

ABD Group - Whistleblowing Policy



Policy

AB Dynamics plc, its subsidiaries and associated companies are committed to conducting our business with honesty and integrity, and we expect all staff to maintain these high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

Purpose

The aims of this 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, volunteers, interns, casual workers, and agency workers as well as suppliers, customers and other third parties.

What is whistleblowing?

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

- a) criminal activity;
- b) miscarriages of justice;
- c) danger to health and safety;
- d) damage to the environment;
- e) failure to comply with any legal or professional obligation or regulatory requirements;
- f) financial fraud or mismanagement;
- g) negligence;
- h) breach of our internal policies and procedures;
- i) conduct likely to damage our reputation;
- j) unauthorised disclosure of confidential information;
- k) the deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

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 or Anti-harassment and Bullying Policy as appropriate.

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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 HR Department, or the Group General Counsel.

Raising a Whistleblowing Concern

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 HR Department, 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.

AB Dynamics Integrity Line

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, you should contact the AB Dynamics Integrity Line at abdynamics.integrityline.com and make a report.

Through our independent online reporting system, you can quickly and easily report concerns about actual or suspected misconduct that can affect our company or the wellbeing of people. The reporting system is available 24 hours a day/7 days a week/365 days a year.

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.

When you send the report, you have the option to choose whether you can be contacted by the case manager by creating a secure Inbox. We recommend that you do so because we may not be able to investigate the case without further information from you.

When you create an Inbox, you will be given a case number, and you will choose a password. You will use the case number and password to log in to the Inbox in order to see if you have received any questions. Please make sure you keep a record of your Case Number and Password, you will not be able to add further information or access communications from us without these.

Your anonymity will not be compromised; therefore, even if you wish to remain anonymous, we ask you to open a post box. This makes it safer and easier for us to communicate with you. Should you choose to file a report through the AB Dynamics Integrity Line all communication(s) with us can remain anonymous if you wish them to be.

External Disclosures



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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. 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 other individuals referred to, for guidance.

Investigations and Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings or provide further information through the AB Dynamics Integrity Line.

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.

We will aim to keep you informed of the progress of the investigation and 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 any information about the investigation as confidential.

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 are not happy 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 or our external auditors.

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.

In many jurisdictions whistle-blowers benefit from specific legal protection. AB Dynamics is committed to upholding these protections and supplementing them with this policy and our commitment staff must never suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental

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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 HR Department and / or the Group General Counsel immediately. If the matter is not remedied, you should raise it formally using the appropriate regional grievance procedure. Staff must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

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.

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 HR Department.

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.