



Speak-up Guidance for Reporters

Our Commitment




We are committed to maintaining an environment in which workers feel safe and supported in speaking up to raise concerns. We have established channels and processes that you can use to report in confidence and without fear of retaliation, illegal or unethical conduct that may harm the Company and the public interest. You should speak up if you have a genuine belief that potential or actual wrongdoing has occurred, is occurring or will occur in the workplace.

You may use these channels to raise concerns about breaches involving:

- Criminal activity
- Miscarriage of justice
- Oppressive, discriminatory, or negligent behaviour by a public body or unlawful or improper use of public funds
- Financial malpractice or impropriety or fraud
- Breaches of EU or national legal or regulatory requirements in the following areas (see Annex for examples of specific EU legislation):
 - Financial services, products, and markets
 - Prevention of money laundering and terrorist financing
 - Protection of the environment
 - Danger to health and safety
 - Consumer protection
 - Protection of privacy and personal data, security of network and information systems
- Securities or commodities fraud, insider dealing and wholesale or consumer/ customer market conduct rule breaches.
- Breaches affecting the EU's financial interests.
- Breaches relating to the internal market, including breaches of EU competition and State aid rules, and breaches of national corporate tax rules.
- Attempts to conceal or destroy evidence of any of the above

Note: Issues related to interpersonal conflict, or your personal employment should be reported to Human Resources through the grievance process.

You may report your concerns to Elavon via one of the following confidential channels:

	<p>Email: ethicshotline@usbank.com</p> <p>Mail: Global Ethics Office Elavon Financial Services DAC Block F1 Cherrywood Business Park Dublin 18, D18 W2X7, Ireland</p>																				
	<p>Request an in-person meeting at ethicshotline@usbank.com</p>																				
	<p>Contact the Ethics Line:</p> <table><tbody><tr><td>Ireland</td><td>1800851345</td><td>Norway</td><td>800 62 156</td></tr><tr><td>UK</td><td>0800 046 5394</td><td>Poland</td><td>800005097</td></tr><tr><td>Germany</td><td>0800 1820176</td><td>Spain</td><td>900876077</td></tr><tr><td>Lithuania</td><td>880031729</td><td>Sweden</td><td>010-102 04 34</td></tr><tr><td>Luxembourg</td><td>800 24 965</td><td></td><td></td></tr></tbody></table>	Ireland	1800851345	Norway	800 62 156	UK	0800 046 5394	Poland	800005097	Germany	0800 1820176	Spain	900876077	Lithuania	880031729	Sweden	010-102 04 34	Luxembourg	800 24 965		
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Anonymous reports will be acted upon to the extent permitted by law.

This process complements our internal policies which also include other [internal and external escalation and reporting routines](#) which may also be appropriate under the circumstances (notably in financial services and money laundering, and terrorist financing).

Before deciding to report, you may wish to provide information or seek guidance from leaders in Risk Management and Compliance, Human Resources, or the Law Division, depending on the nature of your concern. Such advice will be kept confidential to the fullest extent possible.

We will follow-up on reports received through internal channels as follows:

- We will acknowledge receipt within 7 days of your report, appoint an impartial person to investigate and then provide feedback not exceeding 3 months from acknowledgment of receipt.
- We will not reveal the reporting person's identity, except to those authorized to receive or follow up on reports.
- We will ensure compliance with EU data protection legislation.
- We will keep records of every oral or written report received.

Any information provided internally shall be dealt with compliantly with all laws and regulations governing the protection of personal data.

You may also choose to report externally if you are not comfortable raising your concern internally.

We encourage you first to use our whistleblowing process. However, if you don't feel able to do so, you may choose to report externally to one of the following entities by email, telephone or in writing. Please go to the entity's website (or to comparable entities websites in other EU countries) for the most up to date information.

Central Bank of Ireland

Email: confidential@centralbank.ie
Phone: 1890 130014
Mail: Protected Disclosures Desk
P.O. Box 11517
Spencer Dock
Dublin 1
D01 W920

Depending on the nature of your concern, it may be appropriate to report to a regulator other than the Central Bank of Ireland. Contact information for prescribed persons can be found here: [Ireland](#), [UK](#), [Germany](#), [Lithuania](#), [Luxembourg](#), [Norway](#), [Poland](#), [Spain](#), and [Sweden](#).

Commitment to Non-retaliation

We do not tolerate retaliation against any person reporting in good faith based on a reasonable belief that a breach has occurred or is very likely to occur. Any person who believes they have experienced retaliation should immediately report this to the Global Ethics Office or Human Resources. Such reports will be investigated without delay.