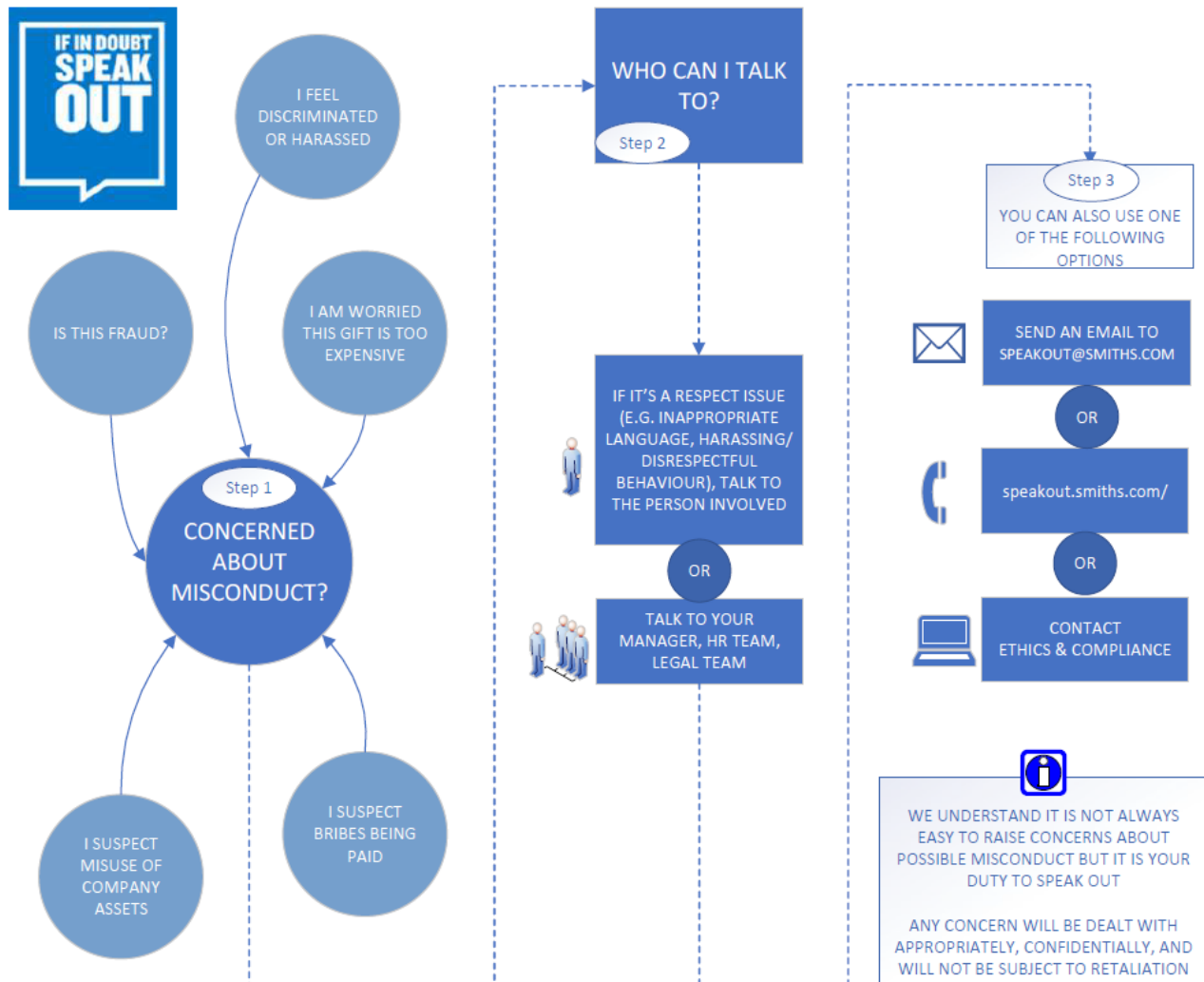


Speak Out Policy

Business Controls | 2.5 | Smiths Group Policies

Mandatory Policy



Speak Out Policy

Business Controls | 2.5 | Smiths Group Policies

Mandatory Policy

Background

At Smiths we are committed to conducting our business with honesty and integrity. We expect everyone to maintain high standards and honour our Code of Business Ethics. A culture of openness and accountability is essential to preventing illegal or unethical conduct and to being able to address issues should they occur. Remaining silent about possible misconduct may worsen a situation. If in doubt, speak out.

