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Lamprell Speaking Up Policy

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Group General Counsel & Company Secretary



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1. Introduction

The Board of Lamprell plc (the 'Company') is committed to maintaining the highest standards of ethics, honesty, openness and accountability, and recognises that all employees and other stakeholders such as consultants or suppliers have an important role to play in achieving this goal.

Many people, at one time or other, have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about breaches of the law or regulations, serious misconduct by another person, health and safety or financial misconduct – any of which could negatively impact Lamprell – it can be difficult to know what to do.

Our stakeholders and in particular Lamprell employees may feel that speaking up in such circumstances would be disloyal to their colleagues or to the Company itself, or they may feel that their concerns will not be taken seriously. Perhaps there is the worry that they will be victimised, bullied or even dismissed. The Company does not believe that it is in the interest of any one of our stakeholders with knowledge of wrongdoing to remain silent.

2. The purpose of this policy

- 2.1 The Company wishes to encourage an open culture in all dealings with Company personnel and all people with whom the Company comes into contact. Effective and honest communication is essential if instances of breach and/or non-compliance are to be effectively dealt with.
- 2.2 The Board takes all breaches and/or non-compliance very seriously, whether it is committed by a Company Director, a member of senior management, staff, suppliers or contractors. This policy sets out the procedure by which you can raise such concerns.
- 2.3 This policy is designed to protect those raising a genuine concern from suffering detriment. It means that if you believe there is wrongdoing, breaches and/or non-compliance in your workplace (e.g. improper, illegal or negligent behaviour by anyone), you can report this by following the correct processes. Your employment rights will be protected and all matters will be treated in confidence.
- 2.4 Please remember that the policy is not a substitute for the Company's grievance procedure for Lamprell's employees, which should be used where appropriate (for example, in the instance of issues arising with terms and conditions of employment).

3. Who is covered by this policy

- 3.1 The policy is applicable to Directors, officers, staff and 'workers' of all Lamprell Group companies. For the purpose of this policy, 'worker' means employees, agency workers, freelance workers, seconded workers, home workers and trainees. Some self-employed people may also be considered to be workers.
- 3.2 This policy is based on the UK Public Interest Disclosure Act 1998. In line with the provisions of this Act, Lamprell wishes to encourage the responsible disclosure of concerns on the following matters:
 - that a criminal offence has been committed, is being committed, or is likely to be committed;
 - that a person has failed, is failing or, is likely to fail to comply with legal obligations to which they are subject;
 - that a miscarriage of justice has occurred, is occurring, or is likely to occur;
 - that the health and safety of an individual has been, is being, or is likely to be endangered;
 - that the environment has been, is being, or is likely to be damaged; and
 - that information tending to show any matter falling within the areas above has been, is being, or is likely to be deliberately concealed.

- 3.3 It is important to remember that you can report on a breach and/or non-compliance in the workplace that is currently happening, has happened in the past or that may happen in the future, even if such breach and/or non-compliance took place (or may take place) overseas.
- 3.4 Some examples of issues that should be reported under this policy include any concerns you have about:
 - certain personnel being involved in instances of bribery and corruption – for example, someone receiving money to favour a certain supplier of goods in a particular project, or someone providing payment (that is not formally required) to help certain transactions run more smoothly;
 - there appear to be cases of modern slavery or human trafficking within our business operations, which would be contrary to the UK's Modern Slavery Act 2015 and which needs to be addressed by the Company;
 - the lack of (or incorrect) health and safety procedures being followed by someone in the Company;
 - the theft of Company money or equipment; or
 - personnel deliberately providing false or incorrect information in any Company documents (for example: accounts, invoices or time sheets).

3.5 The reporting methods detailed in this policy should not be used to report any personal grievances you may have, for example:

- complaints about rates of pay;
- concerns about holidays or working hours (unless such complaint relates to a breach of law);
- complaints about company benefits such as accommodation, and/or allowances (unless such concern relates to a breach of law); or
- disputes with other individuals regarding personal matters.

4. How to raise your concern

REMEMBER: all concerns must be raised in good faith. Anyone who abuses the procedure (for example by maliciously raising a concern they know to be untrue) will be subject to disciplinary action, as will anyone who victimises a colleague who raises a concern through this procedure.

