

Whistleblowing procedure

Global



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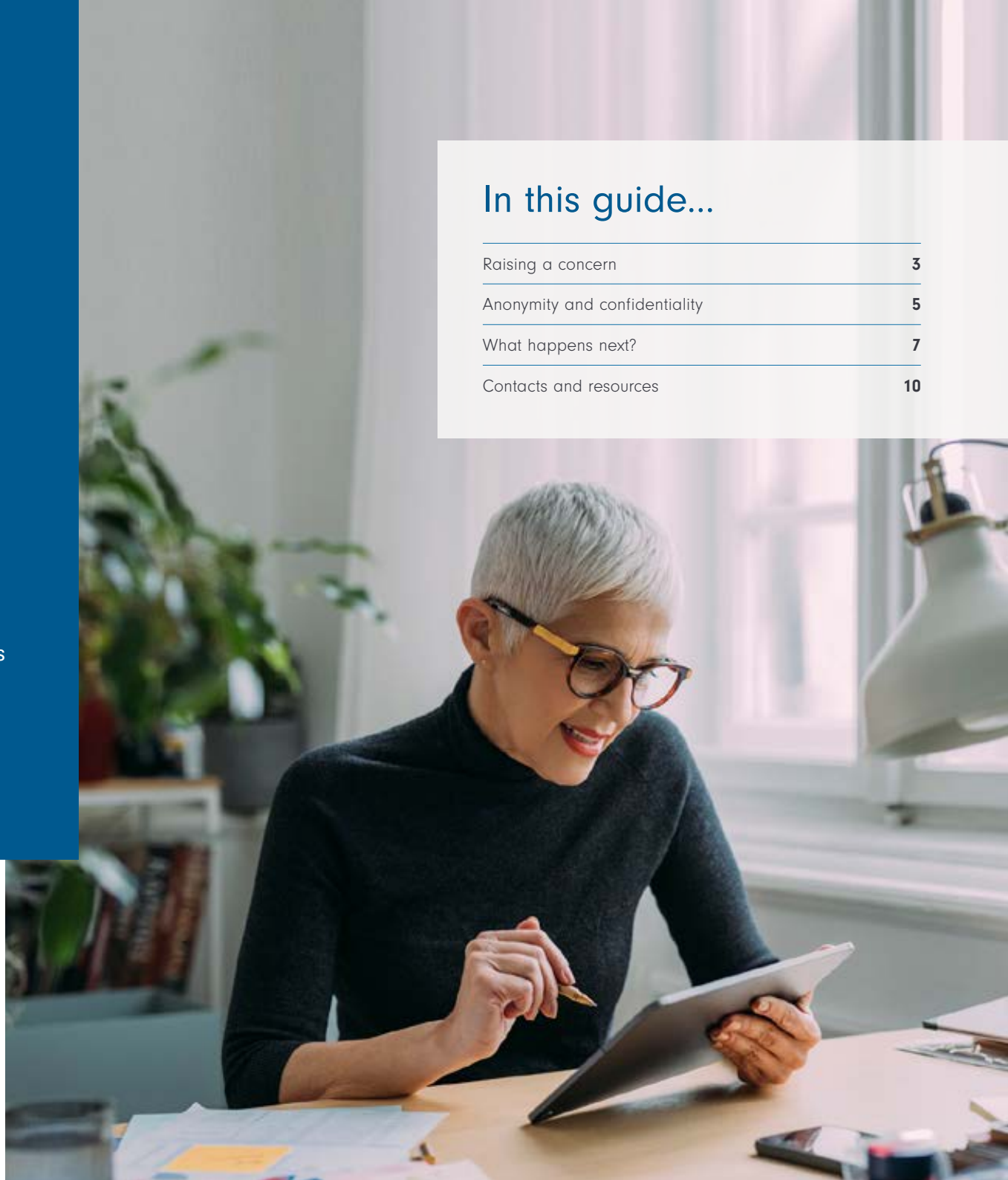
FIL's integrity is one of its greatest strengths. We are entrusted with great responsibility for our customers' assets. Protecting that trust is of vital importance to us. Whistleblowing provides important sources of confidential information to help us identify risks to our business and our customers.

