

Date Released: 16-SEP-2021		Rev: A
Doc Title: Complaints and Concerns		
Function/Owner: Legal/Corporate Compliance	Policy Number: 10.4	
Formerly: "Report of Complaints or Concerns," 09/01/2016, Policy		licy Description

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1.0 PURPOSE:

The purpose of this policy is to define Albany International Corp.'s ("Albany" or the "Company") process and manner by which reported complaints and concerns are addressed.

#### **2.0 SCOPE:**

This policy applies to all Company employees, managers, officers, consultants and contractors, including those of Company subsidiaries where-located.

#### 3.0 DEFINITIONS:

Term / Acronym	Definition
N/A	N/A

#### 4.0 POLICY:

The Company takes all reports of misconduct and policy violations seriously and seeks to address any misconduct as early as possible and prevent the recurrence of future situations. The Company will appropriately review or investigate all claims of misconduct or wrongdoing brought to its attention, regardless of the reporting channel, and will take appropriate steps (disciplinary or otherwise) to review or investigate and address policy violations.

Any employee who has a concern or complaint regarding:

- A possible violation by others of the Company's Business Ethics Policy or the Code of Ethics for the Chief Executive Officer, the Chief Financial Officer and the Controller;
- Questionable accounting or auditing matters or internal controls; or

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 A possible violation by the Company of any law, regulation or rule to which it is subject, must report such concern or complaint.

Reports may be made by telephone communication and directed to the following:

- Chairman of the Audit Committee: +1 (518) 445-2206
- Chief Executive Officer: +1 (603) 330-5877
- General Counsel: +1 (518) 445-2277

Written communications to such persons should be sent to the following address:

Albany International Corp.
216 Airport Drive, Rochester, New Hampshire
03867 USA

An employee of the Company, or a subsidiary, who receives an oral or written report, including an anonymous report, shall promptly forward such written report or communicate such oral report to:

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- an Appropriate Senior Supervisor; or
- one of the persons listed above.

A Senior Supervisor who receives a report from an employee shall promptly forward the written report or communicate the oral report to

- an Appropriate Senior Supervisor; or
- one of the persons listed above.

For purposes of this policy, the term "Senior Supervisor" shall mean, with respect to any employee, a person whose responsibilities include the direct or indirect supervision of such employee, and the term "Appropriate Senior Supervisor' shall mean, with respect to any employee, a Senior Supervisor who such employee reasonably believes will comply with this policy in forwarding or communicating the report.

Reports may also be made to Ethics Point (in one's preferred language and either anonymously or on a named basis) using www.ethicspoint.com or calling a number listed below. Country numbers not listed below may be found on the website.

Location	Contact Information
USA and Canada	999-291-7592
Brazil	(ITFS) 0880-892-0732
China	(GIS) 4006012616
France	(ITFS) 0800-91-0608
Italy	(ITFS) 800-792909
Mexico	(ITFS) 001-844-565-4533
South Korea	(ITFS) 00308-13-3068
Sweden	(GIS) 0201408112
United Kingdom	(ITFS) 0808-234-2944

All reports will be treated as confidential and will carry no risk of retribution if made in good faith. Any Company personnel who take any action in retaliation against a person who, in good faith, makes a report will be subject to serious discipline. Nevertheless, any person may, if he or she prefers, make a report anonymously.

## 4.1 European Addendum

This addendum supplements the Complaints and Concerns policy for directors, officers, and employees in the European Union ("European Personnel") only. In case of a conflict between the Policy and this addendum, this addendum will prevail, subject to applicable law.

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# 4.1.1 Scope and Purpose

European Personnel may only report:

Possible violations of or complaints or concerns about matters relating to the "Accounting and Financial Reporting" section of the Company's Business Ethics Policy, as well as any other possible violation of or complaints or concerns about matters relating to accounting, internal accounting controls, auditing, and bribery; any other matters if a vital interest of the Company or when the physical or moral integrity of its personnel is at risk, including without limitation possible violations of laws or regulations relating to corruption, money laundering, terrorism, or environmental and health matters.

## 4.1.2 Optional Policy

The reporting of complaints and concerns by European Personnel is optional.

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### 4.1.3 Confidentiality and Anonymous Reporting

European Personnel are, in principle, encouraged to make reports on a name basis. The identity of the person making a report under this Policy will remain confidential and will not be disclosed to third parties, in particular to the reported person or the reporting parties' supervisors. The person making the report should, however, be aware that his or her identity may need to be disclosed to the persons in charge of investigating the reported violation or involved in any subsequent judicial proceedings. The making of a report will carry no risk of retribution if the report is made in good faith. European Personnel may, however, prefer, considering the circumstances, to make a report on an anonymous basis. Such reports will be processed as an exception to the principle that European Personnel are encouraged to report on a named basis.

### 4.1.4 Retention of Data

Data concerning European Personnel obtained through a report made outside the scope and purpose of this Policy will be deleted without delay.

Personal data processed in connection with the investigation of a report will be deleted within two months of completion of the investigation of the facts alleged in the REPORT. In the event that legal proceedings or disciplinary measures are initiated against the reported person or the person making the REPORT in the case of false or abusive reporting, such period will be extended until the conclusion of these proceedings and the period allowed for any appeal.

### 4.1.5 Notification

Following the preliminary investigation of the REPORT, European Personnel concerned by the REPORT and/or the investigation will be notified as soon as practicably possible. When, however, protective measures are required, including without limitation to preserve evidence by preventing its destruction or

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alteration by the reported person, notification to the reported person may be deferred until after such protective measures are implemented.

The reported European Personnel will be informed about (i) the name of the person in charge of investigating the REPORT; (ii) the names of the persons, departments or services within the Company which may receive a copy of the REPORT or information about the investigation; (iii) the facts he or she is accused of; (iv) the reported European Personnel's rights of access to, and of rectification of personal data and how to exercise such rights; and (v) the transfer of his or her personal data out of the EU. The reported person has the right to object to the processing of the personal data for compelling legitimate reasons.

## 4.1.6 Rights of Access and Rectification

Subject to the foregoing, reported European Personnel can access their registered data in order to check its accuracy and rectify it if they are inaccurate, incomplete or outdated. The exercise of these rights may, however, be restricted in order to ensure the protection of the rights and freedoms of others involved. The reported person cannot obtain information about the identity of the party making the REPORT, except where the latter knowingly reported false allegations of misconduct.

## 4.1.7 Reporting Methods

European Personnel may report violations to:

Chairman of the Audit Committee: +1 (518) 445-2206

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Chief Executive Officer: +1 (603) 330-5877

General Counsel: +1 (518) 445-2277

The foregoing policy is designed, at a minimum, to comply with any relevant national, provincial, state, local, federal or other requirements having the force of law. In the event of any conflict between this policy and any such requirement, such requirements shall govern.

## **5.0 FREQUENCY OF REVIEW AND UPDATE:**

The Legal Department and the Assistant General Counsel will review the policy annually to determine if updates are needed, as well as to assess organizational compliance with the policy.

### **6.0 ADDITIONAL POLICIES TO CONSIDER:**

- Business Ethics Policy
- Workplace Investigations
- Records Retention

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