

We believe confidential concerns should be raised, reporters protected, and best-practice investigations conducted.

Our ethical principles underpin Accordience's vision and values. They are reflected in our Leadership Commitments (our "Commitments"), Codes of Conduct, and Accordience's policies and processes.

Accordience's Commitments are clear promises we make and keep to our clients, partners, and each other. They define our culture, the experience we offer, and ultimately our reputation. We expect everyone who works with or for us to respect these Commitments and maintain the highest ethical standards.

Aim of this policy

Despite our best efforts at times things can go wrong, or conflict with our Commitments. In these instances it is vitally important people feel comfortable Speaking Up to ensure genuine wrongs can be righted, and our Commitments upheld.

This policy establishes how confidential concerns should be raised in connection with:

- Breaches of law or serious misconduct including but not limited to financial malpractice and fraud,

- Failure to comply with legal, professional, or regulatory obligations,
- Practices and behaviours that severely undermine our Leadership Commitments, or
- Infringements of our policies and Codes of Conduct including but not limited to quality, health & safety, and environmental practices.

Employee grievances should be addressed via local HR processes and are generally not within the scope of this policy.

Zero tolerance for retaliation or retribution

We encourage those that work with and for us to report such issues and concerns - and to do so as soon as possible.

Concerns raised will be carefully vetted, and genuine issues will be investigated thoroughly.

Accordience will not tolerate retaliation, retribution, or threats of such in any form. Any employee found to be undertaking, or threatening to undertake, retaliatory measures will be subject to disciplinary action up to and including dismissal.

Reporting Concerns

There are multiple channels through which concerns may be raised, including:

- **Communicating with your line manager**, usually the person best positioned to help resolve or escalate issues
- **Communicating with HR or another trusted manager**, particularly if you are more comfortable doing so
- **Communicating with a member of the Confidential Reporting Team ("CRT")**,
- **Contacting one of our 24-hour confidential reporting hotlines**, or
- **Reporting a concern online at: accordience.ethicspoint.com or accordience.ethicspoint.com**

Detailed reporting channel information is found on the next page.

Once a Concern is Raised

Accordience's Confidential Reporting Team will:

- **Get the details.** We may request to do this in a meeting. If so, you can elect to bring along a colleague. We will record the details and provide you a copy.
- **Assess the concern and investigate as necessary.** We will consider if a concern should be investigated. The nature of an investigation, and a reporter's further involvement in it, will depend on the concern. Reporters will be informed if an investigation is being conducted, and how long it is expected to take, but we may not be able to provide reporters any further investigation details.
- **Refer reporters of employment or workplace related grievances to their line manager or relevant HR partner.** Such concerns will be addressed through other organizational processes and will not be investigated by the CRT.

Protecting Our People

Accordience is fully committed to protecting the confidentiality of reporters and individuals identified within a report.

The CRT will make every effort to protect reporters who choose to not reveal their identity. However, investigations can proceed to the point where a reporter's identity will need to be or will likely be revealed. At such points, the CRT will liaise with reporters to obtain their explicit consent to proceed (as required).

Electing anonymity may make it difficult and sometimes impossible for investigations to progress to a full conclusion. Reporters with potential retaliation concerns should raise this with the CRT or via an appropriate confidential reporting channel as early in the Speak Up process as possible.

This policy is reflective of the European Union's Whistleblowing Directive, though Accordience always strives to abide by local laws and regulations. If any element of this policy or its related processes conflicts with local requirements, then such requirements take precedent. Otherwise confidential concerns should be raised as detailed herein.



Letting us know when things are not right

We expect everyone who works for or with us to respect our Commitments and maintain the highest ethical standards. But sometimes things can go wrong. It is very important that you should feel comfortable in raising issues and concerns to ensure that things don't go wrong or that they are put right as soon as possible.

You should Speak Up about genuine issues and concerns that relate to or are in connection with:

- Breaches of law or serious misconduct including but not limited to financial malpractice and fraud,
- Failure to comply with legal, professional, or regulatory obligations,
- Practices and behaviours that severely undermine our Leadership Commitments, or
- Infringements of our policies and Codes of Conduct including but not limited to quality, health & safety, and environmental practices.

Accordience encourages you to discuss genuine issues and concerns with your manager; another trusted Manager; Group Legal, HR or Compliance; or the Confidential Reporting Team via the web link, accordience.ethicspoint.com, or one of the telephone hotlines below.

We also want to assure you that concerns will be taken seriously. Reported concerns will be investigated where appropriate and your confidentiality will be respected.

Finally, we wish to assure you that concerns raised in good faith can always be reported without fear of retaliation, even if they turn out to be mistaken. Speak Up when things are not right or feel wrong.

All Covered Persons under Accordience's Code of Ethics may report concerns at: accordience.ethicspoint.com

Or by dialling one of the following numbers:

Country	Freephone Number
Austria	0800 200 288
Belgium	0800 100 10
Bulgaria	00 800 0010
China	108 888
France	0800 99 0011
Germany	0800 225 5288
Hong Kong	800 93 2266
Hungary	06 800 011 11
Netherlands	0800 022 9111
Poland	00 800 111 1111
Romania	0808 03 4288
Singapore	800 011 1111
Slovak Republic	0800 000 101
Spain	900 99 0011
United Kingdom	0800 89 0011
United States of America	833 547 0150

Freephone numbers for 9 additional countries are available at: accordience.ethicspoint.com

