

Speaking Up

Global Policy



We expect our colleagues and business partners to act with integrity and in a way that is ethical and lawful.

There may be times when we are unsure of the right course of action, or when we observe, or suspect, unethical or illegal activity.

Our Speak Up process is designed to support anyone wishing to ask for help or advice, raise a concern or make a report, in confidence and without fear of retaliation.

Why it matters

All colleagues and business partners should conduct themselves in a way that supports both the spirit and letter of our Code of Conduct (Code), and our Guiding Principles.

We take our legal and ethical responsibilities seriously and recognise that breaches of our Code or supporting policies could significantly harm our people, business or reputation.

It is sometimes difficult to know whether to speak up about something you have observed, heard about or suspected. Sometimes people can feel reluctant to get involved, but ignoring the issue could result in serious consequences. By speaking up, you give us the opportunity to help and to investigate any potential issues.

Speak up

Challenge and report

Each of us has a responsibility to raise concerns about suspected misconduct within or involving our company.

If you see or hear about something that doesn't feel right, **report it immediately** to:

- Your line manager or director
- HR
- Your Compliance lead in your Division
- Group Compliance.



Reporting in confidence

If you feel more comfortable talking to someone in confidence, you can contact our confidential reporting line, **Speak Up**.

Speak Up, which is operated by an external third party provider, Navex Global, allows you to make a report in confidence in your own language, either via the web or telephone:

www.informaspeakup.ethicspoint.com

International number: +44 (0)808-234-7287

For local telephone numbers for other countries, please visit the Speak Up website.

Depending on where you are located, you can also use Speak Up to make a report anonymously.

What should I report?

Our Code of Conduct and our Business Partner Code of Conduct together cover a very wide range of activities, including fraud, bullying, harassment, bribery, safety, information security and data privacy. You can make a report, raise a concern or even ask a simple question, about any of the topics in our Codes.

Examples of concerns that can be raised using this Speak Up policy are:

- Fraud
- Discrimination or harassment
- Inadequate financial or non-financial recordkeeping
- Conflicts of interest
- Bribery
- Improper use of company resources
- Insider trading
- Violations of our policies on gifts, entertainment and hospitality

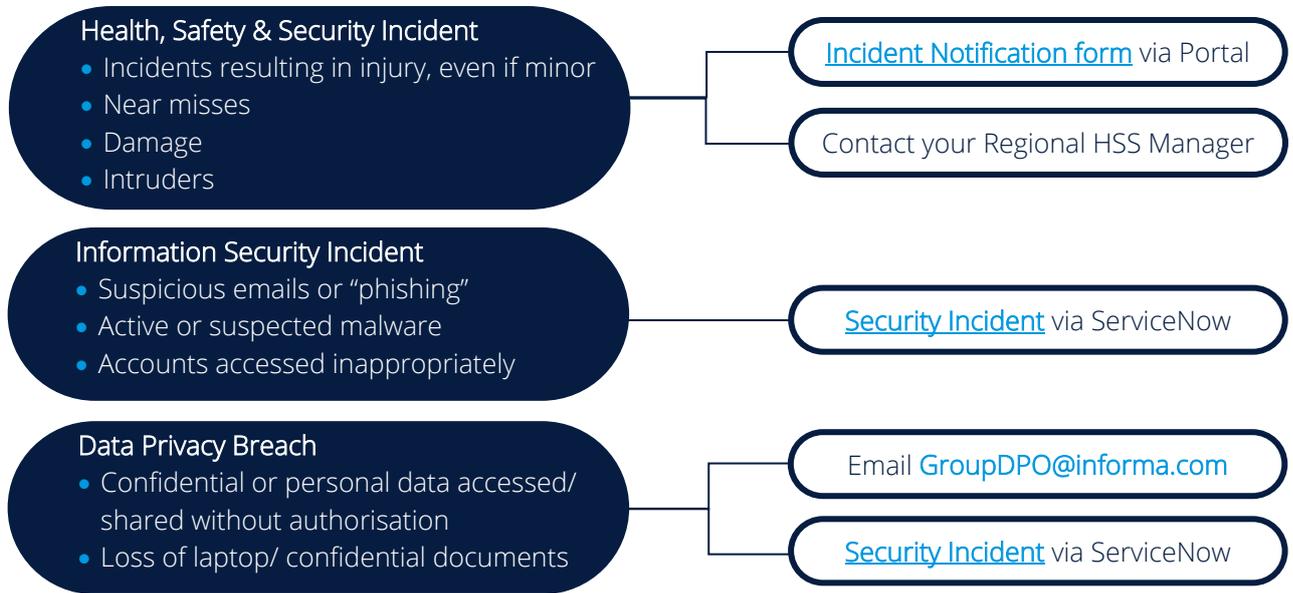
Do not use Speak Up to report events presenting an immediate threat to life or property: in these circumstances, contact local emergency services

