

FENNER PLC

GROUP WHISTLEBLOWING POLICY

INTRODUCTION & PURPOSE

The Group is committed to maintaining the highest standards of honesty, openness and accountability and this Whistleblowing Policy enables all employees to voice genuine concerns regarding suspected malpractice in a responsible and effective manner without fear of reprisal or retribution.

Whether you are an employee or simply working on Group premises, you may discover or suspect malpractice. The Group has a duty to identify such situations, take appropriate action and encourage this with a culture of openness throughout the Organisation.

This Whistleblowing Policy has been put in place to give you guidance on what to do if you discover or suspect malpractice in the workplace. It should assist you to report your concerns to an appropriate person so that they can be investigated and dealt with as quickly as possible. The policy is not intended to deal with general operational issues that you may have as these should be raised in the normal manner with your line manager.

EXAMPLES OF MALPRACTICE

Workplace malpractice includes:

- criminal offences such as fraud, deception, bribery, theft and corruption
- financial malpractice
- breaching legal requirements and statutes
- deliberately ignoring significant health and safety or environmental protection obligations
- improper conduct or unethical behaviour including the concealment of malpractice
- other similar matters which are against the public or the company's interests.

PROCEDURE

If you have a genuine belief that malpractice is being, or is likely to be, committed you will need to decide to whom this should be reported. In normal events such matters should be reported to your line manager. However, if this is not appropriate because you suspect that he or she may be involved in the malpractice or he or she does not resolve the matter you should report it to the next appropriate person set out below:

- **Firstly, another member of your line management or HR Team.**
- **Secondly, your Unit MD**
- **Thirdly, your Divisional Director.**
- **Fourthly, the Group Company Secretary or any Executive Director of Fenner PLC.**
- **Finally, the Senior Independent Director of Fenner PLC**
- **or contact the confidential independent third party whistle blowing hotline**

You can contact any Executive Director, the Group Company Secretary and the Senior Independent Director at Hessewood Country Office Park, Feriby Road, Hesse, UK, HU13 0PW.

INVESTIGATION & CONFIDENTIALITY

The person to whom malpractice is reported will take prompt and appropriate action to investigate your concern by following the Group guidelines as issued from time to time. They will do all they can to respect your confidentiality and will probably take advice in confidence from the Group Company Secretary and or the Group Business Risk Manager as necessary. All concerns that you raise will be treated seriously and, you will be kept informed of action taken.

The Group Company Secretary is the executive who decides on whether to notify any external regulators and or the police following an allegation of malpractice dependent on the nature of the allegation.

DISCIPLINARY ACTION

You will not be dismissed or disadvantaged as a result of raising any genuine and reasonably held concern about workplace malpractice. Disciplinary action will be taken against anyone who victimises you as a result of your raising such concern. You should, however, be aware that a concern that is raised by you frivolously, maliciously or in bad faith will be treated as a disciplinary matter.

Finally, you should note that this policy is concerned with the identification of workplace malpractice and is not a personal grievance procedure.

WHISTLE BLOWING HELPLINE

Independent Confidential Whistle Blowing Helpline: Main UK Number – 0800 915 1571

Whistle Blowing Helpline: the telephone number for each territory should be available on notice boards in all Group locations