

## Global Whistleblowing Policy

To help provide a safe and supportive working environment for employees, to protect the interests of our clients and stakeholders, to prevent damage to the firm's reputation and to ensure compliance by employees with the Code of Conduct, legal standards and policies set forth in this handbook, we have adopted the whistleblowing policy and guidelines outlined below.

An employee who becomes aware of wrongdoing at the company is obligated either to report it directly to a supervisor or senior executive, or to report it in accordance with the following whistleblowing procedure.

Note: "Wrongdoing" includes not only violations of company standards and policies but also criminal offences, violations of law, fraud, corruption, misleading or deceptive conduct, acts of unfairness, practices that endanger health, safety, the environment or the wellbeing of company employees and actions taken to cover up wrongdoing.

### Whistleblowing Procedure & Guidelines:

**Reporting:** Whistleblowing reports may be submitted at the discretion of the whistleblower either to the employee's supervisor, or to the regional or global HR director, or to a regional or global senior executive. The report may be oral or in writing. If oral, then a written record will be made at the time of the report.

**Confidentiality:** All reasonable steps will be taken to maintain the confidentiality of the whistleblower and the details of the report.

**Anonymity:** A whistleblower report may be submitted anonymously, however no feedback or information about resolution of the issue or disciplinary action can then be provided to the whistleblower.

**Protection against retaliation:** No retaliation will be permitted in response to a whistleblowing report. Any effort to retaliate or victimize the whistleblower will itself be treated as a further wrongdoing.



Intentional misuse: Any intentional misuse or abuse of the whistleblowing procedure will be treated as a wrongdoing.

Feedback: The whistleblower, when the report is not submitted anonymously, will be kept informed of the measures taken to investigate the wrongdoing.

Resolution: To the extent permitted by law, the whistleblower will be advised of the resolution and disciplinary action taken to correct or eliminate the wrongdoing.

OCTOBER 2022  
Amended April 2024