# Speak-Up Anti-Retaliation Policy

HARMAN COMPLIANCE
CONNECTED BY INTEGRITY

## Purpose

HARMAN International, Incorporated. and all of its businesses and subsidiaries worldwide ("HARMAN" or the "Company") is committed to creating a speak-up culture where our employees, officers, and directors (collectively, "HARMAN Personnel") are confident and comfortable raising concerns and reporting suspected legal or policy violations in good-faith, without fear of retaliation or reprisal. This Speak Up and Anti-Retaliation Policy ("Policy") provides further details of this commitment.

## Scope & Applicability

This mandatory Policy applies to all HARMAN Personnel and non-compliance may, consistent with applicable law, result in disciplinary action up to and including termination. Where local law conflicts with or provides additional protections to HARMAN Personnel, including but not limited to the European Union Whistleblowing Directive (2019/1937), the Company will comply with local law.

## Policy Statement

HARMAN encourages and expects HARMAN Personnel to speak up and report, in good faith, any behavior or conduct which may be illegal, wrongful, unethical, or in violation of our Code of Conduct ("Code") or Company policies and procedures.

The Company strictly prohibits retaliation and threats of retaliation against any HARMAN Personnel who, in good faith:

- make a report or complaint
- raise a concern or inquiry
- provide information, or
- participate or assist in any inquiry, investigation, or proceeding

regarding any actual or suspected ethical lapse, misconduct, or violation of our Code, Company policies or procedures, or applicable laws, rules, or regulations ("Protected Activity").

Retaliation occurs when adverse action is taken against an individual as retribution for engaging in Protected Activity and may include any form of discipline, reprisal or intimidation.

Individuals engaging in retaliatory conduct may be subject to disciplinary action, up to and including termination.

This Policy does not exempt any self-reporting individual from the consequences of his or her own misconduct.

## Raising Concerns

All HARMAN Personnel must immediately report any potential, suspected, or actual violations of this Policy to their manager, Human Resources at HRCorporate@HARMAN.com, Legal & Compliance at compliance@harman.com, or via the HARMAN Ethics Hotline. All reports will be treated as confidential to the extent possible and as permissible by law. The Company will accept and review anonymous reports where permitted by local law.

HARMAN will conduct fair and thorough investigations of all reports received consistent with applicable law. After investigations are completed, appropriate next steps, if applicable, will be taken *(e.g. training, process improvements, discipline, etc.)*, and reporters will be notified about the investigation completion, but not specific details.

**HARMAN Whistleblower Hotline**

- Online at speakup.harman.com
- By Phone: +1 (800) 563-4037 (U.S.). If dialing internationally, please visit the speakup.harman.com, click call now and select your country location
- By email to compliance@harman.com
- Available 24/7
- Reports can be made anonymously (where permitted by law)

## Policy Oversight & Questions

The Legal and Compliance Department has overall responsibility for oversight, implementation, and enforcement of this Policy. Questions regarding this Policy should be directed to the Legal and Compliance Department at compliance@harman.com

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| **Author:** Kymberly Reeves, VP EIP | **Approver:** Tamika Frimpong, CLCO |

### Change History

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