



# GLOBAL SPEAK UP POLICY

## IT'S IMPORTANT TO SPEAK UP

Hyster-Yale, Inc. and its subsidiaries (together "Hyster-Yale" or "Company") are committed to the highest standards of ethical and legal business conduct. We are all responsible for being familiar with [Hyster-Yale's Code of Corporate Conduct](#) ("Code of Conduct"), seeking guidance and raising concerns. Our corporate integrity and reputation depend upon the honesty and integrity you bring to Hyster-Yale. You may observe or experience conduct that appears to violate the law, our Code of Conduct, or other Hyster-Yale policies and procedures. In these situations, we encourage you to Speak Up. By doing so, the Company can properly address the issue and take corrective measures if needed. Remaining silent about possible misconduct may worsen a situation and undermine trust. Employees who speak up are protected. We do not tolerate any form of retaliation for speaking up in good faith. Speaking up is essential to the Company's reputation, success, and ability to operate in the global marketplace – both now and in the future.

The purpose of the Speak Up Policy is to explain the process so that employees can confidently raise concerns about suspected misconduct without fear of retaliation. The policy describes what you can expect from Hyster-Yale if you Speak Up and what possible steps will be taken after you raise a concern.

This Speak Up Policy is available to anyone who wishes to raise a concern about possible misconduct within our Company, whether you are working for or on behalf of Hyster-Yale or have or have had some type of business relationship (such as contractors, business partners, dealers, suppliers, shareholders, agents, representatives, and customers).

Suspected misconduct within Hyster-Yale includes any violation of the law, our Code of Conduct, or other Hyster-Yale policies. Specific examples include any of the following:

- Fraud and theft and improper use of Company resources and data
- Violations of competition laws and rules
- Bribery and corruption
- Money laundering or violations of sanction laws
- Inadequate financial or non-financial record keeping
- Conflicts of interest
- Human rights violations
- Environmental, health and safety issues
- Insider trading
- Harassment, discrimination and bullying or hostile workplace
- Non-Adherence to Company policies and procedures.

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- Retaliation against anyone for speaking up in good faith.

You should address any grievances you have in relation to employment, performance, or interpersonal disputes with your direct manager or Human Resources. If you do not feel comfortable reporting these concerns through those channels or would prefer to report anonymously, the additional reporting channels in this Policy are available to you.

Speaking Up is never easy and we recognize that it can sometimes feel simpler to not to get involved. All employees are encouraged to take personal responsibility for reporting possible misconduct and to trust that reporting is the right thing to do. The Company is dedicated to making the reporting process safe, trustworthy, transparent, and fair.

Managers have an even greater level of responsibility and are expected to act as role models and encourage their teams to always act with dignity and respect. They are the first resource for employees who have questions on ethical issues or potential violations of policies. Reporting a concern can be a stressful experience for employees. Managers must foster an open-door environment that makes Speaking Up as easy as possible. Managers should take reported concerns seriously and take action. Managers may be held responsible for their failure to report misconduct or to take steps to address or remediate an issue. Notice to a manager is notice to the Company.

## WAYS TO SPEAK UP

The best and quickest way to get your concerns addressed is to reach out to your direct manager, Human Resources, or the Legal Department. You can also reach out to any manager or leader in Hyster-Yale with your concerns. You can raise concerns about suspected misconduct through a variety of other channels if you don't feel comfortable addressing the issue with your direct manager, Human Resources, or the Legal Department.

**The Hyster-Yale Corporate Compliance Alertline** operates 24 hours a day, seven days a week, and is run by an independent third-party provider. The Alertline is designed to protect your confidentiality and, where applicable, your anonymity, if requested and in accordance with applicable laws. All reports received via the Alertline are routed back to our Company for further handling. You may submit your concern in any of the following ways:

1. **BY PHONE:** call the Hyster-Yale Corporate Compliance Alertline for your country (free of charge). Please see Appendix 1 or click [here](#) for your country specific number and further instructions.
2. **ONLINE:** You may submit your report online at [www.hyster-yale.ethicspoint.com/](http://www.hyster-yale.ethicspoint.com/)
3. **IN PERSON:** You may request a meeting through the Alertline or by contacting your direct manager, Human Resources, or the Legal Department. A meeting in person shall be organized within a reasonable time.

