



GKN AEROSPACE
ANTI-BRIBERY & CORRUPTION SUMMARY POLICY

Document Owner		Document Approver	
Name	Julie Smyth	Name	Julie Smyth (on behalf of AEC)
Title	General Counsel	Title	General Counsel
Date	July 2022	Date	July 2022
Signature		Signature	

Doc Ref:	Issue:	Date:	Owner & Role Title:	Approved by & Role Title:	
COMP-POL-SUM-11	1	July 2022	Julie Smyth General Counsel	Julie Smyth (on behalf of AEC) General Counsel	Page 1 of 4

1. POLICY STATEMENT

- 1.1 One of the fundamental principles of GKN Aerospace is to conduct all of its business in an open, honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships, within all jurisdictions in which we operate.
- 1.2 GKN Aerospace operates a strict Anti-Bribery & Corruption Policy (“**the ABC Policy**”) which prohibits all forms of bribery and corruption, to ensure that its expectations are clear to all who work for and with GKN Aerospace.
- 1.3 This Summary Policy is a summary of the key provisions of the ABC Policy.

2. APPLICATION

- 2.1 The Summary Policy and the ABC Policy apply to all individuals working at all levels of GKN Aerospace, including officers, directors, senior managers, employees (whether permanent, fixed-term, or temporary), contractors, trainees, casual workers/agency staff, or any other person working for GKN Aerospace throughout the world (collectively referred to as “**Company Employees**”).
- 2.2 GKN Aerospace expects any suppliers and those who perform services for or on behalf of GKN Aerospace, for example, agents, advisers, consultants, contractors, and freight forwarders (referred to as “**External Associates**”) and persons, companies or entities with whom we enter into a joint venture, consortium or similar relationship (referred to as “**Relevant Joint Venture Partners**”) to comply with the ABC Policy and the Summary Policy and to not engage in acts of bribery.

3. WHAT IS BRIBERY?

- 3.1 Bribery is the offering, promising, giving, accepting or requesting anything of value in order to influence the decision-making of another person. Bribery generally entails the giving of personal advantages to an individual to influence them to act in an improper way in relation to the organisation they work for or represent.
- 3.2 Under the UK Bribery Act 2010 and US Foreign Corrupt Practices Act of 1977 (and the laws of other countries), bribery of foreign public officials is a specific crime. Under UK law, any advantage given to a foreign public official or to a third person with an intention of influencing the official in the course of their public functions is a bribe even if they carry out those functions properly.
- 3.3 For the purposes of the ABC Policy and the Summary Policy, the term “Public Official” is defined broadly to include: (i) officials, whether elected or appointed, who hold a legislative, administrative or judicial position of any kind; (ii) any person who performs public functions in national, local or municipal government; (iii) any person who exercises a public function for a public agency or enterprise, such as public health agencies; (iv) any official or agent of a public international organisation such as the UN or the World Bank; (v) any political candidate, political party, or political party official, or (vi) any person acting on behalf of any government, including entities such as state-owned businesses.

Doc Ref:	Issue:	Date:	Owner & Role Title:	Approved by & Role Title:	Page 1 of 4
COMP-POL-SUM-11	1	July 2022	Julie Smyth General Counsel	Julie Smyth (on behalf of AEC) General Counsel	

4. FACILITATION PAYMENTS

4.1 Facilitation payments are relatively small, unofficial payments made to secure or expedite a routine government action by a Public Official (such as speeding up imports or exports through customs). Facilitation payments are a form of bribery and are illegal in most countries in the world. Facilitation payments are prohibited by GKN Aerospace under the ABC Policy and the Summary Policy.

5. GIFTS, ENTERTAINMENT AND HOSPITALITY

5.1 Gifts, entertainment and hospitality must not to be given or received with the intention of influencing the recipient in order to obtain or retain business or a business advantage.

5.2 Dealings with Public Officials are high-risk from a bribery perspective. Gifts, entertainment or hospitality should not be offered to, or accepted from, Public Officials.