This Group Policy 2.5 – Speak Out applies to all employees (including colleagues working at Smiths on temporary or fixed contract) of Smiths Group and its Divisions. The Policy encourages everyone to report suspected wrongdoing through appropriate channels, provides guidance on how to report concerns, explains Smiths' investigations process, and reminds colleagues that Smiths' will not tolerate any form of retaliation against anyone who raises a concern.

Policy 2.5 – Speak Out**Who should speak out?**

Anyone who wishes to raise a concern about possible misconduct or behaviour within Smiths or one of its business partners should speak out.

Anyone can speak out by reporting an issue to Smiths or Divisional leadership, line management, HR or Legal, or by submitting the concern to Smiths' Speak Out hotline. This includes, but is not limited to, anyone who works for or on behalf of Smiths (such as colleagues, interns, contractors, and temporary workers), or anyone who has had a business relationship with Smiths (such as business partners, suppliers, shareholders, agents, distributors, representatives, government officials, and customers).

What types of issues should be reported to the Speak Out hotline?

The Speak Out hotline should be used to raise genuine concerns about any misconduct, suspected wrongdoing or dangers at work at Smiths or by its business partners. Misconduct includes any violation of the law, Smiths Code of Business Ethics, its Supplier Code of Ethics, its Human Rights Policy or any other Policies under which Smiths operates.

Examples of concerns that should be raised using the Speak Out hotline:

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

- Fraud, concerns about accounting or auditing matters
- Discrimination or harassment
- Violations of competition or public procurement laws and rules
- Inadequate financial or non-financial record-keeping
- Conflicts of interest
- Bribery or corruption
- Violations of our Human Rights Policy, including forced/involuntary labour, child labour, inhumane treatment in the workplace, workplace inequality/bias, the right to a living wage, the right to reasonable working hours and vacation, freedom of association, the right to a safe and healthy workplace
- Environmental, health and safety issues including product safety issues
- Improper use of company resources
- Disclosure of confidential information
- Violations of our policies on gifts, meals and hospitality
- Breach of our data protection obligations
- Tax evasion or the facilitation of tax evasion
- Money laundering or terrorist financing
- Conduct likely to damage our reputation or financial wellbeing
- Violations of export and import controls laws, rules or policies
- Failure to comply with any legal or professional obligation or regulatory requirements
- Antitrust (competition law) violations
- The deliberate concealment of any of the above matters

What types of concerns are better suited for other reporting channels?

- Immediate threats to life, safety, or property. For this, contact local authorities through your local emergency phone number, and your local management, as appropriate.
- Questions or grievances you may have in relation to your employment terms. For this, contact your line manager or your local or regional Human Resources colleague.
- Interpersonal disagreements or questions about your performance review. For this, first consider whether the most effective way of addressing it is to discuss it with the person involved. You may also raise the concern with your line manager or your local or regional Human Resources colleague.
- Issues not related to Smiths. The issue is about another organisation not related to Smiths.
- Local, Specialist, HSE or HR Matters. Concerns that are better handled by local management, HSE, HR, or other existing processes.

What types of concerns are not appropriate for Speak Out?

- False accusations. Submitting false accusations or frequent and intentional misuse may lead to disciplinary measures up to and including termination.

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

- Misuse of Speak Out. This includes repeated complaints with no new information, reporting the same issue through multiple channels, bypassing normal processes (for example, Health & Safety processes) without a good reason, or trivial and time-wasting allegations.

Who should I speak to first?

As a general guideline, if your concern relates to a disagreement or disrespect, first consider whether the most effective way of addressing it is to discuss it with the person involved. If this would not be appropriate, you may raise it through any of the following channels.

For other concerns, the first person to approach when raising any concern is often your line manager, a Human Resources colleague, or a Legal team colleague.

If you suspect misconduct and believe it cannot or should not be dealt with through the available channels within your Division, or if you feel uncomfortable speaking with these colleagues, you should use the Speak Out hotline.

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

How can I access the Speak Out hotline?

You can access the Smiths Speak Out hotline **online, by phone, or by email**.