Reports concerning European Union companies or reports from individuals within the European Union may also be made to EU agencies or national designated authorities within the EU if the report concerns a breach of EU laws as listed in the EU Whistleblowing Directive or as defined by the respective national laws. Please contact the Legal department if you need help to identify the appropriate EU authority.

You will receive a unique code called a 'report key' after you complete your report online or by phone. You can use this key to call back or access the website to check the progress of your report as well as obtain any feedback or follow-up questions from the person reviewing your report. You can also provide

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additional information. Your report key is particularly important if you choose to remain anonymous, as we will only be able contact you through the website.

A report can only be thoroughly investigated if it contains sufficient information to proceed. Please provide as much detailed information as possible when you file a report (in person, in writing, online or by phone) to enable our Company to assess and investigate your concern including:

1. The background, history, and reason for the concern
2. Names, dates, places, and other relevant information
3. Any documents that may support your report

The Company encourages you to Speak Up as soon as possible if you know of or suspect misconduct even if you do not have all the facts. Ideally, you would raise the issue for discussion upfront rather than report the issue after damage is done. You are not expected to have all the answers and you are not required to prove that your concern is “correct”. Our investigation teams will investigate the matter to determine if there is a reason for concern. Never investigate the matter yourself and do not seek evidence to build a strong case. No disciplinary measures or other steps will be taken against you if your good faith concern later turns out to be mistaken or misguided.

You are encouraged to seek guidance and ask questions as to whether a situation might constitute a misconduct. All reporting channels outlined in the Speak Up policy can be used to ask for clarification.

## **SPEAKING UP: CONFIDENTIALITY AND ANONYMITY**

All reporting is done confidentially. This means that information about your concern will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside of this limited group if we are required to do so by law or an important public interest is at stake. In principle, the Company might be obliged to inform the implicated person that a complaint has been filed against them. You can help the Company protect confidentiality by being discreet and not discussing your report with people who are not involved in the investigation.

The Company encourages you to identify yourself when filing a report as it is more difficult, and sometimes even impossible, to investigate reports that are made anonymously. Nevertheless, you may choose to remain anonymous (where allowed by the laws of your country). When you provide identifying information, your report will be treated on a confidential basis. and your identity will be protected at all stages of the investigation. Your identity will be kept confidential and protected to the extent possible and will not be revealed to anyone within or outside the Company, except to those individuals who are directly involved in the investigation and/or who have a need to know such information unless otherwise required by law.

Our Company is committed to protecting the privacy of everyone involved and will safeguard personal data from unauthorized access and processing. Any personal data obtained in relation to Speaking Up will only be used for the purposes explained in this policy or to comply with the law or an important public interest. Please find more details on the protection, processing and transfer of personal data, data security measures, and data subject access rights for employees in the [Employee Privacy Policy](#) and for non-employees in the [External Privacy Policy](#).

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Calls and on-line reports to the Hyster-Yale Corporate Compliance Alertline are received on behalf of Hyster-Yale by a third party. Your personal information may also be processed on a need-to-know basis by employees operating outside the EEA who work for Hyster-Yale. Whenever we transfer your personal data out of the EEA and/or to third parties, we ensure a similar degree of protection is afforded to it by the UK and EU GDPR.

## SPEAKING UP: NON-RETALIATION

Retaliation is any action, consequence or punishment imposed on an employee for engaging in a protected activity, such as raising a concern, participating in an investigation, or for refusing to engage in behaviour that would violate Hyster-Yale values, Code of Conduct, or other policies and procedures. It is also retaliation if an action against you is reasonably likely to deter you from Speaking Up and reporting misconduct. Retaliation is not always “direct” or obvious, like termination, fewer hours, reassignment, or harassment. Sometimes retaliation can be “indirect” or “soft” – for example suddenly experiencing increased scrutiny while on the job, having projects reassigned, or being intentionally left out of team social events. You can always use the reporting channels in this policy to raise concerns about any type of retaliation – direct or indirect. Any form of threat or retaliation will not be tolerated and will be treated as a violation of our Hyster-Yale Corporate Code of Conduct and may lead to disciplinary measures.

