



ROBERT
WALTERS
GROUP

Raising A Serious Concern At Work

January 2024

RAISING A SERIOUS CONCERN AT WORK

1. Our approach

1.1 The Robert Walters Group of companies (the "**Group**") conduct their business with honesty and integrity. The Group believes it has a duty to take appropriate measures to identify and remedy any malpractice within or affecting the organisation. This policy aims to offer a straightforward method for employees and others engaged by us to raise serious and genuine concerns connected with the workplace in confidence and without being subject to any detriment or dismissal as a result of raising such concerns. This policy provides an opportunity for those concerns to be investigated and for any appropriate action to be taken to ensure that the matter is resolved effectively. We welcome information that will enable us to address wrongdoing. We recognise the importance of an open and supportive culture in which people can make disclosures without fear of reprisal, confident that they will be listened to.

1.2 **NOTHING IN THIS POLICY IS INTENDED TO RESTRICT YOU FROM MAKING ANY DISCLOSURE TO AN APPROPRIATE REGULATORY OR LAW ENFORCEMENT AUTHORITY OR RELIEVE YOU OF ANY LEGAL DUTY TO DO SO.**

1.3 **THIS IS A GROUP-WIDE POLICY AND IS, AS FAR AS POSSIBLE, INTENDED TO BE APPLICABLE TO THE GROUP’S OPERATIONS ACROSS THE WORLD. HOWEVER, IT IS ACKNOWLEDGED THAT LOCAL LAWS REQUIRE ALTERNATIVE PROCEDURES AND PROCESSES. THESE VARIANCES ARE SET OUT IN A SUPPLEMENT AND WILL TAKE PRIORITY OVER THIS POLICY (“COUNTRY LEVEL VARIANCES”).**

Please go to the end of this document FOR THE COUNTRY LEVEL VARIANCES.

1.4 “Whistleblowing” is using this policy to report any genuine suspicion you hold of actual or planned **wrongdoing or malpractice** that does not relate to you personally or which relates to you but may also negatively affect other people.

Some examples of types of suspected wrongdoing or malpractice at work that you should report under this policy:
<ul style="list-style-type: none">• criminal activity by the Group• failure to comply with regulatory requirements• miscarriages of justice• danger to health and safety of the public or of any individual• damage to the environment

- bribery
- facilitating tax evasion, financial fraud or mismanagement, including conduct which represents a danger to a national financial system
- conduct likely to damage our reputation or financial wellbeing
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters
- victimisation of a Whistleblower
- adverse behaviour (including breaches of the Group's policies)

1.5 In this policy, the terms:

“Whistleblower” refers to the person raising a Concern

“Concern” refers to the wrongdoing or malpractice at work which may or, is being reported by the Whistleblower

1.6 The purpose of this policy is:

- to encourage people to report concerns as soon as possible, in the knowledge that we will take your concerns seriously and thoroughly investigate
- to reassure that Staff raising a genuine concern will not face reprisals or detriment, even if the allegation turns out to be mistaken
- to provide clarity as to how confidentiality and anonymity can be protected for the Whistleblower, witnesses or anyone else involved in a Whistleblowing investigation
- to explain how a Concern is raised and the process which is then followed

1.7 This policy is not a substitute for the Group's other processes set out in its other policies or its day-to-day management. This policy sits alongside "to step in" where needed. In particular, this policy is not intended to deal with Staff grievances. If you have a grievance relating to your own personal circumstances in the workplace you should comply with the separate grievance procedures that exist for this purpose.

1.8 Before you invoke this Policy, please first check whether it is more appropriate to raise your concern under one of our other policies. We may decide that your concern is more appropriately addressed under one of the other policies and deal with it accordingly. Our other group policies include:

- Anti-Bribery and Competition Policy
- Anti-Facilitation of Tax Evasion Policy

- Anti-Harassment Policy
- Anti-Slavery Policy
- Code of Conduct
- Disciplinary and Performance Review Policy
- Data Privacy
- Equality, Diversity and Inclusion Policy
- Grievance Procedure

You should also check with your local HR to ensure no specific local policies apply to the circumstances.

CLICK [HERE](#) FOR GROUP POLICIES.

1.9 To help you decide which policy to use, we have given a number of examples in the Appendix to this policy which illustrates the correct policy to use in different scenarios, together with a checklist to use to identify whether this is the right policy.

1.10 Nothing in this policy is intended to restrict you from disclosing to an appropriate regulatory or law enforcement authority or relieve you of any legal duty to do so.

2. Who can access this policy

2.1 The mechanisms set out in this policy are open to all employees, officers, non-executive board members, consultants, contractors, temporary workers, casual workers, and interns engaged by the Group for its own internal purposes (together "**Staff**"). Staff may also access this policy once they cease to be employed or engaged by the Group, provided the matter of concern occurred whilst employed or engaged by the Group.

2.2 This policy does not form part of any contract of employment or contract for services, and we may amend it at any time.

