



GKN AEROSPACE



Code of Ethics

Our Business, Our Values, Our Policies

June 2026

MAKING THINGS FLY

A message from our CEO



Peter Dilnot

GKN Aerospace is a world-class global technology business with a proud heritage and an exciting future. We have a clear and unifying mission to be **“The Most Trusted and Sustainable Partner in the Sky”**. We are well placed to fulfil this ambition with a highly skilled and dedicated global team that delivers our broad portfolio of technology. Our products and solutions are deployed on a 100,000 flights a day - what we do matters!

We have clear plans to unlock the further potential of GKN Aerospace and grow together going forward. To be successful, it is not just about what we do - it is about how we do it. Put simply we must always **“do the right thing”**. This applies to every aspect of business and how we work together internally and externally. It starts with integrity which is not optional; it is the foundation of GKN Aerospace.

Our Culture Principles shape how we work together. We must pride ourselves on treating everyone with respect and honesty, whether they are colleagues, customers, suppliers or any other stakeholders. We also have standard practices, such as the Golden Safety Rules, to keep everyone safe from harm. These are reinforced by formal policies covering areas such as how to handle confidential information or IT security.

This Code of Ethics aims to provide a holistic reference on how we can **“do the right thing”** at GKN Aerospace. It also provides practical examples and guidance. Please take the time to read it, and most importantly, to follow it in your daily work.

Finally, please do not **“walk by”** if you see something that isn't right or doesn't live up to our values - fix it if you can, or raise it with your manager. There is also our Ethics Hotline to report particularly serious issues confidentially and anonymously if needed.

GKN Aerospace is our business. We define its future by what we do and how we do it. I am proud to be part of a team that **“does the right thing”** and we should all live this core guiding principle together, every day.



Peter Dilnot
Chief Executive Officer

June 2026



A guide to our Code of Ethics

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Why do we have a Code of Ethics?

Making GKN Aerospace a Great Place to Work means ensuring our behaviour is consistent with our values and Culture Principles, both internally and with our external customers, suppliers and stakeholders.

Our **Code of Ethics** explains how we want to do business. It sets out the standards of behaviour and business conduct we expect from GKN Aerospace employees, together with the commitments our organisation makes in respect of the topics set out in this **Code**.

All these standards are underpinned by one of our core principles; '*doing the right thing*'. We all have a personal responsibility for ensuring that our personal and organisational commitment to sound and ethical business conduct is delivered.

Who does it apply to?

This **Code of Ethics** applies to all individuals working at all levels throughout GKN Aerospace, including senior managers, officers, directors, employees, contractors, trainees, casual workers, agency staff and volunteers.⁽¹⁾

We expect all of you to know and to follow this **Code of Ethics** at all times.

⁽¹⁾ This **Code of Ethics** also applies to majority owned group companies. Note that references to GKN Aerospace also include Melrose.



What is expected from me?

Our **Code of Ethics** defines the clear standards we must uphold every single day – without exception.

As employees of GKN Aerospace, we expect you to:

> Act ethically

Use sound judgment and always act with integrity. Comply with all applicable laws, our **Code of Ethics**, and company policies. Honour our commitment to ethical conduct in everything you do. Stay attentive to the concerns of customers, colleagues, suppliers, and other business partners and respond thoughtfully. Before making decisions or taking action, consider whether legal or ethical issues may arise. To support your decision-making, we encourage you to use our Ethical Decision-Making Model as a guide.

> Understand the rules

In addition to complying with the principles set out in this **Code of Ethics**, you must comply with all applicable local and international laws and regulations.

> Speak Up

If you suspect that our **Code of Ethics**, our Culture Principles, a law, regulation, standard, or internal policy or procedure is being, or will be breached we expect you to raise it. Please refer to the section on Raising Concerns, Speaking Up and Seeking Advice which gives you guidance on how to raise a concern.

> Complete training

We expect you to complete all mandatory training you are invited to participate in, and to promptly complete all mandatory e-learning assigned to you.

What additional responsibilities do managers have?

Managers are expected to lead by example, demonstrating a strong commitment to our **Code of Ethics** and upholding the highest ethical standards in all aspects of their work.

In addition to the responsibilities we place on all employees of GKN Aerospace, as a manager, you must:

> Be a role model

Set a good example for your team and demonstrate our commitment to working ethically and in accordance with our values through your words and actions.

> Build an ethical culture

Encourage people to review and work within our **Code of Ethics** and help them understand their responsibilities. Actively promote a culture of commitment to ethics and compliance, where it is normal to do the right thing and have confidence in Speaking Up. Ensure your team takes time to promptly complete any mandatory training assigned to them.

> Listen and offer guidance

Be available and listen when employees and contractors come to you with questions or concerns. Discuss these questions or concerns and assist them in making ethical decisions. We encourage you to use our Ethical Decision Making Model to help guide you through the decision making process.

> Speak Up

Report any actual or potential violation of our **Code of Ethics** that you are aware of, or are made aware of.

Ensure all reported concerns are kept confidential, and speak to the Legal function where necessary.



In the course of our work, we may find ourselves hearing or saying phrases like "I don't want to know", "Everyone does it, so it must be okay", "This is how we do it here", "No one will know", "It doesn't matter how it gets done, just do it". We must be conscious of justifying unacceptable behaviour.

While the Code of Ethics provides essential guidance, it can't anticipate every situation you might face.

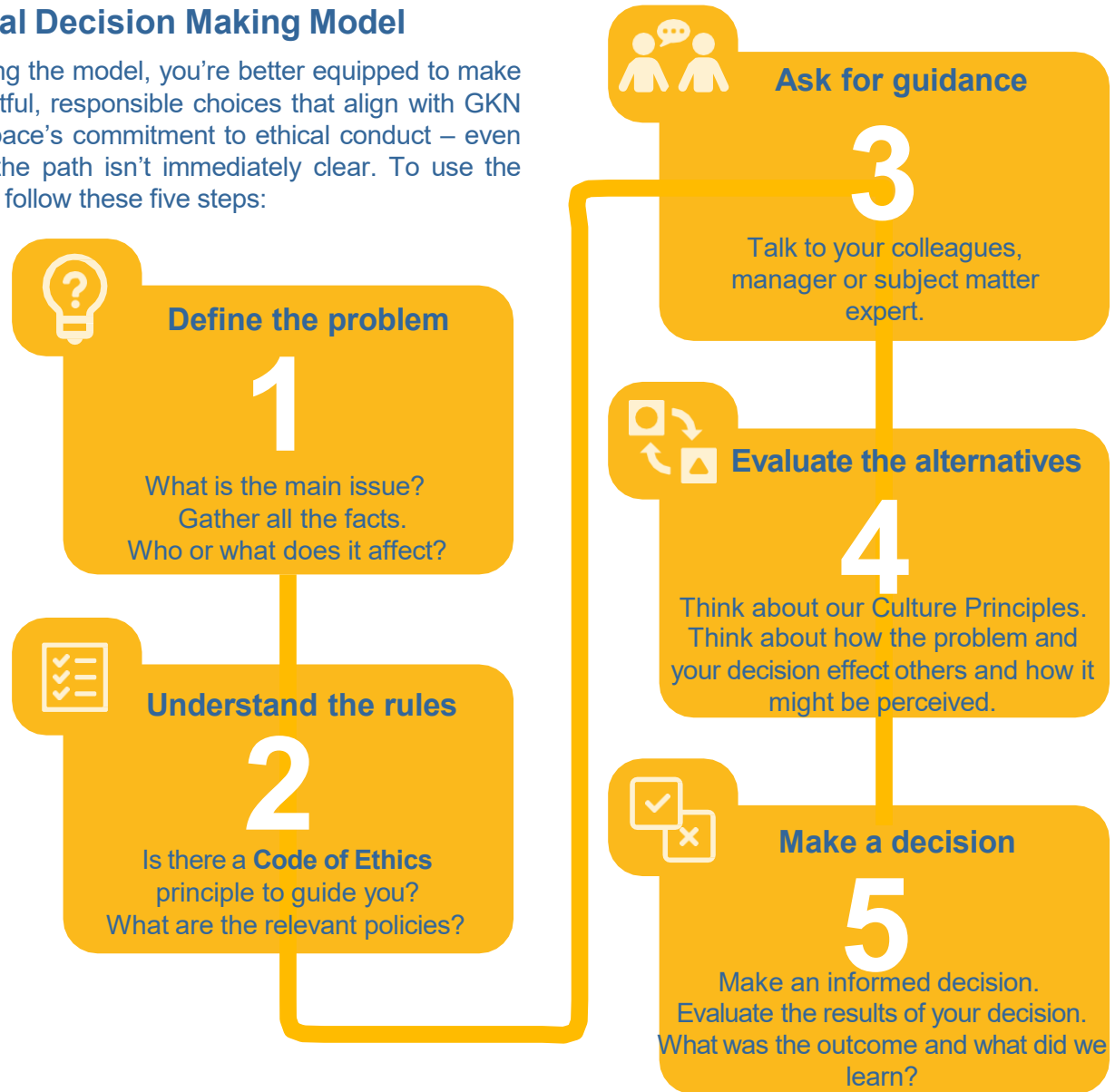
In complex or ambiguous circumstances where the Code may not offer a direct answer, the Ethical Decision Making Model helps you think through the issue systematically. It encourages you to:

