

# WHISTLEBLOWING AND WHISTLEBLOWER PROTECTION POLICY

REV: 00000001 November 3, 2025

### 1. PURPOSE

Crown Equipment Corporation and its subsidiaries and affiliates, including without limitation, those listed on Appendix A (collectively "<u>Crown</u>") are committed to maintaining a high standard of ethical business practices and corporate governance. Accordingly, Crown requires its directors, officers, and employees to observe high standards of business conduct and ethics, and to comply with all applicable laws, regulations, and policies that govern Crown's operations.

The purposes of this Whistleblowing and Whistleblower Protection Policy (the "Policy") are to:

- Encourage reporting of suspected or actual, past, present, or future instances of unethical or unlawful behavior relating to Crown;
- Assist in deterring wrongdoing;
- Ensure that anyone who reports wrongdoing in accordance with this Policy can do so safely, securely, and with confidence that they will be protected and supported;
- Provide transparency around the framework for receiving, handling, and investigating reports;
- Support Crown's values and Code of Conduct;
- Support Crown's long-term sustainability and reputation; and
- Meet Crown's legal and regulatory obligations.

#### NOTICE TO EMPLOYEES AROUND THE WORLD

This Policy is intended to provide a global framework for reporting unethical or unlawful behavior at Crown. However, Crown recognizes that laws, regulations, and practices vary across jurisdictions. As a result, it may be the case that in addition to this global Policy, a particular country or region has also implemented a local policy related to whistleblowing activity (See Section 12 for such country or region-specific policies). Where this Policy requires more protection for whistleblowers than local law, practice, and/or local policy, Crown and Crown employees are required to follow this Policy, and where applicable local laws, practice, and/or local policy provide more protection for whistleblowers, Crown and Crown employees are required to follow the applicable local laws, practice, and/or local policy. This global Policy in application shall only by applied to the extent permitted by local laws and regulations.

This Policy is a tool for assisting and encouraging personnel to report any conduct they in good faith believe qualifies as "Reportable Conduct" according to this Policy. Crown encourages its employees and non-employees who are aware of possible Reportable Conduct to have the confidence to speak up.

### 2. TO WHOM DOES THIS POLICY APPLY?

This Policy applies to all Crown employees – permanent, part-time, fixed-term or temporary, interns, secondees, directors, officers, and contingent workers – (each, a "Reporter"). To the extent third parties such as contractors, dealers, suppliers, or others report any conduct they believe in good faith qualifies as "Reportable Conduct" pursuant to this Policy, they will also be treated as "Reporters" under this Policy.

### 3. WHAT IS WHISTLEBLOWING?

Whistleblowing occurs when a Reporter reports information about suspected or actual conduct or activity where the Reporter has a good faith concern, or reasonable belief, that such conduct or activity is or would be:

- Illegal;
- Unethical;
- A breach of Crown's policies, including the Code of Conduct; or
- Dangerous in the workplace.

Each such activity or conduct is referred to in this Policy as "Reportable Conduct". Whistleblowing does not apply to personal grievances about an employee's own employment situation unless the employee has a good faith concern or reasonable belief that there is conduct or activity by or on behalf of Crown that constitutes Reportable Conduct. Crown has separate procedures in place for dealing with individual employee grievances about his/her own personal employment situations. Examples of personal grievances not covered by this Policy include:

- A conflict between a Crown employee and another Crown employee;
- A decision concerning the terms of a Crown employee's employment;
- A decision concerning a Crown employee's promotion or transfer;
- A decision concerning the handling or resolution of a workplace grievance;
- A decision concerning disciplinary action; or
- A decision relating to the termination of a Crown employee's employment.

If a personal grievance arises from a Crown employee raising a concern about Reportable Conduct, it will be covered by this Policy.

### 4. EXAMPLES OF REPORTABLE CONDUCT AND ACTIVITIES

Examples of Reportable Conduct that Reporters are encouraged to report, include, but are not limited to, the following:

- Theft or fraud;
- Threat of violence:
- Discrimination, harassment or bullying;
- Drug or alcohol abuse;
- Unlawful or unethical behavior;
- Safety, health or environmental violations or dangers;
- Inappropriate use of confidential information;
- Falsification of company records;
- Bribery, kickbacks, or acceptance of gifts;
- Conflicts of Crown's interest;
- Inaccurate financial reporting;
- Money laundering;
- Actual or potential breaches of Crown's policies, including the Code of Conduct;
- Violations of law or regulations;
- Violations of human rights;
- · Conduct or activities that may be detrimental to the interests or reputation of Crown; and/or
- Abuse of a position with Crown to obtain personal benefits.

