

Whistleblowing Reporting Channels

Columbia Threadneedle is committed to creating a secure working environment and expects its employees 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 Safecall using the numbers below. Safecall 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 Safecall 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	Safecall Phone Number
Austria	00800 7233 2255
France	00 800 72332255
Germany	00 800 72332255
Italy	00 800 72332255
Luxembourg	00 800 72332255
Netherlands	00 800 72332255
Spain	00 800 72332255
Sweden	0850 252 122
Switzerland	00 800 72332255
UK	0800 9151571

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.

Regulator	Email address	Telephone number	Address
PRA	whistleblowing@bankofengland.co.uk	+44 20 3461 8703	Confidential Reporting (Whistleblowing) PRA CSS 20 Moorgate London, EC2R 6DA
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	