

## Whistleblowing Policy

1. It is the responsibility of every Babcock employee to bring to the attention of appropriate management any concerns that they have that:
  - a) bribery or corruption has taken place, or is likely to take place;
  - b) there may be fraud or other irregularities going on in the way transactions, goods or services are being paid for, recorded or invoiced (or in the failure properly to record or invoice them)
  - c) the health or safety of any individual is being, or is likely to be, endangered by the way activities are being carried out;
  - d) any other criminal offence has taken place, or is likely to take place;
  - e) there has been, or is likely to be, a failure to comply with legal obligations;
  - f) there has been, or is likely to be, a miscarriage of justice; or
  - g) the environment has been, or is likely to be, damaged,

in each case, as a result of acts or omissions of Babcock or any of its employees. Or, indeed, if any of the above result from the acts or omissions of Babcock's agents, advisers, subcontractors, suppliers or customers in their dealings or activities so far as they affect or relate to Babcock, its business or employees at work.

2. No action will be taken against an employee who alerts management to these concerns if they turn out to be unfounded so long as the information and any allegations made were passed on in good faith; in the genuine belief that they were substantially true; with no intention of personal gain; and without malice.

### **Procedure**

3. Normally, employees should feel able to bring these matters to the attention of their line managers, who are in turn under a duty to pass on the information to appropriate senior management.
4. However, if an employee feels that this is an inappropriate route in the circumstances or is uncomfortable with it, or believes that the matter has not been dealt with satisfactorily by the line manager, they should (by phone, letter or email) bring the matter to the attention of the Group General Counsel or any of the Group's lawyers.
5. Alternatively, employees may use the confidential "whistleblowing" telephone or web service established for employees to report matters of concern. Details of the whistleblowing service are published at all sites and on the Group's intranet.
6. It is the responsibility of Sector management to ensure that details of that service and these procedures are made known to existing employees and new joiners, and are refreshed from time to time.