Step 1 : line manager

If you have a concern about breaches and/or non-compliance, we hope you will feel able to raise it firstly with your line manager, or a more senior member of Company management. This may be done orally or in writing. It will help if you state the facts of the matter clearly, and you can outline how you would like it to be investigated. If you have a direct or personal interest in the matter, you must also tell us at this stage.

Step 2 : alternative internal contacts

If you feel unable to raise the matter with someone in your immediate line management, for whatever reason, please contact either of the below:

Alex Ridout

Group General Counsel and Company Secretary
Tel: +971 06 528 2323
Email: aridout@lamprell.com

Step 3 : external contacts

If the nature of the matter is such that you feel that you cannot raise it with any of the above, or if the internal channels listed in steps 1 and 2 have been followed and you still have concerns, please contact Navex Global using any of the following methods:

- Telephone: **800 0320 422** (UAE) or **800 8500 573** (KSA) - free of charge from mobiles and landlines.

Please note that Navex Global can be contacted by telephone no matter where you are in the world. Unless indicated otherwise, these numbers are free of charge.

- By scanning the QR code below using your mobile phone camera:



- Through the Navex Global website reporting function:
<https://lamprell.ethicspoint.com/>

Navex Global is an independent, external organisation that has extensive experience in dealing with matters relating to speaking up. They have been instructed by the Company to respond to any queries or concerns that you may have. All matters will be treated confidentially by Navex Global.

Navex Global can be contacted using the above details **24 hours a day, 7 days a week.**

Navex Global have professional translators available who can communicate with you in a wide variety of languages. The translation service can be used in the event that you would prefer to communicate in a language other than English. When you contact Navex Global by telephone, you can request to speak to someone who can communicate in your language of preference.

Step 4: allegations against a Chief Officer or Company Director

There is an alternative reporting mechanism in case of a need to file a complaint against a Chief Officer or Director of the Company, as follows:

- where an accusation is made against a Chief Officer or against any Company Director, the Company Secretary will refer the matter to the Chairman of the Board for direction; and
- where the complaint is against the Chairman of the Board, the Company Secretary will refer the matter to the Senior Independent Director (SID) for direction and the SID will consult with

the CEO or other Board Directors as required.

The Chairman or the SID will make such direction or determination as deemed appropriate in the circumstances including how the Company should handle the matter, as detailed in section 6 below.

5. Raising a concern in confidence

- 5.1 You may decide that you want to raise a concern in confidence. If you want to raise the matter in confidence, we will ensure that practical measures are put in place to protect your identity. We will contact you by the most secure means. You can also communicate with Navex Global directly. Neither the Company, nor Navex Global, will disclose your identity without your consent, unless we are required to do so by law.
- 5.2 If a situation arises where it is not possible to deal with the concern without revealing your identity (for instance because your evidence is needed in court), there will be a discussion as to whether and how we can proceed.
- 5.3 You are always entitled to raise a matter anonymously but, it is preferable if the individual puts his/her name to any disclosure. This policy does not cover the situation where information about breaches and/or non-compliance is received anonymously, although discretion will be used in the investigation of such information.

6. How the Company will handle the matter

6.1 Once you have reported your concern, the Company will look into it to assess initially what action should be taken. The Company will undertake to supply a response within a time span that shall be mutually agreed by both parties. You may be asked how you think the matter might best be resolved. If your concern falls more properly within the general grievance procedure, we will tell you.

6.2 The Company will institute the appropriate enquiries and/or investigations. We will:

- decide whether a full investigation is necessary;
- decide how best this investigation should be undertaken;
 - internally (by management, internal audit or personnel)
 - externally (by our external advisors, or the police, for example)
- tell you who is handling the matter and how you can contact them;
- say whether your further assistance may be requested; and
- if you request, you will be written to with a summary of your concern and an outline of how the Company proposes to handle it.

6.3 While the purpose of this policy is to enable the Company to investigate possible breaches and/or non-compliance and take appropriate steps to deal with them, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else, or where we may be subject to any legal constraints.

6.4 The matter will be handled fairly and properly, and by correctly using this policy, you will help us to achieve this.





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