



Whistle-blowing Policy

Introduction

This policy applies to all employees of the Company. Other individuals performing functions in relation to the Company, such as agency workers and contractors, are also encouraged to use it.

B. Braun, its Board and Management, is committed to a policy of openness and honesty. It is important that any fraud, misconduct or wrongdoing by employees is reported and properly dealt with. The Company therefore encourages any concerns about the conduct of others in the Company or the way in which the business is run, including breaches of the global code of conduct, to be raised.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

Background

The law provides protection to employees who raise legitimate concerns about specified matters, these are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation or
- concealment of any of the above

is being, has been or is likely to be committed. It is not necessary for the employee to have proof that such an act is being, has been or is likely to be committed, a reasonable belief is sufficient. The employee has no responsibility for investigating the matter, it is the Company's responsibility to ensure that an investigation takes place.

An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised because he/she has made a disclosure.

The Company encourages employees to raise their concerns under this procedure in the first instance. If an employee is not sure whether to raise a concern or whether their concern comes within the scope of this policy, they should discuss the issue with the Human Resources Department. This discussion will be treated in the strictest confidence.

Should your concern fall outside the scope of a qualifying disclosure then the Company's grievance procedure can be used. For example, if an employee is concerned that their own contract has been or is likely to be broken.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially. The outcome of the investigation will be reported back to the employee who raised the issue.
- An employee will not be victimised, dismissed, or subjected to any other detriment for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern.
- Victimisation of a worker for raising a qualified disclosure will not be tolerated by the Company and will be treated as a disciplinary offence.
- Should it be established that this policy has been used inappropriately to make a maliciously false allegation then the Company reserves the right to take disciplinary action at the most appropriate level.

- If misconduct is discovered as a result of any investigation under this procedure the Company's disciplinary procedure will be instigated in addition to any appropriate external measures.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to the Head of Human Resources or a Director of the Company.
- The Company reserves the right to review and revise this policy to ensure that it: is applied consistently, operates fairly, is in the best interests of employees and meets the Company's legal obligations.

Scope of the policy

This policy is intended to cover:

- behaviour between employees in the workplace
- behaviour of employees and/or suppliers during the course of their work

By way of example only, the Company would encourage the following to be raised via this policy (this list is not exhaustive):

- bribery
- anti-competitive behaviour
- deliberate breaches of B. Braun policies
- discrimination and bullying
- miss-use of company funds
- a breach of the B. Braun Ethical Trading Policy
- suspected instances of potential or actual modern slavery

Procedure

This procedure is for qualifying disclosures only. If an employee is concerned that their own contract has been or is likely to be broken, they should use the Company's grievance procedure.

1. In the first instance, any concerns should be raised with the employee's line manager. However, if the employee believes their line manager is involved, or for any reason does not wish to approach their line manager, they should proceed straight to stage 3.
2. The line manager will conduct an investigation of the matter in accordance with the principles set out above (or arrange for a more Senior manager to conduct the investigation where appropriate). This may involve the employee and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above.

The employee's statement will be taken into account and they will be asked to comment on any additional evidence obtained. The investigating manager will then report to the relevant Director, who will in turn report to the Board. The Board will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency, if required.

If disciplinary action is required the investigating manager will report the matter to the Human Resources department to initiate disciplinary proceedings.

On conclusion of any investigation, the employee will be told the outcome of the investigation and what the Board has done, or proposes to do about it. If no action is to be taken the reason for this will be explained.

3. If the employee is concerned that their line manager:
 - is involved in the wrongdoing
 - has failed to conduct a proper investigation
 - has failed to report the outcome of the investigations to the Board

they should inform the Head of Human Resources. The Head of Human Resources will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report to the Board as in stage 2 above.

If for any other reason the employee does not wish to approach their line manager in the first instance, they should contact the Head of Human Resources. Any approach to the Head of Human Resources will be treated with the strictest confidence and the employee's identity will not be disclosed without their prior consent.

4. If on conclusion of stages 1, 2 and 3 the employee reasonably believes that the appropriate action has not been taken, they should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:
 - HM Revenue & Customs
 - the Financial Services Authority
 - the Office of Fair Trading
 - the Health and Safety Executive
 - the Environment Agency
 - the Director of Public Prosecutions
 - the Serious Fraud Office
 - the Modern Slavery Helpline

Last reviewed: December 2017