	Finance, Governance, Risk and Compliance – Process Level 2		
	<b>Whistleblowing &amp; Employee Disclosure Policy</b>		
Proprietary and Confidential	DL-04-PY-004-ENG	Rev A	1   3
	Driveline STD (n/a)		

Revision	Date	Modification notes
A	21.04.2021	First Issue

**Document Approval**

Document approved through electronic system in Windchill (DES Library) by all relevant functions.  
Document Owner is visible in the DES Portal.

**This is a translated version of the DES policy for reference only.  
In the event of any conflict, the original English language version of the policy prevails.**

## 1.0 Purpose

At GKN Automotive we are committed to maintaining the highest standards of business conduct and we expect all our employees and workers to conduct themselves in accordance with our values and the requirements of our Employee Code of Conduct. In order to maintain these standards, it is important that if things go wrong, employees speak up and bring issues to our attention so that we can address them appropriately. We therefore encourage a culture of ‘Speaking Up’ which includes the reporting of concerns under this policy.


The purpose of this policy is to set out GKN Automotive’s approach to the governance and management of Whistleblowing.

Responsibility for this policy, for reviewing the effectiveness of actions taken in response to concerns raised under this policy, and for ensuring that the facilities to enable compliance with this policy are maintained, resides with the General Counsel.

## 2.0 Scope

This policy applies at all GKN Automotive locations globally and applies to all GKN Automotive Employees (as defined below). This policy sets out GKN Automotive’s approach to the governance and management of “**Whistleblowing**” which for the purposes of this policy means the disclosure of information which relates to suspected wrongdoing, improper conduct, or dangers at work, in each case relating to GKN Automotive or its business. This may include matters relating to:

- (a) Breach of Law or Regulation. For example, any criminal activity, failure to comply with any legal obligation or regulatory requirement.
- (b) Health, Safety or Environmental Concerns. For example, reporting any potentially unsafe practices, any damage to the environment, or breach of GKN Automotive HSE policies.
- (c) Financial Irregularities. Including fraud, tax evasion or improper recordkeeping.
- (d) Unethical Behaviour. For example, bribery, corruption, racism, discrimination, bullying, harassment or any other behaviour that is contrary to GKN Automotive’s values.
- (e) Breach of any GKN Automotive Policy. Including all quality related policies and all policies referred to in our Employee Code of Conduct.
- (f) The deliberate or knowing concealment of any of the above.

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(g) Any other action which would be likely to harm the reputation of GKN Automotive or its shareholder(s).

This policy does not form part of any GKN Automotive Employee’s terms and conditions of employment and is not principally intended to cover complaints or grievances relating to a GKN Automotive Employee’s own personal circumstances, such as the way they have been treated at work.

Although there can be some overlap, such complaints are usually more appropriately handled through the local grievance procedure (or equivalent) which applies to the GKN Automotive Employee’s employment.. These policies differ from country to country and are available from your local HR function.

### 3.0 Process

#### 3.1 Raising a Whistleblowing Concern

All GKN Automotive Employees should feel free to raise any Whistleblowing concerns with their line manager. This can be done verbally or in writing. In many cases line managers may be able to resolve concerns quickly and effectively. In some cases, they may refer the matter to another more appropriate person. In doing so, line managers will keep the GKN Automotive Employee who raised the concern informed as to how they are addressing the issue, unless doing so would breach confidentiality which is reasonably required to manage the issue.

However, if the matter is more serious, or a GKN Automotive Employees feels that their line manager cannot or has not addressed their concern, or they prefer not to raise it with their line manager for any reason, they should raise the concern by either:


- (a) contacting any member of the Legal Function (contact details are available on Ourspace); or
- (b) calling our confidential Employee Disclosure Hotline. The Hotline is externally managed and can handle calls on an anonymous basis if necessary. Information provided via the hotline will be shared with the Legal Function who will consider how best to address the concern as described in paragraph 3.2 below. The phone numbers for the Employee Disclosure Hotline are available on Ourspace, at [www.gknautomotive.com/SpeakingUp](http://www.gknautomotive.com/SpeakingUp), and are prominently displayed at each GKN Automotive location.

We encourage wherever possible that concerns are raised openly and directly, and are only raised anonymously when the GKN Automotive Employee feels they have no alternative, as raising concerns anonymously often makes it more difficult to undertake a proper investigation or to establish whether any allegations are credible. GKN Automotive will endeavor to keep GKN Automotive Employees’ identities confidential where requested, unless disclosure is necessary for the purposes of the investigation or to comply with any legal obligation, or GKN Automotive otherwise determines there is no reasonable alternative.

#### 3.2 Investigations

Once a concern has been raised to the Legal Function or via the Employee Disclosure Hotline, the Legal Function will carry out an initial assessment of the nature of the concern and will then (having consulted with any relevant functions or leadership) determine how to proceed. This may include:

- (a) Determining that an investigation into the concern is appropriate, in which case an investigator or team of investigators will be appointed.
- (b) Determining that the matter should be addressed through another process, for example a local grievance procedure, in which case this decision will be communicated to the Whistleblower.

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- (c) Determining that there are no grounds for any further action, in which case this will be communicated to the Whistleblower.

Following the conclusion of any investigation or other process, information on the outcome of that process may be communicated to the Whistleblower, to the extent appropriate in the circumstances.

There is no right of appeal or equivalent process to any decision taken under this policy. Any complaints regarding how any investigation, concern or incident is dealt with must be made via any applicable local grievance procedure (or equivalent) which applies to the GKN Automotive Employee's employment.

### 3.3 Protection & Support for Whistleblowers

It is understandable that Whistleblowers can be worried about possible repercussions. GKN Automotive aims to encourage openness and will support GKN Automotive Employees who raise genuine concerns under this policy, even if they turn out to be mistaken. In particular, whistleblowers will not suffer any detrimental treatment (such as dismissal, disciplinary action, threats or other adverse treatment) as a result of raising a genuine concern. However, a Whistleblower who makes false allegations maliciously may themselves be subject to disciplinary action.

GKN Automotive Employees must not threaten or retaliate against Whistleblowers in any way. Any such conduct may itself result in disciplinary action.

### 4.0 Definitions

**"GKN Automotive Employee"** means all employees or workers within GKN Automotive, which includes full time and part time employees and other workers including contractors, agency workers, interns, apprentices and volunteers.

**"Whistleblower"** means a GKN Automotive Employee who raises a genuine concern relating to matters which constitute Whistleblowing as set out in paragraph 2.0 of this policy.

### 5.0 Records/ Logs

The Legal function will maintain confidential records of all Whistleblowing matters referred to them.

### 6.0 References

n/a