- > Identify potential risks or conflicts, including legal and ethical implications.
- > Consider the impact on stakeholders such as colleagues, customers, and the Company.
- > Reflect on values and principles, not just rules.
- > Make decisions with integrity, even in grey areas.

How can I make the right decisions?

Ethical Decision Making Model

By using the model, you're better equipped to make thoughtful, responsible choices that align with GKN Aerospace's commitment to ethical conduct – even when the path isn't immediately clear. To use the model, follow these five steps:





What happens if I don't comply with the Code?

- > Any breach of this **Code of Ethics**, including violations of related policies and procedures, is treated as a serious matter.
- > Depending upon the circumstances the response from GKN Aerospace may include re-training, an unsatisfactory PDP rating or other employment consequences, including disciplinary action up to and including termination of employment.
- > Where required to do so by applicable law or regulations, GKN Aerospace may also report a violation to the relevant authorities, which could lead to individual legal action, fines or even imprisonment.

If you are aware of an actual or potential violation of the **Code of Ethics**, we would encourage you to Speak Up and escalate your concern via the appropriate escalation channel. For further information, please refer to the section of the Code on Raising Concerns, Speaking Up and Seeking Advice for further guidance.

What about different laws in different countries?

- > We are committed to complying with the applicable laws and business regulations in each of the countries in which we operate.
- > This **Code of Ethics** applies universally – across all locations where GKN Aerospace operates.
- > Even where local laws or business practices allow for standards lower than those provided for in this **Code of Ethics**, we are committed to operating at the higher ethical standards as defined in this **Code**. Higher standards must always be met.

If there is a conflict between local laws and our business practices, and you are not sure which has the higher standard, please contact a member of the Legal function

Raising Concerns, Speaking Up and Seeking Advice

We want everyone working for GKN Aerospace to feel comfortable raising legitimate concerns about actual or potential misconduct, in the knowledge that their concerns will be listened to, investigated and dealt with properly and sensitively – without fear of reprisal or disciplinary action.

If you suspect that our Code of Ethics, a law, regulation, standard, or internal policy or procedure is being, or will be, breached, there are many ways in which you can raise this concern, including by talking to:

- > your manager, or
- > your Human Resources contact, or
- > a subject matter expert, or
- > a member of the Legal function.

The Ethics Hotline is also available for you to raise concerns confidentially and anonymously.

Please refer to the Speak Up flow chart for guidance on how and to whom you should report any concerns. For further information please refer to the Speaking Up page on Aeronet.

Raising a concern or reporting suspected or known misconduct

Do I feel comfortable speaking to my Line Manager?

NO

YES Your line manager is there for you to discuss any questions or concerns and to support you to resolve them. They are your first point of contact especially in respect of any concerns regarding your terms of employment, working conditions, and issues or personal disputes with colleagues.

Do I feel comfortable speaking to HR or a subject matter expert?

NO

YES If you do not feel comfortable speaking to your line manager, you may be more comfortable contacting a member of the Human Resources Team. They are there to talk to you about any concerns you may have in any aspect of your role or the role of those around you. We also have many subject matter experts who you may wish to speak to concerning queries or concerns regarding a variety of topics, including Quality and Health and Safety.

Do I feel comfortable speaking to a member of the Legal Team?

NO

YES Members of the Legal Team are there to investigate concerns you may have regarding possible or actual breaches of laws and regulations and other unethical behavior, including those covered by our Code of Ethics.

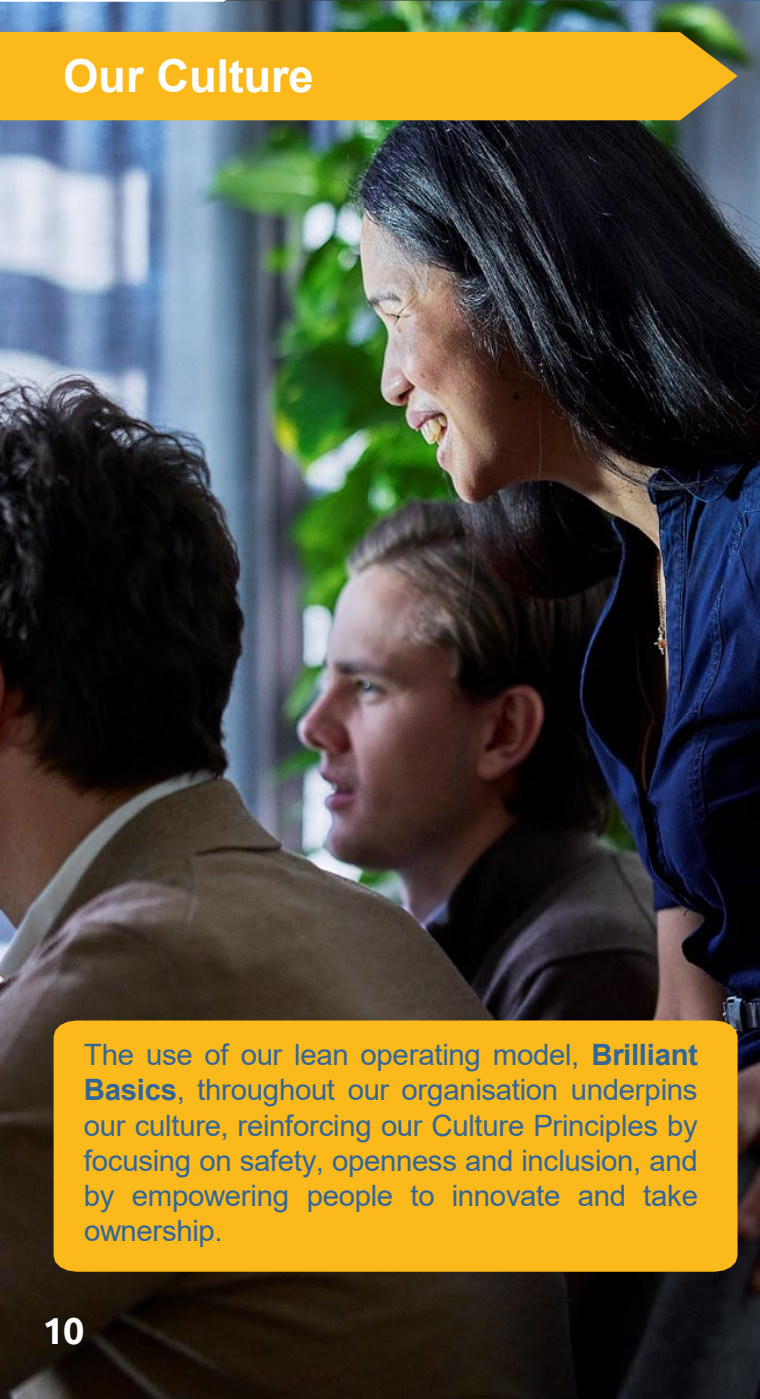
You are able to raise concerns by calling the Ethics Hotline or submitting an online report. You can raise a concern and find your local Ethics Hotline number by visiting our dedicated website: gknaerospace.ethicspoint.com

The Ethics Hotline is an independently managed service that is available in multiple languages. It is accessible to everyone 24 hours a day, 7 days a week.

