

Whistleblowing: Our SpeakUp Policy

Policy

AB Dynamics plc, its subsidiaries and associated companies are committed to responsible and ethical business practices. We expect all staff to act in accordance with relevant laws and regulations. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. We wish to encourage and facilitate our employees to report suspected wrongdoings or dangerous conduct and situations, as soon as they become aware of them, as a culture of openness and accountability is essential to prevent such situations occurring, or to address them if they do occur.

Purpose

This SpeakUp policy describes how you can speak up about suspected illegal or unethical conduct. The policy describes the process from start to finish, so that you know what to expect and the ways you will be protected when speaking up (confidentiality, anonymity, non-retaliation).

The aims of this SpeakUp policy are:

- a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- b) To provide staff with guidance as to how to raise those concerns.
- c) To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, customers, suppliers, volunteers, interns, casual workers, and agency workers.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- a) Health and Safety Risk or Breach;
- b) Bribery or Corruption;
- c) Risk or Actual Damage to the Environment;
- d) Loss of, or Intentional Damage to Company Property;
- e) Anti-competitive behaviour (anti-trust);
- f) A Criminal Offence (including theft or financial crime or mismanagement);
- g) Fraud (including falsifying information or documentation);
- h) Failure to protect Personal Data;
- i) International Trade Controls and Sanctions Breaches;
- j) Bullying, Harassment or Discrimination;
- k) Conflicts of Interest;
- l) Human Rights violations (including Modern Slavery);
- m) Conduct likely to cause Reputational Damage to the Group or a subsidiary;
- n) Unauthorised disclosure of Confidential Information;
- o) Other breach of Company Ethics, Policies or Procedures.

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This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the appropriate regional grievance procedure(s).

If you are uncertain whether something is within the scope of this policy, you should seek advice from your Line Manager. If the matter concerns that person, you should refer it to a more Senior Manager, the People Team, or the Group General Counsel.

How to Raise a Whistleblowing Concern

As soon as you suspect illegal or unethical conduct you should speak up. We do not expect you to have all the answers and encourage you to use what is described in this policy as a reference point to determine if something is not right.

We hope that in many cases you will be able to raise any concerns with your Line Manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to a more Senior Manager, the People Team, or the Group General Counsel.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague, or other appropriate representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

However, where the matter is more serious, or you feel that your line manager or other notified person has not addressed your concern, or you prefer not to raise it with them for any reason, or if you wish to remain anonymous, you can submit a report at:

<https://abdynamics.speakup.report/raiseyourconcern>

or download the app by scanning this QR code:



The SpeakUp system is operated by an independent service provider and is available 24/7. You can speak up in your own language via app or internet. Reports are handled internally at AB Dynamics, and they will be sent to our Non-Executive Directors, the Legal Department or Group Head of People (the ABD SpeakUp team).

All reports are strictly confidential. Whilst we encourage you to provide your name in the report, you may use the system to file an anonymous report.

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When you lodge a report, you will be given a report number, and you will choose a password. Please make sure you keep a record of your Report Number and Password, you will not be able to add further information or access communications from us without these. Should you choose to file a report through the AB Dynamics SpeakUp system all communication(s) with us can remain anonymous if you wish them to be.

External Disclosures

The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. Local legislation may stipulate that in some circumstances it would be appropriate for you to report your concerns to an external body such as a regulator. Nevertheless, we strongly encourage you to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. You can raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your Line Manager or one of the ABD SpeakUp team, for guidance.

Investigations and Outcome

Once you have raised a concern, the ABD SpeakUp team will send you an acknowledgement of receipt within seven days. Your report will be evaluated and assessed to define the scope of any investigation and determine the appropriate course of action. Sometimes you will be asked follow-up questions. You may also be required to attend additional meetings or provide further information through the SpeakUp channels (the webpage or app).

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

The ABD SpeakUp team is responsible for solid, confidential, and precise fact-finding. Procedures are in place to ensure that this approach is upheld.

Please note that not all issues raised will automatically lead to a formal investigation. Sometimes following another course of action is better for all parties involved (e.g. mediation). Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information.

