



FTI GROUP

Rules of Procedure for Incident Handling

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21.12.2023

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A. FTI GROUP whistleblower system

FTI GROUP ("FTI") insists on integrity, respect, and responsibility in all aspects of its business activities. Compliance with all relevant national and international legal requirements is a prerequisite for all corporate actions and decisions. This is expected not only of all FTI employees but also of all business partners. To this end, both an employee Code of Conduct (OUR WORLD travel guide) and a Business Partner Code of Conduct, which forms the basis for all business relationships, have been implemented.

Violations of the minimum standards set out therein are taken very seriously. We therefore encourage all employees, business partners and third parties to report violations of these codices. FTI has set up a group-wide whistleblower system for this purpose. Every report helps us to remedy possible misconduct and continuously improve our processes.

Employees must not suffer adverse treatment or retaliation if they report potential misconduct in good faith. Discrimination against whistleblowers based on a complaint made in good faith will not be tolerated. Adverse treatment and retaliation include dismissal, disciplinary actions, or threats in connection with reporting (potential) misconduct. If you believe you are experiencing such adverse treatment, you should report it immediately through the reporting channels listed under B.1.

These rules of procedure form the basis of our complaints procedure. The following describes how concerns about an actual or potential compliance violation can be raised without fear of retaliation and how such reports are handled within FTI.

B. Reporting concerns

1. Reporting channels

FTI's reporting channels are open to both internal parties (FTI employees) and external parties (e.g., employees of suppliers or residents of hotels).

FTI has set up various reporting channels to make it as easy as possible to submit reports or complaints. All incoming reports are handled in accordance with the provisions of these rules of procedure, regardless of the reporting channel selected.

FTI Governance & Compliance is responsible for the complaints procedure.

Compliance Helpdesk

Information can be submitted at any time via e-mail to compliance@fti-group.com.

IntegrityLine

In addition, FTI provides a web-based whistleblower system. The system can be accessed via all FTI websites and the websites of its affiliated companies. Reports can also be submitted anonymously.



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Postal

Information can also be submitted via post:

FTI GROUP
Governance & Compliance
Landsbergerstraße 88
80339 Munich

Every whistleblower is free to decide which reporting channel they wish to use. The choice of reporting channel does not affect the processing of reports in any way.

2. What can be reported?

The reporting channels are available for reporting possible compliance violations. In particular, we encourage the reporting of issues relating to:

- Fraud and embezzlement
- Corruption and bribery
- Antitrust & competition law
- Money laundering
- Conflicts of interest
- Tax fraud
- other economic crimes
- Data protection & information security
- Sexual harassment
- Human rights
- Environmental risks

For general complaints, e.g. about FTI products or services, please use the general [contact form](#) or the customer hotline of the FTI company concerned.

3. What information should a report contain?

Governance & Compliance requires sufficient information to be able to process any reports received as quickly as possible. If you suspect or are aware of an actual or potential compliance violation, please report it as soon as possible and provide all information you consider relevant. Support your report with evidence, if available. You have the option of submitting documents to Governance & Compliance via all reporting channels.

The report should contain as much relevant information as possible in order to obtain a complete picture of the (potential) offence.

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The **4 W questions** are particularly relevant here:

What has happened? Please describe the incident and the nature of the offence.

Who is involved? Who is involved in the incident or who can provide further information?

When did the incident occur? Has the offence already occurred, or will it (likely) occur soon? Is the problem still ongoing or has it already been solved?

Where did the incident take place? Is a division of FTI affected or a business partner / supplier of FTI? In which country / city did the incident occur?

Information should only be provided if the whistleblower is in good faith that the facts are correct. They are not in good faith if they are aware that something reported as fact is untrue.

In the event of doubt, the relevant facts are not to be presented as fact, but as a presumption, judgement, or statement by other persons.

It should be noted that whistleblowers may be liable to prosecution if, contrary to their better judgement, they assert untrue facts about other persons.

C. Dealing with incoming reports

1. Basic principles for processing tips



All information received and all information and documents collected during an investigation are treated as strictly **confidential**. Information is only passed on, if necessary, in compliance with data protection and strictly in accordance with the "**need-to-know principle**". The identity of the whistleblower will only be disclosed if the whistleblower consents in writing and the disclosure is necessary for follow-up measures.