The Company encourages and supports the open discussion and good faith reporting of genuine concerns and (suspected) misconduct even if the employee is mistaken. Employees are always protected when they address a concern in good faith. “Good faith” means making a report with honest intentions and providing all relevant information, it does not mean that you need to be “right” about any concerns you raise. This includes Speaking Up when something “feels wrong”. In all instances, you should not perform your own investigations but instead leave the investigating to our Legal, Compliance and Human Resources teams.

You will not be at risk of losing your job or receiving discipline when reporting in good faith what you reasonably believe to be a dishonest, fraudulent, unethical, or illegal act, malpractice, or wrongdoing. You should inform your direct manager, Human Resources, the Legal Department, or the Chief Compliance Officer if you believe that you or anyone else has experienced retaliation. You may also report retaliation via the Alertline. Anyone involved in any retaliation actions against a reporting employee may be subject to disciplinary action.

It is a violation of our Hyster-Yale Corporate Code of Conduct to knowingly make a false accusation. Doing so may lead to disciplinary measures. You will not be protected under the non-retaliation principle if you maliciously raise a concern that you know is false or if we conclude that you have made false allegations maliciously or with a view to personal gain. You may be subject to appropriate disciplinary and/or legal action if you misuse this Policy.

## WHAT HAPPENS AFTER I SPEAK UP?

Our Company takes every report of possible misconduct seriously.

Depending on the nature, urgency and potential impact of your concern, the case is assigned to appropriate personnel which may include the Legal Department, the Internal Audit Department and/or Human Resources, along with the Chief Compliance Officer. Hyster-Yale may also engage third party service providers to assist in the investigation if specialist advice is required to respond to the report.

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. Providing untruthful statements or purposely omitting relevant facts can lead to disciplinary measures. Delaying, interfering with, or refusing to cooperate with an investigation may also lead to

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disciplinary measures. All parties involved, including the accused, are entitled to confidentiality to avoid unnecessary damage to their reputation.

Please remember to keep the details of the investigation confidential. If anyone asks you what the investigation was about, please respond by telling them that you were advised to keep it confidential.

You may not attempt to influence the investigation by trying to persuade or to support a particular viewpoint. You are prohibited from altering, destroying, or removing any evidence relating to the issues that you know or believe may be relevant.

At the conclusion of the investigation, you may or may not be included in any review of the findings. What we share is limited and may vary by your involvement.

Please inform a member of your local Legal Team if you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly.

## MORE INFORMATION

Please contact any of the following if you have questions related to the Speak Up Policy or if you need assistance:

- Your direct manager, Human Resources, or the Legal Department.
- Any other manager at Hyster-Yale
- The Hyster-Yale Corporate Compliance Alertline [www.hyster-yale.ethicspoint.com](http://www.hyster-yale.ethicspoint.com)

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## APPENDIX 1: COUNTRY-SPECIFIC ADDENDA

### Alertline Numbers

Country	Alertline Number
United States	1-800-514-6268
Australia	1800-519-460
Brazil	0800-891-4386
Canada	1-800-514-6268
China	400-6-612-670
Czech Republic	800-144-305
Finland	0800-9-12761
Germany	0800-182-1023
France	0800-91-3674
India	000-800-919-1268
Italy	800-897-501
Japan	0800-123-7073
Malaysia	1-800-81-2710
Mexico	800-681-9294
Netherlands	0800-022-5971
Philippines	1800-1-322-0358
Poland	800-005-014
Portugal	800-181-413
Russia	8-800-301-83-52
Singapore	800-110-2391
South Africa	080-098-1144
Spain	900-876-152
Sweden	020-12-72-97
Taiwan	00801-49-1657
United Kingdom	0800-249-4571