

## Whistleblowing Policy

### Content

Purpose .....	2
Responsibilities .....	2
Confidentiality and anonymity .....	3
Protection against retaliation .....	3
Malicious allegations .....	3
How to report a concern .....	3
Feedback on the reported concern .....	4
Investigation of the concern .....	5
Data protection and Confidential Records .....	5
ANNEX 1 - NAVEX REPORTING CHANNELS .....	7

## Purpose

This Policy is in place to help try and ensure that all companies within the Group comply with the applicable whistleblowing laws in all countries in which they do business.

The objective of this Policy is to:

- 1) ensure that anyone with a concern:
  - Understands their responsibilities to help the Group stop serious misconduct;
  - Knows how to report such misconduct and how reports will be investigated; and
  - Understands the legal protections they will be entitled to if they make a report.
- 2) ensure that the Group's directors, officers, employees, representatives, contractors, agents and anyone representing the Group understands how to handle a concern in compliance with whistleblowing laws.

Capitalised terms are defined throughout this Policy and in the Definitions section.

## Responsibilities

You are responsible for complying with this Policy and are expected to act at all times in accordance with the Halma Code of Conduct, and the highest standards of integrity and good faith. If you become aware of an instance of serious misconduct within a Halma Business then you have a responsibility to help the Group stop it.

Each Halma Business should ensure that this Policy is communicated, implemented and understood throughout the organisation, through internal and external communication, including training.

The Policy has been put together on the basis of UK and EU requirements in relation to whistleblowing. Each Halma Business with operations outside of the UK and EU should check whether there are any additional local law requirements in relation to whistleblowing and implement the same as part of its whistleblowing process (in addition to the requirements under this Policy).

## What constitutes serious misconduct?

Serious misconduct includes but is not limited to:

- An action which is a civil or criminal offence or breach of a legal obligation in any country (e.g. fraud).
- An action that leads to the obstruction of, or improper interference with an investigation or court proceedings.
- An action which compromises the health and safety of any individual.
- An action which causes environmental damage.
- Any breach of the Halma Code of Conduct.

- The deliberate concealment of information about any of the above.

### Confidentiality and anonymity

The Group recognises that an individual who raises an allegation may not want to be identified when coming forward. In such circumstances and should the Group become aware of the individual's identity, the Group will do everything it reasonably can to protect the individual's identity.

If it proves impossible to resolve the matter without revealing the individual's identity, the person responsible for dealing with the matter will discuss with the individual how they would like to proceed.

In some cases, it may not be possible to guarantee confidentiality, as the very fact of the investigation may serve to reveal the source of the information, the statement of the individual raising the concern may be needed as part of evidence against the perpetrator, or legal proceedings at a later stage may require the individual to appear as a witness.

### Protection against retaliation

The Group recognises that the decision to raise a concern may not be an easy one, particularly as there may be a fear of reprisal from the alleged perpetrators or others who may be involved.

The Group will not tolerate the victimisation or detrimental treatment of anyone who raises a concern which they could reasonably believe is in the public interest, even if it becomes apparent that there is no basis for concluding that any serious misconduct has occurred or is likely to occur.

The Group will take appropriate steps to protect anyone who raises an allegation, including potentially taking disciplinary action against anyone who is found to be pursuing any form of retaliation, or has threatened to do so.

### Malicious allegations

Just as the Group will seek to protect anyone who raises a concern which they reasonably believe to be in the public interest, it will also protect those against whom claims are made, where the person making the claim does so maliciously, and knowing it to be untrue.

The Group may take disciplinary action against any employee who raises a concern maliciously which may include summary dismissal. If it can be shown that there are reasonable grounds to suspect that an individual has acted maliciously, that individual may be identified where the Group considers it appropriate to do so.

### How to report a concern

Where it is possible and appropriate to do so, concerns should be resolved informally with the appropriate individuals responsible for the matter. However, where a concern cannot

be resolved by this approach, or if it would be inappropriate to do so due to the nature of the concern, it should be reported in line with the procedure set out below.

### 1. Report to local management

Wherever possible local problems and concerns should be resolved at a local level. Therefore, if you have an issue it is best raised with the management of the Halma Business involved who should be capable of investigating in full compliance with this Policy and with applicable Whistleblowing laws.

### 2. Report to the respective Sector Chief Executive ("SCE") or to the Director of Risk & Compliance

If the issue is so serious it needs to be brought to the attention of Halma staff or you are dissatisfied with the local response, you can report the concern to the respective Sector Chief Executive or to the Halma Director of Risk & Compliance.

