

Group Procedures Open Door Line

Issued by: Bodycote plc Group Company Secretary
Issue 5 / May 2025

1. Introduction

- 1.1 Anyone who is aware of or has a reason to believe that there may have been a potential violation of our Code of Conduct, Supplier Code, policies, standards, or applicable laws is expected to report their concerns. This principle does not just apply to employees. We also encourage anyone who is involved with or who engages with Bodycote, including casual and agency workers, consultants, contractors, customers, or suppliers, to report any such concerns.

2. Procedures for reporting a concern

There are a number of ways to report a concern:

- For employees, the first point of contact should be to speak directly to their line manager or supervisor.
- If this is not practical, then concerns should be raised with a senior manager, the HR team, Company Secretary or the Legal team, as long as they feel comfortable doing so. This makes it easier to collect the necessary information and maintain a dialogue regarding disclosure going forward.
- Alternatively, if you do not feel comfortable raising your concern in person, contact should be made using the Company's Open Door Line facility. The Open Door Line is available to all employees and third parties and is an outsourced, secure and confidential reporting system that provides a safe method to report concerns. The service is run by an external third party and therefore reports can be submitted anonymously if so wished.
- This Open Door Line service, which is available 24 hours 7 days a week, can be accessed two ways, by sending an e-mail to bodycote@getintouch.com or alternatively, may be accessed via telephone. The available free-phone numbers are:

Austria	0800-292296	Lichtenstein	41-435016741
Belgium	32-28080361	Mexico	800-681-6732
China	4001-200577	Netherlands	31-850644044
Canada	1-855-257-1164	Poland	48-123953249
Czech Republic	420-228880025	Romania	40-215398269
Denmark	8070-5302	Slovakia	0-800-606-674
Finland	358 9 42725042	Sweden	46-313011803
France	0805-080025	Switzerland	41-435016741
Germany	0800-189-9316	Turkey	0800 621 2184
Hungary	06-800-16264	United Kingdom	0808 271 1360
Italy	39-0240708049	USA	1-855-257-1100

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3. Procedure for using the Open Door Line

- 3.1 As set out above and in the Open Door Line Policy, anyone can use the Open Door Line by calling the free-phone lines or by sending an e-mail to the service email address.
- 3.2 If the telephone facility is used, the caller will listen to a script in his/her/their local language. The message will be adapted to comply with local laws. The caller will be asked to make a note the five digit case number and will then be asked to record a voice message setting out the concern. The caller will be given the option to identify him/her/themselves(ves), but can remain anonymous if he/she/they wishes to do so.
- 3.3 On sending an email, the sender should state if he/she/they wish to be identified. Their message will be translated and routed in the same manner as calls. The message will not include the sender's name or email address, unless the sender makes clear that he/she/they wish to be identified. The third party service provider will not delete the original email; they are required to respond to the sender. By not disclosing the sender's name and email address to Bodycote, the sender remains anonymous.
- 3.4 Upon receipt of a call or email, an acknowledgment that a matter has been raised by them under the Open Door Line Policy will be provided to the caller, stating that the caller should call back in 10 business days after the call for further updates.
- 3.5 The recorded message will be transcribed verbatim in the local language and translated to English by the third party service provider and distributed in line with the call routing procedure. This will be within one business day for English language messages and within three business days for non-English language messages. The recording will then be erased.

4. Triage procedure

- 4.1 On receipt of an Open Door Line report, the Group Company Secretary will log the message and forward it to the Bodycote Triage Committee for review and onward investigation.
- 4.2 The Triage Committee will consist of: Group Company Secretary, Chief Human Resources Officer, Group General Counsel and Group Head of Audit and Risk. This Committee will invite members of functional management to the Triage Committee, as required, such as the Group Financial Controller, Chief Sustainability Officer, SVP Health & Safety, etc.
- 4.3 For matters relating to a Division or a PLC Function, or CEO/CFO direct report, the Triage Committee will give consideration to the inclusion of the relevant President, SVP, VP or Function Manager. While the CEO and CFO will be notified, it should be noted that the relevant line manager may not be informed.

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4.5 Matrix structure for investigations:

Matters relating to:	First line*	Second line, as required *	Third line, as required *
PLC Function	Triage Committee	CEO/CFO	Function Manager
CEO/CFO direct line	Triage Committee	CEO/CFO	Chair
Divisions	Triage Committee	CEO/CFO	President; SVP; VP; HR
CEO	Triage Committee	Chair	Senior Independent Director
CFO	Triage Committee	CEO/Chair	Chair of Audit Committee
Chair	Triage Committee	Senior Independent Director	CEO
Non-Executive Director	Triage Committee	Chair	Senior Independent Director
Group Company Secretary	Triage Committee	Chair	CEO
Group Head of Audit	Triage Committee	Chair of Audit Committee	CFO

* Except where the matter relates to a particular individual.

- 4.6 The individuals notified will determine the scope of the investigation, the appointment of an Investigation Officer, and consider the involvement of outside parties. An initial response will be provided to the caller within 10 business days. This response will provide feedback on how the call is being dealt with or it may request further details.
- 4.7 Investigations will be undertaken as quickly as possible, without affecting the quality and depth of the investigation. Subject to confidentiality requirements, the complainant should be kept informed throughout the process.

5. Investigation procedure

- 5.1 Once a concern has been raised, reports will be saved to the secure server operated by the Open Door Line service. Reports will only be made available to specific individuals within the Company. All Open Door Line reports will be held in strict confidence.
- 5.2 On receipt of an Open Door Line report, the Triage Committee (as set out in 4.2) will undertake an initial assessment to determine the scope of any investigation.
- 5.3 Investigations should follow the following steps:
- Full details and clarifications of the complaint should be obtained.
 - The investigation should focus on the nature and substance of a report and not on the person making it.
 - The allegations should be fully investigated by the Investigating Officer with the assistance where appropriate, of other individuals / advisers as required.

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- The Investigating Officer will manage the involvement of external parties where appropriate.
- A judgement concerning the complaint, its validity and the proposed action to be taken will be submitted to the Group Company Secretary.
- A report will be submitted to the Open Door Line service informing the caller of the outcome of any assessment. Subject to confidentiality requirements, feedback on progress or the result of an investigation will be provided to the individual in line with how the report was made.
- If the complaint is shown to be justified, appropriate measures will be taken.

5.4 If the complainant is not satisfied that their concern is being properly dealt with by the Investigating Officer, they have the right to address the matter in confidence with the CEO or the Chair.

6. Responsibility

If there are any questions about the Open Door Policy or Procedures contact the Group Company Secretary at Bodycote plc's registered office +44(0)1625 505300 or info@bodycote.com.