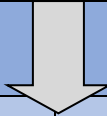
2.3 Clients, candidates (including contractors, temporary, casual workers the Group engages for assignment at a client), suppliers, Staff spouses or children, and dependents of Staff or their spouse should not use this policy. Instead, they should use the External Whistleblowing Policy – Third Parties.

CLICK [HERE](#) FOR THE EXTERNAL WHISTLEBLOWING POLICY

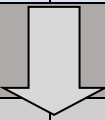
3. Raising a Concern and the process that follows.

3.1 We hope that in many cases, Staff will feel comfortable in raising concerns informally and outside of this policy with their line manager, HR, or via one of the other procedures set out in the Group’s policies. A line manager or HR may be able to agree on a way of resolving Staff concerns quickly and effectively.

3.2 However, there may be situations where Staff genuinely believe that they must raise a Concern. The table below sets out the 5-stage process for raising a Whistleblowing Concern and also provides a guide to the timelines for each stage. Please note that Country Level Variances may apply to these timelines.

1. Raising a Concern		
	<p>Having decided that there is a genuine concern to raise through this policy, you should contact the Chief Legal Officer or Safecall.</p> <p>You can raise your concern by email or request a phone call. Either way, please make it clear that you are using this policy to report a Concern.</p> <p>If you believe the Chief Legal Officer is conflicted, you should contact the Chair of the Audit and Risk Committee in the first instance. If you believe both the Chief Legal Officer and the Chair of the Audit and Risk Committee are conflicted, you should contact the Chair of the Board of Directors.</p>	<p>If you have requested a phone call, you will be contacted within 2 business days to arrange a convenient time to speak.</p>
2. Acknowledgement		
	<p>We will formally acknowledge your concern.</p>	<p>Within around 3 business days of raising a concern if by email or discussing the matter by phone.</p>

	<p>You may be asked to provide clarifications or more information at this point.</p>	
<p>3</p>	<p>Initial Assessment</p>	
	<p>An initial assessment will be made of your concern. The initial evaluation will consider whether your concern has been raised under the right policy. If it has been submitted under the correct policy, the initial assessment will also consider whether it is appropriate for the concern to be escalated to a full investigation under the next stage of this policy, or whether it can be resolved without further investigation.</p>	<p>Wherever possible, we will inform you of the initial assessment decision within around 21 business days of you raising the concern to us.</p> <p>If we cannot meet this timeline, we will endeavour to give you a reasonable estimate for the initial decision within around 14 business days of your raising the concern with us.</p> <p>If it has been determined that your concern should have been raised under one of the Group's other policies, the initial assessment decision will explain the following steps to be taken in accordance with that other policy as soon as possible. You will not be required to re-submit the concern in a different format.</p> <p>The timelines above are indicative only, not guaranteed and may be longer, especially if more information is required from you or the business.</p>
<p>4.</p>	<p>Investigation</p>	
	<p>The concern will be formally investigated if the initial assessment concludes that further investigation is necessary. Depending on the nature of the concern, the investigation may be carried out internally by trained Staff or external experts.</p>	<p>The timescales for an investigation will depend on factors such as its complexity, whether a witness must be interviewed (and then the number of witnesses), and whether external legal advice is required.</p>

		<p>We will seek to provide you with a time estimate for us to complete the investigation and conclude within one month of your concern being raised. We will update you if this estimate materially changes.</p> <p>Due to confidentiality and possible legal privilege, we will not be able to update you on the investigation itself whilst it is underway. However, we will contact you every two weeks to confirm that it is still ongoing and the likely time to reach its conclusions.</p>
		
5.	<p>Final Report and Decision</p> <p>Once the investigation has been completed, an initial report of the facts will be provided to the Chair of the Audit and Risk Committee.</p> <p>The Chair of the Audit and Risk Committee may ask further questions of the investigation team before finalising the report and making recommendations to the Board.</p>	<p>You will be informed within 5 business days of the report being finalised.</p> <p>Within 14 days of the report being finalised, you will receive a high-level summary of findings and any steps the Group intends to take.</p> <p>The amount of information we will provide you will depend on the specific nature of the concern and take into account our duties of confidentiality. In some particularly sensitive cases, where it is reasonable to do so, we will only be able to share with you confirmations that the investigation has been completed and appropriate action has been taken, or no further action has been taken (see further 4.5 & 4.6 below).</p>

4. Confidentiality

Anonymity

4.1 It is possible to raise concerns anonymously (see paragraph 9 below). However, this may make proper investigations more difficult or impossible. It is also more challenging to establish whether

allegations are credible and more difficult to speak to witnesses. We, therefore, encourage you to identify yourself when raising a concern. However, we will always limit any disclosure of personal identities to a strict "need to know basis". If you choose to remain anonymous, we encourage you to maintain ongoing two-way communication with us, so we can ask follow-up questions or provide feedback.