### 3. Report through the Whistleblowing hotline

This is an independent service provided by NAVEX Global, which is available 24 hours a day, every day of the year and makes use of a range of channels are available to report concerns. Reports can be reported via the freephone numbers, via the web at [www.halma.ethicspoint.com](http://www.halma.ethicspoint.com) or by clicking on the link on the Halma website. Contact details are listed in Annex 1.

Callers can choose to remain anonymous, providing this is allowed by the laws of the country where they work. However Halma would encourage you to share your name, since this makes discussing, investigating and providing feedback on your concern more accurate and effective.

A call to the hotline will be treated with absolute confidentiality. You will talk to one of NAVEX Global's intake specialists who will listen to your concerns and type up a report. The call will not be recorded. NAVEX will then securely send a report to Halma where a limited number of senior Halma staff will be responsible for logging the report and following up the matter in accordance with the Halma Investigation Procedure.

### Feedback on the reported concern

If you are reporting via the hotline the NAVEX Global operator will ask if you want to receive feedback. If so, they will give you a reference number and ask you to set up a password for your report. If you are reporting via the web the reference number will appear on the submission page, where a password can be created to allow you to check for feedback. Within 7 days, you will receive an acknowledgement receipt of your disclosure and outline of the likely timescales and next steps.

## Investigation of the concern

At the preliminary discussion, your concern will be discussed and you are invited to share any further evidence in relation to the matter, such as documents or the names of people involved.

Your concern will be investigated as quickly as possible and the investigation team will aim to conclude the investigation as soon as possible and, at the latest, within 3 months wherever possible. Where the circumstances of the investigation require a longer period, you will be kept informed. Whilst steps will be taken to avoid unreasonable delay, given the nature of investigations, timescales may be prolonged (for example, where external legal, accounting or other advisers need to be consulted).

All investigations will adhere to the following principles:

- they will be conducted as sensitively and quickly as possible;
- you will be kept up-to-date with progress; and
- they will be carried out by an independent person or team, who have had no previous involvement in the matter you have raised.

Where there is evidence of illegal activity or a regulatory breach, a report may be made to a law enforcement or regulatory agency, as appropriate.

At the end of an investigation, the investigation team will analyse all the evidence and summarise the conclusions in a confidential report to Halma. An investigator will also notify you that the investigation has concluded and, where appropriate to do so, will advise you of the outcome of the investigation.

## Data protection and Confidential Records

The Group recognises that it is important, and in the interests of both employer and employee, to keep written records during the process of raising and investigating the concern.

The Group will process any personal data collected in accordance with its data retention guidelines. Data collected from the point at which you make a report is held securely and accessed by, and disclosed to individuals only for the purposes of dealing with the disclosure.

Records will be treated as confidential and may be disclosed to specific parties if there is an obligation under the law.

## Questions

If you have a question about this Policy you should contact your line manager in the first instance. If it is not possible to discuss with your line manager or the matter requires specialist advice please interlink with the Deputy General Counsel for your Sector or the Halma Director of Risk and Compliance (for Group Functions).

## Definitions

Please see below for defined terms used in this Policy:

“Group” means: Halma plc, its subsidiaries and affiliates;

“Halma” means: Halma plc;

“Halma Business” means: any business within the Group including each OpCo and Halma;

“Halma Employee” means: any worker performing duties on behalf of a Halma Entity, whether or not employed directly by the relevant Halma Entity, including (without limitation) officers, employees, directors, consultants or contractors;

“Halma Entity” means: any company within the Group; and

“OpCo” means: any operating company within the Group.

Unless the context otherwise requires, words in the singular shall include the plural and the plural shall include the singular.

**This Policy will be reviewed on an annual basis and updated accordingly if necessary.**

## Annex 1 - NAVEX Reporting Channels

Web reporting link: [www.halma.ethicspoint.com](http://www.halma.ethicspoint.com)

Hotline phone numbers:

Country	Telephone
Australia	1800 861 773
Austria	0800 291354
Belgium	0800 74 649
Brazil	0800 724 8366
Canada	(844) 951-1996
China	400 120 4137
Czech Republic	800 142 966
France	0 800 90 74 84
Germany	0800 1833290
India	000 800 0501 405
Italy	800-729-256
Japan	0800-222-0394
Netherlands	0800 0235036
New Zealand	0800 753 239
Singapore	800 492 2294
Spain	900 999 368
Switzerland	0800 896 814
United Arab Emirates	800 0320802
United Kingdom (including NI)	0800 048 8497
United States	(844) 951-1996

**Collect call dialling telephone lines:**

Tunisia	(503) 726-2363
---------	----------------

1. From an outside line contact your local operator
2. Request a reverse charge or collect call to be placed to the United States, to the number above
3. All collect calls will be accepted by the NAVEX contact centre using an automated English message

Calls from mobile phones are not free and charges will vary depending on your provider.

**Mobile reporting QR code:**