


GKN AEROSPACE

ANTI-MONEY LAUNDERING

SUMMARY POLICY

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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 money laundering and take seriously the responsibility of ensuring our business is not used for the purposes of money laundering.
- 1.2 GKN Aerospace operates a strict Anti-Money Laundering Policy (“the **AML Policy**”).
- 1.3 This Summary Policy is a summary of the key provisions of GKN Aerospace’s AML Policy.

2. APPLICATION

- 2.1 The AML Policy and the Summary 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 AML Policy and the Summary Policy and to not engage in or facilitate money laundering.

3. WHAT IS MONEY LAUNDERING?

- 3.1 Money laundering is the process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently, or recycled to fund further crime. The "proceeds of crime" are, broadly speaking, money or other property which results from any criminal conduct, including (for example) bribery and corruption, fraud, tax evasion, modern slavery, and breaches of criminal competition laws.

4. COUNTERPARTY DUE DILIGENCE

- 4.1 As part of our commitment to prevent money laundering, GKN Aerospace completes risk-based counterparty due diligence on all of its customers, vendors, and other counterparties. The due diligence process is set out in the AML Policy.
- 4.2 It is the responsibility of each Business Line to follow the due diligence process with respect to its customers, and Procurement to follow the process with respect to External Associates.

5. BOOKKEEPING AND ACCOUNTING

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

6. CONSEQUENCES OF NON-COMPLIANCE

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

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- 6.2 GKN Aerospace may take appropriate disciplinary action, up to and including termination of employment, against any Company Employee who fails to comply with the AML Policy and this Summary Policy.
- 6.3 GKN Aerospace may cease to continue working with an External Associate who it believes to have breached the AML Policy and this Summary Policy.
- 6.4 In addition, a Company Employee or External Associate who breaks the law may be reported to the police and/or relevant money laundering authorities.

7. HOW TO RAISE A CONCERN

- 7.1 If Company Employees suspect that the AML Policy or this Summary Policy has been breached, or they have a concern about the proceeds of crime being received or transferred they should speak to the Head of Legal.
- 7.2 Company Employees can also make a disclosure through the GKN Aerospace Disclosure Hotline.
- 7.3 External Associates should speak to their GKN Aerospace contact or the General Counsel of GKN Aerospace; or email: speaking.up@gknaerospace.com.
- 7.4 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 for raising a concern.

8. TIPPING OFF AND PREJUDICING INVESTIGATIONS

- 8.1 Many of the jurisdictions in which GKN Aerospace does business impose offences relating to activities that could prejudice money laundering investigations by law enforcement and regulatory authorities.
- 8.2 If there is a suspicion that someone is engaged in money laundering, GKN Aerospace expects these to be raised in accordance with section 7 of this Summary Policy. Concerns must not be shared with the person under suspicion, or anyone connected with that person and all relevant documents and communications must be retained.

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