The persons in charge of the investigation act **independently** and may not be influenced by third parties. All decisions are made **objectively and impartially** i.e., free from conflicts of interest.

Any information reported is processed immediately to ensure that it is investigated **quickly** and **thoroughly**. Investigation measures must be suitable, necessary, and appropriate and are carried out in compliance **with laws and regulations**. Documentation is protected from unauthorised access and statutory retention as well as deletion periods are considered.



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The processing of reports and any clarification measures are carried out with integrity, fairness, truthfulness, perseverance, trust and diligence.

2. Procedure for processing information

Every report received via the official reporting channels mentioned under B.1. will be processed in accordance with these rules of procedure. This enables standardised, fast, and professional handling. FTI Governance & Compliance is responsible for all reporting channels.

Receipt, initial assessment and plausibility check

If a report is submitted via an official reporting channel, the whistleblower will receive confirmation of receipt of the report within **7 days**.

To check the plausibility, a basic search is carried out (who, how, what, when, where?) to determine whether the information is sufficiently specific and what type of offence could have been committed.

Investigation mandate and securing evidence

If the initial verification shows that a report is basically plausible, a more detailed review is carried out to clarify whether sufficient information is available to justify an internal investigation. If a concrete initial suspicion of misconduct can be substantiated, an investigation mandate is drawn up, which defines the persons responsible as well as the specific questions to be asked and the scope of the investigation. Depending on the business area concerned, the investigation can be carried out by the relevant business unit or corporate function. An internal investigation is usually coordinated by Governance & Compliance.

If necessary, initial evidence is already being secured.

Internal investigation and evaluation

An investigation plan is drawn up at the beginning of an internal investigation. Compliance with legal requirements (e.g., data protection) and the information and co-determination rights of the works council are ensured.

An internal investigation may include the following steps:

1. Carrying out background checks
2. Searching, saving, and analysing structured data and documents (e.g., contracts, orders, invoices, etc.)
3. Searching, saving and analysing unstructured data, such as communication data (e.g., emails)
4. Conducting interviews



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During an investigation, both incriminating and exonerating information is considered equally. The investigation steps and results are documented in a fact-based investigation report.

Remedial measures

If FTI becomes aware of the imminent occurrence of a compliance risk, suitable measures are taken immediately to prevent this occurrence. Violations that have already occurred are terminated immediately or minimised as far as possible. Suitable (disciplinary) measures are then taken to minimise the future risk of a similar violation.

If a violation has not occurred in FTI's own business area but along the supply chain, we expect our direct suppliers to support us in clarifying the matter and to cooperate fully with us so that we can take joint and immediate measures to end or minimise the violation. The information is first checked internally for plausibility as far as possible and then passed on to the supplier concerned while maintaining confidentiality and data protection. A plan is then drawn up together with the supplier as to how the reported misconduct can be remedied without undue delay.

If we obtain substantiated knowledge of violations at indirect suppliers, we immediately carry out a risk analysis. We support the indirect supplier and the direct supplier concerned as far as possible in remedying violations and minimising risks going forward.

3. Involvement of the whistleblower

The whistleblower will initially be informed of the receipt of their report after 7 days at the latest. This is done either by email (for reports via the Compliance Helpdesk), via the secure mailbox (for reports via IntegrityLine) or by post. Governance & Compliance can use these channels to ask the whistleblower questions and request further clarification or documents. The whistleblower can also use these channels for queries and further communication. Communication can be completely anonymous if desired.

We ask every whistleblower to be available for any queries and to regularly check the communication channel used. This helps us to process reports quickly and comprehensively.

Three months after confirmation of receipt of the report, the whistleblower is informed of the result of the investigation or receives information on the current status of the investigation if it has not yet been completed at this time. The feedback includes notification of planned and already taken follow-up measures as well as the reasons for these. Care is taken to ensure that the rights of the persons who are the subject of a report or who are named in the report are not affected.



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D. Version history

Version	Date	Author	Changes
1	1 Jan 2024	MSE	Creation