
**GKN AEROSPACE
WHISTLEBLOWING SUMMARY
POLICY**

1. POLICY STATEMENT

- 1.1 GKN Aerospace is committed to conducting its business with honesty and integrity at all times. This means that we follow the laws, regulations, standards and ethical practices that apply to GKN Aerospace wherever we conduct our business. We expect and rely on our employees and all other people working for GKN Aerospace to achieve this. We want everyone to feel valued at GKN Aerospace: safe, respected, treated fairly, and to feel they can speak openly and honestly.
- 1.2 GKN Aerospace aims to ensure that all employees and third parties with whom it deals feel confident that they can raise matters of concern. For employees it is important that this is without fear of being disloyal to colleagues or to the company, or for fear of being subjected to harassment, victimisation or any other detriment or retaliation. Any individual coming forward in such circumstances will be protected to the fullest extent possible by GKN Aerospace and their concerns will be taken seriously.
- 1.3 GKN Aerospace will fully investigate any disclosures made to it by employees and third parties (e.g. customers, suppliers, counterparties) of any circumstances or conduct that a person reasonably believes GKN Aerospace should be aware of. GKN Aerospace has a hotline for internal whistleblowing concerns.
- 1.4 GKN Aerospace operates a Whistleblowing Policy (“the **Whistleblowing Policy**”). This Summary Policy is a summary of the key provisions of GKN Aerospace’s Policy.

2. WHAT IS WHISTLEBLOWING?

- 2.1 “**Whistleblowing**” refers to the act of reporting or exposing suspected or actual wrongdoing or dangers at work, either within an organisation, or externally to someone like a regulator. A “**whistleblower**” is a person who reports or raises a concern which relates to suspected or actual wrongdoing or dangers at work.
- 2.2 We encourage disclosures under the Whistleblowing Policy if employees or third parties have reasonable belief that a wrongdoing or danger at work has occurred, is in the process of taking place, or is likely to occur in the future.¹

3. HOW SHOULD A WHISTLEBLOWING CONCERN BE RAISED?

- 3.1 All employees are encouraged to disclose relevant information as soon as possible after they become aware of the issue in question by one of the following routes:

¹ Including any: criminal offence; breach of a legal obligation; miscarriage of justice; danger to the health and safety of any individual; damage to the environment; failure to comply with any legal or professional obligation, or regulatory requirements; bribery; financial fraud or mismanagement; negligence; breach of our internal policies and procedures; unauthorised disclosure of confidential information; deliberate concealment of information about suspected or actual wrongdoing or dangers at work; and any other conduct of a fellow employee not covered within the above which would be likely to harm the reputation of GKN Aerospace

- 3.2 **Option 1 – Normal Procedure** - If they are not the subject of the concern, employees are encouraged to tell their immediate Line Manager, another manager, or their HR Contact. Employees may also refer the matter to a more senior member of staff, or a member of the Legal and Compliance Function.
- 3.3 **Option 2 – Alternative Procedure** – Where employees consider that their Line Manager, another manager, or HR Contact has not addressed their concern, or they prefer not to raise it with them, they may report the matter to the GKN Aerospace Hotline. The Hotline is hosted by an independent third party. The following options are available:
- (a) **Call the Hotline** - concerns can be reported in many different languages to the country specific hotline.
 - (b) **Use web reporting** - Go to the Melrose ethics point website and follow the instructions. Again, concerns can be reported in many different languages.

All options are available 24/7.

3.4 **Can concerns be reported anonymously?**

- (a) When a concern is reported through the Hotline there are two options regarding identity: (i) an anonymous option where an individual does not reveal their name; and (ii) a known-identity option where GKN Aerospace knows who the individual is and can contact them directly in case of any questions;
- (b) While there is no pressure to reveal their identity, if allegations are made anonymously and GKN Aerospace is unable to obtain further information from the whistleblower, this may affect the level of detail with which we can investigate the concern.

- 3.5 Relevant Joint Venture Partners should speak to their GKN Aerospace contact or the General Counsel of GKN Aerospace; or email: speaking.up@gknaerospace.com.

