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About Safe Reporting Portal

What is Safe Reporting Portal?

“Safe Reporting Portal” is a resource provided by Federated Hermes, Inc. (including Hermes Fund Managers Limited (“Hermes”) and other domestic and offshore subsidiaries "Federated Hermes"). Safe Reporting Portal is hosted on the EthicsPoint platform. EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively.

Any personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities.

Why do we need a system like Safe Reporting Portal?

Federated Hermes provides access to Safe Reporting Portal so that employees, customers and vendors have a confidential and anonymous resource to provide information to its Internal Compliance Committee, the Board of Directors/Trustees of Federated Hermes or its Funds (or their non-management directors), and their respective Audit Committees, and, for Federated Hermes' subsidiary Hermes, its Risk and Compliance Committee and its Fund Boards (if relevant), regarding the following topics pertaining to Federated Hermes (including Hermes):

- Accounting/Auditing Related Complaints or Concerns
- Code of Ethics Violations
- Compliance and Regulatory Violations (Financial and Non-Financial)
- Conflicts of Interest
- Copyright or Trademark Infringement
- Corruption or Bribery
- Fraud/Misconduct
- Securities Violation
- Shareholder Concerns
- Theft (Financial and Other)
- Vendor Concern

- **Please note that Safe Reporting Portal is not intended to be used as a resource for reporting Human Resources-related concerns or questions.** Employees should address Human Resources-related matters by directly contacting their Manager or a representative in the Human Resources department.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With Safe Reporting Portal, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The Safe Reporting Portal is designed for employees to report any violation of our stated Code of Business Conduct and Ethics, or other concern you may have. However, Safe Reporting Portal (hosted by EthicsPoint) is not intended to be used as a resource for reporting Human Resources-related concerns or questions.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the Safe Reporting Portal secure server to mitigate against a breach in security. Safe Reporting Portal makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

Safe Reporting Portal does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to Safe Reporting Portal is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the Safe Reporting Portal secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and Safe Reporting Portal strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide through Safe Reporting Portal will ultimately reveal my identity. How can you assure me that will not happen?

Safe Reporting Portal is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into Safe Reporting Portal. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent publicly reported corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. Safe Reporting Portal can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

Safe Reporting Portal and the distribution of reports are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report in Safe Reporting Portal (whether by internet or by calling the toll-free phone number) you receive a unique user name and are asked to choose a password. You can return to Safe Reporting Portal again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site or call back in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All Safe Reporting Portal correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the Internet?

You can file a Safe Reporting Portal report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the Safe Reporting Portal toll-free hotline, which is available 24 hours a day, 365 days a year.