- 4.2 If you are concerned about possible reprisals if your identity is revealed, you should speak to the Chief Legal Officer or the Whistleblowing Champion in confidence to discuss what appropriate measures can be put in place to preserve confidentiality and to reassure you that you will not suffer negative repercussions by coming forward.
- 4.3 If, having discussed the matter with the Chief Legal Officer or the Whistleblowing Champion, you want to raise your concern anonymously, we will make every effort to keep your identity secret.
- 4.4 We will always require anyone involved in an investigation (including any witnesses and investigators) to sign an appropriate non-disclosure agreement ("**NDA**"). Any NDA will be without prejudice to any legal rights which may exist. For example, nothing in the NDA would prevent you from reporting a crime to the appropriate authorities.

Protection of confidentiality of others involved

- 4.5 The very nature of a Concern is likely to be sensitive not just for the Whistleblower but for anyone else who may be involved, including someone accused of wrongdoing, witnesses and even the investigation team. In addition, there are duties of confidentiality and secrecy owed under various laws, which must be respected. For this reason, providing updates or conclusions may not be possible; where we can, these may be at a high level or omit certain elements.
- 4.6 The Group will seek to balance the wish for transparency with its legal duties and obligations towards Staff. However, the Group's decision will be final if it believes it is appropriate to limit information to you during and after an investigation.
- 4.7 During an investigation and afterwards, please do not discuss any aspect of the Concern with anyone else, including those who may be witnesses to it, unless you have received written permission from the Chief Legal Officer. You must also not post about the topic on any social media or speak to the media. These restrictions will apply even if the matter is in the public domain. This is without prejudice to your rights described in the next paragraph.

5. External disclosures

- 5.1 The policy aims to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, Staff should not find it necessary to alert anyone externally.

- 5.2 The law recognises that in some circumstances, it may be appropriate or permitted for you to report your concerns to an external body such as a regulator or an ombudsman. It will very rarely, if ever, be appropriate to alert the media except where the laws of specific countries provide protection for such disclosures. We strongly encourage Staff to seek advice before reporting a concern to anyone external and ask that you contact the Chief Legal Officer for guidance.
- 5.3 The independent whistleblowing charity, Protect operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concerns. Their contact details are at the end of this policy.
- 5.4 Whistleblowing concerns usually relate to the conduct of our Staff. Still, they may sometimes relate to the actions of a third party, such as a client, candidate, supplier or service provider. In some circumstances, the law will protect you if you directly raise the matter with a third party. However, we encourage you to report such concerns internally first. You should contact the Chief Legal Officer for guidance.

6. Misuse of this policy

- 6.1 We appreciate that a concern may be raised without you having "hard proof". For the avoidance of doubt, no action will be taken against a Whistleblower where their beliefs are genuine but ultimately found to be incorrect.
- 6.2 If we conclude that a Whistleblower has made false allegations maliciously, the Whistleblower may be subject to disciplinary action.
- 6.3 A breach of the policy's rules on confidentiality (see paragraph 4 above) may undermine or delay the investigation process and could lead to disciplinary action being taken against the person in breach.

7. If you are not satisfied

- 7.1 We will deal with your Concern fairly and appropriately. If you are unhappy with how your concern is handled (including raising any conflicts of interest of those dealing with the concern), you should speak to the Whistleblowing Champion or the Chief Legal Officer in confidence.
- 7.2 If, after having communicated with the Whistleblowing Champion or the Chief Legal Officer, you are still not happy with how your concern has been handled, you can contact the Chair of the Board of Directors.

8. Protection and support for Whistleblower

- 8.1 Understandably, Staff raising a Concern are sometimes worried about possible repercussions. We aim to encourage openness and will support Staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

- 8.2 A Whistleblower will not suffer any detrimental treatment as a result of raising a concern (providing that the concern is raised in good faith and the procedure set out in this policy is followed). Detrimental treatment includes dismissal, disciplinary action, harassment, threats or other unfavourable treatment connected with, or damage or harm arising from, raising a concern. If you believe you have suffered any such treatment, damage or harm, you should inform the Chief Legal Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 8.3 If you become aware of the identity of a Whistleblower alleging a Concern addressed towards you, you must not threaten or retaliate against the person raising the Concern in any way. You may be subject to disciplinary action if you are involved in such conduct. In some cases, the Whistleblower could have a right to sue you personally for compensation.
- 8.4 A confidential counselling hotline is also available through our local employee assistance programme. You may wish to contact Protect, which is an independent whistleblowing charity based in the UK. Details of both are set out in the section below in the Contacts section in paragraph 11.

9. Raising a Concern Anonymously

- 9.1 The Group has appointed Safecall to operate an independent confidential reporting service. This service is open to all Staff regardless of where you are located and can be provided in most languages of the countries where we operate.
- 9.2 Calls are handled by skilled staff and will be treated in complete confidence. A report of the call will be sent to the Chief Legal Officer (except where the Concern relates to the Chief Legal Officer when the report will be sent to the Chair of Audit and Risk Committee).
- 9.3 Safecall will not disclose your name if you wish to remain anonymous. Your call will not be audio-recorded. Calls received by Safecall will be treated confidentially and should you wish, Safecall will guarantee your anonymity.
- 9.4 You can contact Safecall 24 hours a day, seven days a week on a freephone number. Alternatively, Safecall can be contacted via the web.