5.3 The requirements which will need to be met to give or receive a gift, entertainment or hospitality, including relevant thresholds, required approvals and the requirement to record details of all gifts, entertainment and hospitality in the Gifts, Entertainment and Hospitality Register, can be found within the ABC Policy.

6. DONATIONS – POLITICAL, CHARITABLE AND SPONSORSHIP

6.1 No political donations should be offered to any individuals or organisations on behalf of or otherwise paid for by GKN Aerospace, including, without limitation, payments to political action committees.

6.2 Charitable contributions and/or sponsorship may never be used to confer a personal benefit on a Public Official or business contact and must not be made in order to seek an improper benefit or to influence a decision maker.

6.3 The requirements which will need to be met in order to make a charitable donation or sponsorship, and the associated approval process, including due diligence on any charity, required sign offs and the requirement to record details of all donations in the Charitable Donations and Sponsorship Register, can be found within the ABC Policy.

7. LOBBYING

7.1 Engaging in any political activity or lobbying (except as first approved by the External Relations team and as permitted by any applicable guidelines published by the Legal and Compliance Function from time to time) on behalf of GKN Aerospace, or which might reasonably be regarded as being on behalf of GKN Aerospace, is not permitted.

7.2 This is not intended to prevent Company Employees from carrying out a local civic / public service role in their personal time, provided: (1) it is either unpaid or any pay is nominal / set by law or regulation / covers reimbursement of expenses, and (2) in no way puts or could put the employee or a Public Official in a situation of actual or potential conflict with GKN Aerospace's interests.

Doc Ref:	Issue:	Date:	Owner & Role Title:	Approved by & Role Title:	Page 2 of 4
COMP-POL-SUM-11	1	July 2022	Julie Smyth General Counsel	Julie Smyth (on behalf of AEC) General Counsel	

8. COMPLIANCE MEASURES

8.1 GKN Aerospace has in place a compliance programme which includes top-level commitment; policies and processes; risk assessments; third party due diligence; communication and training; and risk reviews and monitoring.

8.2 GKN Aerospace expects its External Associates and Relevant Joint Venture Partners to have in place comparable compliance measures and to support GKN Aerospace's compliance programme.

9. BOOKKEEPING AND ACCOUNTING

9.1 Books, records and accounts must be kept which accurately and fairly reflect all transactions.

10. CONSEQUENCES OF NON-COMPLIANCE

10.1 In all the countries in which GKN Aerospace operates, bribery is illegal and is punishable by serious fines and imprisonment. GKN Aerospace would also suffer from serious reputational damage as a further consequence.

10.2 GKN Aerospace may take appropriate disciplinary action, up to and including termination of employment, against any Company Employee who fails to comply with the ABC Policy and this Summary Policy.

10.3 GKN Aerospace may cease to continue working with an External Associate who it believes to have breached the ABC Policy and this Summary Policy.

10.4 In addition, a Company Employee or External Associate who breaks the law may be reported to the police and/or relevant bribery/corruption authorities.

11. HOW TO RAISE A CONCERN

11.1 If Company Employees suspect that the ABC Policy or this Summary Policy has been breached, they should speak to their line manager, HR contact or Head of Legal.

11.2 Company Employees can also make a disclosure through the GKN Aerospace Disclosure Hotline.

11.3 External Associates should speak to their GKN Aerospace contact or the General Counsel of GKN Aerospace; or email: speaking.up@gknaerospace.com.

11.4 GKN Aerospace encourages openness and will support anyone who raises genuine concerns even if they turn out to be mistaken. All concerns will be investigated. GKN Aerospace is committed to ensuring that no Company Employee suffers any detrimental treatment as a result of refusing to take part in bribery or corruption and/or for raising a concern.

Doc Ref:	Issue:	Date:	Owner & Role Title:	Approved by & Role Title:	Page 3 of 4
COMP-POL-SUM-11	1	July 2022	Julie Smyth General Counsel	Julie Smyth (on behalf of AEC) General Counsel	