obliged to maintain confidentiality, except for legal exceptions. This confidential information includes in any case the identity of the Reporter (also data that can be traced back indirectly to the Reporter) and information about a business secret.

To the extent possible, the identity of the Reporter and any information which directly and/or indirectly reveals the identity of the Reporter shall not be disclosed without the consent of the Reporter. There may be circumstances where the Reporter's identity, the identity of any persons named in the Report or the identity of those who are associated with the Report are necessary for the receipt, transmission of or follow up on handling of a Report.

If the Reporter does reveal his/her identity, but requests for confidentiality purposes that his/her identity not be disclosed in the investigation or follow-up of the Report, the Company will keep the Reporter's identity confidential to the extent reasonably possible in accordance with laws and regulations and a full and fair investigation. Any Reports made shall be handled in such a manner as to ensure that it is only accessible to those persons necessary for the receipt, transmission of or follow-up on such Report.

The same confidentiality obligations apply with regard to the identity and information of persons who are the subject of a Report and any other persons named in the Report.

5. False Reporting

All Reporters must have reasonable grounds for believing the accuracy of information disclosed in a Report and that it indicates a Reportable Wrongdoing. A Report that proves to be made

with the knowledge that the allegations are false, will be considered as a serious offense and may result in a disciplinary action, up to and including termination of the employment agreement of the Reporter. Such conduct may also give rise to other measures, including civil or criminal proceedings, against the Reporter.

The Reporter is not protected in the event of disclosure of deliberately false (or without reasonable belief) information and, in addition, may even be liable to pay damages for the harm resulting from such an unlawful Report.

6. Authority of the Whistleblower Committee

The Reporter can make a Report to the committee established by the Company responsible for overseeing the receipt, recording, retention and investigation of and response to Reports (the “**Whistleblower Committee**”). The exact composition of the Whistleblower Committee by the time this Whistleblower Policy comes into effect as well as the respective contact details can be found in **Addendum 2**. Addendum 2 may be amended from time to time due to future changes of the composition of the Whistleblower Committee or the relevant contact details. The Whistleblower Committee will notify the Reporter (if self-identified to the Whistleblower Committee) of receipt of the Report within seven business days, unless it will not be possible to acknowledge receipt such as in case of anonymously submitted Reports.

To comply with internal policies and applicable law, the Whistleblower Committee will promptly bring all Reports to the attention of each of the Executive Vice President-Chief Legal Officer of the Ultimate Parent (the “**EVP-CLO**”), the Vice President of Internal Audit and Compliance of Lippert Components, Inc. and the Executive Vice President-Chief Human Resources Officer of Lippert Components, Inc. (collectively, the “**US Group**”). The US Group will in turn inform the Chairman of the Audit Committee of the Board of Directors of the Ultimate Parent (the “**Audit Committee**”) of the substance of every Report in accordance with the terms of the whistleblower policy of the Ultimate Parent then in effect to the extent such policy assigns to the Audit Committee the ultimate responsibility for overseeing the receipt, recording, retention and/or investigation of and/or response to any such Report related to the Company (as a subsidiary of the Ultimate Parent).

All Reports covered by this Whistleblower Policy will be promptly reviewed and, if necessary, investigated by the Whistleblower Committee and/or, when appropriate, the Audit Committee. If it is established that there is no evidence to substantiate a Report, the Whistleblowing Committee and/or Audit Committee may close the investigation. The Whistleblower Committee and/or the Audit Committee, may choose to not conduct an investigation if the Report, for example, (i) does not reasonably appear to be credible, (ii) involves only routine human resources or employment matters, (iii) does not involve an illegal practice, or (iv) involves minor inconsistencies with any Applicable Policy that would not have a material impact on the Company’s business, financial reporting or reputation.

However, if after having carried out an initial assessment, the Whistleblowing Committee and/or Audit Committee decides that there is evidence to substantiate a Report, the scope and

terms of reference of any next steps which may include an investigation which the Whistleblowing Committee might decide to carry out shall be determined as appropriate.

