



FILTRONA GROUP
RIGHT TO SPEAK POLICY

Version: 0.1 Date Of Issue: 1st Jan 2023

Owner: Legal, Compliance, Risk & Governance (LCRG)



1. INTRODUCTION

1.1 Overview

Filtrona Group (“Company”) is committed to doing business the right way, to continually earn the trust of customers, stakeholders and the wider marketplace. In accordance with the Company **Ethics Code**, the **Executive Leadership Team** (“ELT”) expect all employees – and anyone carrying out work on behalf the Company – to maintain the highest standards of ethical business conduct and personal behavior at all times, and to act safely, honestly, responsibly, lawfully and with integrity.

1.2 Scope

This **Right to Speak Policy** (“Policy”) is designed to enable any employee to make fair and prompt disclosure of any concerns where they genuinely and reasonably believe that the high standards expected by the Company’s Ethics Code are not being upheld.

For the purposes of this Policy, the term “**employee**” means employees (whether fixed term, permanent or temporary), directors, officers and other individuals working for the Company such as contractors and agency workers.

The aims of this Policy are:

- i. to make employees aware that:
 - a. genuine and reasonable suspicions of illegal or unethical activities, or inappropriate practices, should be reported as soon as possible;
 - b. any concerns will be taken seriously;
 - c. any concerns will be thoroughly investigated and action taken as appropriate; and
 - d. confidentiality will be respected;
- ii. to provide employees with guidance as to how to raise any concerns; and
- iii. to support employees and reassure them that:
 - a. they are able to raise genuine and reasonably held concerns in good faith, even if they turn out to be mistaken; and
 - b. they will be protected against reprisal and retaliation.

Note: This Policy does not form part of any employee's contract of employment and it may be amended at any time.

Any information which relates to suspected activities or practices which fall below the highest standards of business conduct and personal behaviour as expected by the Company Ethics Code should be disclosed under the Policy.

This may include:

- dangers to health and safety;
- criminal activity;
- damage to the environment;
- failure to comply with any legal or regulatory requirements;
- financial fraud or mismanagement;
- the deliberate concealment of any of the above matters; or
- unethical behaviour.



The above list is not exhaustive, and employees should not be discouraged from making any disclosure of concerns that they may have simply because those concerns do not fall within the categories identified above.

2. WHEN SHOULD AN EMPLOYEE RAISE ANY CONCERNS

Employees are encouraged to use their judgement prior to raising any concerns under the Policy. Employees do not need absolute proof of their suspicions, but those suspicions should be genuine and based on a reasonable belief of the relevant circumstances and any disclosures should be made in good faith.

Consistent with our values, the Company is committed to maintaining a culture of openness, honesty and integrity. Employees should be aware therefore that they may face sanctions if they make a false report in bad faith.

3. WHEN SHOULD AN EMPLOYEE NOT USE THE PORTAL TO RAISE A CONCERN

Employees should not use the Policy for any issues or concerns relating to their own personal circumstances at work. Employees should follow the Company's Human Resource grievance or other procedures established at their place of work for handling such matters.

4. HOW DO EMPLOYEES MAKE A DISCLOSURE UNDER THE POLICY

In the first instance, employees are encouraged to raise any concerns requiring disclosure with their Line Manager, Human Resource representative or other management within their immediate working environment. Procedures are established across the company for the prompt escalation of any issues requiring review by more senior management.

If employees feel that they need to raise the issue outside of their immediate working environment at any time, the Company has put in place, through an independent third party, the '**Filtrona Group EthicsPoint Helpline**'. This is a confidential call centre manned 24 hours a day by appropriately trained, local language speaking individuals, and the relevant telephone numbers are displayed at each Filtrona Group business location. Alternatively, employees can submit a report online using the '**Filtrona Group EthicsPoint Portal**' and file a confidential concern.

5. HOW WILL FILTRONA GROUP RESPOND TO ANY DISCLOSURES

The Company will arrange for the proper and appropriate investigation of any disclosures made by any employee under the Policy. Investigations will be conducted promptly and fairly, with due regard to the nature of any allegations and the rights of the individuals subject to the concerns.

Depending on the nature of the concern it will either be dealt with by internal management or it may be referred to an appropriate external body, such as the police, regulatory bodies or professional firms having due and proper regard to applicable Data Protection legislation in order to ensure that the rights of individuals are respected as appropriate.

The person appointed to investigate the concern will be independent, without any direct interest in the subject matter or general engagement with the employee making the disclosures or any individuals subject to any concerns.



Subject to any recommendations from the police, regulatory bodies or professional advisers, and the rights of the individuals subject to the concerns, the Company will advise the employee responsible for making the disclosure of the findings of the investigation and any actions to be taken as a result.

If any investigation concludes that an employee has made false concerns in bad faith, that employee's conduct may be sanctioned for failing to uphold the Company's commitment to openness, honesty and integrity in the workplace.

6. CONFIDENTIALITY AND PROTECTION FROM REPRISALS

The Company is committed to ensuring that employees feel able to raise concerns openly in good faith (without malicious intent) under the Policy, without fear of reprisal or retaliation and with the support of the Company.

Where an employee genuinely believes that there is some form of wrongdoing or danger at work and a concern is raised in accordance with the Policy, the Company will take all reasonable steps to ensure the employee does not suffer any disadvantage in the workplace as a result of speaking up about their concerns.

If a concern turns out not to be well founded, provided that it was genuine at the time it was raised and the employee did not commit any misconduct collecting evidence regarding their concern, the Company will take all reasonable steps to ensure there is no disadvantage in the workplace suffered as a result of speaking up, nor will an employee lose their legal protection as a result.

The Company will seek to carry out its investigations in a confidential and sensitive manner, and the number of persons involved and who are aware of the details of the concerns, including the identity of the employee raising the concerns, will be kept to a minimum.

The Company does not encourage employees to make anonymous disclosures, as the proper investigation of any concerns may be prejudiced and the credibility of those concerns called into question. However, if employees do wish to preserve anonymity and/or confidentiality, then the Company will make every effort to respect that whilst conducting whatever investigation may be appropriate or possible in the circumstances.

Employees should be aware that they may be asked to be a witness, should any disclosures result in a criminal or other regulatory investigation.

It would not normally be appropriate for an employee to discuss concerns outside the Company or with a third party, unless the procedures detailed in this Policy have first been followed. An employee who disregards this Policy, and makes a disclosure to a third party where it is not appropriate to do so, may be in breach of confidentiality duties owed to the Company (which may lead to the employee being sanctioned), and may lose their statutory protection for raising Right to Speak concerns.

7. WHAT IF THE OUTCOME OF ANY INVESTIGATION IS UNSATISFACTORY

If any employee is dissatisfied with the manner in which their concern has been handled, they should write to the **Head of Legal, Compliance and Risk**.



Version Control:

No./Version	Revisions	Effective Date	Owner	Approver	Status
001	Updated policy in the name of the Filtrona Group	1 st Jan 2023	Shahid Ali	Patrick Meredith	Approved