

Speak Up Policy (Whistleblowing)

Document no: HR102

Issue: 02

Effective date: 06/07/2020

Purpose:

To explain the mechanism for reporting suspected or potential illegal or unethical behaviour.

Additional authority:

Public Interest Disclosure Act 1998.

Summary/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.

Responsible party:

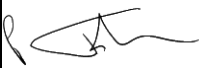
Group Legal.

Policy

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

The policy is detailed on pages 3 to 5 displayed below.

Reviewer	 <hr/> <p>Policy reviewer</p>	Owner/ approver	<u>Jacqueline Conway</u> Policy owner/approver
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1 Purpose of the Speak Up policy

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

2 What is Speak Up?

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

3 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.

4 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](#), or which seems illegal or unethical. You must report any behaviour which you suspect to be unlawful or criminal. Examples could be:

- | | |
|--|---|
| <ul style="list-style-type: none">• Bribery• Fraud• Breach of data protection and or privacy• Violation of child labour laws• Conflicts of interest• Bullying and or harassment | <ul style="list-style-type: none">• Failure to comply with legal obligations• Damage to the environment• Abuse of our systems, processes or policies• Accounting and other financial impropriety• Health and safety violations• The deliberate concealment of any of the above matters |
|--|---|

5 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.

Option 1 - Reporting confidentially by email

Reports can be emailed to speakup@renishaw.com or directly to Jacqueline Conway (Group General Counsel) (jacqueline.conway@renishaw.com). Jacqueline can also be reached on +44 (0)1453 522455.

If either Jacqueline Conway and/or Patrick Tampkins (Director of Corporate Development) (administrators of speakup@renishaw.com) are the subjects of the report, it should be reported using the independent reporting service. 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 Jacqueline Conway (Group General Counsel) and Patrick Tampkins (Director of Corporate Development) for further investigation. If either Jacqueline and/or Patrick are named in the report, it will be diverted to Rob Macdonald (Head of Group Finance). 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.

6 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.
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.

7 Confidentiality and non-retaliation

7.1 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.

7.2 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.

7.3 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.

8 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), or by visiting www.icaslifestyle.com.

9 Responsibilities of line managers

If you are a line manager, it is your responsibility to become familiar with this policy and facilitate the reporting of any Speak Up concerns raised by members of your team. Line managers are not expected or advised to raise complaints for or on behalf of any employee, but instead are required to direct the member of their team with a Speak Up concern to use the Speak Up channels set out in set out in section 5 of this policy. You must make your team members aware of this policy.

10 Reporting of outcomes

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

11 Review of the policy

This policy will be reviewed at least annually.

Country	Dialling options Each country has different dialling options.
Australia	International Toll-Free Service (ITFS) 1. From an outside line dial: 1-800-139957
Austria	International Toll-Free Service (ITFS) 1. From an outside line dial: 0800-296732 Or Direct Access 1. From an outside line dial: 0-800-200-288 2. At the English prompt dial: 855-229-9304
Brazil	International Toll-Free Service (ITFS) 1. From an outside line dial: 0800-8920515
Canada	Direct Dial 1. From an outside line dial: 855-229-9304
China	Global Inbound Service (GIS) 1. From an outside line dial: 400-999-4530
Czech Republic	International Toll-Free Service (ITFS) 1. From an outside line dial: 800-144-075
Denmark	International Toll-Free Service (ITFS) 1. From an outside line dial: 80-251000 Or Direct Access 1. From an outside line dial: 800-100-10 2. At the English prompt dial: 855-229-9304
Finland	International Toll-Free Service (ITFS) 1. From an outside line dial: 0800-9-15946
France	International Toll-Free Service (ITFS) 1. From an outside line dial: 0800-917075
Germany	International Toll-Free Service (ITFS) 1. From an outside line dial: 0800-1800042 Or Direct Access 1. From an outside line dial: 0-800-225-5288 2. At the English prompt dial: 855-229-9304
Hong Kong	International Toll-Free Service (ITFS) 1. From an outside line dial: 800-908839
Hungary	International Toll-Free Service (ITFS) 1. From an outside line dial: 06-800-20808
India	Direct Access 1. From an outside line dial: 000-117 2. At the English prompt dial: 855-229-9304
Indonesia	Direct Access 1. From an outside line dial: 001-801-10 2. At the English prompt dial: 855-229-9304 Not available from cellular phones Use public phones allowing international access
Ireland	Universal International Freephone Number (UIFN) 1. From an outside line dial: 00-800-222-55288 or 1-800-550-000 2. At the English prompt dial: 855-229-9304 Or Direct Access 1. From an outside line dial: 1-800-550-000 2. At the English prompt dial: 855-229-9304
Israel	International Toll-Free Service (ITFS) 1. From an outside line dial: 1-809-31-7148
Italy	International Toll-Free Service (ITFS) 1. From an outside line dial: 800-797458

