

September 26, 2024

# Whistleblower Policy

<b>Issues By:</b>	<u>Ethics &amp; Compliance</u>	<b>Segment:</b>	<u>Global Employees</u>
<b>Region:</b>	<u>Global</u>		
	<u>Chief Risk &amp; Compliance</u>		
<b>Policy Owner:</b>	<u>Officer</u>	<b>Supersedes:</b>	<u>February 18, 2022</u>
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<b>Effective Date:</b>	<u>September 26, 2024</u>		

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## Purpose of Policy

FTI Consulting, Inc., which includes its direct and indirect subsidiaries and affiliates (together, “FTI Consulting” or our “Company”), is committed to ethical behavior. We strive to foster an environment where concerns can be raised and issues addressed without fear of retaliation. This Whistleblower Policy (the “Policy”) translates this attitude into process, and reflects our adherence to the highest prevailing standards.

This Policy is applicable to our entire Company worldwide. All of us—employees, partners, officers, outside directors—are subject to this Policy. While this Policy is directed primarily at FTI Consulting’s internal stakeholders (i.e., employees, partners, officers, outside directors, interns, etc.), the reporting mechanisms described herein can be used by outside stakeholders (e.g., contractors, employment recruits, and other third parties). We are expected to become familiar with and comply with this Policy, both in letter and spirit. In addition, we have a responsibility to participate in training, and to communicate the values underlying this Policy in our interactions with fellow FTI Consulting employees and third parties.

While all of us at FTI Consulting are expected to know and follow this Policy, some exceptions may exist. For example, if specific conduct is permitted under this Policy, but is prohibited by local law, you must comply with local law. The laws of certain jurisdictions may limit the Company’s ability to protect your identity or keep reports confidential. If you are located in the Company’s European offices, please note carefully the specific provisions contained in this Policy applicable to you, as a result of data privacy and other laws in the European Union (“EU”) or the country in which you are employed. Individuals located in Australia should also review FTI Consulting’s Australia Supplemental Whistleblower Policy.

## Reporting Improper Activity

FTI Consulting strongly encourages all of us, regardless of our location, to raise questions or concerns promptly. Doing so allows our Company to address them quickly and appropriately. This sentiment is echoed in our Code of Ethics and Business Conduct (“Code”) and Anti-Corruption Policy, as well as other Company policies and procedures.

You may make a report either orally or in writing, and on an anonymous basis, as further detailed below.

While any concern or question may be raised, some examples of reportable activities include:

- Unethical or illegal business conduct;
- A violation of our Code and policies;
- Any violation or action that may contribute to a violation of applicable laws, rules or regulations, whether committed by the Company or employees, including but not limited to:
  - Financial crimes, such as fraud, money laundering, bribery, terrorist financing, insider trading;
  - Sanctions;
  - Human rights, including modern slavery and human trafficking;
  - Environmental, social and governance, including anti-discrimination laws and environmental laws;
- Questionable accounting practices, issues with internal accounting controls, concerns around the accuracy of financial statements, auditing matters or a substantial mismanagement of Company resources;
- A failure to adhere to legal or contractual obligations;
- Substantial and specific danger to the health and safety of your colleagues or the public; and
- Any other matter that you believe may adversely affect FTI Consulting or your colleagues.

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**Q:** Jeanine suspects that a supervisor in her department has been directing employees to manipulate financial statements. Recently, she overheard him instructing one of his direct reports to alter the dates on an invoice. Jeanine doesn’t have any substantial evidence to back her claim, and none of her colleagues want to involve themselves in the matter. Should Jeanine still report her concerns?

**A:** Yes. Jeanine should speak with her supervisor or office manager, or any other resource with whom she feels comfortable including those referenced in this Policy. She has a valid reason to believe that this supervisor may be violating our Code, Company policy and the law, even if she does not have any evidence. FTI Consulting will still investigate the matter and, whether or not misconduct by Jeanine’s supervisor is revealed by the investigation, Jeanine will not be retaliated against for speaking up.

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## Protection From and Prohibition Against Retaliation

FTI Consulting strictly prohibits retaliation, harassment or discrimination of any kind against anyone who makes a report in good faith. “Good faith” means you reasonably believed that your report was true, regardless of the outcome of the investigation.

