Whistleblowing Policy

Honesty, integrity and fairness
1. POLICY STATEMENT

1.1 Rotork encourages an open culture in which every person respects the views and opinions of their colleagues. Rotork is committed to conducting its business with honesty, integrity and fairness and expects all people to maintain 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 in order to prevent such situations occurring or to address them when they do occur and this is why Rotork has a Whistleblowing Policy.

1.2 This policy aims to:

(a) Encourage people to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate.

(b) Provide people with guidance as to how to raise those concerns.

(c) Reassure people that they should be able to raise genuine concerns without fear of any comeback, even if they turn out to be mistaken.

2. WHO IS COVERED BY THIS POLICY AND WHO IS A WHISTLEBLOWER?

2.1 This policy applies to all individuals working within, for or with Rotork, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency people, suppliers and customers (collectively referred to as people in this policy).

2.2 A Whistleblower is a person who raises a genuine concern relating to any of the activities listed in section

3.1. 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.

2.3 This policy is not intended for use 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 Grievance Procedure which is available from your usual human resources representative or your manager.

3. WHAT IS WHISTLEBLOWING?

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

(a) criminal activity;

(b) danger to health and safety;

(c) damage to the environment;

(d) failure to comply with any legal or professional obligations or regulatory requirements;

(e) bribery;

(f) financial fraud or mismanagement;

(g) negligence;

(h) breach of our internal policies and procedures;

(i) conduct likely to damage Rotork’s reputation (including unethical conduct);

(j) unauthorised disclosure of confidential information; and/or

(k) the deliberate concealment of any of the above matters.

3.2 If you are uncertain whether something is within the scope of this policy you should seek advice from one of the Whistleblowing Officers (details are found in section 8).

4. RAISING A WHISTLEBLOWING CONCERN

4.1 We hope that in many cases you will be able to raise any whistleblowing concerns with your manager. You may tell them in person or in writing. However, if you would prefer not to raise it with your manager for any reason or you feel that your manager has not addressed your concern adequately, you can raise your concern with a more senior manager, your local human resources department, or, if you would prefer, with one of the Whistleblowing Officers, or through our external Safecall Whistleblowing Hotline.

Refer to section 8 for contact details.

4.2 We do not encourage people to make disclosures anonymously. Without your name, proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers are sometimes concerned about possible reprisals if their identity is revealed. When you make a whistleblowing report, we will discuss with you what appropriate measures can be taken to preserve confidentiality.
5. INVESTIGATION AND OUTCOME

5.1 Once you have raised a concern, an initial assessment will be carried out to determine the scope of any investigation. While we will endeavour to keep you informed of Rotork’s response to the whistleblowing report, sometimes the need for confidentiality may prevent you receiving specific details of the investigation or action taken as a result.

5.2 In some cases we may appoint an investigator or team of investigators including people 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.

5.3 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.

6. PUBLIC CONCERN AT WORK

If you wish to do so, you can seek further advice and support from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are contained in section 8.

7. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

7.1 It is understandable that Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support people who raise genuine concerns under this policy, even if they turn out to be mistaken.

7.2 People should be assured that genuine whistleblowing reports, made without malice and without a view to personal gain or to cause disruption and damage to Rotork, will not result in any detrimental treatment to the Whistleblower, even if it is a mistake. Detrimental treatment includes demotion, 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 one of the Whistleblowing Officers immediately. If the matter is not remedied you should raise it formally using your local grievance procedure.

7.3 No one may threaten or retaliate against Whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

8. CONTACTS

Whistleblowing Officers

Name: Karen Leigh
Group HR Manager
Telephone: +44 (0)1225 733546
E-mail: Karen.Leigh@rotork.com

Name: Stephen R. Jones
Group Company Secretary
Telephone: +44 (0)1225 733331
E-mail: Stephen.Jones@rotork.com

Safecall Whistleblowing hotline (24 hours)
Telephone: Please see Appendix 1
E-mail: Rotork@safecall.co.uk

Public Concern At Work
Helpline: +44 (0)20 7404 6609
E-mail: whistle@pcaw.co.uk
Website: www.pcaw.co.uk
Overseas advice: http://www.pcaw.co.uk/law-policy/international-law

Report online: http://www.safecall.co.uk/report
## Appendix 1 – Safecall telephone numbers

<table>
<thead>
<tr>
<th>Country</th>
<th>Telephone number</th>
</tr>
</thead>
<tbody>
<tr>
<td>AUSTRALIA</td>
<td>0011 800 72332255</td>
</tr>
<tr>
<td>BAHRAIN</td>
<td>8000 4264</td>
</tr>
<tr>
<td>BRAZIL</td>
<td>0800 892 1750</td>
</tr>
<tr>
<td>CANADA</td>
<td>1877 59 98073</td>
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<tr>
<td>CHILE</td>
<td>800 200 734</td>
</tr>
<tr>
<td>CZECH REPUBLIC</td>
<td>00800 72332255</td>
</tr>
<tr>
<td>CHINA</td>
<td>10800 744 0605 (China Unicom) 10800 440 0682 (China Telecom)</td>
</tr>
<tr>
<td>FRANCE</td>
<td>00800 72332255</td>
</tr>
<tr>
<td>GERMANY</td>
<td>00800 72332255</td>
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<tr>
<td>HONG KONG</td>
<td>001 800 3077 5524</td>
</tr>
<tr>
<td>INDIA</td>
<td>00800 440 01256</td>
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<tr>
<td>INDONESIA</td>
<td>001 803 440 0884</td>
</tr>
<tr>
<td>ISRAEL</td>
<td>012 800 72332255 (Golden Lines) 013 800 72332255 (Barak) 014 800 72332255 (Bezeq)</td>
</tr>
<tr>
<td>ITALY</td>
<td>00800 72332255</td>
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<tr>
<td>JAPAN</td>
<td>0120 921 067</td>
</tr>
<tr>
<td>KOREA</td>
<td>01 800 72332255 (Korea Telecom) 002 800 72332255 (DACOM)</td>
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<tr>
<td>LIBYA</td>
<td>+44 191 516 7764</td>
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<tr>
<td>MALAYSIA</td>
<td>1800 220554</td>
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<tr>
<td>MEXICO</td>
<td>01800 123 1758</td>
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<tr>
<td>NETHERLANDS</td>
<td>00800 72332255</td>
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<tr>
<td>NORWAY</td>
<td>00800 72332255</td>
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<tr>
<td>NEW ZEALAND</td>
<td>00800 72332255</td>
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</tbody>
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- **POLAND**: 00800 72332255
- **PORTUGAL**: 00800 72332255
- **RUSSIA**: 810 800 72332255
- **SOUTH AFRICA**: 00800 72332255
- **SAUDI ARABIA**: 800 844 2067
- **SINGAPORE**: 001 800 7233 2255 (SingTel) 002 800 7233 2255 (M1) 008 800 7233 2255 (Star Hub)
- **SPAIN**: 0800 72332255
- **SWEDEN**: 0850 252 122
- **SWITZERLAND**: 00800 72332255
- **THAILAND**: 001 800 72332255 (CAT)
- **TURKEY**: 00800 4488 20729
- **UNITED ARAB EMIRATES**: 8000 441 3376
- **UNITED KINGDOM**: 0800 915 1571
- **USA**: 1 866 901 3295
- **VENUEZUELA**: 800 100 696