Japan	<p>International Toll-Free Service (ITFS) 1. From an outside line dial: 00531-110303 or 0066-33-830532 or 0034-800-600152 depending on your location</p>
Korea, Republic of South	<p>International Toll-Free Service (ITFS) 1. From an outside line dial: 00308-132884</p>
Malaysia	<p>International Toll-Free Service (ITFS) 1. From an outside line dial: 1-800-81-7270</p>
Mexico	<p>International Toll-Free Service (ITFS) 1. From an outside line dial: 001-855-366-2458</p>
Netherlands	<p>International Toll-Free Service (ITFS) 1. From an outside line dial: 0800-0232214</p> <p>Or</p> <p>Direct Access 1. From an outside line dial: 0800-022-9111 2. At the English prompt dial: 855-229-9304</p>
Poland	<p>International Toll-Free Service (ITFS) 1. From an outside line dial: 0-0-800-1510052</p>
Russia	<p>Direct Access 1. From an outside line dial the direct access number for your location:</p> <p>Russia (St. Petersburg): 363-2400 Russia (Moscow): 363-2400 Russia: 8^10-800-110-1011</p> <p>^ Indicates second dial tone</p> <p>Russia (Outside Moscow): 8^495-363-2400</p> <p>^ Indicates second dial tone</p> <p>Russia (Outside St. Petersburg): 8^812-363-2400</p> <p>^ Indicates second dial tone</p> <p>2. At the English prompt dial 855-229-9304.</p>
Singapore	<p>International Toll-Free Service (ITFS) From an outside line dial: 800-1102074</p>
Slovenia	<p>Reverse Charge Calls / Collect Calls 1. From an outside line contact your local operator.</p> <p>2. Request a reverse charge or collect call to be placed to the United States, to 704-526-1128</p> <p>3. All reverse charge or collect calls will be accepted by the Contact Center using an automated English message.</p>
Spain	<p>International Toll-Free Service (ITFS) From an outside line dial 900-97-1251</p> <p>Or</p> <p>Direct Access 1. From an outside line dial 900-99-0011 2. At the English prompt dial 855-229-9304.</p>
Switzerland	<p>International Toll-Free Service (ITFS) From an outside line dial 0800-836085</p> <p>Or</p> <p>Direct Access 1. From an outside line dial: 0-800-890011 2. At the English prompt dial: 855-229-9304</p>

Taiwan	International Toll-Free Service (ITFS) 1. From an outside line dial: 00801-10-4471
Thailand	International Toll-Free Service (ITFS) 1. From an outside line dial: 001-800-11-0029735
Turkey	Direct Access 1.From an outside line dial: 0811-288-0001 2.At the English prompt dial 855-229-9304
United Kingdom & Northern Ireland	International Toll-Free Service (ITFS) From an outside line dial: 0808-234-7287
United States	Direct Dial From an outside line dial direct for your location 855-229-9304
Vietnam	Direct Access 1.From an outside line dial 1-201-0288 or 1-228-0288 depending on your location. 2.At the English prompt dial 855-229-9304.