The main purpose of the Ethics Hotline is to provide another avenue for you to speak up about particularly serious matters. This includes reports concerning known or suspected fraud, bribery, corruption, money laundering, serious dangers to health and safety, and theft.

All calls are confidential, and details can be provided anonymously if preferred.

Our Culture



The use of our lean operating model, **Brilliant Basics**, throughout our organisation underpins our culture, reinforcing our Culture Principles by focusing on safety, openness and inclusion, and by empowering people to innovate and take ownership.

A Great Place to Work needs a great way of working.

At GKN Aerospace we want to create an environment where everyone can be at their best, where they feel connected to their team and the wider organisation, and are ultimately proud of the work they do, and of working for GKN Aerospace.

Our commitment

We promote the 5 Culture Principles we expect everyone working at GKN Aerospace to live by which we hope will help us to create a Great Place to Work.



> **Safe** – We want people to feel valued, be safe at work and get home to their families safely every day. Safety is our number one priority.



> **Respect and Care** – We want people to feel cared for and appreciated for the unique contribution they bring to the team.



> **Open and Honest** – We want everyone to know their ideas and opinions matter and to speak openly and honestly.



> **Innovative** – We want to encourage everyone to keep improving and to share their new ideas.



> **Ownership** – We want individuals to take ownership of their work. Don't wait to be told or for someone else to do it.

Your role

Here are clear, practical ways you can demonstrate and reinforce our 5 Cultural Principles:

- > **Safe** - speak up about safety concerns and encourage others to do the same. Follow safety procedures. Check in on colleagues' wellbeing. Support a culture where mental health is taken seriously.
- > **Respect and Care** - treat colleagues, customers and partners with courtesy and professionalism. Listen actively and seek to understand different perspectives before responding or deciding. Be considerate of the wider impact of decisions on teams and communities.
- > **Open and Honest** - communicate clearly, truthfully and constructively, including when delivering difficult messages. Share information appropriately and raise concerns early. Don't let issues escalate.
- > **Innovative** - share ideas and improvements, and encourage others to do the same. Collaborate across teams to solve problems. Don't work in silos. Be open to change and willing to try new approaches.
- > **Ownership** - take ownership for your work and for meeting commitments and deadlines. Be proactive in addressing issues rather than waiting for direction. Step in to help where there is a clear need or opportunity to improve outcomes.

We should all be...doing the right thing, speaking up, listening well, working together, and taking responsibility, every day.

Health and Safety

We are committed to providing safe and healthy workplaces.

The Health and Safety of everyone working at GKN Aerospace is a priority. This means providing a safe working environment for everyone who works for us or with us. This responsibility extends beyond our own sites – whether you're visiting a supplier, customer, or any other location. No one should be injured at work or experience harm to their health. At GKN Aerospace, we are all expected to support our commitment to zero accidents. Our goal is simple: for everyone to return home in the same condition they arrived – **safe and well**.

Health and Safety Reporting

We report on the following data:

- > Accidents involving injuries.
- > Near misses.
- > Hazards identified and solved.
- > Property damage.
- > Environmental incidents.
- > Breaches of HSE legislation and enforcement actions.

WHAT IF?

... I see a hazard in my workplace?

Don't Walk By! Can you solve the hazard? If yes, do so. Any hazard, whether you can solve it or not, should also be reported through the appropriate channels.

Our commitment

At GKN Aerospace, we are committed to:

- > continually strengthening our Safety Foundations through our internal framework '*The Golden Safety Rules*'.
- > engaging, listening to and communicating with our employees and providing appropriate safety and occupational health training.
- > working proactively to meet and exceed applicable safety and occupational health standards and legislation across all our sites, working continuously to improve our health and safety performance.
- > conducting audits regularly to identify gaps and improvement opportunities.
- > working to achieve ISO 14001:2015.
- > working to achieve ISO 45001:2018 standard – Occupational Health and Safety Management System – in all manufacturing sites.

Your role

Everyone at GKN Aerospace plays a role in keeping themselves and others safe. You are **expected** to:

- > always adhere to the Golden Safety Rules, they are in place to save lives.
- > report all incidents promptly.
- > be aware of hazards and solve them where possible.
- > take responsibility for your own and your colleagues' safety, even if you are performing your role somewhere else.

HELP:

For further guidance on policies, and procedures, supporting documentation, and training please contact your line manager or the Health, Safety and Environment function.

Environment and Energy

We are dedicated to continually building a more sustainable business by reducing energy consumption and emissions, and conserving our planets natural resources.

We are committed to reducing our environmental impact and operating responsibly across every part of GKN Aerospace. Our environmental priorities are clear: use less energy, cut emissions, reduce waste generation and water use. We set measurable goals and track our progress so every employee can see where we stand and how they can contribute. Together, we are building a cleaner and more efficient business for the future

Environmental Reporting

We report the following data:

- > Energy consumption – electricity, gas and other fuels.
- > Waste generation – to landfill, incineration and waste recovery.
- > Greenhouse Gas Emissions.
- > Water withdrawal.

WHAT IF?

... I see excessive use of energy?

Don't Walk By! If you know things can be switched off, you should action it accordingly. If it's not something you can resolve, you should report it through the appropriate escalation channels.

Our commitment

At GKN Aerospace, we are committed to:

- > reducing the negative impacts of our operations on the environment.
- > conserving natural resources and minimising waste generation and pollution.
- > conducting internal audits to meet the requirements of our ISO certification and compliance checks, to identify gaps and opportunities for improvement.
- > maintaining compliance with our permitted activities and proactively preparing for the implementation of new legislation.
- > achieving or working towards ISO 14001 (EMS) managed by competent personnel at applicable sites, and applying ISO 14001 principles at sites yet to be certified.

Your role

- > Prevent waste (reduce – reuse – recycle).
- > Switch equipment off when not in use.
- > Reduce the amount of resources you use to minimise waste production.
- > Reuse and recycle waste ahead of any incineration or landfill disposal options.
- > Report Environmental issues – Don't Walk By!

HELP:

For further guidance on policies and procedures, supporting documentation, and training please contact your line manager or the Health, Safety and Environment function or the Sustainability function.

Diversity, Inclusion and Belonging



We encourage a respectful and inclusive workplace, because everyone, in every role, function, site and business, should be treated fairly, with respect and care.

We ask people to give their best every day and we encourage teams to embrace their individuality and recognise that the diversity of backgrounds, experiences and perspectives within our teams leads to stronger, more informed decision-making. By embracing individuality, we foster a culture of collaboration and innovation that drives our collective success.

WHAT IF?

.....there is some practical joking going on in my office and one person is being made fun of. The joking feels inappropriate and is possibly making them feel uncomfortable, but they have not said anything. Should I say something?

Yes, you should.

No one should be made fun of or be made to feel uncomfortable particularly where it relates to their race, sex, sexual orientation, religion or any other similar personal characteristic. Ask the individual how they are feeling, if the behaviour is making them feel uncomfortable and whether they feel comfortable Speaking Up about this themselves.

