

What happens when I call the Ethics HelpLine?

A representative from NAVEX Global, a third party contracted by Vialto Partners to document questions and concerns, will ask you a series of questions and record your question or concern. A Vialto Partners colleague from the Risk and Compliance Office will review and determine how best to assist you.

When you call the HelpLine:

- We'll ask you to describe your question, issue or concern
- It's up to you if you choose to remain anonymous
- You'll receive a case number for future follow-up

We will then determine next steps:

- We'll clarify firm policy
- Conduct analysis and research
- Consult with subject matter specialists
- Interview involved parties
- Offer guidance and coaching

What happens next:

- If your matter is an inquiry, such as a question about policies, procedures or how to appropriately respond to a situation:
 - **We will provide guidance so that you can make an informed decision.**
- If your matter is an issue or a concern about perceived inappropriate behavior or a potential violation of firm policies:
 - **We will review, investigate, or provide to the appropriate specialist to handle, and address the issue or concern, as appropriate.**

How can I contact the Ethics HelpLine?

AMERICAS	HELPLINE NUMBER
Brazil	0800 000 0514
Canada	8449745073
Mexico	8006811878
United States / Puerto Rico	8449745073
Argentina	<i>We are currently unable to accept reports for this country. If you wish to report a compliance concern, please contact your Regional R&C department, or complete and submit the Allegation and Complaint form.</i>

EMEA COUNTRIES	HELPLINE NUMBER
Belgium	0800 77 976
Finland	0800 416150
Germany	0800 1819501
Hungary	(80) 088 215

Ireland	1800851844
Italy	800715063
Norway	80062448
Portugal	800181352
Romania	0800 890 382
Spain	900876073
Sweden	020 089 00 26
Austria Czech Republic Denmark France Luxembourg Morocco Netherlands Poland Qatar Russia Saudi Arabia South Africa Switzerland Turkey United Arab Emirates United Kingdom	<p><i>We are currently unable to accept reports for these countries. If you wish to report a compliance concern, please contact your Regional R&C department, or complete and submit the Allegation and Complaint form.</i></p>

APAC COUNTRIES	HELPLINE NUMBER	RESTRICTIONS
Australia	1800161121	Laws in Australia restrict only persons who have a working relationship or other legal relationship with an organization to make a report. If the report you wish to make does not meet this requirement, please contact a representative of HR, Legal, or the Risk and Compliance team.
Hong Kong	800930353	
India	8449745073	
Japan	0800-080-9414	Laws in Japan restrict only company officers and workers to make, or be the subject of, a report submitted through this site. If the report you wish to file does not meet these requirements, please contact a representative of HR, Legal or the Risk and Compliance team.
Singapore	8004922540	
Vietnam	1800 400123	
China Kazakhstan Malaysia Philippines Thailand	<p><i>We are currently unable to accept reports for these countries. If you wish to report a compliance concern, please contact your Regional R&C department, or complete and</i></p>	

	<i>submit the Allegation and Complaint form.</i>	
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What can I call the Ethics HelpLine about?

The Ethics Helpline receives calls from partners and employees at all levels at the Company, from clients and from third parties and is available 24 hours a day, every day. You can call the Ethics HelpLine to obtain policy guidance or to report a concern about someone's conduct, for example:

- Questions about policies related to gifts and entertainment, conflicts of interest, relationships, time charging, client confidentiality
- Concerns about possible expense fraud, falsified documentation or misrepresentations in firm disclosures, directions to eat time, conflicts of interest, corruption, harassment, discrimination, retaliation, inappropriate comments, or inappropriate social media postings
- When you find yourself in a situation where something just doesn't feel right.

Who will know that I contacted the Ethics HelpLine?

The Risk and Compliance team handles all matters confidentially, meaning they discuss the issues and your name only on a need-to-know basis. Vialto Partners is committed to protecting our people against retaliation. Retaliation will not be tolerated and any Vialto Partners professionals (including, partners or employees) who takes a retaliatory action will be held accountable.

What is the Reporting Concerns Policy?

Always keep in mind that it's safe to speak up at Vialto Partners. Retaliation will not be tolerated and any Vialto Partners professionals (including, partners or employees) who takes a retaliatory action will be held accountable.

Can I report a concern anonymously?

Yes, you can ask a policy question or report a concern anonymously, if preferred. If you choose to do so, please provide enough information about your question or your concern to allow the Risk and Compliance team to give you the right policy guidance or to investigate the concern (e.g., the name of anyone who engaged in possible misconduct, anyone who may have witnessed the conduct, and any documents related to the issue). In addition, the Ethics HelpLine provides anonymous callers with a unique case number and a mechanism for follow-up contacts.

Know that if you provide your name, it enables the team to connect with you more easily to comprehensively understand the concern and follow-up with you throughout, and at the closure of, an investigation. The team keeps matters confidential to the extent possible, meaning they

will share and discuss the issues and your name only to the extent necessary to investigate your concerns. Vialto Partners is committed to protecting our people against retaliation and will help protect you against any form of reprisal for reporting, in good faith, any actual or suspected policy violation.

Why is it so important to voice my concerns?

We want to create an environment where all of our people feel safe and comfortable in the workplace. Having a speak up culture which supports and nurtures our employees is crucial to our success and long-term results. Vialto Partners is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable speaking up in instances where you believe violations of Code of Conduct or Company policies have occurred.

Could I get into trouble for reporting a concern?

No, you cannot get into trouble for reporting a concern in good faith. Vialto Partners is committed to protecting our people against retaliation and will help protect you against any form of reprisal for reporting, in good faith, any actual or suspected policy violation.

What are the consequences for violating Vialto Partner's Code of Conduct or Company policies?

When actual or suspected policy violations are reported to the Ethics HelpLine, the Risk and Compliance team investigates the issue(s), and when the team confirms that a partner or employee violated policy, the Company appropriately disciplines that partner or employee. Discipline includes a range of penalties, such as: verbal warning, written warning, training, suspension, financial sanction, internal or external coaching or counseling and separation (employee) or withdrawal (partner).

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 at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site 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.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

What should I do if the telephone number is not working?

If the telephone number listed for your location is not functioning, please make your report online through this site or use the mobile site to submit a report. Please indicate in the report that the telephone number did not work.

What should I do if the location I am in is not listed?

If the location you are reporting from is not listed, please contact your Regional Risk and Compliance resource.

What should I do if I want to report in my native language?

You can report in the language you feel most comfortable reporting with.

If your language is not available on the website, please report using the English version of the website, and fill out the form in your native language.

Should you report by phone, all Communications Specialists are bilingual, offering language support in English and at least one additional language.

If you require interpretation in a language that is not supported by an internal NAVEX Global resource, an interpretation vendor is consulted to provide over-the-phone interpretation to aid in facilitating the interview.

NOTE:

This is not an emergency service. Do not use this site to report events presenting an immediate threat to life or property.

Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your public emergency services.