If an investigation is deemed necessary, we will aim to keep you informed of the progress of the investigation and the status of the complaint. We aim to conclude our investigations and provide you with feedback within three months from the acknowledgement of receipt, although some investigations may take longer.

On conclusion of an investigation the applicable members of the ABD SpeakUp team will provide a report to the Audit and Risk Committee Chair with recommendation of how the investigation should be

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concluded. They will then decide whether to accept the proposal or recommend an alternative resolution.

Please note that we may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy, and the legal rights of the other parties. All parties involved, including the accused, are entitled to confidentiality. You should treat any and all information you have or become aware of regarding the investigation as confidential.

Misuse of the policy

We take the practice of reporting in bad faith or any other form of misuse of this policy very seriously. If we conclude that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

If you are not satisfied

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 believe your concern has not been handled by the ABD SpeakUp team in accordance with this policy or if you are not satisfied with the way in which your concern has been handled, you can raise it with one of the other key contacts. Alternatively, you may contact a Member of the Board of Directors not previously involved in this procedure.

Protection and support for whistle-blowers

It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Protecting you as a reporter is one of the main purposes of this policy. In many jurisdictions whistle-blowers benefit from specific legal protection. AB Dynamics is committed to upholding these protections and supplementing them with this policy

Non-retaliation

Staff must never suffer any detrimental treatment because of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the People Team and / or the Group General Counsel immediately. If the matter is not remedied, you should raise it formally using the appropriate regional grievance procedure. We encourage speaking up and any person that speaks up is protected. Staff must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action. If you notice or experience any retaliation, you can report this via one of our SpeakUp channels.

Anonymity

Please also note that the ABD SpeakUp team has a responsibility to anonymise any information that comes in, in order to protect your identity. If you are concerned about speaking to your Line Manager, the People Team, or the General Counsel, the SpeakUp channels (webpage or app detailed above) offer

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you the best protection. The SpeakUp channels allow you to upload information and engage with the ABD SpeakUp team in an entirely anonymous way.

Protection for Other Parties

This policy aims to safeguard the other parties involved in a whistleblowing situation. The following principles apply to all parties involved in a whistleblowing report:

Privacy

Our Company is committed to protecting the privacy of everyone involved in the SpeakUp process. We will do everything within reason to safeguard personal data from unauthorised access and processing. Any personal data obtained will be processed in line with our privacy policy and will only be used for the purposes explained in this policy or to comply with the law or an important public interest.

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. Depending on the purpose of sharing, the ABD SpeakUp team will anonymise the information prior to sharing it. Information will only be shared outside of this Group if we are required to do so by law or if there is an important public interest element.

In principle, we are obliged to inform any person under investigation that he or she is the subject of a report and is being investigated. This notification may be delayed if there is a risk that this may jeopardise the investigation or the gathering of evidence. The reporter's identity will not be disclosed, unless it is essential to do so. In those circumstances the ABD SpeakUp team will seek the permission of the reporter before any disclosure is made.

Despite the measures we take to protect a reporter's confidentiality, we cannot guarantee that you will never be implicated by circumstances or events, during the course of an investigation.

Protecting you, as the accused

A person who is subject to a concern needs our utmost protection. The presumption of innocence is a leading principle. The ABD SpeakUp team is responsible for protecting the rights of anyone who is accused or otherwise involved, in any issue.

Information Rights

When a person is officially under investigation, they should be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

Right to Defend and Appeal

During the course of any investigation, after the facts are determined, the accused shall receive an opportunity to not only give a statement (responding to the accusations) but also have the right to provide their own evidence and comment on the draft findings.

Responsibility for the success of policy

The board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

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The Group General Counsel has day-to-day operational responsibility for this policy and must ensure that all personnel within AB Dynamics or its subsidiaries who may deal with concerns or investigations under this policy receive support and training where appropriate.

The Group General Counsel, in conjunction with the board should review this policy from a legal and operational perspective on a regular basis. All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the People Team.

This policy may be changed at any time, in accordance with the practices and needs of the Company. It will also be reviewed on a regular basis and updated in accordance with changes to relevant legislation.

This document is a statement of Company policy, is non-contractual in its effect and does not form part of employees' terms and conditions of employment.