Whistleblowing Policy

October 2026

Spirax Group

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1. ABOUT THIS POLICY

1.1 "We" and "our" means Spirax Group plc and its subsidiaries wherever used in this policy.

1.2 We are committed to conducting our business with honesty and integrity, and we expect all colleagues to maintain high standards in accordance with our Group Management Code and our Core Values. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

1.3 The aims of this policy are:

(a) To encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

(b) To provide colleagues with guidance as to how to raise those concerns.

(c) To reassure colleagues that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.4 This policy covers all employees (colleagues), officers, consultants, contractors, casual workers and agency workers.

1.5 This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

1.6 This policy does not form part of any contract of employment and we may amend it at any time.

2. PERSONNEL RESPONSIBLE FOR THE POLICY

2.1 The Audit and Risk Committee of Spirax Group plc has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 The Whistleblowing Officer has responsibility for this policy and must ensure that all managers and other colleagues who may deal with concerns or investigations under this policy receive regular and appropriate training.

2.3 The Whistleblowing Officer, in conjunction with the Audit and Risk Committee, should review this policy from a legal and operational perspective at least once a year.

All colleagues are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Colleagues are invited to comment on this

policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

3. WHAT IS WHISTLEBLOWING?

3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

(a) criminal activity

(b) failure to comply with any legal obligations

(c) miscarriages of justice

(d) danger to health and safety

(e) damage to the environment

(f) bribery under our Anti-Corruption Policy

(g) financial fraud

(h) negligence

(i) material breach of our internal policies and procedures including our Group Management Code

(j) material conduct likely to damage our reputation

(k) unauthorised disclosure of confidential information

(l) the deliberate concealment of any of the above matters

(m) bullying, harassment and discrimination.

3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If an colleague has any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) they should report it under this policy.

3.3 This policy should not be used for complaints relating to an colleague's own personal circumstances, such as the way they have been treated at work. In those cases, a colleague should use the documented grievance procedure.

3.4 If a colleague is uncertain whether something is within the scope of this policy they should seek advice from the Whistleblowing Officer, whose contact details are on page 5.

4. RAISING A WHISTLEBLOWING CONCERN

4.1 We hope that in many cases a colleague will be able to raise any concerns with their line manager, either through telling them in person or putting the matter in writing, if preferred. The line manager may be able to agree a way of resolving

the colleague's concern quickly and effectively. In all cases, the line manager should refer the matter to the Whistleblowing Officer so that it can be reported to the Audit and Risk Committee.

4.2 However, if a colleague feels that their line manager has not addressed their concern, or they prefer not to raise it with them for any reason, the colleague should contact the Whistleblowing Officer. Contact details are set out in this policy.

4.3 The Whistleblowing Officer will arrange a meeting or call with the colleague as soon as possible to discuss their concern.

4.4 The Whistleblowing Officer will take down a written summary of the colleague's concern and provide them with a copy of the summary after the meeting or call. The Whistleblowing Officer will also aim to give an indication of how the Group proposes to deal with the matter.

5. CONFIDENTIALITY

5.1 We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if a colleague wants to raise a concern confidentially, we will make every effort to keep their identity confidential. If it is necessary for anyone investigating the concern to know the colleague's identity, this will be discussed with the colleague before their name is disclosed.

5.2 We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from the colleague. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If a colleague is in any doubt, they can use the confidential and independent helpline offered by Safecall.

6. INVESTIGATION AND OUTCOME

6.1 Once a colleague has raised a concern, we will carry out an initial assessment to determine the scope of any investigation and will inform the colleague of the outcome. The colleague may be asked to attend additional meetings in order to provide further information.

6.2 In some cases, we may appoint an investigator or team of investigators, including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

6.3 We will aim to keep the colleague informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving the colleague specific details of the investigation or any disciplinary action taken as a result. Colleagues should treat any information about the investigation as confidential.

6.4 If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action in accordance with local employment policies. No disciplinary action will be taken solely because a genuinely held concern proves to be mistaken or unsubstantiated.

7. IF THE COLLEAGUE IS NOT SATISFIED

7.1 While we cannot always guarantee the outcome a colleague is seeking, we will try to deal with the colleague's concern fairly and in an appropriate way. By using this policy colleagues can help us to achieve this.

7.2 If a colleague is not happy with the way in which their concern has been handled, they can raise it with the Whistleblowing Officer. Alternatively, they may contact the Chairman of the Audit and Risk Committee. Contact details are set out on page 5.

8. EXTERNAL DISCLOSURES

8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases a colleague should not find it necessary to alert anyone externally.

8.2 The law recognises that in some circumstances it may be appropriate for a colleague to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We encourage colleagues to raise matters internally before reporting a concern to anyone externally.

8.3 Whistleblowing concerns usually relate to the conduct of other colleagues, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances, the law will protect a colleague if they raise the matter with the third party directly. However, we encourage colleagues to report such concerns internally first. Colleagues should contact their line manager or the Whistleblowing Officer for guidance.

9. PROTECTION AND SUPPORT FOR WHISTLE-BLOWERS

9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We encourage openness and will support colleagues who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If colleagues believe that they have suffered any such treatment, they should inform the Whistleblowing Officer immediately. If the matter is not remedied, they should raise it formally using the documented grievance procedure.

9.3 Managers and colleagues must not threaten or retaliate against whistleblowers in any way. If colleagues are involved in such conduct, they may be subject to disciplinary action.

10. KEY CONTACTS

Whistleblowing Officer	Celine Barroche, General Counsel and Company Secretary Email: Celine.Barroche@spiraxgroup.com
Audit & Risk Committee Chair	Andy Kemp Email: Andrew.Kemp@spiraxgroup.com
Safecall (Independent Confidential Reporting Line)	Helpline: 0800 915 1571 (International Freephone numbers attached) Email: Spiraxsarco@safecall.co.uk

Safecall provides an independent confidential reporting line where colleagues can raise concerns and be assured that they will be fully addressed. Calls are handled by skilled staff and will be treated with complete confidence. A report of the call will be sent to the Whistleblowing Officer.

Safecall will not disclose your name to Spirax Group if you wish to remain anonymous.

You can contact Safecall at any time on the Freephone numbers attached where you can speak to someone in your preferred language.

The Safecall line is available 24/7, 365 days a year. Alternatively, Safecall can be contacted via email at spiraxsarco@safecall.co.uk or via the web at safecall.co.uk/report.

Details of the Safecall service can also be found on Safecall posters at your location and on the Group Legal & Secretarial One Place page.