If warranted by the investigation, appropriate corrective action will be recommended to the Board of Directors of the Ultimate Parent, who will communicate such decision, directly or through the US Group, to the Whistleblower Committee. Routine questions, complaints and comments that can be appropriately addressed by management will be directed to the EVP-CLO for handling in his or her discretion, and who will advise the Whistleblower Committee and/or the Chairman of the Audit Committee, as applicable, of any action taken with respect to the communication. Such action could include changes to the way the Company conducts its operations, disciplinary action (following the application of the disciplinary procedure) or a referral to an appropriate third party such as An Garda Síochána. In addition, action taken will include a conclusion and/or follow-up with the Reporter (if self-identified to the Whistleblower Committee). In any event, the Whistleblower Committee will inform the Reporter about the assessment and, if applicable, the feedback/follow-up of the Report no later than three months after the confirmation of receipt of the Report is sent. In circumstances where it is likely that the Company will not be in a position to provide feedback within three (3) months, they should notify Reporter, in writing, as soon as practicable. Similarly, where the investigation does not conclude within three (3) months, feedback will be provided to the Reporter at intervals of three (3) months until the investigation is concluded. While the Company will use its best endeavours to comply with these timeframes, if it cannot reasonably do so, it will notify the Reporter of any revision to them.

In connection with the investigation of a Report, each of the Whistleblower Committee, EVP-CLO and/or the Audit Committee may consult with, and obtain the assistance of, any member of management of the Company or any parent entity thereof who is not the subject of the Report to the extent necessary to properly investigate the Report. In addition, the Whistleblowing Committee, the EVP-CLO and the Audit Committee has the authority, if it so chooses, to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the Report.

The regulations of this Whistleblower Policy regarding the processing and transfer of personal data/data privacy (in particular Section 12 of this Whistleblower Policy, i.e. sharing of personal data only to the extent deemed reasonably necessary, etc.) remain unaffected by this Section.

7. Recording

The Whistleblower Committee shall register all Reports (upon receipt) in a register set up for this purpose. Personal data shall be processed in accordance with the General Data Protection Regulation (“**GDPR**”) and the Company’s **Whistleblower Privacy Policy** (the Whistleblower Privacy Policy can be found online, following this link: <https://www.lippertcomponents.eu/whistleblower/ireland/> – please note that the Whistleblower Privacy Policy may be amended from time to time in order to reflect relevant legal or factual changes; the aforementioned link will always lead you to the most current version of the Whistleblower Privacy Policy). In general, the data of a Report in the register will be deleted

three years after the conclusion of the Reporting procedure; it may be retained for a longer period of time to meet requirements under the Irish Protected Disclosures Act or other legislation, as long as this is necessary and proportionate. To the extent required by law, data of a Report will be deleted or anonymized at an earlier stage. Irrespective of the aforementioned, the Company may store data of a Report in an anonymized and aggregate form (e.g. for statistical purposes), provided that and to the extent this is in line with applicable statutory requirements.

If the Report is made orally or by telephone, or other voice message system, the Whistleblower Committee shall record the Report by making a recording of the conversation in a durable and retrievable form, which requires the prior consent of the Reporter, or shall make a precise written record of the Report. The Company will offer the Reporter the opportunity to check, rectify and agree to the transcript of the call by signing it for approval. Please note that such Reports may not be able to be made anonymously in such a case. Personal data shall be processed in accordance with GDPR and the Whistleblower Privacy Policy.

8. To whom should the Report be made?

Employees are encouraged to first discuss any Report with their immediate supervisor, or the supervisor's manager. If, after speaking with his or her supervisor or manager, the Reporter is not satisfied with the outcome and continues to have reasonable grounds to believe that the Report is valid, the Reporter should make the Report to the Whistleblower Committee. If the Reporter is uncomfortable speaking to his or her supervisor or the supervisor's manager for any reason, the Reporter can make the Report directly to the Whistleblower Committee using any of the methods described below.