Our Company forbids retaliation against anyone who refuses to carry out a directive that may constitute a violation of applicable laws, rules or regulations, or our Code.

FTI Consulting strictly prohibits any retaliation, harassment, recrimination, or discrimination against any person who participates in an investigation of complaints about questionable accounting or auditing matters, or reporting of fraudulent financial information or other improper activities as described above.

Anyone who engages in such retaliation—directly or indirectly—or encourages others to do so may be disciplined, up to and including discharge, to the extent permitted by applicable law.

FTI Consulting employees, including managers, will receive training regarding the Company’s prohibition on retaliation.

## Communicating Concerns

You are free to raise your concerns orally or in writing, including through the FTI Consulting Integrity Helpline (see instructions below).

You may choose to raise a matter with your local support, including your supervisor or office manager, if you feel they are best placed to address it. However, this is not your only option.

You may also communicate your concerns to FTI Consulting’s:

- Compliance Department;
- Human Resources/Employee Relations;
- Legal Department; and/or
- The Audit Committee by sending a letter to FTI Consulting, Inc.’s offices at:

FTI Consulting, Inc.  
555 12<sup>th</sup> Street  
Suite 700  
Washington, DC 20004  
c/o General Counsel.

You may also seek guidance from other departments within FTI Consulting, depending on the type of concern you have.

If preferred, you may send such communications anonymously.

### What Information Should I Provide?

When submitting your concerns, you are encouraged to provide accurate information with as many specifics as possible, including:

- Names;
- Dates;
- Places;
- Events that took place; and
- An explanation of your concern.

Further, if you are making a report or are otherwise involved in an investigation, you are expected to provide all relevant information requested from you in the course of the investigation.

Providing all of the relevant information means that the situation can be appropriately investigated and, if warranted, resolved.

### How Can the FTI Consulting Integrity Helpline Be Used to Report Concerns?

FTI Consulting provides a mechanism for confidential and anonymous reports by using a “Helpline” through EthicsPoint, a third-party service provider.

Use of the Helpline is purely voluntary. No one will be subject to disciplinary action due to a failure to use the Helpline. Improper or abusive use of the Helpline by any person may be subject to disciplinary action.

If you wish to do so, you may report known or suspected violations to the Helpline anonymously. However, providing your name may expedite the time it takes FTI Consulting to respond to your concern. It also allows FTI Consulting to contact you directly during an investigation, if necessary.

You should treat the information that you provide as confidential, and FTI Consulting will treat the information as confidential to the extent reasonably possible.

### What Are the Steps for Filing a Report On the Helpline?

There are two ways to make a report:

- By telephone; or
- Online at [www.fticonsulting.ethicspoint.com](http://www.fticonsulting.ethicspoint.com).

#### Filing a Report by Telephone

The Helpline can be accessed by telephone:

- In the U.S. and Canada by calling 1-866-294-3576;
- In the United Kingdom (“UK”) by calling 0800-652-4651; or
- From any other country, by following the instructions for filing a report online described below. On the FTI Consulting landing page, click the link for the list of international access codes to find the local number for your location.

EthicsPoint representatives are available to answer your call 24 hours a day and in local languages. They will guide you through a series of questions and file your report. You will be given a confidential report ID number.

### Filing a Report Online

To file a report online, go to [www.fticonsulting.ethicspoint.com](http://www.fticonsulting.ethicspoint.com), then follow the instructions on the FTI Consulting landing page.

### **What Happens to the Reports I Make?**

Reports made via the Helpline are entered directly onto the EthicsPoint secure server. EthicsPoint makes these reports available only to specific individuals within our Company. The initial designated recipients of EthicsPoint Reports are FTI Consulting's Compliance department.

Reports to the Helpline regarding accounting, auditing, or other financial matters will be forwarded to the Chief Risk & Compliance Officer and the General Counsel. They, in turn, will forward them to the Chair of the Audit Committee of FTI Consulting's Board of Directors. Reports on other subjects will be forwarded to the appropriate internal department that is responsible for ensuring that your concern is investigated and appropriately addressed.

