



## **ANONYMOUS WHISTLE BLOWER POLICY PUBLISHED 2025**

The Company is committed to the highest possible standards of ethical, moral, and legal business conduct. In conjunction with this commitment and the Company's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns anonymously about suspected or actual occurrence(s) of illegal, unethical, or inappropriate events described in the Employee Handbook (behaviors or practices) without retribution.

This policy is intended to cover serious legal and ethical concerns, or other inappropriate conduct, which could have a significant impact on the Company, including, but not limited to, actions that:

- May involve questionable accounting, violations of internal accounting controls, any other auditing or financial matters, or the reporting of fraudulent or incorrect financial information.
- Are unlawful.
- Are not in line with Company policy, including the Code of Business Conduct, and/or otherwise amount to serious improper conduct.

Examples of illegal or unethical activities covered by this policy are violations of federal, state, or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. Regular business matters that do not require anonymity should be directed to the Employee's Supervisor or VP - Human Resources and are not addressed by this policy.

### **PROCEDURE**

Employees can anonymously report serious concerns relating to financial reporting, unethical, or illegal conduct in either of the following ways:

- Via [www.lighthouse-services.com/sealynet](http://www.lighthouse-services.com/sealynet) ; or
- Fax alternative for written documents: 215.689.3885 (must include the Company name with Report)

Employees who make reports via the Hotline (866-860-0008) can remain anonymous if they choose. Please note, however, that the information provided may be the basis of an internal and/or external investigation into the issue(s) reported. Information disclosed during the investigation will, to the extent practical and appropriate, remain confidential, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable Law.



Employment-related or other concerns, as noted in the Employee Handbook, should continue to be reported through your usual channels, such as your supervisor or VP – Human Resources. The earlier a concern is expressed, the easier it is for us to act.

A party who knowingly and intentionally files a false report or provides false or deliberately misleading information in connection with an investigation of a report may face disciplinary action, up to and including termination of employment or legal proceedings.

### **HOW THE REPORT WILL BE HANDLED**

Reports will be taken seriously and will be promptly and thoroughly investigated. The specific action taken in any case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation.

Upon receipt of a report pursuant to this policy, the Company will make initial inquiries to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Whether reported directly to the Company personnel or through the Hotline, a whistleblower under this policy may be entitled to the following updates regarding their concerns:

- Acknowledgment that the Report was received.
- An estimate of the time that it will take for a final response.
- An update on whether initial inquiries have been made, and/or guidance on whether further investigations will follow.

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the Employee remains accessible for follow-up. The Company reserves the right to determine what information, if any, the whistleblower will be provided regarding the outcome of an investigation, unless otherwise required by applicable Law.

The Company reserves the right to modify or amend this policy at any time it may deem necessary. Notwithstanding anything to the contrary set forth in this policy, pursuant to the Defend Trade Secrets Act of 2016 (18 U.S.C. § 1833(b)(1)), no individual shall be held criminally or civilly liable under federal or state Law for the disclosure of a trade secret that: (1) is made (x) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (y) solely for the purpose of reporting or investigating a suspected violation of Law; or (2) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.



This policy provides a mechanism for employees to report concerns, allowing the Company to promptly investigate and address any issues as soon as possible. However, nothing in this policy is intended to prevent an employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that a federal or state statute has been violated. A report to law enforcement, regulatory or administrative agencies may be made instead of, or in addition to, a report directly to Sealy and Company through any reporting method specified in this policy.

If requested, the Company may also ask that you provide truthful information in connection with an inquiry or investigation by a court, an agency, law enforcement, or any other governmental body.

### **SAFEGUARDS**

Sealy & Company strictly prohibits and does not tolerate unlawful retaliation against any employee for making a good faith report pursuant to this policy or otherwise cooperating in an investigation of a whistleblower complaint. All forms of unlawful retaliation are prohibited, including any form of adverse action, discipline, threats, intimidation, or other form of retaliation for reporting on or complying with this policy.