The Speak Out hotline allows you to raise concerns confidentially and in your own language. Speak Out reports are stored within an independent third-party software system, reviewed and managed by the Smiths Group Ethics & Compliance team (E&C). The Speak Out hotline is available 24/7, 365 days a year.

There are 3 ways to submit a report:

ONLINE



To file a concern online, visit the Speak Out website at <<http://speakout.smiths.com>>. Here you can complete a form to submit your concern. You can also find a link on your Divisional intranet home page or on the Smiths Now App, in the main menu.

PHONE



To raise your concern by phone, dial the Speak Out phone number corresponding to your country. Phone numbers can be found here: <<http://speakout.smiths.com>>

EMAIL



You can report suspected misconduct to the Ethics & Compliance office by confidential e-mail at <speakout@smiths.com>. You can also contact one of the Ethics & Compliance team directly.

Note

Other

Local variations may apply depending upon your territory. Please see Appendix 1.

After you complete your report (online, by phone or email), you will receive a unique code called a 'report key'. You can use this key to call back or access the website (<<http://speakout.smiths.com>>) to check progress on your report. You can see whether the person dealing with your report has feedback for you or questions. If you want, you can provide additional information. Your report key is particularly important if you choose to remain anonymous, as we can only contact you through the website. All reports received via Speak Out are routed back to E&C for further handling.

Who can see my Speak Out report?

Speak Out reports that are made online, by phone or by email as described above are investigated by someone from Smiths Ethics & Compliance team (E&C). If you are a colleague reporting to Smiths

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

Detection Inc., your report must be managed by the SSA and will be referred to the site's General Counsel for appropriate assignment.

When reports are made online or by email, they come directly to E&C. Where they are phoned in to the Speak Out call centre, they are entered by the call centre representative into the Smiths Speak Out system, and E&C is alerted. The person in E&C who manages your report will depend on your location and time zone. When E&C receives the report, it is kept confidential (see below). If you prefer to remain anonymous, see the section 'Can I report to the Speak Out hotline anonymously?' below.

If you prefer that your report is investigated locally (in other words, by someone in the country or at the site in which you are based) that is **not** a problem. You will need to speak to your local manager, HR or Legal representative to initiate the investigation. If you need help arranging for the investigation to be conducted locally you can speak to E&C, again via the Speak Out hotline. Unless there are legal reasons why the conclusions of an investigation cannot be shared outside the country in which it is conducted, those conclusions will be uploaded into Smiths' ethics management system. All reports in the system are kept strictly confidential.

What kind of information do I need to provide in a Speak Out report?

When you make a report (in person, online, by phone or email), please provide as much detailed information as you can to enable E&C to assess and investigate your concern, such as:

- **Who?** First and last names of individuals involved
- **What?** The background, history, and reasons for the concern
- **Where?** The place or site information
- **When?** The date and time information
- **How?** Any documentation or other relevant information to support the concern

The more information that you can provide, the easier it is for E&C to investigate, and the more thorough the investigation.

What should I do if I do not have all the facts?

It doesn't matter if you don't have all the facts. Smiths E&C does not expect you to have all the answers or for you to prove your concern. We encourage you to speak out anyway, and as soon as possible. Not speaking out can make a bad situation worse. Whether you know about or suspect misconduct, speak out with the information you have. Allow E&C to investigate the matter to determine if there is a reason for concern.

Never investigate the matter yourself, and do not seek evidence to build a stronger case. Smiths commits to ensuring that no disciplinary measures or other steps will be taken against you for raising a genuine concern if it later turns out to be mistaken or misguided. Nor will the person or people about whom you are reporting in anyway be prejudiced if you have raised a genuine concern which

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

ultimately is not substantiated. That is another important reason why investigations will be kept confidential.

Safeguarding: Confidentiality and Non-Retaliation

Do all reports remain confidential?

Yes, all reports remain confidential. Information about your concern will only be shared with a limited number of people on a strict need-to-know basis, and Smiths' Group Ethics & Compliance team will keep you informed of this. If there is any sensitivity about disclosing the report to a particular person, the Ethics & Compliance team will discuss this with you beforehand. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake. Smiths also reserves the right to disclose information about the concern and/or the reporter in the event of a clear misuse of the hotline and where there is a risk to the health or safety of others. As part of the investigation, it may be necessary to inform the implicated person that a complaint has been filed against them, but (unless we are legally required to do so) your identity will not be disclosed. All reasonable steps will be taken to ensure your identity remains confidential. If you ever have concerns about this, speak to the E&C team who will work with you help address those concerns.