If they do not, encourage them (with support) to speak to their line manager or someone from the Human Resources function. If this behaviour persists after being addressed, encourage the individual to report this via the Ethics Hotline.

HELP:

For further guidance on the Diversity, Inclusion, and Belonging Policy and Employee Resource Groups please contact your line manager or the Human Resources function.

Our commitment

At GKN Aerospace, we are committed to:

- > promoting equality, diversity and inclusion.
- > creating an environment where people can challenge potentially discriminatory behaviours.
- > maintaining a zero-tolerance approach to discrimination, bullying and harassment.
- > welcoming different ways of thinking, encouraging innovation, leading with our strengths, and creating a culture where individuals feel comfortable Speaking Up.

Your role

- > Think about the impact of your actions on others and act fairly.
- > Respect individual differences and celebrate these as unique strengths.
- > Treat each other with respect, consideration and good manners at all times.
- > Don't Walk By! where you see or hear inappropriate behaviour.
- > Look out for signs of discrimination, bullying and harassment and Speak Up if you see something that you feel is wrong.
- > Support one another – make it easy for people to speak up if they are stressed, anxious or feeling under pressure. Find ways to help as a team.



Quality and Product Safety



We are committed to delivering safe, high quality products and services.

In order for GKN Aerospace to be the most trusted and sustainable partner in the sky we must consistently ensure that our products and services are produced in line with external customer and regulatory requirements and industry standards. This does not just include the products and services that we give to our customers, but it also includes those products and services we give to one another within our business, as well as to those in our supply chain.

Every one of us contributes to ensuring the quality of our products and services, no matter what role we have in the business.

WHAT IF?

..... I see or hear something that I believe is unclear or incorrect, or has the potential to produce a quality non-conformance?

Speak Up!

Never compromise when it comes to product safety. If something seems wrong, stop and ask for help – from your Supervisor, Manufacturing Engineering function or the Quality function. They can check and determine the right course of action. It's better to report a concern than let it slip by. Not reporting could have a detrimental impact on our quality and product safety.

Our commitment

At GKN Aerospace, we are committed to:

- > designing, building and delivering safe, high-quality products and services.
- > listening to our customers and measuring our quality performance through their eyes.
- > listening to each other, to drive quality improvements within our business.
- > building an atmosphere of trust where everyone is openly encouraged to report product safety and culture improvements within our business.
- > ensuring excellence in our processes, systems, standards and tools.

All of our operational sites are expected to maintain **certification to an internationally and industry-recognised Quality Management System standard, such as ISO 9001 or AS 9100**, with AS 9100 preferred where applicable.

Your role

- > Speak Up when you have a question, concern, or see something wrong.
- > Follow our policies, processes and procedures and your work instructions, looking for opportunities to improve.
- > Ask when you have questions about your work or are unsure of what to do.
- > Be committed to quality and taking ownership for your work at every opportunity.

HELP:

For further guidance on policies and procedures, supporting documentation, and training please contact your line manager or the Quality, Supplier Quality, Design Engineering, or the Manufacturing Engineering functions.



Sustainability

We are putting sustainability at the heart of our business.

Sustainability is a cornerstone of our mission to be the most trusted and sustainable partner in the sky, guiding how we operate, innovate, and contribute to a better future for our communities and the planet. We are actively investing in technologies that accelerate the decarbonisation of existing aircraft and pioneering innovations that will enable the future of zero-emission flight. We continuously seek to enhance fuel efficiency and reduce emissions, all whilst minimising the environmental impact of our operations. At the same time, we seek to build a safe, collaborative, and innovative workplace that empowers our people and supports long-term value creation for society.

Our approach to sustainability focuses on one of our core principles, *'doing the right thing'*. This means doing the right thing by our people, for our planet, and with our technology. Meaning we must act in a safe, ethical manner in everything we do.

By focusing on sustainability today, we ensure that we do not compromise the ability of future generations to thrive.

Our commitments

At GKN Aerospace, we are committed to:

- > reducing GKN Aerospace emissions as a business.
- > conserving our planet's natural resources.
- > enabling aviation's route to Net Zero.
- > keeping our people and business safe.
- > investing in skills and development.
- > promoting diversity and inclusion.

Your role

- > Consider joining our vibrant Sustainability Network and become part of a community dedicated to making a difference.
- > Consider becoming a dynamic Sustainability Champion to spearhead initiatives at your site, or advocate for sustainable practices in your daily work, within your team and across the entire business.
- > Don't Walk By! if you observe unsustainable behaviour, processes or room for improvement, act yourself or notify your line manager.

HELP:

For further guidance on policies and procedures, supporting documentation and training please contact your line manager or your local HSE representative, local sustainability champion, or the Sustainability function.



HELP:
For further guidance please contact your line manager or the Legal or Finance functions.

Preventing Fraud

We take a zero-tolerance approach to fraud in all its forms and will not tolerate it either within our business, or within the operations of our business associates.

Fraud explained

Fraud can take many forms, but at its core involves deception with a view to making a gain or causing a loss. Specific instances of fraud might include making false statements or representations (including through financial record keeping), dishonestly failing to disclose information, dishonestly abusing a position, fraudulent trading or dishonestly obtaining services. It also includes any form of assistance that is offered in relation to these fraudulent activities, or the procurement of them.

Why this matters

The prevention, detection and reporting of fraudulent activity is the responsibility of everyone at GKN Aerospace. Our mission is to prevent fraud by fostering a culture of honesty and accountability.

We recognise the long-term benefits of rejecting fraudulent practices, including enhanced reputation, increased customer confidence and sustainable business growth. We recognise that engaging in fraudulent activity will not only damage our reputation, but could also lead to criminal prosecution for GKN Aerospace and any individuals implicated.

Our commitments

At GKN Aerospace, we are committed to:

- > ensuring we have a robust fraud prevention policy and applicable procedures in place and providing training to help our employees become aware of what fraud is and the forms it may take.
- > maintaining an integrated financial control framework with three levels of defence to prevent malpractice.
- > not engaging in business with companies that have a reputation of fraudulent activity.
- > thoroughly investigating allegations of fraud and taking action where we suspect that fraud has been committed against (or purportedly for the benefit of) GKN Aerospace.

Your role

- > Do not engage in any form of fraudulent activity, including any fraudulent activity that is purportedly for the benefit of GKN Aerospace.
- > Follow the fraud prevention policies and procedures that are in place, including (but not limited to) those related to cyber security, quality checks, onboarding business associates, time keeping, and the payment and creation of invoices.
- > Report actual or suspected fraudulent activity immediately to the Legal function, or by following the procedure set out in the Whistleblowing Policy.



Anti-bribery (including gifts and hospitality, lobbying and donations)



HELP:

For further guidance please refer to the Anti-Bribery and Corruption Policy or contact your line manager or the Legal function.

We must comply with all applicable anti-bribery laws and regulations.

One of our fundamental principles is to conduct our 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.

The Group's reputation for lawful and ethical business practices is of the utmost importance and even the suggestion of bribery or corruption may damage the reputation of GKN Aerospace.

The prevention, detection and reporting of bribery and other forms of corruption is everyone's responsibility. You are required to avoid any activity that might constitute, lead to, or suggest bribery and/or corrupt activities.

Our commitment

At GKN Aerospace, we are committed to:

- > maintaining effective monitoring and internal controls to prevent and detect bribery and corruption.
- > providing anti-bribery and corruption training to ensure relevant employees and contractors are fully aware of their own, and GKN Aerospace's, responsibilities.
- > not offering political donations to any individuals or organisations on behalf of or otherwise paid for by GKN Aerospace including, without limitation, payments to political action committees.
- > making charitable donations and/or sponsorships to properly established charities (or other organisations) for a valid charitable or other similar, not-for-profit purpose.