This procedure sets out how you can report information to us about potential wrongdoing in our business which affects others using our internal reporting channels. Our Whistleblowing Policy sets out our the internal standards of our Whistleblowing programme. It can be found on the Source.

This procedure applies to all of our locations, globally.

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Raising a concern



Who can raise a concern?

Anyone can raise a concern with us if they think it could relate to an actual or potential wrongdoing in our business which affects others.

You do not have to be an employee to raise a concern. You could be a third-party agency worker, or you could work for one of our suppliers. You might be a volunteer, an intern or anyone who has information about our business to report that they have acquired in a work-related context, whether you work for us personally or not.

What can I raise a concern about?

We established our Whistleblowing Policy to encourage people to share information with us about actual or potential wrongdoing in our business which affects others.

We want to make it as easy as possible for you to tell us information that we need to know so we don't want to set out a list of things that you can or cannot tell us about. If you think there is a risk, malpractice, wrongdoing or breach of policy or internal standard that we should be aware of, we want you to tell us about it.

Examples of concern that are appropriate for this procedure could include concerns about compliance with financial services regulation, financial crime or irregularities, bribery and corruption, procurement, product compliance and consumer protection, data privacy and information security, breaches of our Code of Conduct and associated policies, and serious bullying, harassment or discrimination.

My concern is about how I have been treated personally, can I raise it using this Whistleblowing procedure?

After reading this procedure, you should consider if it is the right channel for the concerns that you want to raise. There might be more appropriate channels like customer complaints; or, if your concern is of a personal nature that does not impact anyone else, it may be more appropriate to raise it via an alternative procedure like Respect in the Workplace.

If your concern only affects you and does not affect anyone else and you raise it using this Whistleblowing procedure, we might decide that it should be considered under a different procedure that is more suitable to the nature of the concern that you have raised.

For example, if you are an employee and you are unhappy with a management decision about you personally, or a relationship at work that has broken down, we may use our Grievance Procedure instead. If you are a customer, we may direct you to customer complaints in the first instance.

We will always tell you what procedure we are using to look into your concern. Other procedures that could be relevant are our Respect in the Workplace Procedure, our Privacy Policy for Employees or Contingent Workers; and, if you are an employee, our Grievance Procedure.



How do I raise a concern?

We recognise that concerns can arise in a variety of circumstances, and it is important that you have different ways to share information with us, depending on those circumstances.

If you want to report information to us formally under this procedure, you can speak or write to:

- Your line manager or any more senior manager;
- Your local HR Business Partner or Head of HR;
- The Head of Group Employment Legal, Conduct and Privacy.

Alternatively, you can contact Navex Global EthicsPoint, our global independent whistleblowing helpline. Their details are set out under 'Contacts' at the end of this procedure. Navex Global EthicsPoint is designated as our official internal reporting body.

You may also contact designated external reporting bodies in the country in which you live or work. We have explained more about when and how to do so under the question ['Do I have to keep my concerns confidential?'](#)

When should I raise a concern – is there a time limit?

There is no time limit that applies to telling us about a concern.

We encourage you to tell us about your concerns at the earliest opportunity so that we can investigate and address any findings of wrongdoing promptly. It is much better if you share any information you have as soon as you become aware of it, even if it is about something that happened in the past.

Does my concern have to be in writing?

No, you do not have to put your concern to us in writing. You can speak to us at any time if you prefer, by telephone or in person. If you would rather send an e-mail or write to us instead of speaking to us, you can do that too.

When we investigate your concern, we will ask you about it and we will record the specific details that you share with us at that time. We will do this in writing, and you will have the opportunity to check, rectify and agree our record of the information that you have reported.

Anonymity and confidentiality

Can I remain anonymous?

You can remain anonymous, if that is what you would prefer to do. The only way to remain truly anonymous is to use CALL ('Confidential Alert Line'), our global independent whistleblowing helpline through Navex Global EthicsPoint. Their details are set out under 'Contacts' at the end of this procedure. Otherwise, you will be known at the very least to the person that you speak to about your concern.

