



Vesuvius plc Speak up Policy

Policy	Speak up Policy
Corporate Responsibility	Compliance Director
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This Documentation must not be amended without the approval of the Compliance Director and General Counsel of Vesuvius Plc.

Speak Up Policy

Vesuvius is committed to maintaining the highest standards of ethical business conduct. We conduct our business in compliance with our CORE Values, principles established in our Code of Conduct, the requirements of our policies and the laws and regulations applicable in the countries we operate (our “**Ethical Standards**”)

We are committed to fostering a corporate culture where speaking up is accepted and encouraged, where our people and those we are working with us feel safe and confident to speak up openly and to raise concerns about actions and behaviours that do not align with our Ethical Standards .

1. Purpose

This Policy defines minimum compliance requirements, speak up channels and confirms our requirement that all employees of Vesuvius have a responsibility and are expected to report any observed or suspected breaches of Ethical Standards.

Where local laws on whistleblowing establish more stringent requirements than those set out in this policy, those will supersede the provisions of this policy. Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply.

2. Scope

This Policy applies:

1. To directors, officers, and employees of Vesuvius plc and its majority-owned or controlled subsidiaries, agents, intermediaries and other representatives acting on behalf of Vesuvius, and partners and business associates doing business with Vesuvius.
2. Throughout Vesuvius, irrespective of the country where business is conducted and/or a business unit is situated.



This reporting processes designated under this Policy are also available to any third party who wishes to raise their concerns regarding Vesuvius's business practices; we invite them to do so in accordance with this Policy.

3. Reporting obligations

Every employee, officer and director of Vesuvius, agent, intermediary, and other representative acting on behalf of Vesuvius has a duty to report any observed or suspected breaches of the Ethical Standards in the conduct of Vesuvius' business.

- Reports should be made promptly through one of the reporting channels specified in this Policy
- Reporters should provide as much information as possible to enable, where appropriate, an investigation to be conducted.

Third Parties performing services for or on behalf of Vesuvius shall be contractually required to report any business practices that contradict the requirements of our Ethical Standards.

Reports must be made in good faith, requiring employees to honestly and accurately disclose concerns or suspicions of wrongdoing, ensuring that the information provided is truthful and without malicious intent.

Nothing in this policy prohibits an individual from making reports externally to relevant competent authorities in accordance with the applicable laws and regulations.

4. Investigation Obligations

Vesuvius takes all reports seriously and will follow up, and where appropriate and possible, investigate, all allegations received in accordance with this Policy in a confidential, timely and impartial manner.

Vesuvius will establish and operate a thorough and independent investigation process.

Where requested, Vesuvius employees are requested to cooperate with and provide relevant information to assist in such investigation . wherever possible, confidentiality will be maintained and Information about the report will only be disclosed if, and to the extent, required to conduct and conclude an effective investigation.

5. How to make a Speak Up Report

A Speak Up Report can be made as follows:

In-person:

- To a direct supervisor or manager
- To an HR Representative, or to a member of the Legal Department or Compliance team

All reports made in person will be treated as confidential, and assurances should be made to the reporter of this.

Alternatively, the report can be made through one of the external Speak Up channels established by the company, which are managed by an independent third-party provider:

- By phone, by calling 24-hour confidential Speak up Helpline on the number publicised in your location or
- By making a report online at www.vesuvius.ethicspoint.com.

Reports can be made in local languages, and the Speak Up Helpline provides operators who speak all of Vesuvius' major functional languages.



Reports will be treated sensitively and confidentially and can be made anonymously. We, however, encourage reporters to identify themselves when reporting concerns, as this will allow for a more effective and timely investigation of their report.

Reports made in person to management or Legal/Compliance team members shall be duly reported by the recipient through one of the Speak Up channels. Management individuals receiving such reports are requested to obtain as much information as possible to support effective investigation of the allegation.

Speak-up channels should never be used to report events that represent an immediate threat to life or property, as they may not receive immediate attention. These should be made directly to a Senior Manager for swift attention.

If you are aware of misconduct and fail to report or intentionally provide misleading information, you may be subject to disciplinary action.

6. Whistleblower Protection

Vesuvius strictly prohibits retaliation, reprisal or victimisation against any person who, in good faith, reports observed or suspected breaches of the Ethical Standards or participates in an investigation around the reported allegation. This includes instances where concerns reported in good faith are subsequently found to be inaccurate or unsubstantiated.

Vesuvius is committed to taking all adequate measures to protect the reporter as described in this Policy. Disciplinary actions, including up to termination of employment, may be taken against any person who retaliates or attempts to retaliate against any person who raised their concerns in good faith or participated in an investigation around the reported allegation.

01 July 2024