You can help us protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else (although you are, of course, always free to seek professional advice or support, if you feel you need to).

Can I report to the Speak Out hotline anonymously?

Yes, you may Speak Out and share your concerns anonymously (where allowed by the laws of the country in which you are based). However, our preference is for you to share your identity with the Ethics & Compliance team because it is more difficult, and in some circumstances impossible, for the team to investigate reports that are made anonymously (for example, if the team does not know who to contact for questions and for clarifications).

Will my privacy be safeguarded?

Yes, Smiths is committed to protecting the privacy of everyone involved. We will do everything reasonable and lawfully required to safeguard personal data from unauthorised access and processing. Any personal data obtained as part of Speak Out will only be used for the purposes explained in this Policy or to comply with the law or an important public interest. Please click [here](#) for the Smiths Privacy Statement and [here](#) for the Smiths Employee Privacy Statement for more details about the protection of personal data.

Non-retaliation: How will I be protected after speaking out?

Speaking out is expected of employees, and reporters (whether internal or external) who speak out (or cooperate with a Speak Out investigation) are protected from retaliation. Please feel confident that

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation will not be tolerated.

Retaliation is treated as a serious disciplinary matter. If the E&C team considers that there is an elevated risk of retaliation, as a matter of procedure, it will follow up and check-in with a reporting colleague after an investigation has concluded to ensure the employee feels safe in their role and no retaliation has occurred. If you have any concerns about retaliation at any time after making a Speak Out report, you should immediately contact E&C, a member of the Legal team, or your local Human Resources manager.

What happens if this Policy is misused?

It is a violation of our Code of Business Ethics and Smiths Values to knowingly make a false accusation, lie to investigators, interfere with an investigation or refuse to cooperate in an investigation. Doing so may lead to disciplinary measures.

What about external 'whistleblowing'?

We strongly encourage you to raise concerns internally through one of the available channels. By speaking out internally, you give us the opportunity to investigate the matter and act if needed. In this way we can truly improve Smiths together. However, if you do wish to report an issue to an external body (for example, the UK's Serious Fraud Office or Information Commissioner's Office), their websites provide information on how to make a report. If you are not based in the UK, other external bodies are available for raising concerns, and you can find out details online.

What can I expect after using the Speak Out hotline?

Smiths takes every report of possible misconduct seriously. If you submit a report into the Speak Out hotline, the E&C team will confirm receipt as quickly as possible, but in any event, within 7 days, with an estimate of how long it will take to handle and assess your concern wherever possible. The time it takes to investigate each concern depends on its nature. More complicated reports typically take between 1-3 months. You will be informed of the overall findings (i.e. whether or not we have found misconduct), but not the full details of outcome or actions taken. This is for the confidentiality, privacy and the legal rights of all involved. Whether or not the investigation has concluded, you will be given an update on the steps taken no later than 3 months after making your report.

Who will act on my concerns, and how?

All concerns that are received by Smiths are logged into a secure third-party case management system. Typically, the investigation will be handled by E&C. However, E&C may need to draw on expertise of other functions (for example, HR, HSE, Internal Audit or Finance). No other function will be involved unless and until E&C has first discussed this with you. In certain circumstances (for example, if Smiths does not have an investigator with required language skills, or the investigation requires a particular type of expertise not available in Smiths) E&C may rely on third parties to investigate (for example, a law firm or an accountancy firm). Again, if this is the case, it will advise you first.

What will the review and investigations process involve?

Smiths follows a two-phased approach when handling concerns:

- **Initial review and inquiries** – Assess the concern and decide if it requires further investigation (and, if so, by whom). You may be approached for additional information.
- **Further review and investigations** – If the report requires further review and investigation, someone in the E&C team, or with consent of the reporter, someone in another function but well placed to conduct the investigation, will be assigned to investigate it. The investigation will focus on an objective, factual analysis. If needed, outside experts (e.g. lawyers or accountants) may be engaged to assist. They will work under strict confidentiality and report to the E&C team. Review and investigation will be conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing).

What is expected of me to help in connection with investigations?