If you raise your concern anonymously through our whistleblowing helpline, you'll have the option to provide further information and answer our questions through that channel without identifying yourself. We would ask that you do so as it can be very difficult, if not impossible, to investigate a truly anonymous concern, especially where the person does not provide further information to answer our questions.

It is usually much better to speak to us and identify yourself so that we can work with you to investigate your concern – typically, we get better outcomes that way as we have a fuller understanding of the concern and its scope and impact.

If you remain anonymous, we will do our best to communicate with you and let you know the outcome of our investigation into your concern. However, we can only do so within the limits of the information that we have – if we do not know who you are or how to contact you, we will not be able to communicate with you.

Will you tell anyone that I raised the concern in the first place?

No, we will never associate our investigation with you personally or identify you as the person who made a report to us unless you ask us to, agree that we can, or, we are required by law to disclose your identity to a competent authority (this could be the case if there is a criminal or regulatory investigation underway and we are required to provide information to it). For example, we will not tell people that we are investigating a concern that you have raised unless you ask us to, or agree that we can.

The only exception to this is that it may be necessary for you to be identified for the proper management of your concern and the investigation into it. For example, we may need to tell Internal Investigations that you raised the concern so that they can contact you and your name may be recorded in records kept of the investigation and follow up actions. We may also need to identify you to others if we decide that special measures are needed to protect you from retaliation.

We will consider it to be a most serious matter under our disciplinary policy and procedure if anyone identifies you as the 'whistleblower' to others.

Who will be told about my concern?

We will look into the concern that you have raised. To do that, we'll inevitably have to engage with others to find out information, manage our investigation into your concerns and follow up as appropriate. We've described the steps we'll take and who will be involved in them under the question ['I have raised a concern, what happens next?'](#)

When we look into your concern, we may also have to use some of the information you have given us or discuss some of the facts or circumstances that you have told us about.

However, we will always talk to you first about the approach that we intend to take to our investigation so that you understand what will and will not be shared, who the information will be shared with and how the information will be shared.



What if I am a witness?

Often, when people report an actual or potential wrongdoing, they have become aware of it because of something they have witnessed personally.

We try where possible to investigate concerns in a way that does not require the whistleblower to be a witness themselves, but sometimes that is impossible to do. For example, if we can establish the facts by looking at documents, correspondence or other technology or digitally enabled tools or platforms, we will do that first. However, if the concern relates to a set of actions in which you were personally involved, we may have to take a witness statement from you as we do from the other who were involved too.

If we take a witness statement from you, you will be able to review a copy of it for accuracy before it is finalised.

What protection and support will you offer me if I raise a concern?

Under no circumstances should you experience repercussions because you have reported information to us under this procedure.

We will treat it as a most serious matter if any other person retaliates against you by taking adverse action in a work-related context, or threatening to do so, because you have made a report to us. 'Taking adverse action against you' also includes failing to do something that should have been done in a work-related context.

If any employee of ours is found to have retaliated against you or identified you as the source of a report to us without your consent, we will treat it as a very serious matter and may take disciplinary action against them up to and including dismissal. If they are a regulated person, we will treat the matter as a FIT issue under our FIT Assessment Policy and Framework and they may lose their Certificate or Licence as a result.

Will I be legally protected as a whistleblower if I use this procedure?

If you tell us about a concern, we'll always take it seriously and follow the standards we commit to in this procedure, that includes protecting you from retaliation. However, each country in which we operate has their own rules and laws about when someone has a legal right to be protected as a whistleblower. If you want to know what your legal rights are in the country in which you work, you can speak to one of the organisations listed at the end of this procedure.

In very general terms, you are usually protected legally as a whistleblower if you have acquired information in a work-related context which you reasonably suspect indicates that a law has been, or is very likely to be, broken in our organisation or that such a breach will be concealed; and, you first raise your concern with us using the internal reporting protocol that we describe in this procedure.