CLICK [HERE](#) FOR THE FREEPHONE NUMBERS WHERE YOU ARE LOCATED

CLICK [HERE](#) TO ACCESS THE SAFECALL PORTAL

10. Personnel Responsible For The Policy

- 10.1 The Audit & Risk Committee (the “**Committee**”) is ultimately responsible for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under it.

- 10.2 The Chief Legal Officer has day-to-day operational accountability for this policy and must ensure that all managers and other Staff who may deal with investigations or decision making under this policy receive regular and appropriate training. If you are unable to reach the Chief Legal Officer, you may also contact the appropriate Deputy CLO (see paragraph 11 below for contact details of the relevant persons).
- 10.3 The Chief Legal Officer, in conjunction with the Committee, will review this policy from a legal and operational perspective at least once every two years.
- 10.4 In addition, the Group has appointed a Whistleblowing Champion who will not be involved in any investigation or deciding the outcome of any investigation but will be able to discuss the process and help answer questions that a Whistleblower may have. If a Whistleblower believes there is likely to be a conflict with the involvement of a member of the Committee, the Chief Legal Officer, or anyone else who may be involved in an investigation or decision-making, they should discuss this with the Whistleblowing Champion in confidence.

11. Contacts

Chair of the Board of Directors	Leslie Van de Walle +44 (0)20 7379 3333 <u>BoardChair@robertwalters.com</u>
Chair of Audit and Risk Committee	Matt Ashley +44 (0)20 7379 3333 <u>AuditChair@robertwalters.com</u>
Chief Legal Officer	Richard Harris (dd) +44 020 7509 8027 (m) +44 07826551728 <u>richard.harris@robertwalters.com</u>
Deputy Chief Legal Officers	Robert Dyson (RS) (dd) +442075098431 (m) +7585903107 <u>robert.dyson@robertwalters.com</u> Sandy Scott (RW/WP) T(dd) +33140674868

	(m): +33667595979 sandy.scott@robertwalters.com
Whistleblowing Champion	Coral Bamgboye Head of Equality, Diversity and Inclusion (dd) +44 207 5098908 coral.bamboye@robertwalters.com
Confidential counselling hotline	Contact your HR Business Partner, and they can direct you.
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 Contact Via Website: www.protect-advice.org.uk
Safecall (Confidential Reporting Hotline) (Via the web)	You can contact Safecall 24 hours a day, seven days a week on a freephone number (the following link HERE) provides a list of freephone numbers to call depending on which country you are calling from. Alternatively, Safecall can be contacted via the web HERE

APPENDIX

Which policy should you use – examples

Where you should use <u>this</u> policy	Where <u>other</u> policies are appropriate
<p><i>Where you have a complaint about the inappropriate behaviour of a member of Staff and you genuinely believe that reporting it through the Grievance Process is likely to result in reprisals against you.</i></p>	<p><i>Where you witness inappropriate behaviour by a colleague in the office and there are no grounds to believe that reporting this to HR or your manager would result in any detrimental treatment to you or the person to whom the behaviour was targeted.</i></p> <p>Use Grievance Policy and Anti-Harassment Policy</p>
<p><i>You are suspicious that a colleague is planning to bribe a client to win a place on a preferred supplier list. However, you genuinely believe that management will not act even if the suspicion is found to be true.</i></p>	<p><i>You believe that management will fairly decide whether to take appropriate action on learning of your concern relating to suspicion of bribery of a client by a colleague. You do not have to agree with the level of action that may be taken, but only that management will act appropriately and in line with its Anti-Bribery Policy.</i></p> <p>Report under Anti-Bribery Policy</p>
<p><i>Where you believe the Group is involved in criminal activity such as facilitating money laundering.</i></p>	<p><i>You become aware of an employee personally involved in submitting false expense claims for their own gain. You do not believe the Group has involved itself.</i></p> <p>Report under Fraud Policy</p>

Checklist

The checklist below provides a framework for Staff to reach a decision on whether to raise a Concern. The checklist is for guidance only.

Employee's Checklist Before Raising A Concern Under This Policy

- Is the matter of the subject type covered by this policy?
- Is another Group policy more appropriate? In particular, is the Grievance Policy more appropriate? See paragraphs 1.5 and 1.6.
- Is this a matter I could speak to my manager, a member of senior management or HR about?
- Do I have reasonable grounds for my belief that wrongdoing or malpractice has occurred or is going to occur?
- Is it necessary to raise the concern anonymously or request complete confidentiality? See paragraph 4.
- Is anyone named in the investigation or decision-making process likely to be conflicted? See paragraph 10.4.
- Am I aware of the extent of my legal protections? (see paragraph 8)
- Have you checked the Country Level Variances?