9. How can the Report be made?

Reports may be submitted at any time, confidentially and anonymously (if desired), using any of the following methods:

1. Complete the Report Form attached as Exhibit A to this Whistleblower Policy (whereby the personal data can be omitted) and send it in a sealed envelope to Taylor Made Glass and Systems Limited, Whistleblower Committee, Railway Road, Templemore, Tipperary, E41 DP97 Ireland. Write on the envelope "Whistleblower Report", or
2. Send a Report by email to the Whistleblower Committee: <mailto:WhistleblowerIreland@lci1.com> or to a member of the Whistleblower Committee. The respective email addresses of the members of the Whistleblower Committee are listed in **Addendum 2** (as amended from time to time), or
3. Call a member of the Whistleblower Committee. The respective phone numbers of the members of the Whistleblower Committee are listed in **Addendum 2** (as

amended from time to time), or

4. Request a face-to-face meeting with a member of the Whistleblower Committee to Report a violation by contacting them in advance by email or phone (contact information is listed in Addendum 2, as amended from time to time); such face-to-face meeting can also be carried out by video transmission if the Reporter agrees to it.

Note: submitting a Report using any of the above-mentioned methods can be done English or any other language indicated as available in Addendum 2 (as amended from time to time).

“Spam” such as advertising, solicitations for business, requests for employment or requests for contributions will not be forwarded or addressed.

10. Reporting and annual review

The Whistleblower Committee and/or a designated representative will submit periodic reports to the Audit Committee of all Reports, and any remedial actions taken in connection therewith. This Whistleblower Policy will be reviewed annually by the Whistleblower Committee and/or the Audit Committee in consultation with the EVP-CLO, taking into account the effectiveness of this policy in promoting the reporting of Reports, but with a view to minimize improper Reporting and investigations.

11. Publication on the website

This Whistleblower Policy will be posted on the Company’s website at <https://www.lippertcomponents.eu/whistleblower/ireland> and/or intranet.

12. Transferring and processing of personal data

In order for the Company to comply with this Whistleblower Policy, the Company may transfer personal data from the EEA to the US. Personal data related to this Whistleblower Policy will be transferred in accordance with applicable laws and regulations and the Company will ensure that the personal data transferred is provided an essentially equivalent level of protection as the personal data is awarded based on the GDPR, by implementing technical, organizational and contractual measures.

Personal data will only be processed and shared to the extent deemed reasonably necessary to review, investigate and evaluate the Report and to be able to take necessary measures. For more information about transferring and processing personal data pursuant to Articles 13 and 14 of GDPR, please find the **Whistleblower Privacy Policy** following this link: <https://www.lippertcomponents.eu/whistleblower/ireland/> (as amended from time to time). The Whistleblower Privacy Policy applies with respect to any method of Reporting by the Reporter – in the case of a Report by mail, by e-mail, by telephone and also in the case of a personal

Report in a face-to-face meeting. The Reporter will be made aware of the Whistleblower Privacy Policy in an appropriate form and thus of the processing of personal data pursuant to Articles 13 and 14 of GDPR.

The Company, the Whistleblower Committee as well as all other stakeholders involved in reviewing the Reported information will use reasonable efforts from a technical and organizational point of view to ensure the privacy and security of the Reported information as well as any personal data.



EXHIBIT A

**The purpose of this form is to report a Report as described
in the Whistleblower Policy of Taylor Made Glass and Systems Limited.**

General Instructions:

Employees of Taylor Made Glass and Systems Limited (the “**Company**”), who are Reporting, as well as external Reporters (such as customers or business partners) may, but are not required to, complete Part I of this form. All contact information is optional. Please note that, in the case of an anonymous Report without providing contact information, no corresponding feedback and follow-up can be given to the Reporter.

Part I

Name: _____

Address: _____

My relationship to the Company is: _____

Telephone Number: _____

E-Mail: _____

☐ I am ☐ I am not an employee of the Company

☐ I hereby authorize the disclosure of my identity if the Whistleblower Committee reasonable believes it is necessary or appropriate.

Part II

Type of Report: _____

Activity: ☐ Ongoing ☐ Completed ☐ About to occur

☐ Unclear whether ongoing, completed or about to occur.

Department(s) suspected: _____

Individual(s) suspected: _____

Describe all relevant facts of the activity which is the subject of the Report: _____

Describe how, and approximately when, you became aware of the activity: _____

Describe any steps taken to remedy the situation prior to submitting this Report: _____

Who, if anyone, may be harmed by this activity: _____

Part III

Would you like to discuss this matter with (a member of) the Whistleblower Committee and/or the Audit Committee?