If you become involved in an investigation, you must cooperate and answer all questions completely and honestly. All parties involved, including the accused, are entitled to confidentiality to avoid unnecessary damage to their reputation. Confidentiality is also essential to maintain people's trust in Smiths Speak Out system. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

Will the outcome and actions taken be shared with me?

If misconduct is found, appropriate measures will be taken in accordance with the law and our Human Resources disciplinary policies. We will confirm to you whether the complaint has been substantiated or not and we may share details of the remedial actions. However, there will be occasions where we are not able to share details because to do so would violate privacy or other rights of others involved in the investigation, including the person being investigated.

What should I do if I have a concern about the way the investigation or follow up was handled or disagree with the findings?

If you have reason to believe that your concern or a concern raised against you has not been handled appropriately, or that an investigation has not been performed correctly, please inform the:

- Smiths Group General Counsel; or
- Smiths Global Director of Human Resources;

Stating the grounds for your concern. The Group General Counsel and the Global Director of Human Resources will review your concern and assess the investigation process and conclusions to determine whether the outcome was appropriate. If this Speak Out report concerns financial impropriety. Smiths Group's Chief Financial Officer will be involved in the assessment. If Sr VP &

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

General Counsel Ethics & Compliance considers that the Group General Counsel or the Global Director of Human Resources is unable to conduct the appeal (including because they have a conflict of interest), they will identify, alternative non-conflicted senior reviewers to assess your concern.

Definitions

For further guidance see the [Glossary](#) for definitions of terms.

For further guidance

If you have questions, doubts or suggestions relating to speaking out, the Speak Out hotline, or if you need other assistance, please contact:

- your manager, Human Resources representative or the Legal team
- the Ethics & Compliance Office by email at «speakout@smiths.com»
- Protect, the independent whistleblowing charity at <www.pcaw.co.uk>, +44 203 117 2520 or <whistle@pcaw.co.uk>

Depending upon your territory, additional reporting channels may be available to you including external reporting channels to national or supranational authorities. Some of these have been compiled at Appendix 1.

Relevant policies

- Code of Business Ethics
- Supplier Code of Conduct
- Human Rights Policy

The above listed policies can be found on the intranet here: [Smiths Group Global Policies](#)

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

Appendix 1 Alternative reporting lines:

- Czechia: a Czech-specific email address for Speak Out (speakout.czechia@smiths.com).

External reporting lines:

Territory	National Reporting Body	Link (where available)
Austria	Federal Office for Preventing and Combating Corruption	https://www.bak.gv.at/
Belgium	Varies by sector, or the Federal Ombudsmen for undesignated sectors	
Bulgaria	Commission for Personal Data Protection	https://www.cdpd.bg/
Croatia	The Ombudswoman	
Cyprus	N/A	
Czechia	Ministry of Justice Work Inspectorate	
Denmark	Datatilsynet	https://www.datatilsynet.dk/
Estonia	N/A	
Finland	Office of the Chancellor of Justice	
France	Défenseur des droits and sector-specific authorities	https://www.defenseurdesdroits.fr/
Germany	Federal Office of Justice	
Greece	National Transparency Authority	https://www.gna.gov.gr/
Hungary	Labour and Occupational Health and Safety Department of County and Government Offices	
Iceland	N/A	
Ireland	The Office of the Protected Disclosures Commissioner	https://www.opdc.ie/
Italy	The National Anti-Corruption Authority	https://www.anticorruzione.it/
Latvia	Various authorities with the State Chancellery as the centralized contact point	
Liechtenstein	N/A	
Lithuania	The Public Prosecutor's Office	https://www.prp.gov.lt/
Luxembourg	Office des Signalements	
Malta	Various competent authorities depending on circumstances	
Netherlands	Huis voor klokkenluiders and various sector-specific authorities	
Norway	N/A	

Speak Out Policy

Business Controls | 2.2 | Smiths Group Policies

Mandatory Policy

Poland	Ombudsman or a public authority	
Portugal	Various competent authorities, or the National Anti-Corruption Mechanism	
Romania	National Integrity Agency	http://www.integritate.eu/
Slovakia	Whistleblower Protection Office	
Slovenia	Commission for the Prevention of Corruption and other competent authorities	
Spain	La Autoridad Independiente de Protección del Informante	
Sweden	Swedish Work Environment Authority and additional authorities	
United Kingdom	N/A	