Country Specific Terms

Europe

January 2024

Whistleblowing Policy - Raising a Serious Concern at Work Country Specific Terms - Europe

BELGIUM	<p>1.4 Wrongdoing or malpractice. In Belgium, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in article 2 of the <i>Wet betreffende de bescherming van melders van inbreuken op het Unie-of nationale recht vastgesteld binnen een juridische entiteit in de private sector</i>.</p> <p>3.2 Raising a Concern. In Belgium, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern (article 12 sub 1 of the <i>Wet betreffende de bescherming van melders van inbreuken op het Unie-of nationale recht vastgesteld binnen een juridische entiteit in de private sector</i>).</p> <p>5.2 External Disclosures. In Belgium, Whistleblower Concerns may also be raised externally with the following regulator or authority:</p> <ul style="list-style-type: none"> • Federal Coordinator; • Competent authorities. <p>8.2 Protections and support for Whistleblower. In Belgium, the scope of persons protected against detrimental treatment is extended to also cover:</p> <ul style="list-style-type: none"> • Reporting persons working in the private sector who obtained information about breaches in a work-related context (article 6 of the <i>Wet betreffende de bescherming van melders van inbreuken op het Unie-of nationale recht vastgesteld binnen een juridische entiteit in de private sector</i>).
FRANCE	<p>1.4 Wrongdoing or malpractice. In France, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in article 2 of law 2022-401 of 21March 2022 - Section II and article 8 of law 2022-401 of 21March 2022.</p> <p>3.2 Raising a Concern. In France, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern.</p> <p>5.2 External Disclosures. In France, Whistleblower Concerns may also be raised externally with the following regulator or authority:</p> <ul style="list-style-type: none"> • One of the 45 competent external authorities listed in the appendix of the Decree n° 2022-1284 du 3rd October 2022 such as “l’AFA, la DGCCRF, l’Autorité de la Concurrence, l’AMF, l’ACPR, la CNIL...”; • Defender of Rights; • Judicial authority;

	<ul style="list-style-type: none"> • The institutions, bodies or agencies of the European Union. <p>8.2 Protections and support for Whistleblower. In France, the scope of persons protected against detrimental treatment is extended to also cover:</p> <ul style="list-style-type: none"> • “Facilitators” which means any natural person or any non-profit private law legal person who helps a Whistleblower to make a report or disclosure in compliance with articles 6 and 8 of the law 2022-401 of 21 March 2022.
<p>GERMANY</p>	<p>1.4 Wrongdoing or malpractice. In Germany, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in sec. 2 of the Whistleblower Protection Act.</p> <p>3.2 Raising a Concern. In Germany, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern.</p> <p>5.2 External Disclosures. In Germany, Whistleblower Concerns may also be raised externally with the following regulator or authority:</p> <ul style="list-style-type: none"> • Bundesjustizministerium • Bundesanstalt für Finanzdienstleistungsaufsicht • Bundeskartellamt <p>8.2 Protections and support for Whistleblower. In Germany, sec. 34 Whistleblower Protection Act extends the scope of persons protected against detrimental treatment (sec. 33 Whistleblower Protection Act) to also cover:</p> <ul style="list-style-type: none"> • Natural persons who confidentially assist the Whistleblower with an internal or external report or disclosure in a professional context; • Third parties associated with the Whistleblower who have suffered reprisals in a professional context, unless these are not based on the reporting or disclosure by the person providing the information; and • Legal entities, partnerships with legal capacity and other associations of persons with legal capacity that are legally affiliated with the Whistleblower as a result of a shareholding or for which the Whistleblower works or with which the Whistleblower is otherwise associated in a professional context.
<p>IRELAND</p>	<p>1.4 Wrongdoing or malpractice. In Ireland, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in section 5 of the Protected Disclosures Act 2014 and the Protected Disclosures Amendment Act 2022.</p>

	<p>3.2 Raising a Concern. In Ireland, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern.</p> <p>5.2 External Disclosures. In Ireland, Whistleblower Concerns may also be raised externally to:</p> <ul style="list-style-type: none"> • The relevant prescribed person; or • the Office of the Protected Disclosures Commissioner. <p>Prescribed Persons are bodies that generally have regulatory functions in the area that forms the subject matter of a Whistleblower’s Concern. A full list of prescribed persons and the matters that can be reported to them can be found <i>here</i>.</p> <p>8.2 Protections and support for Whistleblower. In Ireland, the scope of persons protected against detrimental treatment is extended to also cover:</p> <ul style="list-style-type: none"> • Shareholders; • Member of the administrative, management or supervisory body of an undertaking (including non-execs); • Volunteers and unpaid trainees; • Job applicants or individuals who acquire information on a relevant wrongdoing during a recruitment process or other pre-contractual process; • Facilitators; • Third parties connected to the reporting person (colleague or relatives); • Legal entities that a reporting person owns or is connected to.
<p>ITALY</p>	<p>1.4 Wrongdoing or malpractice. In Italy, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in article 3 of the Law no. 24, 10 March 2023.</p> <p>3.2 Raising a Concern. In Italy, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern.</p> <p>5.2 External Disclosures. In Italy, Whistleblower Concerns may also be raised externally with the following regulator or authority:</p> <ul style="list-style-type: none"> • L'Autorita' nazionale anticorruzione (ANAC) <p>8.2 Protections and support for Whistleblower. In Italy, the scope of persons protected against detrimental treatment is extended to also cover all those who report violations of which they have become aware in the context of their work, such as:</p>