Your role

- > Do not engage in any form of active (giving a bribe) or passive (accepting a bribe) bribery, nor the bribing of a public official.
- > Avoid activities that might lead to a facilitation payment (or a suggestion that one will) be made or accepted.
- > Speak Up! Raise concerns about any conduct, issue or suspicion of malpractice by a colleague or a third party (such as a customer, supplier, or agent) at the earliest possible stage by speaking to the Legal function, or by using the Ethics Hotline.
- > With regard to **gifts, hospitality and entertainment** consider:
 - > whether, taking into account all circumstances, the gift or hospitality being offered is reasonable and justifiable.
 - > the intention behind the gift being offered or accepted.
 - > seek prior approval before accepting any gifts, hospitality, or entertainment, through the [Gifts, Hospitality and Entertainment Register](#).
- > With regard to **donations, sponsorships and lobbying**: seek prior approval through the [Charitable Donations and Sponsorship Register](#) for any charitable donations or sponsorships you plan to make and undertake proper due diligence on the charity or organisation.
- > Do not engage 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 function from time to time) on behalf of the Group, or which might reasonably be regarded as being on behalf of the Group.

Continued >>

Anti-bribery, including Gifts and Hospitality, Lobbying and Donations

Did you know...that in some countries where we operate, facilitation payments are common? Although these unofficial payments made to secure or expedite a routine government action by a public official are relatively small, they are against the law and should not be made.

Bribery explained

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act dishonestly, improperly or in a way which they would not have done had they not been paid or promised the bribe.

A person being bribed, or offered a bribe, will generally be someone who is able to obtain, retain, direct and influence the decision-making powers of a government, vendor, customer, supplier, or intermediary, in order to procure some form of benefit.

Giving and receiving of Gifts, Entertainment or Hospitality

We recognise that the courtesy of giving or receiving gifts, entertainment and hospitality of modest value in the normal course of business, where permitted by law, is acceptable in principle. However, under no circumstances must the giving or receiving be done with a view to the recipient being influenced to act improperly or to obtaining any form of improper advantage.

What is meant by Gifts, Entertainment and Hospitality?

Gifts are items of value provided to the recipient to create a favourable impression. They typically include consumables, electrical items, tickets to events (where the donor does not attend) or any other items of value.

Entertainment and Hospitality typically includes accompanying the provider to an event, such as a concert, sporting or charity event, along with associated travel, accommodation, meals and refreshments.

This table is a summary of how we expect employees to seek approval and report gifts, entertainment and hospitality that is offered to them.

Employees should refer to the Anti-Bribery and Corruption Policy for the full details.

Value	Category	Prior approval required	Recorded to the Gifts, Entertainment and Hospitality Register*
Less than or equal to GBP 100 (or local currency equivalent)	Gifts, Entertainment, and/or hospitality event (singular)	No approval needed	No
Over GBP 100 (or local currency equivalent) ⁽¹⁾	Gifts, entertainment and / or hospitality event (singular or multiple gifts and / or events <£100 within a calendar year to / from same contact)	Prior approval through G,E and H Register required	Yes
Any	Gifts, entertainment or hospitality event related to public officials	Not allowed	N/A (contact your Head of Legal for support if offered to you)

*You should ensure that you accurately record details of all material gifts, entertainment, and hospitality given or received in relation to GKN Aerospace via the Register. All requests, even if you have declined them, must be recorded.

Given the enhanced risk profile associated with **Sales Agents** and **Joint Ventures**, in addition to our Anti-Bribery and Corruption Policy, please refer to the specific policies in place for those areas.

⁽¹⁾ Entertainment or hospitality valued at £250 or more will only be approved in exceptional circumstances.



Conflicts of Interest

We should avoid personal and organisational conflicts of interest to ensure we make objective decisions.

Conflicts of interest can compromise sound decision-making. At GKN Aerospace, our reputation for conducting business lawfully and ethically is paramount and even the appearance of a conflict can undermine the trust we've built.

Conflict of interests explained

Conflict of interests situations take many forms, including influencing or making the decision to hire a friend or family member, having a second job, holding financial interests in suppliers or competitors, or serving on the board of directors or having an advisory position with another company or organisation without GKN Aerospace's approval.

Recognising and appropriately managing potential conflicts of interest is essential to maintaining our integrity, protecting our reputation, and ensuring that all decisions are made in the best interests of GKN Aerospace.

Our commitment

At GKN Aerospace, we are committed to:

- > striving to avoid conflicts of interests.
- > promoting processes to ensure that all potential, perceived or actual personal conflicts of interests are addressed promptly and objectively.
- > mitigating the impact of any organisational conflicts of interests and protecting employees with appropriate protocols to help limit access to sensitive information.

Your role

- > Avoid any influence, interest or relationship that might conflict, or be perceived to conflict, with the interests of GKN Aerospace.
- > Avoid activities, investments or associations that could interfere with the independent exercise of your judgement on behalf of GKN Aerospace.
- > Register and keep updated any actual, potential or perceived conflicts of interest in your local conflict of interest register.

HELP:

For further guidance please contact your line manager or the Legal or Human Resources functions.

Export Control, Sanctions, Customs and International Trade

WHAT IF?

....I have regular exchanges with an engineer at a customer in another country about a project. Should I have any concerns about this from an export control perspective?

Yes, you should.

You could be transferring technology that is controlled under your country's export control laws or those of the US government. An export can be more than a transfer of goods. It can include electronic or oral communication of information. You must ensure you understand the export classification of any technology you are sharing and ensure the necessary authorisation is in place.

We must comply with all applicable international trade laws and regulations, including sanctions, embargoes, export controls, and customs requirements.

Export control, customs and sanctions laws and regulations are designed to ensure that our products and data, as well as those of our customers and suppliers, are handled responsibly and do not fall into the wrong hands. Compliance with these laws and regulations is essential when moving goods and information across borders. Breaches can lead to serious consequences, including civil and criminal penalties, loss of regulatory trust, and reputational harm.

Export Control, Sanctions and International Trade

- > Export Controls exist in the interests of national security and foreign policy.
- > Sanctions restrict dealings with certain individuals, entities, groups or countries for a range of objectives, including international peace and stability, promotion of human rights and the deterrence of terrorism and weapons proliferation.
- > Customs regulations set the rules that countries and businesses must follow in order to do business across borders.

HELP:

For further guidance on applicable policies and procedures, supporting documentation, and training please contact the Trade Compliance function.

Our Commitment

At GKN Aerospace, we are committed to:

- > complying with all applicable sanctions, embargoes, export control and customs laws and regulations wherever we operate and whenever we export, re-export or transfer goods, technology, software or provide services.
- > performing due diligence on our customers, suppliers, and business associates to ensure compliance with all applicable export control and sanctions laws and regulations.
- > complying with all applicable international trade control laws and sanctions. We will not engage in or support unsanctioned boycotts or other restrictive trade practises.

Your role

- > Ensure that any sharing, export, re-export or transfer of goods, technology, software or services is always appropriately authorised.
- > Follow established processes and using approved systems to avoid unauthorised sharing, import, export, re-export or transfer of goods, technology, software or services.
- > Speak Up! Report any concerns you may have through the Ethics Hotline.



Anti-competitive behaviour

We must compete fairly and contribute to diverse markets.

Fair competition encourages enterprise, drives efficiency, and fuels innovation. It benefits customers by offering greater choice, better quality, and lower prices.

Non-compliance with competition laws can result in severe consequences – including substantial fines, legal action, and reputational harm to both individuals and the organisation.

Upholding competition law is not only a legal obligation but a vital part of maintaining trust, integrity, and long-term success for the Group.

Competition law authorities have wide-ranging powers to demand disclosure of company documents and employee communications. **You must take care with your language in all business communications** – consider how they could be interpreted by relevant authorities. Make sure the language you use is accurate, precise and unambiguous. A poor choice of words may make even a perfectly lawful action look suspicious.

