

Whistleblowing - Speak up



Group Speak Up policy

Policy purpose and values

Reporting concerns is our duty of demonstrating integrity.

This policy explains the mechanism for reporting suspected or potential illegal or unethical behaviour.

Scope

This policy covers all Renishaw's business partners, including: employees; officers; consultants; contractors; casual workers; agency workers; interns; volunteers; students; suppliers; visitors to Renishaw sites; customers and third parties who provide services for or on behalf of Renishaw.

Policy statement

The guiding principles of this policy are:

- To encourage you to report suspected or potential illegal or unethical behaviour.
- To reassure you that you can raise genuine concerns without fear of reprisals

Table of contents

1	What is Speak Up?.....	2
2	Who can Speak Up?	2
3	When should you Speak Up?.....	2
4	How can you Speak Up?.....	2
5	What happens after you Speak Up?	3
6	Confidentiality and non-retaliation.....	3
7	Advice and support.....	4
8	Your responsibilities	4
9	Reporting of outcomes	4
10	Review of the policy	4

Policy number	Issue number	Change description	Effective date	Author	Owner
HR102	02		06/07/20	Patrick Tampkins	Jacqueline Conway
HR102	03	Section 3, 4 & 8 updated	26/06/23	Patrick Tampkins	Rob Macdonald

© 2020 Renishaw plc. All rights reserved.

This document is the property of Renishaw plc and the information contained herein is confidential. The contents of the document must not be reproduced or disclosed wholly or in part, or used for purposes other than that for which it has been supplied, without the prior written permission of Renishaw plc, or, if it has been furnished under a contract with another party, as expressly authorised under that contract.

1 What is Speak Up?

Speak Up is the name for Renishaw's global whistleblowing service.

2 Who can Speak Up?

This policy covers all Renishaw's business partners, including: employees; officers; consultants; contractors; casual workers; agency workers; interns; volunteers; students; suppliers; visitors to Renishaw sites; customers and third parties who provide services for or on behalf of Renishaw.

3 When should you Speak Up?

You should Speak Up when you see or hear behaviour, related to Renishaw's business, that you feel:

- may be in violation of our [Group Business Code](#);
- seems illegal;
- seems unethical.

You must report any behaviour which you suspect to be unlawful or criminal.

Examples could be:

Bribery	Failure to comply with legal obligations
Fraud	Damage to the environment
Breach of data protection and or privacy	Abuse of our systems, processes or policies
Violation of child labour laws	Accounting and other financial impropriety
Conflicts of interest	Health and safety violations
Bullying and or harassment	The deliberate concealment of any of the above matters

4 How can you Speak Up?

You can report any concerns, and why you believe them to be true, by using the options set out below.



Report a concern by email
See **Option 1**



Report a concern online
See **Option 2**



Report a concern by phone
See **Option 2**

Option 1 - Reporting confidentially by email

Reports can be emailed to speakup@renishaw.com or directly to one of the Speak Up team (Rob Macdonald, Patrick Tampkins, Lucy Eccles at the time of issue – see [Speak Up on SharePoint \[internal only\]](#) for an up to date list of the Speak Up team).

If any of the Speak Up administrators are the subjects of the report, it should be reported using the independent reporting service – the report will then not be visible to the implicated Speak Up administrator. Your report will always be dealt with in the strictest of confidence.

Option 2 - Reporting confidentially to our independent reporting service

You can make a report (anonymously if you wish, and where local law allows) using a free-phone number or through the online form 24 hours a day, 7 days a week, 365 days a year. This service is provided by NAVEX Global, a world-class provider of ethics and compliance reporting services. You can access this by visiting <https://renishaw.ethicspoint.com>.

Your concern will be logged and directed to the Speak Up team for further investigation. Your report will always be dealt with in the strictest of confidence.

After you complete your online report, you will be assigned a unique code called a 'report key'. Please write down your report key and password and keep them in a safe place (it is NOT possible to retrieve the report key).

If you lose your report key, you will not be able to track the progress of your report or provide further information if required, which may limit our ability to investigate the matter or to do so thoroughly. After 72 hours, use your report key and password to check your report for feedback or questions.

5 What happens after you Speak Up?

1. An investigator is assigned to your report. In some cases, we may appoint an investigator or team of investigators, including appropriate employees with relevant experience of investigations or specialist knowledge of the subject matter.
2. You will be informed when the investigator has been appointed. If you reported through the online form and have your report key, you should log in every 2-3 weeks to see if there are any updates on progress or questions / requests for extra information from the investigator.
3. The investigation is conducted. In all cases, we aim to keep you informed of the progress of the investigation and its likely timescale. You must treat any information about the investigation as strictly confidential.
4. You will be informed of the conclusion. You will be only told that your report was either substantiated, partially substantiated, or not substantiated. You may not be provided with any further details regarding any outcomes.

6 Confidentiality and non-retaliation

6.1 Confidentiality

You will be given the option, when making a report via the independent phone and online services, to choose whether to remain anonymous if the local law allows. Your information will be treated on a confidential basis regardless of which option you chose, unless required by law to disclose it.

If you reported your concern anonymously, then your identity will not be attributed to the report.

6.2 Non-retaliation

Renishaw has a non-retaliation policy when a genuine concern has been reported in good faith. No action will be taken against you if you report such concerns, even if it is found that there was no wrongdoing, unlawful conduct or compliance breach.

In many countries in which we operate, the local law may protect you if you raise certain serious concerns through a process like Speak Up.

6.3 Expectation of reporting in good faith

Should you be found to have reported a concern falsely, maliciously or for personal gain, you may face disciplinary and/or legal action.

7 Advice and support

Renishaw's global Employee Assistance Programme helpline is available 24/7. All details can be found here <https://renishawplc.sharepoint.com/sites/HR/SitePages/Wellbeing.aspx> (for internal use only).

8 Your responsibilities

If you are a manager or supervisor, it is your responsibility to ensure your team members are familiar with this policy and to facilitate the reporting of any Speak Up concerns raised by members of your team.

The following guidance shall apply to all employees (including managers and supervisors):

- If you receive a written report of activity that seems to violate our Group Business Code, seems illegal or seems unethical, you should forward this to speakup@renishaw.com – do not respond or begin to investigate the issue yourself.
- If an employee or business partner approaches you with a concern relating to activity that seems to violate our Group Business Code, seems illegal or seems unethical, you should direct them to use the Speak Up channels set out in section 5 of this policy.

9 Reporting of outcomes

Anonymised reports of disclosures, including details of actions taken, may be provided to Renishaw's Audit Committee as and when necessary.

10 Review of the policy

This policy will be reviewed at least annually.