	<ul style="list-style-type: none"> • Employees or collaborators, subordinate and self-employed workers, freelancers and other categories such as volunteers and trainees, including unpaid ones; • Shareholders and persons with administrative, management, control, supervisory or representative functions; • “Facilitators”, colleagues, relatives or stable relatives of the Whistleblower. <p>Protection does not apply to:</p> <ul style="list-style-type: none"> • disputes, claims or demands linked to an exclusively personal interest of the whistleblower; • reports of violations already mandatorily regulated by European Union or national acts; • reports of breaches of national security, procurement relating to defence or national security aspects, unless these aspects are covered by the relevant secondary legislation of the European Union.
<p>LUXEMBOURG</p>	<p>1.4 Wrongdoing or malpractice. In Luxembourg, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in article 1 of the Law no. 7945, 10 January 2022.</p> <p>3.2 Raising a Concern. In Luxembourg, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern.</p> <p>5.2 External Disclosures. In Luxembourg a dedicated Office for raising concerns is created and will guide and help anyone with their reports either internally or externally.</p> <p>In Luxembourg, Whistleblower Concerns may also be raised externally with the following regulator or authority:</p> <ul style="list-style-type: none"> • La Commission de surveillance du secteur financier; • Le Commissariat aux assurances; • Le Conseil de la concurrence; • L’Administration de l’Enregistrement et des Domaines; • L’Inspection du travail et des mines; • La Commission nationale pour la protection des données; • Le Centre d’égalité de traitement; • L’Ombudsman/Contrôle externe des lieux privés de liberté; • L’Ombudscomité fir d’Rechter vum Kand; • L’Institut luxembourgeois de régulation; • L’Autorité luxembourgeoise indépendante de l’audiovisuel; • L’Ordre des avocats; • La Chambre des notaires du GDL;

	<ul style="list-style-type: none"> • Le Collège médical; • L'Administration de la nature et des forêts; • L'Administration de la gestion de l'eau; • L'Administration de la navigation aérienne; • Le Service national du Médiateur de la consommation; • L'Ordre des Architectes et des Ingénieurs-conseils; • L'Ordre des Experts comptables; • L'Institut des Réviseurs d'Entreprise; • L'Administration des contributions directes. <p>8.2 Protections and support for Whistleblower. In Luxembourg, article 2 of the Law no. 7945, 10 January 2022 extends the scope of persons protected against detrimental treatment to also cover:</p> <ul style="list-style-type: none"> • persons with worker status, within the meaning of Article 45(1) of the Treaty on the Functioning of the European Union, including civil servants; • self-employed persons within the meaning of Article 49 of the Treaty on the Functioning of the European Union; • shareholders and members of a company's administrative, management or supervisory body, including non-executive members, as well as volunteers and paid or unpaid trainees; • anyone working under the supervision and direction of contractors, subcontractors and suppliers; • Whistleblowers who report or publicly disclose information about violations obtained in the course of an employment relationship that has since ended; • Whistleblowers whose employment relationship has not yet begun, in cases where information about violations was obtained during the recruitment process or other pre-contractual negotiations; • Facilitators; • Third parties who are related to the Whistleblowers and who are at risk of retaliation in a professional context, such as colleagues or relatives of the Whistleblowers; • legal entities owned by or working for the Whistleblowers, or with whom they have a professional relationship.
<p>NETHERLANDS</p>	<p>1.4 Wrongdoing or malpractice. In the Netherlands, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in article 1 of the <i>Wet bescherming klokkenluiders</i> (under <i>misstand</i>).</p> <p>3.2 Raising a Concern. In the Netherlands, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern (article 2 sub 2, sub c of the <i>Wet bescherming klokkenluiders</i>).</p>

