

FAIRBANKS MORSE DEFENSE WHISTLEBLOWER POLICY

General

Fairbanks Morse Defense (herein known as “FMD” or “the Company”) is committed to maintaining high standards of ethical, moral, and legal conduct in its business operations. As such, all directors, officers, and employees of FMD must practice honesty and integrity in fulfilling their responsibilities and comply with applicable policies, laws, and regulations, including those that apply to companies performing work under US government contracts. This includes an obligation to report misconduct, including potential or suspected misconduct, and to cooperate fully in investigations.

Reporting Misconduct

Employees who have reason to believe that the Company, an employee, or a third party doing business on behalf of the Company has violated, may violate, or is acting in a manner that appears to violate any law, regulation, or corporate policies, including the Company’s code of conduct, are expected to report such activity as soon as practical. While FMD hopes that employees feel comfortable discussing any matter with their immediate supervisors and/or human resources, there may be times when employees prefer to use an alternative for addressing such activities. In such cases, an employee may use one of the following to report a concern:

- Any Manager level or above within the organization
- A member of the Human Resource, Legal, or Finance team as appropriate
- An anonymous report using our Lighthouse integrity line system
 - Call
 - North America: 833-222-0092
 - United Kingdom: 0-808-189-0041
 - Visit www.lighthouse-services.com/fairbanksmorse

No Retaliation

FMD will not tolerate retaliation against any individual who, in good faith, reports (or attempts to report) misconduct or provides information in an investigation related to suspected misconduct. Under US law it is specifically illegal to retaliate against those reporting misconduct related to government contracts. Allegations of retaliation will be investigated as appropriate. If you suspect that you have been retaliated against for raising an ethics or compliance issue, or for providing information in a misconduct investigation, immediately contact your supervisor or any of the contacts listed above.

Acting in Good Faith

Anyone reporting misconduct must act in good faith and have reasonable grounds for believing the information disclosed indicates misconduct. Any allegations which prove to have been made maliciously or knowingly to be false will be viewed as a serious violation of Company policy.

Confidentiality

Reports of misconduct will be kept confidential to the extent reasonably possible. Generally, this means that reports will only be shared with those who have a need to know so that the Company can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may legally have the right to know the identity of the whistleblower.

Handling of Reported Misconduct

Reports of suspected misconduct will be handled seriously, and reports of retaliation will be investigated promptly in a manner intended to protect confidentiality, consistent with a full and fair investigation. Appropriate corrective action will be taken if warranted by the investigation. The investigating parties will notify the concerned individuals of their findings as permitted in accordance with applicable laws.