

**WEYCO GROUP, INC.**  
**PROCEDURES FOR HANDLING**  
**COMPLAINTS AND CONCERNS REGARDING**  
**ACCOUNTING OR AUDITING MATTERS**  
*Last Updated: February 2022*

Weyco Group, Inc. (the “Company”) desires to cultivate an open and effective channel for employees, outsiders, management, advisers and others to communicate on a confidential and anonymous basis, complaints and concerns regarding accounting, internal accounting controls and auditing matters. In order to cultivate this atmosphere and assure that Company management and the Audit Committee are aware of any issues, concerns, or problems regarding accounting, internal accounting controls and/or auditing matters, the Company, through its Audit Committee, has established the following procedures:

- Submitting Complaints and Concerns. Any person who becomes aware of, concerned about, or suspicious of any improper or questionable accounting, internal accounting controls or auditing matters, or otherwise has any concerns regarding any accounting, internal accounting controls or auditing matters of the Company, may communicate those complaints or concerns in the following manner:
  - Submittal. Anyone who desires to submit a complaint or concern may do so by contacting the Chairman of the Audit Committee by mail, phone, or email, as follows:

Frederick P. Stratton, Jr., Chairman of Audit Committee  
10134 N. Port Washington Road, #2B  
Mequon, WI 53092

Phone: 414-899-6760  
E-mail: stratton.fred@lafayettellc.com

The submitter should provide enough information so that the Audit Committee may follow-up meaningfully on the complaint or concern, including, if the submitter desires, the manner in which the Audit Committee may contact the submitter for further follow-up.

- Anonymous Submittal. Anyone who desires to submit a complaint or concern on an anonymous basis may do so by sending an *unsigned* letter by mail to the Chair of the Audit Committee at the address indicated above. *The anonymous sender should be careful not to sign the letter or to include his/her return address.*
- Confidential Treatment. Although all complaints and concerns will be treated with care and respect [**and the identity of the submitter will be kept confidential (whether or not the complaint or concern is submitted anonymously)**], if the submitter desires any special confidential treatment, he/she should indicate the extent and manner in which he/she desires any information to be treated confidentially.

- Follow-up. Any person who has submitted a complaint or concern and believes that his/her concern has not been adequately addressed may submit a follow-up complaint or concern and/or request that the Company verify that it has received the complaint or concern and has taken appropriate action. In such event, the Company will notify the submitter (unless the submittal was anonymous) that the Company has received the complaint or concern and that such action, if any, that the Company deems appropriate has been or will be taken. The Company is not obligated to inform the submitter of any specific action that may have been or may be taken in response to a complaint or concern. Except as required by applicable law, rule, regulation, judicial process or these procedures, the Company is not obligated to inform any person of any complaint or concern received regarding accounting, internal accounting controls or auditing matters or of any action that may have been or may be taken to address any such complaint or concern.
  
- Receipt, Retention and Treatment of Complaints and Concerns.
  - Chair's Report to Audit Committee. The Chair of the Audit Committee shall, on a regular basis, and whenever requested by the Audit Committee, provide the Audit Committee with a report of all the complaints or concerns received regarding accounting, internal accounting controls and/or auditing matters since the Chair's previous report. Such report may be in summary form or in such other form as the Audit Committee may request from time to time. The Audit Committee is free to make further inquiries on its own regarding any complaint or concern.
  
  - Record Keeping. The Chair of the Audit Committee will keep a record of all complaints and concerns received. The records shall be kept in a confidential manner and shall be retained for a period of time determined by the Audit Committee.
  
  - Investigation and Recommendation. The Audit Committee and/or its designee will review all complaints and concerns received and undertake any investigation and/or follow-up that the Audit Committee and/or its designee deems necessary or advisable to understand the allegations or concerns and to recommend appropriate action to the entire Audit Committee and/or the Board of Directors. The Audit Committee and/or its designee may enlist the assistance of management, any employee or any outside person or agency (including, without limitation, outside counsel or other advisors selected by the Audit Committee in its sole discretion) in undertaking any such investigation and/or in determining what action if any is recommended or is to be taken, and shall have full authority to pay related fees and expenses.
  
  - Action To Be Taken. Based on the facts and circumstances, the Audit Committee may take or cause to be taken any action that the Audit Committee deems necessary or appropriate to address any complaint or concern. In any event the Audit Committee shall take or cause to be taken any action required by law, rule, regulation or judicial process. The Audit Committee shall, on a regular basis, report to the Board of Directors regarding any complaints and concerns that the Company has received

regarding accounting, internal accounting controls and/or auditing matters and any action that the Audit Committee has recommended or directed to be taken.

- No Retaliation. Under no circumstances will any action be taken against a person who has submitted a complaint or concern regarding accounting, internal accounting controls and/or auditing matters, for bringing any such matter or concern to the Company's attention. However, this protection shall not shield the submitter from any action that may be taken against the submitter for any act or omission of the submitter in the underlying questionable or wrongful activity.