Our Commitment

At GKN Aerospace, we are committed to not entering into anti-competitive agreements or arrangements with other businesses, which have the object or effect of restricting competition or that have the potential to affect or restrict competition. Where a company has a dominant position in a relevant market, that position must not be abused.

Your role

- > Ensure you are aware of applicable competition law wherever and whenever you are doing business.
- > Do not exchange any commercially sensitive information with a competitor.
- > Do not discuss or agree with a competitor:
 - > to fix sales or purchase prices;
 - > to allocate customers, territories or markets;
 - > to collude on tenders or rig bids;
 - > not to supply certain customers;
 - > not to compete; or
 - > to limit production or supply.
- > Take special care when attending meetings with competitors, such as trade association meetings. Use your common sense and if the meeting strays into territory that does not feel right, like suggestions to collude or engage in a cartel or offer sensitive information, leave the meeting and contact a member of the Legal function, or escalate via the Ethics Hotline.
- > When dealing with customers and suppliers, seek legal advice before entering into or imposing exclusivity obligations.

HELP:

For further guidance please refer to the Competition Law Policy or contact your line manager or the Legal function.



Anti-money Laundering

We must not facilitate money laundering.

We take our responsibility to prevent the misuse of our business for money laundering very seriously and are committed to upholding best practices.

Money laundering explained

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 result from criminal conduct, including (for example) bribery and corruption, tax evasion, modern slavery and breaches of competition law.

Money laundering enables criminals to conceal the origins of illicit funds and activities. It is essential that we remain vigilant and take all necessary steps to ensure our company, its products, and services are not exploited for such purposes.

Our commitment

At GKN Aerospace, we are committed to:

- > undertaking due diligence on all of our customers, suppliers and other counterparties to reduce the risk of GKN Aerospace being involved or implicated in money laundering either knowingly or unintentionally.
- > verifying the identity and the ultimate beneficiary of the counterparty; in this way we establish the purpose of the business relationship and to verify that no sanctions apply.
- > not allowing for cash payments for amounts over GBP 1,000.

Your role

- > Follow and comply with the business processes that are in place to prevent GKN Aerospace from being used for the purposes of money laundering.
- > Rely on evidence and not on assurance; business contacts may not be aware of potentially criminal or unethical activity in their business.
- > Speak Up! Report any concerns you may have in relation to a counterparty, transaction or contract or if you notice a red flag.

Potential red flags

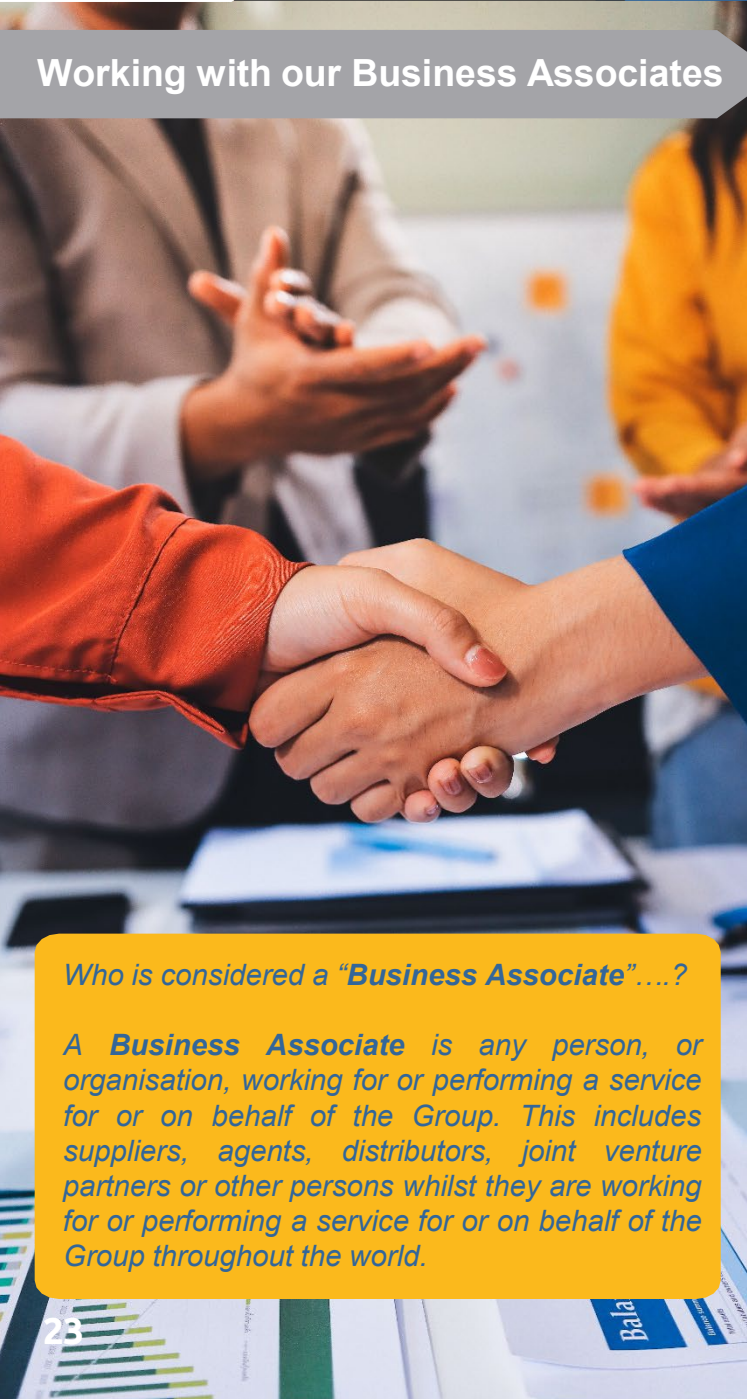
Some red flags for you to look out for in your day to day operations that might be indicative of money laundering taking place are:

- > A counterparty provides minimal, vague or fictitious information about itself or the reasons for wanting to do business.
- > A counterparty is overly secret or evasive about its ultimate beneficial owner.
- > A counterparty cancels orders and is refunded payments on account.
- > Inconsistent information such as multiple tax IDs or unverified documents.
- > Unwillingness to use electronic banking transactions to settle or to receive settlement of trading debts.
- > Complicated corporate structures or the use of offshore entities.

HELP:

For further guidance please refer to the Anti-money Laundering Policy or contact the Treasury or Legal function.

Working with our Business Associates



We cultivate strong, long-term partnerships with our Business Associates to enhance performance and support our strategic objectives.

Our reputation is founded on the quality and safety of our products and services, and our suppliers and business partners play a vital role in helping us achieve these standards. That's why we hold them to the highest ethical expectations, including in the case of our suppliers, requiring full alignment with our Supplier Code of Conduct and adherence to the principles outlined in our Supply Chain Policy.

Our commitment

At GKN Aerospace, we are committed to:

- > establishing a culture of compliance with our Supply Chain Policy across the business and within our supply chain.
- > only working with suppliers who comply with our Supplier Code of Conduct and all relevant laws whilst respecting our social and environmental commitments, and who hold the same high ethical standards as we do.
- > acting professionally when engaging or working with a supplier or other Business Associate, which means following company policies and procedures and conducting due diligence as appropriate.
- > implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within our business. We expect the same high standards from all of our Business Associates.
- > only engaging with and appointing Sales Agents in accordance with our internal policies and procedures.

Your role

- > Set clear and consistent expectations to our Business Associates of how we work and the standards we expect from them.
- > Establish open communication and a strong sense of partnership to ensure Business Associates are aware of and comply with our ethical standards and, in the case of our suppliers, the Supplier Code of Conduct.
- > Follow applicable company policies and guidelines when engaging a Business Associate.
- > Choose Business Associates carefully and take appropriate measures to ensure they meet contractual requirements, follow the law and, where appropriate, our Supplier Code of Conduct.
- > Make sure appropriate agreements and, if applicable, licenses, are in place when discussing company or customer information with potential Business Associates.
- > When sourcing products or raw materials which may contain conflict minerals, follow the requirements of the Conflict Minerals Policy.
- > Make sure you comply with the requirements of the Anti-Bribery and Corruption Policy.