You should not use Speak Up

- To settle personal disputes
- To make accusations which you know are false. Doing so may lead to disciplinary measures.

Grievances relating to your terms of employment may of course be raised via Speak Up but would need to be resolved with HR and by following the appropriate grievance process.

Some issues may need to be dealt with quickly, either because of the risk of harm to an individual or to the business (e.g. a health or security issue, or a suspected computer virus) or because laws require us to act within certain time limits. **We advise that you raise them via the following specific helplines or reporting channels.**



What happens after you make a report?

We take every report of possible misconduct seriously.

You will receive a confirmation of your report within 48 hours.

Your report will undergo an initial review, and if necessary, it will be appropriately investigated. Never try to investigate the matter yourself and do not seek evidence to build a strong case. We aim to close investigations within 1 to 3 months, depending on the nature and complexity of the investigation.

Please note that you will be informed of the overall findings, i.e. whether or not we have established that misconduct has taken place, but we will not be able to give you full details of the outcome of a case (or related actions taken). This is for reasons of confidentiality, privacy and the legal rights of all concerned.

What happens if you become involved in an investigation?

You will need to cooperate and answer all questions completely and honestly. All parties involved, including anyone accused of misconduct, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential and failure to do so may result in disciplinary proceedings.

What happens after an investigation is finished?

If your concern is well-founded, appropriate measures will be taken where necessary and in accordance with the law and our disciplinary procedures.

If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please follow the Grievance process in your employee handbook (if a colleague), or inform the Head of Group Compliance, or escalate to the Group General Counsel.

Managing your Concern

All reports and concerns that are raised via our Speak Up line will be managed, initially, by the Group Head of Compliance, to ensure that we look at them all in a **sensitive** and **consistent** way and so that any investigations that may need to follow are handled appropriately.

Our Business Partners

The Speak Up service is open to **everyone** who might wish to raise a concern about Informa, whether a colleague, contractor, business partner, shareholder or joint venture partner, or other third party.

If our business partners observe any behaviour that violates the law or does not meet the requirements of our Code of Conduct or Guiding Principles, they should report those concerns to their Informa contact or Informa Group Compliance at compliance.officer@informa.com.

Alternatively, they can also use Informa's 'Speak Up' line via the web or telephone, to report a concern relating to, or with an impact on, Informa's business, whether the concern relates to a colleague, contractor, or other third party. To contact 'Speak Up' visit: www.informaspeakup.ethicspoint.com

If you have a business partner or third party, agent or contractor working with you, you should ensure that they know how to report a concern, and that they communicate this to anyone else in their business working on Informa's behalf.

Zero Retaliation

We do not tolerate retaliation in any form against anyone, whether an Informa colleague or not, for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour, or participating in an investigation of a possible breach.

If you believe you are being retaliated against, please contact [Group Compliance](#).

Policy Governance

Policy Owner: Group Compliance

Applicable: This policy is mandatory for all colleagues, contractors and those with access to Informa systems

Classification: Internal Policy

Last updated: September 2019

Additional info: For further assistance, please email compliance.officer@informa.com
