

1. Introduction

At Bodycote, we are committed to maintaining an open and fair culture, conducting our business with honesty and integrity. We expect all employees and third parties to maintain high standards in accordance with our Code of Conduct and Supplier Code. However, we recognise that all organisations face the risk of things going wrong from time-to-time, or of unknowingly becoming associated with unethical conduct.

Anyone who is aware of or has a reason to believe that there may have been a potential violation of the Group's Code of Conduct, the 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. Purpose

The purpose of this policy is:

- (a) To encourage all parties to report suspected malpractice or wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately, and that their confidentiality will be respected;
- (b) To ensure all individuals feel supported in raising concerns, in confidence, and reporting matters they suspect may involve improper, unethical, illegal or inappropriate conduct;
- (c) To provide clear guidance and procedures as to how to raise or report such concerns; and
- (d) To provide assurance to employees that genuine concerns will be handled seriously, treated confidentially and managed without fear of reprisal.

3. Application and scope

This Policy applies to all Bodycote employees and third-parties. It sets out the key processes for any individual to report perceived improper, unethical, illegal or inappropriate conduct in a confidential manner. This could include (but is not limited to):

- criminal activity, including the suspicion of a criminal offence;
- failure to comply with legal or regulatory obligations;
- threat or serious damage to the public interest;
- danger to health and safety or damage to the environment;
- bribery, corruption or anti-competitive behaviour;
- fraud or mismanagement, or inaccurate reporting, including, without limit, in respect of financial matters;
- the facilitation of tax evasion;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- discrimination, harassment, or abuse;
- modern slavery, human trafficking, forced labour or exploitation in any part of the Group's operations or supply chain;
- a breach of the Group's Code of Conduct or the Supplier Code or any other Group policies; and
- deliberate concealment of any of the above.

4. Procedure

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 ODL 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, it may be accessed via telephone. The available free-phone numbers are:

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

5. Anonymity

This policy encourages individuals to identify themselves when making disclosures so that the person appointed to investigate the report can make contact with the individual to check their understanding of the concern. However, we recognise that in certain circumstances the individual may prefer to make an anonymous disclosure. The Open Door Line service will provide those submitting a report, either by email or by telephone, the option to identify him/her/themselves, but they may remain anonymous if he/she/they wish to do so.

6. Investigation and outcome

Once a concern has been raised, reports are saved to the secure server operated by the Open Door Line service. Reports are only made available to specific individuals within the Company, who are authorised to receive and assess them. All Open Door Line reports are held in strict confidence. On receipt of an Open Door Line report, an initial assessment to determine the scope of any investigation will be undertaken. In some cases we may appoint an investigator or team of investigators including employees with relevant experience or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing. The investigator, who will be impartial, independent, and not bound by instruction, will manage the involvement of external parties where appropriate.

Those submitting a report will be informed of the outcome of any assessment and investigation. If, following an investigation, no wrongdoing is discovered, no further action will be taken. The individual who submitted a report may be required to provide further information as part of the investigation.

We will aim to keep you informed of the progress of the investigation and its likely timescale, providing updates, as required. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

7. Malicious Allegations

All incidents reported in good faith will be reviewed and/or investigated and all actions recorded. There will be no retaliation against whistleblowers and we will ensure that no individual will be disciplined or suffer any recrimination for raising a legitimate concern, even if it proves to be mistaken. However, any employee whose disclosure is found to be deliberately false or made with malicious intent will be subject to disciplinary procedures. In addition, any external third party whose disclosure is not made in good faith and is found to be deliberately false or made with malicious intent may risk termination of the business relationship with Bodycote.

8. Communication

Each Bodycote office or facility will communicate and publicise the Open Door Line facility appropriately and ensure the service is freely available to all employees and third parties, during and outside of working hours.

9. Confidentiality

The Group will treat all disclosures in a confidential and sensitive manner. Where provided, the identity of the individual making the allegation will be kept confidential so long as it does not hinder or frustrate an investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required. The identity of the person suspected of wrongdoing will also be kept confidential while the investigation is underway. At the conclusion of any investigation the individual concerned will be informed of the outcome and findings, whether positive or negative.

Any deliberate breach of confidentiality as part of the Open Door Line process could give rise to disciplinary procedures. The only exception is if the information must be disclosed due to legal requirements. If legal authorities so require, Bodycote may share the identity of both the whistleblower, and the person targeted by the concern without consent.

10. Monitoring and Review

All matters raised through the Open Door Line, the findings of each investigation and the actions taken will be recorded and placed on a register held by the Group Company Secretary. These will be reported to the Board on a regular basis. The process will be subject to regular review and the correct functioning of the telephone lines will be checked at least bi-annually.

11. Responsibility

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

Policy owner:	Group Company Secretary
Second policy owner:	Chief Human Resources Officer
Approved by:	Bodycote plc Board
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