



Fitch Ratings' Whistleblowing in the European Union

Fitch Ratings has a strong commitment to the laws and regulations applicable to its business activities and operations. To this end, it encourages individuals to report any unlawful act or any reasonable suspicion of such an act ("Whistleblowing").

In the European Union ("EU"), Eligible Persons can submit a Whistleblowing report in respect of breaches – or potential breaches - of EU laws and relevant national laws of those EU countries where Fitch Ratings has a presence (specifically, France, Germany, Italy, Poland, Spain and Sweden). Such reports can be made by means of:

- EthicsPoint, the primary Fitch Ratings' Whistleblowing reporting channel;
- Email at reporting@fitchratings.com; or
- An in-person meeting requested at reporting@fitchratings.com.

An "Eligible Person" means a Fitch Ratings' employee in the EU (including a former employee or job applicant) or other person who acquired information in a work-related context regarding breaches of EU laws and/or relevant national laws of those EU countries where Fitch Ratings has a presence.

Fitch Ratings' Whistleblowing policy reflects the various obligations in relevant EU and national Whistleblowing legislation, which includes (but is not limited to):

- the acknowledgment of receipt of a Whistleblowing report within seven days of the report;
- diligent investigation of the Whistleblowing report;
- provision of feedback to the reporting person no later than three months from the acknowledgment of receipt of the report; and
- the right to submit a Whistleblowing report anonymously¹.

Fitch Ratings will maintain the confidentiality of the reporting person and any third parties that might be mentioned in the Whistleblowing report except for cases where disclosure is required by law. Fitch Ratings processes personal data obtained in the course of receiving and investigating a Whistleblowing report having regard to obligations under relevant data privacy laws and EU General Data Protection Regulation.

Fitch Ratings does not permit any form of retaliation towards a reporting person prompted by relevant reporting.

An Eligible Person also has the right to report suspected violations of laws or regulations directly to competent national authorities, but Fitch Ratings encourages use of its internal reporting channel to allow it to address any issues involved in a timely and efficient manner.

¹ In case of anonymous submission, an acknowledgment of receipt of the report cannot be provided.