Examples of retaliation might include dismissal, failure to renew a temporary contract, suspension or equivalent measures, withholding promotion or training, a negative performance review or reference without justification, demotion, a reduction in pay or other adverse changes to working arrangements, disciplinary action or penalty, intimidation, bullying, harassment or discrimination, causing harm to a person's reputation, or informal 'blacklisting', cancelling contracts, licences or permits, or, an inappropriate medical referral.

When we start our investigation into your concern, we will give you an independent named point of contact that you can go to at any time if you are worried about repercussions. If you do not want to approach that person and you are worried about repercussions, you can speak to one of our global corporate contacts. Their details are set out under 'Contacts' at the end of this procedure.

What happens next?

I have raised a concern, what happens next?

The person you have spoken or written to about your concerns, or Navex Global EthicsPoint, our global independent whistleblowing helpline, will inform our Internal Investigations team about the information you have brought to their attention.

Our Internal Investigations team will then take the lead on investigating the concerns that you have raised under this procedure.

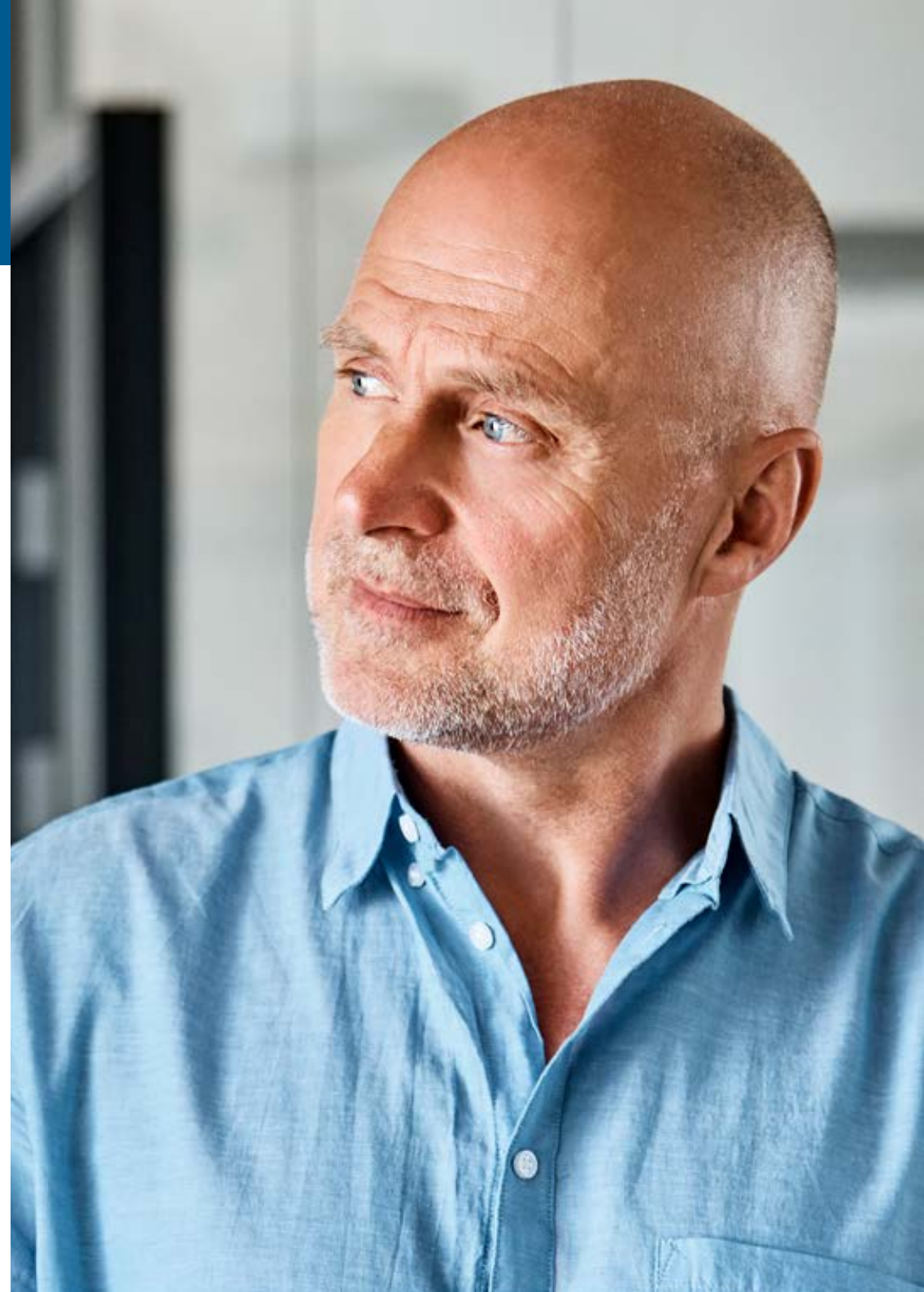
They will arrange to meet with you to have an initial discussion about your concern. This discussion will be relatively informal, and we'll use it as an opportunity to find out a bit more about your concern and to discuss how we might go about looking into it. They will ask you about any concerns about retaliation that you might have and how we can protect you.