Who is considered a "Business Associate"....?

A **Business Associate** is any person, or organisation, working for or performing a service for or on behalf of the Group. This includes suppliers, agents, distributors, joint venture partners or other persons whilst they are working for or performing a service for or on behalf of the Group throughout the world.

Continued >>

Working with our Business Associates



WHAT IF

... one of our suppliers is not working in full compliance with our Supplier Code of Conduct or Supply Chain Policy - when visiting a supplier, you notice their safety procedures were not being followed correctly. What should I do?

We do not Walk By! when we see these types of issues occurring, even where they do not occur at a GKN Aerospace site.

You should consider discussing with your line manager or escalating via the appropriate internal escalation channel. Please refer to the **Raising Concerns, Speaking Up and Seeking Advice** on page 9 for further guidance.

We expect our suppliers to:

- > **Energy Use:** Manage their energy use by implementing energy efficiency measures and reducing energy consumption.
- > **Climate Change:** Take proactive action to minimise their impact on climate change, considering the entire supply chain in their activities.
- > **Water Stewardship:** Understand their impact on water and manage their water usage appropriately.
- > **Environmental Issues:** Avoid causing environmental harm, such as land and water pollution, poor air quality, deforestation, and that they look to mitigate these issues where possible.
- > **Biodiversity:** Share our commitment to biodiversity protection.
- > **Waste:** Manage resources appropriately and reduce waste going to landfill by implementing recycling and other waste reduction initiatives, and to use resources that are recycled or can be recycled easily.
- > **Health and Safety:** Provide a safe and healthy working environment and encourage them to understand and mitigate health and safety related risks in their activities.
- > **Minimum Living Wage:** Pay their UK employees the national living wage and an adequate wage in countries where a national living wage is not defined.
- > **Diversity, Inclusion and Non-Discrimination:** Eliminate illegal and unfair discrimination in hiring, compensation, and training.
- > **Working Hours:** Respect national legislation and industry referenced standards on maximum working hours.
- > **Child Labour and Modern Slavery:** Ensure practices are in place that prohibit the recruitment of child labour and use of forced, or bonded, or trafficked labour.
- > **Standards and Integrity:** To uphold the highest standards of ethical conduct and integrity by fully complying with all applicable laws, regulations, and contractual obligations, while conducting business responsibly, transparently, and in a manner that protects our shared reputation.

HELP:

For further guidance please refer to the relevant supporting policies or contact your line manager or the Procurement, Legal or Sustainability functions.

Protecting our brand and reputation

Open and Honest communication is essential to our mission to be the most trusted and sustainable partner in the sky.

GKN Aerospace is a technology leader in the aerospace industry, with a proud heritage and an exciting future. Melrose, as the listed parent of GKN Aerospace, has a strong investor brand. Our brand, as well as the GKN Aerospace and Melrose name and logo, identifies our business to the world and carries the weight of our reputation with our customers, stakeholders and wider society. Every interaction you have externally and internally, both in a professional and personal capacity, can have an effect on our brand and reputation.

Open and honest communication is fundamental to building trust, and developing and maintaining sustainable relationships with our customers, suppliers, shareholders, the media, and the communities we serve. By ensuring we operate in an Open and Honest way, we strengthen our reputation, build strong relationships that support our long-term goals, whilst supporting a culture of integrity across every part of our business.

HELP:

For further guidance on policies and procedures, and supporting documentation, please contact your line manager or the Communications function.

Our commitment

At GKN Aerospace, we are committed to ensuring all of our communications adhere to our Guiding Principles for communications. These make it clear that all GKN Aerospace communications should be founded on honesty, and aimed at delivering value to the business, as well as maintaining business confidentiality and protecting the GKN Aerospace and Melrose brand, as well as associated brands.

Your Role

- > Ensure you follow all Communications Policies, including our Social Media Policy and Media Communications Policy. All employees must follow these policies.
- > Apply the different visual elements which are used to represent our brands correctly and consistently to help support and strengthen our reputation. This includes consistent use of logos and corporate colours, the quality and style of imagery we use and the style of design of our communications. The Brand Identity Guidelines must be adhered to at all times.
- > Do not make comments on behalf of GKN Aerospace or Melrose unless approved by the Corporate Communications Team. All calls and requests from journalists should be referred to the Corporate Communications Team without answering the query. Appropriate support and advice will be given to you on how to respond.



Share Dealing

We protect share-price sensitive information, sometimes known as inside information, to help protect the integrity of equity capital markets.

GKN Aerospace is owned by Melrose Industries PLC, a public limited company listed on the London Stock Exchange. If “inside information” is made public this could affect the value of Melrose shares or those of another company that we do business with. Trading shares with inside information is illegal.

Inside information explained

Inside information is all non-public information which, if made public, would be likely to have a significant effect on the value of the shares of the company it relates to. You may receive inside information relating to our Group and the business, our customers, our suppliers or other stakeholders. We could receive this from our investors, customers, suppliers or other business partners. Examples include business performance, major new developments and material litigation claims.

Our commitment

At GKN Aerospace, we are committed to:

- > ensuring that the necessary systems and procedures are in place to assist our employees to comply with applicable laws and regulations on share dealing.

Your Role

- > If you are in possession of inside information, do not deal in the shares of the company to which that information, directly or indirectly, relates.
- > Do not give inside information to anyone, including other employees (unless specifically authorised to do so by Melrose/GKN Aerospace), family members, friends or Business Associates, or encourage them to deal in shares based on such information.
- > Make sure you apply for clearance to deal in Melrose shares, depending on your role within GKN Aerospace, as further explained in the Share Dealing Policy.
- > Follow any instructions given to you by a third party when receiving their inside information.

HELP:

For further guidance please refer to the Share Dealing Policy or contact your line manager or the Legal function.

Tax Evasion

HM Revenue & Customs

Tax

At GKN Aerospace we do not evade taxes, nor do we facilitate tax evasion. We take a zero-tolerance approach to acts which enable tax evasion to take place.

HELP:

For further guidance please refer to the Anti Facilitation of Tax Evasion Policy or contact your line manager or the Tax or Legal functions.

Tax evasion explained

Tax evasion is when a person or business knows they have an obligation to account for any tax or duty but dishonestly does not do so. Tax evasion is an offence in most countries around the world and the penalties for it can be severe.

Tax evasion limits the capacity of countries to finance their economic and social policies, whilst also placing a heavy burden on those that do not evade tax. We could be liable for the actions of our employees as well as our business associates such as agents, joint venture partners and consultants. This could lead to unlimited fines.

Potential red flags

If any of the following situations arise with our business associates and/or other third parties, they can be considered red flags in the context of tax evasion and should be reported through the appropriate channels at the earliest opportunity:

- > Uncertainties exist about why they are buying our goods or services, or the price which they are prepared to pay.
- > They request for payments to be made in cash, paid to or through another entity, paid to bank accounts in countries other than the country where services are performed, paid to offshore bank accounts, paid in a currency other than the local currency or paid in advance of the services being performed.

Our commitment

At GKN Aerospace, we are committed to:

- > not evading taxes, nor facilitating tax evasion. We will not knowingly help our business associates, or anyone else we work with, to evade taxes.
- > not providing services or selling goods where we know or suspect they may be misused or abused by a customer for the purposes of fraudulent tax evasion.
- > not buying services or goods from any business associates where we know or suspect them not to be properly declaring their income and any relevant tax and duties in connection with those activities.
- > always declining if we are asked to engage in any activity where there is suspicion that it would facilitate the evasion of tax.
- > ensuring accurate customs declarations are made on all import transactions, and that all applicable duty, taxes, and associated fees are paid in accordance with local requirements.

