

Essentra plc Right to Speak Policy

Essentra plc, together with its affiliates and subsidiaries (“Essentra”), is committed to doing business the right way, to continually earn the trust of customers, other stakeholders and the wider marketplace as well as maintaining a culture where we work collaboratively, effectively, care about each other, our customers, and we deliver on our promises. In accordance with the Essentra Ethics Code, the Board of Directors and the Group Executive Committee expect all employees – and anyone carrying out work on behalf of Essentra – to maintain the highest standards of ethical business conduct and personal behaviour at all times, and to act safely, honestly, responsibly, lawfully and with integrity. Attitudes or activities that amount to a breach of law or trust, or otherwise fall below the highest standards of ethical business conduct and personal behaviour are not tolerated.

Purpose

We are committed to doing business in accordance with the law, our Ethics Code and our values. We encourage whistleblowing as it plays an important role in achieving this commitment and forms part of our values-based culture.

This Right to Speak Policy (“RTS”) (“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 Essentra Ethics Code are not being upheld.

Scope

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

Policy

The aims of this Policy are:

- i. to make employees aware that:
 - genuine and reasonable suspicions of illegal or unethical activities, or inappropriate practices, should be reported as soon as possible;
 - any concerns will be taken seriously;
 - any concerns will be thoroughly investigated and action taken as appropriate; and
 - 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:
 - they are able to raise genuine and reasonably held concerns in good faith, even if they turn out to be mistaken; and
 - they will be protected against reprisal and retaliation.

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

Non-retaliation

Essentra is committed to ensuring that employees feel able to raise concerns openly in good faith under this Policy, without fear of reprisal or retaliation, and with the support of Essentra.

Where an employee genuinely believes that there is some form of wrongdoing or danger at work and a concern is raised in accordance with this Policy, Essentra 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.

Essentra will not tolerate the victimisation, intimidation or penalisation of anyone raising a genuine concern, anyone involved in the subsequent investigation or anyone acting as a witness. Anyone responsible for such action against individuals making a genuine disclosure will be the subject of disciplinary action.

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, Essentra 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.

Raising your concerns

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 Essentra Ethics Code should be reported under this Policy. These may include:

- dangers to health and safety;
- criminal activity;
- forced labour;
- damage to the environment;
- failure to comply with any company policies and/or legal and regulatory requirements;
- financial fraud or mismanagement;
- inappropriate relationships with third parties;
- price fixing (also known as Anti-Trust);
- unethical behaviour; and
- the deliberate concealment of any of the above matters.

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.

Employees should be mindful however, that the Right to Speak process is not for reporting minor grievances or HR issues as there is a specific route for those matters already in place. For those issues, you should speak with your line manager or contact your HR representative. Where an employee feels they are justifiably dissatisfied with the outcome of any performance management procedures, they should initiate the established Appeal Process. However, we recognise that some employees may not be comfortable with raising some matters directly, and we will respond to all information raised through the Right to Speak process in line with the Right to Speak Manual which sets out the process for managing non-whistleblowing information and will track such information as it may be indicative of other issues at a site.

Employees are encouraged to use their judgement prior to raising any concerns under this 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. Employees should be aware that they may face sanctions if they submit a false report in bad faith.

If you cannot talk directly to the person whose conduct is causing concern, you are encouraged to raise the matter with your line manager first and if necessary your local HR representative. If you are unable to raise your concern with your line manager and/or your local HR representative, or they take no action, you should raise your concern using any of the following channels:

- speak directly with a member of the Legal and Governance team; or
- report your concern through the 'Essentra EthicsPoint Helpline' or submit a report online using the online [Essentra EthicsPoint portal](#).

EthicsPoint is our confidential whistleblowing hotline run by an independent third party and 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 Essentra business location. You can submit a concern anonymously if you prefer.

Investigation of your concerns and service level agreement

All concerns received through the Essentra EthicsPoint Helpline and portal will be notified to the Senior Review Team ("SRT") at Essentra. The SRT will determine what steps are to be taken in response to any concern, having used a triage process to determine the type of concern raised and the seriousness and speed with which the investigation should be carried out. The service level agreement states:

1. A Reporter will receive confirmation from a member of the SRT that the case has been received within 7 days of raising the case;
2. An independent Investigator will be allocated within 7 days of the case being raised; and
3. Feedback on the case will be provided to the Reporter within 90 days of the case receipt acknowledgement.

If you are not satisfied with the outcome of any investigation under this Policy

If any employee is dissatisfied with the manner in which their report has been handled, they may respond to the findings and request the report is reconsidered as an appeal. In this instance, the Chief Executive Officer and Audit Committee Chair will form an appeal panel. If an employee remains dissatisfied at the conclusion of the appeal, they may appeal a final time to the Board and should write to the Chair of the Board of Essentra plc, Langford Locks, Kidlington, Oxford, OX5 1HX, United Kingdom, or email paullester@essentra.com, requesting their case be reviewed by the Board.

Responsibilities throughout the Right to Speak process

The table below is intended to provide clarity on the responsibilities of those involved in reviewing a concern:

Who	Responsibility
Reporter	The reporter is required to disclose their concern.
Senior Review Team ("SRT")	<p>The SRT allocate cases to individuals within the business or externally, to investigate concerns and review cases.</p> <p>The SRT will meet at least quarterly to review all cases.</p> <p>The SRT use a triage system to allocate reports raised and regularly review the progression made during an investigation including the outcome and root cause of the report when a case has been closed.</p> <p>The SRT will provide a report to each meeting of the Audit & Risk Committee, advising of concerns reported, detailing Essentra's processes for reviewing and investigating all such reports and the response to the concerns raised.</p>

Investigator	<p>The investigator is selected by the SRT to investigate a concern that has been raised.</p> <p>The investigator will gather facts and evidence and in so far as possible, the investigator will be independent from the nature of the report raised.</p>
Interviewer	<p>An interviewer may meet with the reporter, witnesses and management to interview them with regards to the concern raised.</p> <p>The interviewer is responsible for asking and establishing facts and reporting these back to the investigator on an independent basis.</p>
Chief Executive Officer (“CEO”)	The Chief Executive Officer, together with the Audit Committee Chair, will form the penultimate appeal panel. Together, they will review any appeal made following the conclusion of an investigation into a case.
Audit Committee Chair	<p>The Audit Committee Chair will regularly meet with members of the SRT to review cases raised, and their outcome.</p> <p>The Audit Committee Chair, together with the Chief Executive Officer, will form the penultimate appeal panel. Together, they will review any appeal made following the conclusion of an investigation into a case.</p>
Audit & Risk Committee	At each meeting, the Audit & Risk Committee will receive a report advising of concerns reported under the Essentra EthicsPoint portal, the Helpline, or any other means, detailing Essentra’s processes for reviewing and investigating all such reports and the response to the concerns raised. The Audit & Risk Committee will consider and escalate any concerns to the Board.
Essentra plc Board	<p>The Essentra plc Board approves this Policy and ensures the process is adhered to.</p> <p>The Board is the ultimate appeal panel should an employee be unsatisfied with the outcome of an investigation.</p>

Version control

Document Owner:	Emma Reid
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Approved By:	Essentra plc Board
Date of Approval:	05/12/2023

Policy review

This Policy is subject to annual review and the table below should be completed following review, and the latest version of this Policy should then be added to the central repository and training schedule.

Policy last reviewed date:	10/07/2023
Policy reviewer name:	Emma Reid/Chris Perkins/Joanna Langley-Poole
Policy reviewed by Board/ARC/GEC date:	Reviewed by GEC on 17 th November 2023