

## WHISTLEBLOWING (SPEAK-UP) POLICY

### Policy information

<b>Policy Owner</b>	Carl Moffat	<b>Date of Issue</b>	October 1, 2015
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<b>Author</b>	Karina Gerdes	<b>Version</b>	3
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<b>Applicable to:</b>	All Gardner Companies	<b>Next Revision Date</b>	As and when changes are applied

### Revision Record

Page	Issue		Reasons for change + Revision summary
	Level	Date	
All	3	Feb 2017	Addition of revision record, addition of examples for causes for whistle-blowing, addition of ways to report, slight restructuring and addition of “breach of any of the company’s policies” to types of wrongdoing, up-issued to

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### 1. PURPOSE

Our Policy on Speaking up, often referred to as 'Whistleblowing' is consistent with best practice and we are committed to applying this Policy because it is in the interests of Gardner's employees, customer and industry regulators. Speaking up is the term given to the disclosure by an employee to a line manager, independent manager or external body of serious, potentially criminal matters that have taken place or are taking place within an organisation.

The aim of this procedure is to encourage you to raise any genuine concerns you might have about certain wrongdoings within the company without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

Examples of such matters include:

- All suspected fraudulent/ bribery activity/ serious management malpractices -e.g. theft or misrepresentation
- Failures to comply with legislation, e.g. health and safety guidelines, export control, data protection, human trafficking
- Reckless conduct in the workplace
- Security concerns and Breaches

### 2. PRINCIPLES

We need to be made aware of any matters of malpractice, and all employees are actively encouraged to report any concerns in this area honestly, accurately and without malice. All such concerns will be treated with confidentiality, seriousness and investigated quickly.

We may also be obliged to pass information to relevant enforcement and regulatory authorities.

You should not use this procedure for complaints relating to your own circumstances, such as the way you have been treated at work. In those cases, you should use the grievance procedure or other relevant procedure as appropriate. This procedure is for making a disclosure of wrongdoing or malpractice where you reasonably think that disclosure is in the public interest. If you are uncertain whether or not something is within the scope of this policy, you should seek advice from the Ethics and Compliance Officer (VP HR).

### 3. HOW TO MAKE A REPORT

In the first instance, any relevant concerns should be raised with your line manager or other senior manager within your area with whom you feel comfortable.

If you feel the matter has not been dealt with, or it is not possible to properly discuss the details with your line

manager for any reason, the matter should be reported to the Group Human Resources Vice President (Ethics and Compliance Officer), any Board Director or by using the confidential reporting line, +44 (0)800 316 5407.

The company has various other mechanisms in place to report any such activity, including:

- Writing to any member of the Executive Team at Gardner Group, Victory Road, Derby; or
- Fill in the anonymous form on the intranet (<http://intranet.gardner-aerospace.com/section.aspx?SectionID=MG&PageID=3431>)

If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

### **3.1 Eligibility**

This procedure applies to all employees, apprentices, workers and anyone else who has a contract to carry out work for us personally. It does not apply to genuinely self-employed workers who run a profession or business on their own account.

## **4. TYPES OF WRONGDOING**

If you genuinely believe that we, or any of our workers, has taken, is intending to take or has failed to take action that you reasonably believe could lead or amount to:

- a criminal offence including bribery and/or fraud;
- a failure to comply with any legal obligations;
- danger to the health and safety of any individual;
- damage to the environment, or
- the deliberate concealment of information concerning any of the matters listed above
- breach of any of the company's policies
- breach of Export Control Regulations
- breach of Security rules

Any concerns covered by this procedure should be raised with the company to allow us the chance to deal with them. You should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if you have good reason to believe that evidence would be destroyed. Remember also that social media sites such as YouTube and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

## **5. INVESTIGATING ALLEGATIONS OF WRONGDOING**

If you disclose information in accordance with this procedure, wherever reasonably practicable we will keep your identity confidential. We will investigate your allegation promptly. During the course of our investigation we may require your assistance. We discourage anonymous disclosures as they are likely to hinder effective investigation.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat information about the investigation as confidential.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with our Chief Executive Officer.

We will inform you of the outcome of the investigation as soon as practicable. We will take whatever action we consider to be appropriate.

## 6. ACTION WE MAY TAKE

No action will be taken against anyone who raises a genuine concern in accordance with this procedure. We may take appropriate action against any person found to be:

- victimising another person for using this procedure (please tell the Ethics and Compliance Officer (VP HR) if you think you have been victimised, or raise it formally under the grievance procedure if the matter is not remedied);
- deterring any person from reporting genuine concerns under this procedure (please tell the Ethics and Compliance Officer if you think you have been deterred, and raise it formally under the grievance procedure if the matter is not remedied), or

For employees this action may involve us taking disciplinary action, which may result in dismissal. We may also take disciplinary action against a person who does not act in accordance with this procedure.

## 7. SECURITY OF INFORMATION

Unless expressly authorised to do so, you are strictly prohibited from the sending, transmitting or other external distribution of proprietary information, data, trade secrets or other confidential information belonging to Gardner or its customers. This includes information about procedures and the organisation that could be of value to our competitors.

## 8. THE MEDIA

If a representative of the media contacts you, you should in all cases refer them to the Director for Business Development on +44 (0)1332 274700 / +44 (0) 7917 128 459 or Corporate Development Manager at [kgerdes@gardner-aerospace.de](mailto:kgerdes@gardner-aerospace.de)

### Status of this Policy

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.