We'll formally acknowledge receipt of your concern in writing within 7 days. We'll try to arrange a first initial meeting within that time too.

Internal Investigations will scope out the investigation that's required and identify a small number of people within Legal, HR, Compliance and management who need to know about the concern in order to support the investigation. All of these people are subject to strict confidentiality obligations and they will only be given the information that they need to know.

Internal Investigations will conduct a proportionate investigation into your concerns as appropriate and necessary. During that investigation, they may search digital and paper records, speak to witnesses and take a formal statement from you. A transcribed record of your statement will be taken and you will have the opportunity to review it before it is finalised.

An independent manager will also be appointed to oversee the investigation. This person will usually be a senior person with an appropriate understanding of the issues relating to the concern and who is organisationally independent from the business context in which it was raised.





At the end of the investigation, the independent manager will make recommendations and determine whether any follow up action is required in response to your concern. If so, those follow up actions will be handed off to others independent of the investigation to take forward. Where necessary and appropriate, we'll put in place a plan to check that those actions have been taken.

We aim to complete our investigation into your concern within 3 months of acknowledging receipt. Sometimes, a concern will be so complex that it may take us longer than 3 months to investigate it. For example, if a concern involves a large number of witnesses or documents spanning a number of years, it may take some time to gather in and evaluate all of the evidence.

If that is the case, we'll write to you within 3 months to let you know how long we think our investigation will take. The feedback that we provide you at this time will include information on steps that we have already taken and that we plan to take, as well as the reasons for them, unless giving you that information would affect our further investigation into the matter or the privacy of others involved in the investigation.

Will I find out what action you take to address my concern?

Yes, at the end of our investigation we'll tell you what we have decided to do in response to your concerns and our reasons. We'll do this in writing.

Sometimes, the information about our decision and follow up actions will be confidential, and we will not be able to disclose it to you. This could be the case, for example, if we intend to take personal action in relation to an individual named in your concern. Their right to privacy might limit what we can tell you and we may only be able to tell you that we intend to take personal action, rather than the specific action we intend to take.

We will always provide you with sufficient information so that you understand what we've decided and why, balancing our need to protect the right to privacy and confidentiality of others.

I am not happy about the action you are taking, what can I do?

The primary purpose of this procedure is to provide an independent channel through which you can report information to us acquired within a work-related context about an actual or potential wrongdoing in our business which affects others.

It is not intended to be used to address personal concerns that relate to you only and you have no personal right to appeal against our decisions or the outcome of our investigation into your concerns.

Other policies and procedures exist to support you in raising personal concerns and those procedures will often offer the right of appeal. Other procedures that could be relevant are our Respect in the Workplace Procedure and, if you are an employee, our Grievance Procedure. If you are not employed by us, your employer or work agency may offer a similar procedure to you.

If you are not happy with the way in which your concern has been handled, you can raise it with the Head of Group Employment Legal, Conduct and Privacy.

Do I have to keep my concerns confidential – can I take them externally?