Reports received outside of the Helpline are administered by the Human Resources or the Compliance department, as appropriate. The dissemination of such reports is limited to employees and third parties who have a need to know, or who are involved in any investigation or resolution of the subject matter of such report.

Any reports regarding, or information that appears to be evidence of, improper activity received by the Company outside of the process set forth in this Policy will be promptly forwarded to FTI Consulting's Compliance or Legal departments.

### **How Will I be Kept Up To Date about my Report?**

When you file a report through the Helpline, you will be given a unique user name and password, including when you file an anonymous report. You may log back into EthicsPoint to see if there is an update or if the person who received the report may have questions so that the matter can be appropriately investigated. You should respond to any questions or requests for additional information that you receive.

Receipt of all submissions that are not anonymous will be acknowledged by FTI Consulting's Compliance department, either orally or in writing, unless you have indicated a specific preference as to how to receive the acknowledgment.

Anonymous submissions received via the FTI Consulting Integrity Helpline will be acknowledged through that system.

All acknowledgments and updates will be provided appropriately, promptly and within any applicable timeframes established by local law.

#### Will the Company Investigate my Report?

All reports will be investigated promptly, regardless of how they are received. The time required to complete an investigation will vary depending upon the nature of the alleged conduct and the availability of information related to it.

Among other things, the Company may enlist any of the following resources, as appropriate, in conducting an investigation:

- Board and committee members;
- Management;
- Employees;
- Outside legal counsel; and
- Accountants or other advisors.

In conducting an investigation of your report, FTI Consulting will use reasonable efforts to protect your confidentiality and anonymity. In order to protect the confidentiality of all parties, you should not expect to learn the results of an investigation other than that it has been undertaken and concluded.

#### Will FTI Consulting Take Action as a Result of my Report?

The specific actions taken by our Company will vary with the matter at hand and the results of its investigation. In any particular instance, our Company's actions may depend on the nature and gravity of the subject matter of the report, employee conduct, or circumstances reported, as well as the quality of the information provided.

As warranted, appropriate and permitted by applicable law, corrective actions may be taken by the Company and/or disciplinary action may be taken against the subject of the report. Any disciplinary action depends on the severity of the activity, but may include:

- A warning or letter of reprimand;
- Demotion;
- Loss of merit increase or bonus;
- Suspension; and
- Termination of employment.

## Right to Report Concerns to a Government Agency

Nothing in this Policy or other FTI Consulting policy or employee handbook, or in any applicable employment, restrictive covenants, severance, release or other written agreement between an employee and FTI Consulting or its affiliates:

- Prohibits an employee from making reports, charges or complaints of possible violations of law or regulations to a government agency in accordance with any applicable legal whistleblower protection law, even if doing so would require an employee to share confidential or other proprietary information of the Company;
- Prevents an employee from making truthful statements to any such government agency in response to legal process, required governmental testimony or filings, or administrative or arbitral proceedings;
- Prohibits an employee from collecting any financial incentives in connection with any of the foregoing activities; or
- Requires notification to, or prior approval by, FTI Consulting or its affiliates in connection with any of the foregoing activities.

Appendix 1 outlines responsible external reporting bodies for offices based in the EU and UK.

## Record Management and Retention

FTI Consulting's Compliance department will maintain a record of its response to each submission, including the date of an acknowledgment, if applicable, and any other actions taken. Subject to local law, reports may be reviewed, approved or edited where information requires clarification.

All records related to reporting and investigation under, and enforcement of, this Policy will be kept in accordance with applicable law, including applicable data protection laws, rules, and regulations. The Company will also follow applicable provisions of its internal record retention policy or practices. In addition, FTI Consulting may handle information in such manner as our Company or FTI Consulting's Audit Committee determines appropriate or as advised by counsel.

## Amendments to this Policy

FTI Consulting's Audit Committee and Board of Directors are authorized to modify this Policy unilaterally at any time, without prior notice. This includes, without limitation, to outsource administration of this Policy, as set forth in the following section. It may be necessary to modify this Policy, among other reasons, to maintain compliance with U.S. local, state, and federal laws, rules and regulations and non-U.S. laws, rules and regulations, Exchange Rules, or to accommodate organizational changes within our Company. FTI Consulting will announce any material revisions to this Policy and will make copies of the then-current Policy available. Further, a current version of this Policy will be made available on our website, at [www.fticonsulting.com](http://www.fticonsulting.com). Employees can also access the policy on FTI Consulting's Intranet site, Atlas.