This list is not intended to include all types of Reportable Conduct that should be reported.

### 5. HOW TO MAKE A REPORT?

Crown has always promoted, and will continue to promote, an "Open Door Policy" for employees as well as for third parties, such as contractors, dealers, and suppliers. If an employee is aware of any Reportable Conduct, the employee is encouraged to discuss the concerns with his or her Supervisor, Manager, Human Resources, or Compliance & Ethics. Likewise, Crown encourages third parties to have open and honest discussions with their contacts at Crown and to discuss any activity that they believe is inappropriate with respect to their dealings with Crown.

Crown recognizes that there are times when using the "Open Door Policy" may be uncomfortable or inappropriate. Therefore, Connect with Crown (www.connectwithcrown.com) is available for confidential and

if desired, anonymous, reporting of Reportable Conduct. Connect with Crown is hosted by a third-party hotline provider, Navex/EthicsPoint, and is available 24 hours a day, 7 days a week.

Reports can be made anonymously and still be protected under this Policy and applicable legislation.

### 6. INVESTIGATION OF POTENTIAL MISCONDUCT

Matters raised under this Policy will be received and treated seriously and with the utmost sensitivity. All matters will be dealt with fairly and objectively, in a timely manner, and in accordance with relevant supporting procedures. All reports will be assessed and considered by appropriate Crown personnel who are charged with evaluating the report, deciding whether to proceed with an investigation, and ensuring any investigation is performed in a professional and confidential manner.

Where Crown considers it appropriate, or where legally obliged, feedback will be provided to the Reporter regarding the investigation's progress, outcome, and/or remediation actions taken or to be taken, subject to considerations of the privacy of those against whom allegations are made. Where Crown considers it appropriate, or where required by applicable law, the person accused will be informed.

If a Reporter does not provide his or her name, Crown will assess the content of the report raised under this Policy in the same way as if the Reporter had revealed his or her identity, and any investigation will be conducted as best as possible under the circumstances. However, an investigation may not be possible unless sufficient information is provided, and it may make it difficult to offer the same level of support if Crown does not know a Reporter's identity.

### 7. PROTECTION OF WHISTLEBLOWERS

Crown is committed to ensuring confidentiality and to protecting and respecting the rights of Reporters and ensuring any Reporter who makes a report based on reasonable grounds is treated fairly and does not suffer any retaliation.

### Protecting a Reporter's identity and confidentiality

If a Reporter would like to report on an anonymous basis, the Reporter may report through Connect with Crown (<a href="www.connectwithcrown.com">www.connectwithcrown.com</a>), which is designed to protect the Reporter's anonymity. During an investigation, people who are believed to be able to provide information relevant to the Reportable Conduct being investigated may be contacted and interviewed. Therefore, a Reporter should be prepared that Crown personnel may contact her or him in such circumstances being unaware of the Reporter's identity. In any case, retaliation against someone who has reported, in good faith, or participates in an investigation of misconduct, is strictly prohibited.

Even if a Reporter does not request to be anonymous, steps will be taken to protect a Reporter's confidentiality to the extent possible. For example, the Reporter's concerns will be overseen and investigated by suitably qualified and appointed investigators, and all files and records created that relate to a whistleblower report or an investigation will be securely and confidentially stored.

However, in practice, other people may come to know the Reporter's identity by the information alone and this is beyond Crown's control.

### **Protection from retaliation**

Retaliation against a person who has reported Reportable Conduct in good faith, or cooperates in an investigation of Reportable Conduct, will not be tolerated. If a Reporter has made a report in good faith, all reasonable steps will be taken to protect the Reporter and those who cooperate in an investigation from retaliation, and Crown will take appropriate action where any such retaliation is identified. A report made in good faith means that the report has been made honestly for the purpose of allowing the concerns to be addressed and not for some improper motive. Retaliation includes dismissal, demotion, harassment,

discrimination, disciplinary action, bias, threats, or other unfavorable treatment resulting from making a report or for cooperating in an investigation of Reportable Conduct.

