


GKN AEROSPACE

COMPETITION LAW 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 do not engage in anti-competitive practices. We take a zero tolerance approach to breaches of competition laws 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 Competition and Antitrust Law Policy and Compliance Guidelines (“the Competition Policy”) 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 Competition Policy.

2. APPLICATION

- 2.1 The Summary Policy and the Competition 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 Competition Policy and the Summary Policy and to not engage in anti-competitive practices.

3. WHAT IS COMPETITION LAW ABOUT?

- 3.1 Competition law rules are designed to ensure that competition is not restricted or distorted by:
 - 3.1.1 businesses colluding (i.e. agreeing or acting in a co-ordinated manner) with each other, for example, to fix prices, share markets or allocate customers; or
 - 3.1.2 a business that has a very strong (or dominant) market position using its market strength in a way that unfairly exploits its customers or makes it difficult for competitors (or potential competitors) to compete with it.
- 3.2 Such rules apply in most geographical markets in which GKN Aerospace conducts business.
- 3.3 Examples of behaviours that are prohibited include: (a) agreeing with a competitor to fix sale/purchase prices, to allocate markets, to collude on tenders or rig bids, to not supply certain customers, to not compete or to limit production or supply; (b) to exchange commercially sensitive information with a competitor; or (c) to engage in a cartel.

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4. COMPLIANCE MEASURES

- 4.1 GKN Aerospace has developed a detailed Competition Policy which is supplemented by Guidance.
- 4.2 All senior GKN Aerospace managers and all customer facing Company Employees are required to undertake Competition Compliance e-Learning every two years. Company Employees that join GKN Aerospace or are promoted into the target audience are required to complete the e-Learning training.

5. CONSEQUENCES OF NON-COMPLIANCE

- 5.1 There are significant consequences to infringing the competition rules, including fines, damages claims from customers, suppliers, and competitors, criminal penalties and severe disruption to business and loss of reputation.
- 5.2 GKN Aerospace will take appropriate disciplinary action, up to and including termination of employment, against any Company Employee who fails to comply with the Competition Policy and this Summary Policy.
- 5.3 GKN Aerospace may cease to continue working with an External Associate who it believes to have breached the Competition Policy and this Summary Policy.
- 5.4 In addition, a Company Employee or External Associate who breaks the law may be reported to the police and/or relevant competition authorities and may face criminal proceedings, fines or imprisonment.

6. HOW TO RAISE A CONCERN

- 6.1 If Company Employees find themselves in conversations or activities that potentially violate competition law, they have an obligation to remove themselves from that conversation or activity and disclose the event to the Legal Department.
- 6.2 If Company Employees acquire information that competition law is being - or may have been or has been - infringed they must disclose such information immediately to the Legal Department.
- 6.3 Company Employees can also make a disclosure through the GKN Aerospace Disclosure Hotline.
- 6.4 External Associates should speak to their GKN Aerospace contact or the General Counsel of GKN Aerospace; or email: speaking.up@gknaerospace.com.
- 6.5 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 anti-competitive practices and/or for raising a concern.

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