## Outsourcing Compliance

If deemed appropriate or necessary, the Audit Committee may change, terminate, or engage another third-party service provider to administer a “hotline” or to otherwise manage this Policy. If the obligations of our Company and representatives are outsourced to another third-party provider, we expect that telephone as well as Internet communication options will be maintained.

Any information relayed through a third-party provider will be routed promptly to the appropriate Company designated representative. Any such third-party provider must:

- Be a recognized firm for purposes of such services;
- Have sufficient resources to permit communications 24 hours a day, seven days a week;
- Efficiently and confidentially relay communications to the appropriate persons at the Company; and
- Correspond regularly with the designated representative to ensure that the Policy and the outsourcing thereof are functioning appropriately and efficiently.

## Appendix 1: External Reporting Bodies for UK and the European Union

### Purpose of Appendix

This Appendix provides details of external competent authorities (the “Competent Authorities”) who are responsible for receiving and investigating whistleblowing reports within the UK and the EU where FTI Consulting has offices.

FTI Consulting does encourage everyone to file their reports through our internal reporting channel (as outlined in this Policy) so that your report can be properly investigated by FTI Consulting and appropriate internal actions taken (if applicable). However, there is no requirement to file an internal report if you wish to report externally.

The below contact details are those external Competent Authorities most relevant for FTI Consulting activities. These are not affiliated in any way to FTI Consulting and the receipt of the report and any possible investigation will be carried by a third party. In some cases, there are additional bodies that can be reported to and you can identify these through an online search. Subject to applicable laws, you may also be able to publicly disclose should your report meet specific requirements.

### Details of External Whistleblowing Bodies

Country	Competent Authority	Contact Details
<b>Belgium</b>	Federal Ombudsman – Integrity Centre	<b>Website:</b> <a href="https://www.federaalombudsman.be/en/contact-us">https://www.federaalombudsman.be/en/contact-us</a>
<b>Denmark</b>	The Danish Protection Agency	<b>Website:</b> <a href="https://whistleblower.dk">https://whistleblower.dk</a>
<b>Finland</b>	The Office of the Chancellor of Justice	<b>Website :</b> <a href="https://oikeuskansleri.fi/en/how-to-make-a-report">https://oikeuskansleri.fi/en/how-to-make-a-report</a>
<b>France</b>	Autorité de la concurrence	<b>Website:</b> <a href="https://formulaire.defenseurdesdroits.fr/formulairesaisine/?locale=fr_FR">https://formulaire.defenseurdesdroits.fr/formulairesaisine/?locale=fr_FR</a>
<b>Germany</b>	Bundesanstalt für Finanzdienstleistungsaufsicht	<b>Website:</b> <a href="https://www.bafin.de/EN/DieBaFin/Hinweisgeberstelle/8_Zugang_zur_Hinweisgeberstelle/ZugangHinweisgeberstelle_nod_e_en.html">https://www.bafin.de/EN/DieBaFin/Hinweisgeberstelle/8_Zugang_zur_Hinweisgeberstelle/ZugangHinweisgeberstelle_nod_e_en.html</a>
<b>Ireland</b>	Office of the Protected Disclosures Commissioner	<b>Website:</b> <a href="https://www.opdc.ie/">https://www.opdc.ie/</a>

Country	Competent Authority	Contact Details
<b>Italy</b>	Autorità Nazionale Anticorruzione	<b>Website:</b> <a href="https://www.anticorruzione.it/-/whistleblowing">https://www.anticorruzione.it/-/whistleblowing</a>
<b>Netherlands</b>	Huis voor Klokkeluiders / The House for Whistleblowers	<b>Website:</b> <a href="https://www.huisvoorklokkeluiders.nl/">https://www.huisvoorklokkeluiders.nl/</a>
<b>Portugal</b>	The National Anti-Corruption Mechanism	<b>Website:</b> To be confirmed.
<b>Spain</b>	To be confirmed.	To be confirmed.
<b>United Kingdom</b>	Protect Charity	<b>Website:</b> <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>