

Whistleblower Policy

Reporting Concerns Related to Financial Irregularities, Policy Violations, and Ethical Violations

February 2023

Revision History

Version	Date Change Made	Section	Change Made By	Description of Change
Initial v1.0	February 2023	All	Law Department	Initial document creation

Whistleblower Policy

Governance

Wood Mackenzie's Global Executive Team has adopted this Whistleblower Policy.

This Policy applies to Wood Mackenzie Ltd and its affiliates and subsidiaries (hereinafter collectively called "Wood Mackenzie".)

Purpose

The purpose of this policy is to establish a framework for reporting concerns related to financial irregularities, policy violations, and ethical violations.

This policy establishes procedures for management of complaints, including:

- Those submitted by employees, and pertaining to accounting or auditing matters.
- Those submitted by employees and other interested parties to raise concerns with respect to violations of Wood Mackenzie's Code of Business Conduct and Ethics, other Wood Mackenzie Policies, and potential violations of laws, rules, or regulations.

Scope

This policy provides guidance for interested parties, including employees, to raise concerns. While the list below provides examples of the types of subjects covered by this policy, this list is not intended to be exhaustive, and any person with related concerns should raise those in accordance with this policy.

- Wood Mackenzie's accounting, auditing, or internal controls, such as:
 1. Fraud or intentional error in the preparation or review of Wood Mackenzie's financial statements
 2. Fraud or intentional error in the audit of Wood Mackenzie's financial statements
 3. Any attempts to mislead or improperly influence Wood Mackenzie's independent auditor in the course of the performance of its audit
 4. Fraud or intentional error in the recording and maintenance of Wood Mackenzie's financial books and records
 5. Deficiencies or noncompliance with Wood Mackenzie's internal controls
- Public disclosures of Wood Mackenzie's financial position, such as:
 1. Material misrepresentations or omissions regarding the reporting of Wood Mackenzie's business and financial condition, results of operations, or cash flows, including prospective reports
- Violations of Wood Mackenzie's Code of Business Conduct and Ethics or other Wood Mackenzie Policies such as:
 1. Improper usage of Company property or funds
 2. Improper disclosure of proprietary information
 3. Improper use or disclosure of data or information entrusted to our care

- Any act or suspected act of bribery or any act that may be a violation of the Wood Mackenzie Ltd. Anti- Bribery and Corruption Policy
- Concerns regarding employee relations or employee safety and physical security
- Concerns regarding data privacy and/or cybersecurity matters

Non-Retaliation and Confidentiality

Wood Mackenzie does not tolerate retaliation against anyone who speaks up in good faith to report concerns about behavior that does not follow Wood Mackenzie policies, our [Code of Business Conduct](#) and Ethics or the law.

This includes concerns about any observed, suspected, illegal, unethical behavior, or Code-related Policy violations. Any Wood Mackenzie employee who raises a good faith concern through these methods should do so without fear of dismissal or retaliation of any kind. Employee submissions will be maintained anonymously where allowed by law. Wood Mackenzie will maintain confidentiality, in particular the identity of the employee raising the concern, except as may be necessary to conduct a thorough investigation or as required to be disclosed by law or to legal counsel

Raising a Concern

Concerns related to these matters can be raised to:

- The Office of the General Counsel.
- Wood Mackenzie’s Enterprise Risk Management and Compliance Team
- The Whistleblower Hotline, 24/7/365, by:
 1. Submitting a web-based report [here](#), via the <http://verisk.ethicspoint.com/>
 2. Submitting a telephone report using one of the [global hotline phone numbers](#) available by country.

The concerns raised through these channels should include sufficient information and detail to enable a thorough investigation. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review while respecting legal requirements.

Handling of Concerns

- Any reported concerns shall be communicated to the General Counsel.
- The General Counsel or appropriate designee will acknowledge receipt of the matter to the individual who raised the concern, whenever possible.
- All concerns raised will be reviewed by the appropriate departments with oversight by the Office of the General Counsel:
 1. Accounting, auditing, or internal control matters will be reviewed under the direction and oversight of the Head of Compliance
 2. Data Privacy concerns will be reviewed by Wood Mackenzie’ Enterprise Risk Management and Compliance Team
 3. Cybersecurity concerns will be reviewed by the Global Cybersecurity Team
 4. Ethical and compliance concerns or violations of this policy will be reviewed by Wood

Mackenzie' Enterprise Risk Management and Compliance Team in collaboration with HR.

5. Employee relations concerns will be reviewed by HR.
 6. Employee Safety and Physical Security concerns will be reviewed by both the Global Protection Services Team and HR, as well as other departments as appropriate.
- All concerns related to the violations of this policy, or any other matters raised through these channels, will be reviewed initially by the General Counsel or an appropriate designee in the Law Department, or Wood Mackenzie' Enterprise Risk Management and Compliance Team
 - After initial review, The General Counsel will:
 1. Determine whether the matter warrants an investigation, and
 2. Oversee any such investigation.
 3. Appoint person(s) authorized to conduct the investigation responsible for reporting in a timely manner all findings of fact, conclusions, and proposed recommendations for remedial actions, if any.
 4. Escalate investigation as needed and raise concerns with the Compliance Council.
 5. Issue prompt and appropriate corrective action to be taken in consultation with the Head of Compliance and the Compliance Council.
 6. Maintain both a log of all complaints tracking receipt, investigation and resolution, and a semi-annual summary report for the Compliance Council. Copies of complaints and such log will be maintained in accordance with the Company's policy regarding document retention.

Wood Mackenzie will not retaliate or discriminate against any employee with respect to the good faith reporting of concerns raised.

The Global Executive Team may revise or amend this policy as necessary or appropriate.