Any retaliation is a serious offense and will result in disciplinary action, which may include termination of employment. If a Reporter or someone who assisted in an investigation of Reportable Conduct believes he or she is being or has been subjected to retaliation because of a report based on reasonable grounds under this Policy, he or she should inform any of the Crown contacts listed in <u>Section 10</u>.

#### **Data Protection**

Any personal information collected in administering this Policy will be treated and processed in accordance with applicable privacy policies, laws, and regulations.

# 8. DUTIES OF ALL EMPLOYEES IN RELATION TO POTENTIAL MISCONDUCT

Any Crown employee who has good faith concerns about suspected or actual Reportable Conduct is encouraged to report those concerns promptly and without delay through one of the methods described in Section 5. Subject to applicable law, deliberate or willful failure to report may result in disciplinary action.

### 9. OUTCOME OF INVESTIGATIONS AND REPORTING PROCEDURES

Where an investigation identifies a violation of law, Crown values, or policies, appropriate disciplinary action may be taken. This may include, but is not limited to, terminating or suspending the employment or engagement of the person(s) involved in the matter. If the investigation reveals that there has been a suspected or an actual breach of the law, Crown may refer the matter to the relevant legal authority, including law enforcement agencies.

# 10. CONTACTS FOR ADDITIONAL INFORMATION ABOUT THIS POLICY AND WHISTLEBLOWING GENERALLY

At any time before or after a Reporter reports Reportable Conduct under this Policy, additional information about this Policy, how it works and whistleblower information more generally may be obtained by contacting any of the following:

Through Connect with Crown (www.connectwithcrown.com);

By email to compliance@crown.com;

By telephone or email to Crown's Chief Compliance Officer, Crown's Regional Compliance personnel directly (contact information is available on the Crown Intranet Compliance & Ethics page, where available), or Human Resources.

### 11. REVIEW OF POLICY

This Policy will be periodically reviewed and updated.

### 12. REFERENCES

- EU Whistleblower Protection Policy
- Australia HR-01-20 Whistleblower Policy

## **13. REVISION HISTORY**

Revision Number	Summary of Revisions
1.0	First Issuance of Policy – November 3, 2025

### **14. AUTHORIZATION**

### WRITTEN BY:

Name: Sara B. Corona	Title: Vice President and Chief Compliance Officer
Signature: San Cour	Date: November 3, 2025

### APPROVED BY:

Name: John E. Tate	Title: Senior Vice President
Signature:	Date: November 3, 2025

### **APPENDIX A**

Affiliates and Subsidiaries of Crown Equipment Corporation

**ID CASTINGS LLC** 

CROWN EQUIPMENT PTY LTD.

**CROWN HANDLING NV** 

CROWN LIFT TRUCKS DO BRASIL - COMÉRCIO DE EMPILHADEIRAS LTDA

CROWN EQUIPMENT (SUZHOU) CO LTD

CROWN LIFT TRUCKS COMMERCIAL (SHANGHAI) CO LTD

CROWN GABELSTAPLER GMBH & CO KG

CROWN LIFT TRUCKS HONG KONG, LTD

CROWN LIFT TRUCKS S.R.L.

**CROWN EQUIPMENT SDN BHD** 

INDUSTRIAS MONTACARGAS S. DE R.L. DE C.V.

CROWN INTERN TRANSPORT B.V.

**CROWN EQUIPMENT LIMITED** 

CROWN LIFT TRUCKS PHILIPPINES CORP.

CROWN EQUIPMENT (SINGAPORE) PTE. LTD.

CROWN EQUIPMENT KOREA CO., LTD.

CROWN LIFT TRUCKS, S.L.

CROWN EQUIPMENT THAILAND CO., LTD.

**CROWN LIFT TRUCKS LIMITED** 

CROWN EQUIPMENT (VIETNAM) COMPANY LIMITED

**CROWN LIFT TRUCKS ULC** 

CROWN LIFT TRUCKS S.R.O.

This Whistleblowing and Whistleblower Protection Policy shall be considered a policy of each subsidiary and affiliate of Crown Equipment Corporation and shall be deemed to have been issued by each such subsidiary and affiliate to its respective employees.