

Whistleblowing Reporting Channels

Columbia Threadneedle is committed to creating a secure working environment and expects its staff to act in accordance with the law and applicable codes of practice, and to apply high ethical standards in all areas of its activities. However, all organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

We have an internal process to handle reportable concerns being made that wrongdoing or malpractice has been committed, or is likely to be committed, in a work-related context. Our whistleblowing policy applies to third-party service providers, distributors, suppliers and business partners, who come in contact with Columbia Threadneedle through their work-related activities.

You are encouraged to raise your concern with Columbia Threadneedle in the first instance. Reportable concerns can be raised with Alex Ollier, our Head of Legal for EMEA (Alex.ollier@columbiathreadneedle.com).

Reportable concerns may also be raised with Ethics Hotline using the numbers below. Ethics Hotline is an independent external organisation which provides a confidential and anonymous reporting service to a large number of private and public organisations. The role of Ethics Hotline is to obtain full details of the concern so that they may be forwarded to the relevant internal person for appropriate action.

Columbia Threadneedle Office Locations	Ethics Hotline Phone Number
Austria	0-800-200-288
France	0-800-99-0011
Germany	0800 1818906
Italy	800-172-444
Luxembourg	800-201-11
Netherlands	0800-022-9111
Spain	900-99-0011
Sweden	020-799-111
Switzerland	0-800-890011
UK	0800 048 5522

Although the aim of our whistleblowing policy is to provide an internal mechanism for reporting, investigating and remedying suspected wrongdoing at work, you can also raise concerns at any stage directly with the Financial Conduct Authority (FCA), the Prudential Regulatory Authority (PRA), and/or the Commission de Surveillance du Secteur Financier (CSSF) on a named or anonymous basis. Relevant contact details are listed below. You may choose to raise your concerns with the regulator if you think the alleged breach may not be effectively addressed internally, or there is a perceived risk of retaliation.

PRA	whistleblowing@bankofengland.co.uk	+44 20 3461 8703	Confidential Reporting (Whistleblowing) PRA CSS 20 Moorgate
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FCA	whistle@fca.gov.uk	+44 20 7066 9200	Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN
CSSF	whistleblowing@cssf.lu	+352 26251 2757	