	<p>5.2 External Disclosures. In the Netherlands, Whistleblower Concerns may also be raised externally with the following regulator or authority:</p> <ul style="list-style-type: none"> • Competent authorities • <i>Huis voor Klokkeluiders</i> <p>8.2 Protections and support for Whistleblower. In the Netherlands, the scope of persons protected against detrimental treatment is extended to also cover:</p> <ul style="list-style-type: none"> • Any natural person who reports or discloses suspected wrongdoing in the context of his work-related activities (article 1 of the <i>Wet bescherming klokkenluiders</i>).
<p>PORTUGAL</p>	<p>1.4 Wrongdoing or malpractice. In Portugal, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in article 2 of the Law 93/2021, 21 December 2022:</p> <ul style="list-style-type: none"> • Any act or omission contrary to rules contained in the EU acts referred in Annex to Directive (EU) 2019/1937 as well as aA national rules implementing, transposing or complying with such acts, in the fields of: <ul style="list-style-type: none"> – Public Procurement; – Financial services, products and markets, prevention of money laundering and financing of terrorism; – Product safety and compliance; – Transport safety; – Environmental protection; – Radiation protection and nuclear safety; – Food and feed safety, animal health and welfare; – Public health; – Consumer protection; – Protection of privacy and personal data; – Network and information systems security. <p>3.2 Raising a Concern. In Portugal, Whistleblowers may request a personal meeting within a reasonable time frame to raise a concern.</p> <p>8.2 Protections and support for Whistleblower. In Portugal, the scope of persons protected against detrimental treatment is extended to cover reporting persons becoming aware in a work-related context and business context, besides employees also encompassing:</p> <ul style="list-style-type: none"> • Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction;

	<ul style="list-style-type: none"> • Shareholders and persons belonging to administrative or management bodies or to supervisory or controlling bodies of legal persons, including non-executive members; • Volunteers and interns, remunerated or not; • Natural person who assists the whistleblower in the reporting procedure and whose assistance must be confidential, including trade union representatives or workers' representatives; • Third parties connected to the whistleblower, such as work colleagues or family members, who may be the target of retaliation in a professional context; • Legal persons or similar entities that are owned or controlled by the whistleblower, for which the whistleblower is employed or otherwise connected in a professional context. <p>The fact that the complaint or public disclosure of an infringement is based on information obtained in a professional relationship terminated in the meantime, as well as during the recruitment process or during another phase of pre-contractual negotiation of an existing or non-concluded professional relationship, shall not affect the classification of a natural person as a Whistleblower.</p>
<p>SPAIN</p>	<p>1.4 Wrongdoing or malpractice. In Spain, types of reportable wrongdoing or malpractice (“disclosable matters”) also include all matters listed in article 2 of the Law 2/2023, 20 February 2023.</p> <p>3.2 Raising a Concern. In Spain, Whistleblowers may request a personal meeting within a reasonable time frame (max. 7 days) to raise a concern.</p> <p>5.2 External Disclosures. In Spain, Whistleblower Concerns may also be raised externally with the following regulator or authority:</p> <ul style="list-style-type: none"> • Autoridad Independiente de Protección del Informante, A.A.I. o ante las autoridades u órganos autonómicos correspondientes <p>8.2 Protections and support for Whistleblower. In Spain, the scope of persons protected against detrimental treatment is extended to also cover:</p> <ul style="list-style-type: none"> • Cases where the Whistleblower has obtained the disclosed information (i) in the framework of an employment relationship that has already ended, as well as (ii) during the recruitment or pre-employment negotiation process; • Volunteers, trainees, trainees and persons involved in recruitment processes, as well as persons assisting Whistleblowers or persons close to them who may suffer reprisals.

Country Specific Terms Australia and New Zealand

January 2024

Whistleblowing Policy - Raising a Serious Concern at Work Country Specific Terms – Australia and New Zealand

AUSTRALIA	<p>The Whistleblowing definition in the Policy is specifically extended to include offences or contraventions of certain specified Australian laws, including:</p> <ul style="list-style-type: none"> (i) Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (ii) the ASIC Act 2001 (iii) the Banking Act 1959 (iv) the Financial Sector (Collection of Data) Act 2001 (v) the Insurance Act 1973 (vi) the Life Insurance Act 1995 (vii) the National Consumer Credit Protection Act 2009 (viii) the Superannuation Industry (Supervision) Act 1993 (ix) an instrument made under an Act referred to in any of (i) to (viii) above. <p>Raising the Whistleblower Concern. In Australia, Whistleblower Concerns must be raised to:</p> <ul style="list-style-type: none"> • ‘eligible recipients’ • legal practitioners • regulatory bodies and other external parties (ASIC, APRA, the ATO) • journalists and parliamentarians (public interest and emergency disclosures only) <p>‘Eligible recipients’ are:</p> <ul style="list-style-type: none"> • an officer or senior manager of the company (to this end, emailing a Whistleblowing Concern to reportconcerns@robertwalters.com will result in an Eligible Recipient receiving the whistleblowing Concern. • an auditor or member of an audit team conducting an audit • an actuary • a person authorised by the company to receive Whistleblower Concerns which in the case of the Group are: <ul style="list-style-type: none"> ○ the Chief Legal Officer; or ○ a Deputy Chief Legal Officer. <p>The following process applies to Whistleblowing Concerns raised in Australia:</p> <ul style="list-style-type: none"> • Having received a Whistleblowing Concern, we will formally acknowledge your concern within around 3 business days and request any further information required. • Where possible, we will inform you of the initial assessment decision within around 14 business days. If we require more time, we will let you know after around 10 business days and keep you informed of the investigation. • If further investigation is required, a formal investigation will be undertaken. Timeframes will depend upon the complexity of the matter and if witnesses and external advice are required. We will seek to provide a time estimate to complete the investigation and make a final decision within 1 month of you
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reporting the Whistleblowing Concern. We will endeavour to update you every 2 weeks of progress on the investigation.

