

# Whistleblowing policy

Fidelity International's ('Fidelity') integrity is one of its greatest strengths. Our customers trust us with their assets and to maintain that trust we strive for the highest standard of conduct and integrity at all times. Failure to meet this standard could have serious consequences for Fidelity, its customers and its staff.

This policy applies to all, current and former, Fidelity employees including directors, officers, contractors, contingent workers and consultants globally, as well as others with a connection to the Fidelity group such as associates, suppliers or service providers and their employees, or a relative or dependant or the spouse of any of these individuals.

## Purpose and Protection

Our Whistleblowing Policy is an important defence against corporate fraud and wrong doing. Fidelity encourages its staff and external parties to speak up in confidence if they suspect someone's actions or Fidelity processes are exposing Fidelity to risk - whether that is reputational, ethical, legal or regulatory.

There are several ways in which staff can raise concerns which are set out further below. You may prefer to raise the issue on an anonymous basis, or may be comfortable raising it on a named but confidential basis. When considering how and on what basis you want to raise the concern, consider carefully the level of detail Fidelity needs to fully investigate the issue and whether you wish to be informed of any remedial steps taken.

Provided you raise a genuine concern under this Policy and have reasonable grounds to suspect misconduct or an improper state of affairs, you will not suffer any detriment regardless of whether or not your concern is proved to be well-founded following the investigation. In the event that any individual is harassed or otherwise victimised after raising a concern, Fidelity will take the appropriate actions.

## Nature of reportable conduct or concerns under this Policy

The types of issues that can be raised under this Policy are in respect to:

- breaches of FIL's Code of Conduct and Gifts and Entertainment Policy
- irregularities relating to dealing in shares or other securities
- money laundering
- fraud, bribery or corruption
- breaches of our legal and regulatory obligations
- irregularities involving financial or accounting procedures
- any criminal offence, including theft of proprietary information or property
- conduct which is or may be in conflict with the Company's interests such as involvement with a competitor
- dishonesty or other irregularities in dealing with customers, vendors and other business partners
- illegal payments to government officials or companies
- conduct which endangers the health and safety of employees and others working for FIL
- conduct that represents a danger to the public or the financial system

This list is not exhaustive. If you are not certain whether something is unethical, you are encouraged to raise it in any event.

## Whistleblowing – options for raising an issue

This Policy envisages a number of ways in which you can report a misconduct or concern:

If you would feel more comfortable discussing your concerns externally, or if you don't work for Fidelity, you can use the following CALL service below:

1. **CALL (Confidential ALert Line)** – this is a discreet and free phone service for reporting or discussing concerns about suspected questionable or unethical business practices or any possible or actual breach of regulation (outside of normal breach reporting procedures).

This line is run by Expolink – a third party whistleblowing hotline service provider, and the options for raising an issue are set out below. You can choose to raise the concern on an anonymous or named basis and your personal details will only be passed to the Fidelity Whistleblowing Investigation Group where you have consented. Only where it is permitted or required by law will your name be disclosed without consent.

For those who work for Fidelity, the purpose of CALL is to strengthen your rights by offering an alternative escalation route should you feel uncomfortable about raising any matter via the internal routes and/or you would prefer to remain anonymous.

### How do I use CALL? (Operated by Expolink)

To use CALL please telephone the freephone number below at any time:

Country	Telephone number
Australia	1 800 121 889

### If you work for Fidelity and want to raise a concern internally, you can do so through the below options:

- 2. Legal & Compliance and/or Human Resources** – where you feel comfortable raising concerns directly, please be assured that you can raise issues on a confidential basis with Legal & Compliance and/or Human Resources for your area. The issue may be dealt with within function, or may be reported to the Fidelity Whistleblowing Investigation Group as appropriate for a full and independent investigation.
- 3. Senior management** – you may also raise a concern with a member of senior management, such as a director or a senior manager, who will escalate the issue as appropriate.
- 4. Local Regulator or relevant body** – you can raise concerns direct with the relevant external regulatory authority where you feel that none of the above options will sufficiently address your concern.

### Zero tolerance for retaliation

Those who raise a genuine concern under the Whistleblowing Policy are not at risk of losing their job or suffering any form of retaliation as a result, even if they are mistaken.

We will not tolerate the harassment or victimisation of anyone who makes a disclosure where they have reasonable grounds to suspect misconduct or an improper state of affairs.

We recognise that employees or external parties may want to raise a concern anonymously or in confidence. We will protect their identity and will not disclose it without their consent, unless allowed or required by law.

### Your experience

This Policy is to encourage and enable staff and external parties to speak up. From time to time, Fidelity may request feedback on your experience to ensure it is achieving its aim of creating a culture of openness, transparency and positive recognition of individuals who raise genuine concerns.

### Global applicability

Whilst this policy and the standards contained herein are global, as appropriate, local law will apply to the handling of any particular case.