

Guidance on reportable concerns or violations

This document sets out guidance on reportable concerns or violations when using Got a Concern?. Rights may vary among the countries in which we operate to reflect local practices and legal requirements. If you would like more information on your Privacy rights, our Privacy Notice can be found on the Got a Concern? landing page. *Anytime you see, suspect, or learn about activity that violates Our Code, our firm's policies and standards, or the law, you have a duty to speak up and report your concern.*

Globally, depending on applicable law, you may use Got a Concern? for reporting concerns about financial, accounting, or auditing (e.g., finance and expenses, falsification of contracts, reports or records); Corruption (e.g., bribes, kickbacks, illegal or fraudulent conduct); anti-competitive practices (e.g., antitrust activity); discrimination, harassment or retaliation; human rights & environmental concerns; and health, hygiene and security in the workplace (e.g., substance abuse, violence or threat to safety)

As a McKinsey colleague, other reporting channels in addition to Got a Concern? are available for you if you believe that you have witnessed a violation of Firm policies or topics listed above, you can raise a concern by talking to the individuals involved, speaking with your manager, PD, HR representative, cell or department leadership, the Ombudsman, Chief People Officer or the Global Chief Ethics & Compliance Officer.

Once you submit a report with *Got A Concern?*, you will receive an email confirming receipt. You will be provided with a report number and a PIN, this enables you to log back into the *Got A Concern?* portal and review any messages from the team or provide further information. The report is sent to McKinsey & Company's Ethics Team for review and you should expect to receive a follow up communication within 5-7 days. Whether you have provided your name or submitted your report anonymously you will be contacted after you have submitted your report.

Subject to local law, you can submit concerns anonymously through *Got a Concern?* We, however, encourage you to identify yourself when reporting a concern to make the process of investigating and addressing your concern more effective as this enables someone to contact you and gather additional information related to the issue that you have raised. If you provide your name during the reporting process, we will make reasonable efforts to handle your concern confidentially. We do not tolerate retaliation for raising or reporting a concern in good faith or participating in a review or investigation. Any colleague who engages in retaliation will be subject to discipline, up to and including separation from our firm. All reports of retaliation will be handled by the appropriate people with confidentiality and urgency.

McKinsey & Company commits to thoroughly reviewing any concern raised. All concerns raised are handled by individuals who are trained and provide subject matter expertise. McKinsey &

Company has a core team of trained professionals who conduct internal reviews, with an objective, empathetic, non-judgmental approach throughout the process.

The processing time depends on the nature and complexity of the matter. However, McKinsey & Company will make every effort to complete processing in a timely manner and engage with you on a periodic basis.

Anytime you see, suspect, or learn about activity that violates Our Code, our firm's policies and standards, or the law, you have a duty to speak up and report your concern. Where a review identifies a breach of *Our Code* of Conduct, appropriate disciplinary action will be taken. You will be notified when your concern has been reviewed and addressed. Due to the confidential nature of reported matters, we may not be able to share specific details about the resolution. However, this does not mean that appropriate action has not been taken.

Reportable concerns or violations under the European Union (EU) Whistleblowing Directive

As an **Individual that has a Work-related Relationship with McKinsey¹**, you may use Got a Concern? as follows:

Under the [EU Whistleblowing Directive](#) (2019/1937/EU), you may also report on concerns about certain violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy,

¹ Individuals having the status of workers, such as current and former (part or full-time) employees and temporary workers;

- Individuals who are not workers but can play a key role in exposing violations of the EU law and may find themselves in a position of economic vulnerability in the context of their work-related activities, such as self-employed providing services, freelance workers, contractors, subcontractors, suppliers, shareholders, and persons in managerial bodies;
- Job applicants or individuals seeking to provide services to an organization, who (i) acquire relevant information during the recruitment process or another pre-contractual negotiation stage, and (ii) could suffer retaliation (e.g., in the form of negative employment references, blacklisting, or business boycotting);
- Volunteers and paid, or unpaid, trainees; and
- Anyone who learns about a violation of EU law (as described above) in a work-related context.

For more information on the scope of eligible reporters, please refer to the Article 4 of the [EU Whistleblowing Directive](#).

data protection and data security. For a complete list of violations of EU law, please refer to the Annex within the [EU Whistleblowing Directive](#).

In addition to the above, if your report is subject to the rules of the following countries², reports may also relate to the following:

- **Under Portuguese law**, Got a Concern? may also be used to report about all crimes under Law No. 5/2002 of 11 January, which are: drug trafficking; human trafficking; terrorism, terrorist organizations, international terrorism and financing of terrorism; weapons trafficking; influence peddling / lobbying; active and passive corruption, both in public and private sectors and in the international trade; embezzlement; economic interest in a business; money laundering; criminal association; child pornography and solicitation; forgery; solicitation; smuggling; vehicle theft and trafficking; computer and software sabotage and damage; and illegitimate access to software.
- **Under Swedish law**, Got a Concern? may also be used to report violations of laws or other regulations covered by Chapter 8 of the Instrument of Government (Kungörelse (1974:152)), or information on misconduct in a work-related context which is of public interest (i.e., serious misconduct). Note that reports in Sweden cannot cover classified information under the Protective Security Act (2018:585) and information in the field of defense and national security.
- **Under French law**, Got a Concern? may also be used to report on (i) actual and attempted violations of international law applicable in France; (ii) crimes or offenses under national law; and (iii) threats or harm to the public interest.

If you prefer, you can ask for a physical meeting to report your concern.