Your Role

- > Report any known or suspected facilitation of tax evasion.
- > Where you are aware of possible activities designed to facilitate tax evasion, escalate and report your concerns and provide details to the Tax function, the Legal function or via the Ethics Hotline.

IT Security



HELP:

For further guidance on policies and procedures, and training, please contact your line manager or the IT Cyber Security Team.

We must use Company IT systems, networks and applications responsibly and appropriately.

Cybersecurity is increasingly important to organisations and individuals in today's digital online landscape. It protects people and organisations from criminals who wish to manipulate information to serve their own illegal interests.

WHAT IF?

...I have opened a suspicious email that I wasn't expecting or accidentally shared my credentials to a website I'm not sure about, what should I do?

It is important in these situations that you let the IT Service desk or Cyber Security team know as soon as possible, so that we can investigate and mitigate any risk to the company's systems and data.

A victim's reluctance to report suspicions is what cyber criminals rely on to hide their crimes. At GKN Aerospace we operate a no blame culture when it comes to reporting Cyber Security incidents. The faster we know the quicker we can prevent it.

Our commitment

At GKN Aerospace, we are committed to:

- > protecting our premises, data and digital information from cyber threats.
- > providing our employees with training to spot cyber threats.
- > implementing safeguards and monitoring to detect unauthorised use. We will respond immediately to reported alerts on cyber incidents.

Your Role

- > Protect and do not share your login information, passwords, PINs and smartcards. Keep IT equipment secure when leaving it unattended.
- > Be vigilant for phishing attacks and report suspicious emails.
- > Be cautious about clicking on unknown links or attachments.
- > Respect any restrictions on your use of company IT systems.
- > Immediately report the loss of company IT equipment.
- > Be mindful that all activity on company IT systems may be subject to lawful monitoring. Only access, work on, and transmit business information on approved devices and on company networks, or company approved remote access services.
- > Do not use company IT for inappropriate, abusive, offensive, humiliating or intimidating communications.

Physical Security



We implement an enterprise-wide security risk management programme in order to protect our people, property, assets, information and reputation from harm.

As a responsible employer, we have a duty of care to look after our people and safeguard our business, to ensure we meet our regulatory, contractual and legal obligations and maintain our licence to operate. Breaches or violations in our physical controls may jeopardise our position.

Physical security controls enable us to protect our business and control access to our sites. Protection of our facilities and assets from theft or damage is paramount, whilst ensuring the security and integrity of our company IP and classified programmes is a cornerstone of our security risk management programme.

WHAT IF?

... I see someone I don't know in my working area who is not wearing a badge?

First ask them where their ID card is. If they do have an ID card, check if it allows them to be in that area unaccompanied. If so, ask them to wear it visibly. If they do not have an ID card, notify site security immediately and remain with the person until site security arrive.

Our commitment

At GKN Aerospace, we are committed to:

- > protecting our people, property, assets, information and reputation in order to safeguard the future success of our business.

Your role

- > Comply with all site security procedures when on site, including visibly displaying your company ID card.
- > Only access restricted areas if you are authorised to do so.
- > Always register and accompany any visitors you may have.
- > Be empowered to challenge anyone not wearing their ID card. Do not be afraid to challenge if someone is unable to provide necessary ID.
- > Protect and dispose of sensitive company information appropriately.
- > Report any suspicious activity or persons to Security immediately.

HELP:

For further guidance on policies and procedures, supporting documentation, and training please contact your:

- Site Security Manager (SSM)
- Business Line Security Lead (BLSL)
- Central Security Team (CST)

Record Management

We must maintain business records in a systematic and reliable way.

A systematic approach to records management is essential for ensuring compliance with legal and regulatory obligations – such as those related to data protection, government procurement, taxation, and employment. It also helps reduce the risks and costs associated with retaining unnecessary information.

By managing records effectively, we protect our business, uphold regulatory standards, and support operational efficiency.

What is a record?

Records are documents, communications and other materials that are written, recorded or otherwise machine readable. Records can be in many formats including electronic, paper, book, facsimile, film, videotape, audiotape, and other formats available through existing and emerging technologies.

Our commitment

At GKN Aerospace, we are committed to:

- > providing you with detailed information and resources to help you understand document retention periods and applicable laws and regulations.

Your Role

- > Take care to understand the requirements of the Document Retention Policy.
- > If your role involves working with Government Contracts or Export Controlled items, make sure to take particular care to understand the classification levels applicable to those contracts.
- > When you create records, always think about the right level of classification for that record, particularly for sensitive information.
- > Help colleagues to understand how they should handle documents you create by you applying the correct markings on documents.
- > Think about how you need to store documents, depending on their classification, and action appropriately.
- > Make it your business to understand what records we need to retain and for how long. When it comes to destroying records, follow the correct rules.

HELP:

For further guidance on policies and procedures, supporting documentation, and training, please contact your line manager or the Legal, IT or Trade Compliance functions.

Data Privacy



HELP:

For further guidance on policies and procedures, supporting documentation, and training please or contact your line manager or the Human Resources function or the Legal function.

We must protect the privacy of personal information.

Data is an increasingly valuable asset, and its improper handling, whether through unauthorised access, carelessness, or lack of awareness, can cause significant harm to individuals and organisations. Unauthorised use or disclosure of personal data can seriously impact individuals' privacy and wellbeing, while non-compliance with data protection laws can expose GKN Aerospace to substantial fines and cause serious reputational damage.

What is personal information?

Personal information is any information concerning an identified or identifiable person. This includes names, addresses, dates of birth, national insurance or social security numbers, bank account details, terms of employment, information about a person's ethnic origin, sexual orientation, trade union membership, religious beliefs and health.

Understanding what qualifies as personal information is essential for protecting privacy and ensuring compliance with data protection laws.

Our commitment

At GKN Aerospace, we are committed to:

- > only using and managing personal information in a lawful manner.
- > acting with integrity and protecting any personal information we hold.
- > complying with applicable laws relating to data protection and with the requirements of the Data Protection Policy.
- > providing all colleagues with information about the personal information we hold and their rights regarding that information.
- > ensuring all colleagues who have access to or deal with personal information are properly trained in their responsibilities regarding personal information.
- > ensuring our systems and processes are designed so personal information is safeguarded at all times.
- > regularly reviewing our Data Protection policies and procedures to ensure they meet the appropriate standards and levels of compliance.
- > treating all concerns and enquiries regarding personal information with respect and care.

Your Role

- > If you are a member of a team that deals with personal information, such as the Human Resources function, ensure you understand your responsibilities and treat personal information in accordance with internal policies.
- > Speak Up if you see anything which looks like a risk to the security of personal information.
- > If you have any concerns about your own personal information talk to us about those concerns.

Ethics Hotline



Speaking Up isn't always easy – but it's always worth it.

If you see unsafe behaviour, unethical actions, or something that just feels wrong, you have the power and the responsibility to Speak Up. In an industry where safety and trust are everything, silence can be costly.

Your voice can stop an accident before it happens or expose a risk that others missed. You won't be alone, we have a policy of non-retaliation and confidential support is always available.

There are various ways for you to raise concerns including your line manager, Human Resources, subject matter experts and the Legal function. You are also able to raise concerns by using the Ethics Hotline.

Our Ethics Hotline is hosted by Navex, an external, independent company and is accessible to everyone 24 hours a day, seven days a week.

The main purpose of the Ethics Hotline is to provide another avenue for you to speak up about particularly serious matters. This includes reports concerning known or suspected fraud, bribery, corruption, money laundering, serious dangers to health and safety and theft.

All calls are confidential, and details can be provided anonymously if preferred.

You can raise a concern online or find your local Ethics Hotline number by visiting our dedicated website: gknaerospace.ethicspoint.com or scanning the QR code.



HELP:

For further guidance please refer to the Whistleblowing Policy and the Speaking Up page on Aeronet, or contact your line manager.