- Once the investigation is completed, an initial report of the facts will be prepared. The Whistleblower will be informed within 5 business days of the report being finalised, and within 14 business days, you will receive a high-level summary of the findings and steps the Group intends to take.

Whistleblowing Concerns may be made to a journalist or parliamentarian in limited circumstances and qualify for protection where the following criteria are met:

- **‘public interest disclosures’** may be made if, after 90 days of reporting a Whistleblowing Concern to a regulatory body, there are no reasonable grounds to believe action is, or has, been taken and making a further disclosure is in the public interest, where the Whistleblower has given written notice to the statutory body with sufficient information to identify the previous Whistleblowing Concern and notifying of the intention to make a public interest disclosure.
- **‘emergency disclosures’** may be made to a journalist or parliamentarian if, having reported a Whistleblowing Concern to a regulatory body, there are reasonable grounds to believe the information concerns a substantial and imminent danger to the health or safety of people or the natural environment, where the Whistleblower has given prior written notice to the statutory body with sufficient information to identify the previous Whistleblowing Concern and notifying of the intention to make an emergency disclosure, and the extent of the information is no greater than necessary to notify the journalist or parliamentarian of the danger.

YOU SHOULD CONTACT A LEGAL ADVISER BEFORE MAKING A PUBLIC INTEREST DISCLOSURE OR EMERGENCY DISCLOSURE

Protections for Whistleblowers. Whistleblowers have the following additional protections:

- **Identity protection** – the Group will not disclose the identity, or any information likely to lead to the identification of, a Whistleblower without their consent or unless their identity is disclosed to ASIC, APRA, AFP, a legal practitioner or anyone else prescribed by the regulations.
- **Compensation and other remedies** – anyone who suffers loss as a result of detrimental conduct may seek compensation and other remedies (including court orders) through the courts if they suffer loss, damage or injury due to reporting a Whistleblowing Concern and the Group fails to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. You are encouraged to seek independent legal advice in such circumstances.
- **Civil, criminal and administrative liability protection** – a Whistleblower is protected from civil liability (e.g. for breach of confidentiality or employment contract), criminal liability (except if making a false disclosure) and administrative liability (e.g. disciplinary action). The immunity does not extend to any misconduct revealed in the Whistleblowing Concern.

	<p>Concerns raised that are outside of the definition of wrongdoing or malpractice as described in the Policies as supplemented above will not qualify for the protections detailed in the Policies and this supplement.</p>
<p>NEW ZEALAND</p>	<p>Raising the Whistleblowing Concern. Whistleblowing Concerns can be reported directly to an “appropriate authority” if the Whistleblower is not confident about raising the Whistleblowing Concern directly with the Group.</p> <p>An <i>appropriate authority</i> includes:</p> <ul style="list-style-type: none"> • the head of any public sector organisation • any officer of Parliament (an Ombudsman, the Controller and Auditor-General or the Parliamentary Commissioner for the Environment but not a Minister) • the membership body of a particular profession, trade, or calling with the power to discipline its members; or • Government bodies listed in Schedule 2 of the NZ whistleblower legislation. <p>WHISTLEBLOWING CONCERNS REPORTED TO THE MEDIA ARE NOT PROTECTED IN NEW ZEALAND.</p> <p>A Whistleblowing Concern must be processed within 20 working days (unless impracticable to do so, in which case regular updates must be provided). If the matter is not so processed or addressed, the Whistleblower may report to:</p> <ul style="list-style-type: none"> • an appropriate authority (including an Ombudsman) • A Minister <p>Protections for Whistleblowers. Whistleblowers have the following additional protections:</p> <ul style="list-style-type: none"> • Confidentiality – the Group may not disclose any information likely to identify a Whistleblower without consent, unless essential to: (i) investigate the disclosure; (ii) prevent serious risk to public health or safety, or the health or safety of any individual or the environment; (iii) to comply with principles of justice; or (iv) for the purposes of law enforcement by law enforcement or a regulatory agency. The Whistleblower will be consulted prior to any such disclosure (or where practicable for reason of (ii) or (iv) above). • Civil, criminal and administrative liability protection – Whistleblowers and receivers of Whistleblowing Concerns are protected from civil liability, criminal liability and disciplinary proceedings, even if there is a prohibition or restriction on disclosing the information (such as in a contract or procedure). The immunity does not extend to any wrongdoing by the Whistleblower.