If you make a report, we will inform you about its progress and outcome, within the timeframes prescribed by applicable laws. You can follow up on the status of your report using your report key and password.

Note that you may also have the right to report your concerns about violations of EU laws externally to competent authorities of EU Member States. You have this right (i) if Got a Concern? does not function properly, (ii) if your report was not dealt with diligently or within a reasonable

² Additional EU Member States may further extend the scope.

timeframe, or (iii) if no appropriate action was taken to address your concerns despite the results of the related internal enquiry confirming the existence of a violation of an EU law.

We do encourage you to first contact our [Global Chief Ethics & Compliance Officer](#) who will try to independently resolve your concerns about the effectiveness of Got a Concern? and subsequent investigation.

The list of competent authorities is available in the attached **Annex – List of Competent Authorities in the EU**.

Annex – List of Competent Authorities in the EU

Country	Competent Authority
France	1. The (Défenseur des Droits)
Portugal	<ol style="list-style-type: none"> 1. The Public Prosecutor's Office; 2. The criminal police bodies; 3. The Bank of Portugal; 4. The independent administrative authorities: <ol style="list-style-type: none"> a. Competition Authority; b. Mobility and Transport Authority; c. The Civil Aviation National Authority; d. The Communications Authority; e. Supervisory Authority for Insurance and Pension Funds; f. Securities Market Commission; g. Regulatory Authority for the Media; h. Health Regulatory Authority; i. Regulatory Authority for Water and Waste; j. Energy Services Regulatory Entity; k. Institute of Public Markets, Real Estate and Construction, I.P. 5. Public institutes; 6. General inspections, similar entities and other central services of the direct state administration endowed with administrative autonomy; 7. Local governments; and 8. Public associations.
Sweden	<ol style="list-style-type: none"> 1. Swedish Work Environment Authority (Sw. <i>Arbetsmiljöverket</i>) 2. Swedish Competition Authority (Sw. <i>Konkurrensverket</i>) 3. Swedish Financial Supervisory Authority (Sw. <i>Finansinspektionen</i>) 4. Swedish Estate Agents Inspectorate (Sw. <i>Fastighetsmäklarinspektionen</i>) 5. Swedish Inspectorate of Auditors (Sw. <i>Revisorsinspektionen</i>) 6. Swedish Gambling Authority (Sw. <i>Spelinspektionen</i>) 7. Swedish National Board of Housing, Building and Planning (Sw. <i>Boverket</i>) 8. Swedish Electrical Safety Agency (Sw. <i>Elsäkerhetsverket</i>) 9. Public Health Agency of Sweden (Sw. <i>Folkhälsomyndigheten</i>) 10. Swedish Chemicals Agency (Sw. <i>Kemikalieinspektionen</i>) 11. Swedish Consumer Agency (Sw. <i>Konsumentverket</i>) 12. Swedish Food Agency (Sw. <i>Livsmedelsverket</i>) 13. County Administrative Board of Stockholm (Sw. <i>Länsstyrelsen Stockholm</i>) 14. County Administrative Board of Västra Götaland (Sw. <i>Länsstyrelsen Västra Götaland</i>) 15. County Administrative Board of Skåne (Sw. <i>Länsstyrelsen Skåne län</i>) 16. Swedish Inspectorate of Strategic Products (Sw. <i>Inspektionen för strategiska produkter</i>) 17. Swedish Medical Products Agency (Sw. <i>Läkemedelsverket</i>) 18. Swedish Civil Contingencies Agency (Sw. <i>Myndigheten för samhällsskydd och beredskap</i>) 19. Swedish Environmental Protection Agency (Sw. <i>Naturvårdsverket</i>) 20. Swedish Post and Telecom Authority (Sw. <i>Post- och telestyrelsen</i>) 21. Swedish Energy Agency (Sw. <i>Statens energimyndighet</i>) 22. Swedish Board of Agriculture (Sw. <i>Statens jordbruksverk</i>) 23. Swedish Board for Accreditation and Conformity Assessment (Sw. <i>Styrelsen för ackreditering och teknisk kontroll</i>) 24. Swedish Transport Agency (Sw. <i>Transportstyrelsen</i>)

Country	Competent Authority
	<p>25. Swedish Agency for Marine and Water Management (Sw. <i>Havs- och vattenmyndigheten</i>)</p> <p>26. Swedish Forest Agency (Sw. <i>Skogsstyrelsen</i>)</p> <p>27. Swedish Radiation Safety Authority (Sw. <i>Strålsäkerhetsmyndigheten</i>)</p> <p>28. Swedish Health and Social Care Inspectorate (Sw. <i>Inspektionen för vård och omsorg</i>)</p> <p>29. Swedish Authority for Privacy Protection (Sw. <i>Integritetsskyddsmyndigheten</i>)</p> <p>30. Swedish Economic Crime Authority (Sw. <i>Ekobrottsmyndigheten</i>)</p> <p>31. Swedish Tax Agency (Sw. <i>Skatteverket</i>)</p> <p>32. Government Offices of Sweden (Sw. <i>Regeringskansliet</i>)</p> <p>The Swedish Work Environment Authority is designated as a <u>supervisory</u> as well as <u>specialty competent authority</u>:</p> <ul style="list-style-type: none"> ○ As a <u>supervisory authority</u>, it is responsible for ensuring that organizations comply with their obligations to have internal reporting channels and procedures under the Swedish Whistleblowing Act. ○ As a <u>specialty competent authority</u>, it also receives information from the other competent authorities on the reports made in their external reporting channels.