Your report to us and our investigation into it is confidential. You should treat any information about the investigation, its outcome or any remedial action that we take as a result as confidential.

Any confidentiality obligations that you are subject to continue to apply (for example, a confidentiality clause in your contract of employment), except that they do not prevent you from reporting to us, seeking independent professional legal advice about making a protected whistleblowing report, or using a formally recognised external reporting channel for whistleblowing as set out in local country law. If you are worried that your report to us might require you to disclose confidential information belonging to someone else, you should talk to us first to agree the most appropriate way to make a report.

Our intention is that you can use this procedure to report your concerns to us directly in the first instance and you are encouraged to do so. In most cases, you should not find it necessary to make an external report.

If your report is about information arising in Continental Europe or Ireland, you can also make a confidential report to an external authority formally designated to receive whistleblowing reports. If your report is about information arising in the United Kingdom, you can also make a report to the FCA or the PRA.

We have listed the external organisations that are authorised to receive whistleblowing reports, or which can provide confidential advice, at the end of this procedure. Their details are set out under 'Contacts'.



If your report is about information arising in Continental Europe or Ireland, you may also contact the local relevant judicial authority or competent EU institution, body or agency. As the competent organisation may vary dependent on the nature of the alleged breach, we are not able to list all such organisations in this procedure.

If your report is about information arising in Australia, you may also contact the external organisations listed in our local Australian Whistleblowing Policy which is available on the Source.

What about 'going public' with my concerns – can I do that?

It will rarely be appropriate to make a report public unless there are truly exceptional circumstances – for example, the report concerns very serious information that you reasonably believe is true and which constitutes an imminent danger to the public interest or an emergency; or, you have used our internal reporting channels and those of a properly authorised external authority and no appropriate action has been taken in the required time.

You may not get legal protection if you make a report public outside of the exceptional circumstances that are identified legally in the country in which you work. It could be a breach of your confidentiality obligations if you do so. You should take local legal advice before you make a public disclosure.

What records do you keep about my concern?

We will keep a written record of the concern that you raised, our investigation into it and the associated decisions or recommendations that we make about follow up actions.

How long do you keep records about my concern for?

We will keep these records in line with our record retention policy. The retention period that will apply will be determined by the country that you work in and the nature of the concern that you raise. For example, if you have raised a concern about a breach of a specific regulation, we'll have to retain the records for as long as that regulation requires.

If your concern is about bullying, discrimination or harassment, we'll usually keep the records in-line with the retention period in our employee or contingent worker privacy policy.

Contacts and resources



Who is responsible for our whistleblowing arrangements?

The Head of Group Employment Legal, Conduct and Privacy is the person responsible for our Whistleblowing arrangements and associated record keeping and reporting. Our Whistleblowing Policy applies to our corporate group and globally. It is adopted locally in each country in which we work.

The Head of HR for the country in which you work, or if there is no Head of HR for your country, the Senior HR Business Partner responsible for you, is responsible for the Whistleblowing Policy locally in country.

Your concern will usually be investigated in the country in which you work or reside, or, if different, the country in which the alleged wrongdoing may have occurred. This means that the independent investigations manager and HR professional involved in the investigation will be appointed locally, although they will use the centralised group resources of Internal Investigations. If we have a small or medium sized company in the relevant location, we may rely mainly on group resources instead and the investigating manager and HR professional involved in the investigation may work for a different group company in a different location.

If a concern affects our companies in more than one location, we will decide where to investigate the concern and what resources to use considering the impact on each location of the allegation that has been made.

If we do use group resources to look into your concern, or if the investigation involves other locations, the company you reported to will remain responsible for confidentiality, giving you feedback and addressing any potential wrongdoing where it relates to them.

Misuse of this procedure

We established our whistleblowing arrangements to encourage people to share information with us about actual or potential wrongdoing in our business which affects others.

It is intended to be used where you reasonably believe that such a potential or actual wrongdoing in our business might have occurred. It doesn't matter if, in the end, that wrongdoing hasn't actually occurred or hasn't occurred in the way you originally suspected, as long as you reasonably believed that it might have done when you shared information with us.