Yes ☐ No ☐

Please be advised that applicable law prohibits the Company, as well as its directors, officers, employees or agents, from discharging, demoting, suspending, threatening, harassing or otherwise discriminating against anyone who makes a proper Report (made with reasonable belief that the Report contains factually correct information which has come to their attention in a work-related context) about the Company because of such Report.

Completed forms should be addressed and submitted as follows (by mail)

**Taylor Made Glass and Systems Limited
Railway Road
Templemore, Tipperary, E41 DP97
Ireland
Attention: Whistleblower Committee - "Whistleblower Report"**

or by e-mail to the Whistleblower Committee at
WhistleblowerIreland@lci1.com

or by e-mail to a member of the Whistleblower Committee (the respective email addresses of the members of the Whistleblower Committee are listed in **Addendum 2**, as amended from time to time)

ADDENDUM 1

A. In this Whistleblower Policy, “Stakeholders” in relation to the Company means:

1. officers;
2. consultants;
3. contractors;
4. interns;
5. trainees;
6. casual workers;
7. agency workers;
8. members of the administrative;
9. management or supervisory body;
10. shareholders;
11. job applicants
12. volunteers; and
13. an individual who acquires information on a Relevant Wrongdoing during pre-contractual negotiations.

B. Listing of Relevant Wrongdoings within the meaning of Section 5 of the Irish Protected Disclosures Acts 2014-2022

For the purposes of making a Report under this Whistleblower Policy, the Irish Protected Disclosures Act considers the following to be “**Relevant Wrongdoings**”:

1. the committing of an offence;
2. failure to comply with any legal obligation (other than one arising under the worker’s contract of employment or engagement);
3. miscarriages of justice;
4. danger to health and safety of an individual;
5. damage to the environment;
6. unlawful or improper use of funds and/or resources of a public body, or of other public money;
7. an act or omission by or on behalf of a public body is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement; and
8. deliberate concealment of any of the above matters.

C. “**Penalisation**” means any direct or indirect act or omission which occurs in a work-related context, is prompted by the making of a Report and causes or may cause unjustified detriment to a worker, and, in particular, includes (but is not limited to):

1. suspension, lay-off or dismissal;
2. demotion, loss of opportunity for promotion or withholding of promotion;
3. transfer of duties, change of location of place of work;
4. reduction in wages or change in working hours;
5. imposition or administering of any discipline, reprimand or other penalty (including a financial penalty);
6. unfair treatment;
7. coercion, intimidation, harassment or ostracism;
8. discrimination or disadvantage;
9. injury, damage or loss;
10. threat of reprisal;
11. withholding of training;
12. a negative performance assessment or employment reference;
13. failure to convert a temporary employment contract into a permanent one, where the employee had a legitimate expectation that he or she would be offered permanent employment;
14. failure to renew or early termination of a temporary employment contract;
15. harm, including to the reporting person’s reputation, particularly in social media, or financial loss, including loss of business and loss of income;
16. 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;
17. early termination or cancellation of a contract for goods or services;
18. cancellation of a licence or permit; or
19. psychiatric or medical referrals.

ADDENDUM 2

Composition of the Whistleblower Committee and contact details of the members of the Whistleblower Committee

The members of the Whistleblower Committee and their contact information are currently as follows:

Name	Position/function	E-Mail address	Phone number	Possible Reporting language(s)
Christiaan Koreman	Finance Director EMEA of LCI Industries B.V.	ckoreman@lippertcomponents.com	(+31) (6) 83 78 1937	Dutch and English
Matthew Johnston	Group Managing Director, Lippert Marine Group Europe, of Lewmar Limited	mjohnston@lewmarmarine.com	(+44) (0) 23 9248 5818	English
Catriona Betts	Group HR Lead, Lippert Marine Group Europe, of Trend Marine Products Limited	cbetts@trendmarine.com	(+44) (0) 16 9258 4352	English
Noel Power	General Manager of Taylor Made Glass & Systems Limited	noel.power@taylormadesystems.com	(+353) (0) 504 314311	English