4. **REPORTS FROM THIRD PARTIES**

- 4.1 GKN Aerospace will fully investigate any disclosures made to it by third parties (e.g. customers, suppliers, counterparties) of any circumstances or conduct that the third party believes GKN Aerospace should be aware of. Third parties may contact, in confidence, GKN Aerospace's General Counsel; or email speaking.up@gknaerospace.com. This email address is managed by the GKN Aerospace Business Ethics Officer.

5. **HOW ARE REPORTED CONCERNS DEALT WITH?**

- 5.1 The GKN Aerospace Business Ethics Officer determines how and by whom the concern will be investigated. The investigation of a concern will be conducted in an independent,

fair and unbiased manner with respect to all parties involved and in accordance with the GKN Aerospace investigations protocols and all applicable laws and regulations.

- 5.2 The Business Ethics Officer will provide the whistleblowing report to an appropriate investigator or, in some cases an investigation team may be appointed, to establish whether wrongdoing has occurred. We will aim to keep the whistleblower informed of the progress of the investigation and its likely timescale. However, the need for confidentiality may prevent GKN Aerospace from giving specific details of the investigation or actions taken.
- 5.3 In all circumstances, any corrective measures requested will be reviewed by and confirmed to the Business Ethics Officer.
- 5.4 Following the investigation and subject to any legal constraints concerning data protection or for other legal reasons, findings will be communicated to the whistleblower as soon as possible, and, as appropriate, to the other individual(s) investigated.
- 5.5 Where appropriate, GKN Aerospace will refer matters to external authorities. In some circumstances, GKN Aerospace may need to make such a referral without the knowledge or consent of the whistleblower.
- 5.6 GKN Aerospace has an obligation to report certain categories of wrongdoing to its Melrose PLC, including: (i) fraud or cyber incidents, (ii) bribery or corruption, (iii) health and safety, and (iv) a case that relates to a member of the Executive Committee. In addition, GKN Aerospace reports information of incidents to Melrose on a quarterly basis.
- 5.7 The corrective measures taken will also be verified and recorded in a Whistleblowing Log.

6. CONFIDENTIALITY

- 6.1 If a concern is reported on a named basis, we will try our best to preserve confidentiality and only reveal a whistleblower's identity where necessary. If there are circumstances where the identity of the whistleblower needs to be revealed, where possible and to the extent legally permissible, the matter will first be discussed directly with the whistleblower.

7. PROTECTION FROM DETRIMENT OR RETALIATION

- 7.1 If a concern is raised under the Whistleblowing Policy in the reasonable belief that the disclosure is made in the public interest, GKN Aerospace is committed to ensuring no detriment in any way, including harassment, victimisation or other wrongful impact on a person's employment position. If employees believe that they have suffered a detriment or retaliation within the workplace as a result of raising a concern under the

Whistleblowing Policy, they should raise a formal grievance under the grievance procedure. These protections will not be available if an investigation under the Whistleblowing Policy concludes that a disclosure has been made maliciously or where there was not a reasonable belief that the reported wrongdoing had occurred or was about to occur.

8. US FEDERAL CONTRACTS

- 8.1 A notice required pursuant to FAR 52.203-17 (Contractor Employee Whistleblower Rights and Requirement to Inform Employees of Whistleblower Rights) is provided for all employees whose work supports U.S. Federal contracts. The full notice is detailed in the Whistleblowing Policy.

9. RESPONSIBILITY FOR THE SUCCESS OF THE WHISTLEBLOWING POLICY

- 9.1 The Executive Committee of GKN Aerospace has overall responsibility for the Whistleblowing Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under the Whistleblowing Policy.
- 9.2 The General Counsel is provided with monthly updates on: (a) the number and type of concerns reported through Hotline, specifying the number of concerns found to be (fully or partially) substantiated; and (b) trends and concerns noted by the Business Ethics Officer. The General Counsel reports to GKN Aerospace's Executive Committee and the Melrose's General Counsel
- 9.3 Managers have a specific responsibility to facilitate the operation of the Whistleblowing Policy and will be given training on the relevant legal and operational framework and best practice.
- 9.4 The GKN Aerospace Business Ethics Officer can answer all questions with regard to the Whistleblowing Policy and about raising concerns in general. The Business Ethics Officer also provides quarterly and annual reports to Melrose.