We will treat any false or malicious allegations made under this procedure as a very serious matter and, if you are employed by us, as a disciplinary matter.

Internal Group Contacts

You can contact these group corporate representatives at any time:

Head of Group Employment Legal, Conduct and Privacy	Karen Blondell – fil-whistleblowingreports@fil.com
Whistleblowing hotline	Confidential Alert Line: CALL – EthicsPoint Use the ‘report misconduct’ page on the Source to find local country telephone numbers. Alternatively, use EthicsPoint
Australia	Whistleblowing Protection Officer: David Midolla – david.midolla@fil.com (02) 9225 0566

If you are in Australia or your concern relates to our Australian business you should consult our local Australian whistleblowing policy in conjunction with this procedure. It is available on the Source. That policy sets out important legal information about your rights and responsibilities in relation to whistleblowing and local internal reporting procedures.

External resources and reporting by country

If you work or reside in a country that is not listed here, please check your local official public information channels to find out who the authorised external reporting channel is and how to contact them.

France	<p>AMF: Autorité des marchés financiers</p> <p>The AMF may be contacted:</p> <ul style="list-style-type: none">■ electronically via the AMF website■ by post at the following address: 17, place de la Bourse 75082 Paris Cedex 02■ by telephone on 01.53.45.64.44■ at the AMF’s offices for a face-to-face meeting <p>Défenseur des droits</p> <p>The Défenseur des droits may be contacted by post at the following address:</p> <p>Défenseur des droits Libre réponse 71120 75342 PARIS CEDEX 07</p> <p>The procedure is provided on the Défenseur des droits website</p>
Germany	<p>Federal Financial Supervisory Authority</p> <p>The procedure is provided on the Federal Financial Supervisory Authority website</p> <p>Federal Office of Justice</p> <p>The procedure is provided on the Federal Office of Justice website</p> <p>Federal Cartel Office</p> <p>The procedure is provided on the Federal Cartel Office website</p>

Ireland	<p>Central Bank of Ireland Protected Disclosures Desk Central Bank of Ireland PO Box 559 Dublin 1</p> <p>E-mail: confidential@centralbank.ie</p> <p>The Office of the Protected Disclosures Commissioner Protected Disclosures Commissioner Mr Ger Deering The Office of the Ombudsman 6 Earlsfort Terrace Dublin 2 D02 W773</p> <p>Phone: +353 1 639 5600</p>
Italy	<p>Bank of Italy</p> <p>The Bank of Italy may be contacted by post at the following address: Banca d'Italia Via Nazionale 91 00184 Roma</p> <p>The procedure is provided on the Bank of Italy website</p>
Luxembourg	<p>Commission de Surveillance du Secteur Financier</p> <p>whistleblowing@cssf.lu</p>

Spain	<p>Bank of Spain – Banco de España (bde.es) Claims, complaints and queries (Oficina Virtual del Banco de España – Ciudadanos (bde.es))</p> <p>Enquiries concerning bank transparency regulations and claims.</p> <p>Oficina Virtual Reclamaciones Tel.: (34) 91 338 8830 Tel.: 900 545 454</p> <p>Comisión Nacional del Mercado de Valores – CNMV – Stock Exchange Commission CNMV – Comisión Nacional del Mercado de Valores Edison 4 28006 Madrid</p> <p>Telephone: 34 91 585 15 00 Fax: 34 91 319 33 73</p> <p>CNMV – Complaints</p> <p>SEPBLAC Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences</p>
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United
Kingdom

FCA

Call: 0207 066 9200

Email: whistle@fca.org.uk

Write: Intelligence Department (Ref PIDA) Financial Conduct Authority,
12 Endeavour Square, London, E20 1JN

Web: fca.org.uk/firms/whistleblowing

PRA

Email: whistleblowing@bankofengland.co.uk

Web: bankofengland.co.uk/whistleblowing

Protect (Independent whistleblowing charity)

Helpline: 0203 117 2520

Email: info@protect-advice.org.uk

Web: protect-advice.org.uk/contact-protect-advice-line