



# Whistleblower Policy

Revised: 2/17/22

## ***Internal Use Only***

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# Whistleblower Policy

## Purpose

Epiq is committed to conducting our business with honesty and integrity, and expect all employees to maintain high standards in accordance with our Code of Conduct. A culture of openness and accountability is essential in order to prevent illegal or unethical conduct from occurring and to address them when they do occur.

## Scope

The purpose of this policy is:

- (a) To convey the seriousness and importance of identifying and remedying wrong-doing.
- (b) To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that the concerns will be taken seriously and investigated as appropriate, and that confidentiality will be respected.
- (c) To provide employees with guidance as to how to raise those concerns.
- (d) To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- (e) To provide access to further sources of advice and guidance on whistleblowing.

This Policy applies to Epiq and its personnel, third party consultants, contractors, vendors at all locations and any individual or entity that is provided access to the Epiq's resources. For recent acquisitions to Epiq, this policy applies only once the integration is complete.

This policy should not be used for complaints relating to the reporter's own personal circumstances, such as the way they have been treated at work rather than wrongdoing of a more general nature. In those cases, reporters should use the Epiq Integrity Hotline to report a concern under our Anti-harassment and Bullying Policy as appropriate.

If a reporter are uncertain whether something is within the scope of this policy, please seek advice from the Compliance department, whose contact details are at the end of this policy.

## Exceptions

Compliance with this policy is mandatory. However, the Compliance team will consider requests for exceptions under special circumstances. If anyone wishes to request an exception to this policy, please complete the Policy Exception Request form and send to the Compliance team for review.

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## Responsibilities

Roles	Responsibilities
Board	<ul style="list-style-type: none"><li>• Overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.</li></ul>
Director of Risk and Compliance	<ul style="list-style-type: none"><li>• Day-to-day operational responsibility for this policy and ensuring that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.</li></ul>
	<ul style="list-style-type: none"><li>•</li></ul>
Employees	<ul style="list-style-type: none"><li>• Responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.</li></ul>
	<ul style="list-style-type: none"><li>•</li></ul>

## Policy review

This policy is reviewed at least annually. The annual policy refresh is completed by the Compliance team and approved by the Vice President of Risk and Compliance. Minor updates to the policy can also be requested by the business throughout the year and can be approved and implemented by the Compliance team.

## Enforcement

Suspected or known violations of this policy may result in:

- Removal of non-compliant systems from the Epiq network
- Accountability for conduct under any applicable Epiq corporate policies, procedures, or contractual obligations, including disciplinary action up to and including termination of employment
- Prosecution under applicable statutes
- Suspected or known violations of Local, State, National and International law will be processed by the appropriate Epiq authority and/or law enforcement agencies.

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## Policy

### Whistleblowing Definitions

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- (f) criminal activity
- (g) failure to comply with any legal or professional obligation or regulatory requirements
- (h) miscarriages of justice
- (i) danger to health and safety
- (j) damage to the environment
- (k) bribery under our Anti-corruption and Bribery Policy
- (l) facilitating tax evasion
- (m) financial fraud or mismanagement
- (n) breach of our internal policies and procedures including our Code of Conduct
- (o) conduct likely to damage our reputation or financial wellbeing
- (p) unauthorized disclosure of confidential information
- (q) negligence
- (r) other workplace-related concern or
- (s) the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If a reporter has any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern), it should be reported under this policy.

### Raising a whistleblowing concern



Epiq Integrity  
Hotline FAQs.pdf



Epiq-Integrity  
Hotline Employee Tr

Epiq hopes that in many cases reporters will be able to raise any concerns with the Reporter's managers or human resource business partners. Reporters may tell them in person or put the matter in writing if preferred. They may be able to agree to a way of resolving the concern quickly and effectively. However, where the matter is more serious, or the reporter feels that the manager or human resource business

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partner has not addressed the concern, or it is preferred not to raise it with them for any reason, the reporter should:

- Contact our Vice President of Risk and Compliance or Vice President of Legal or Vice President of Human Resources, 11880 College Blvd., Suite 200, Overland Park, KS 66210 or via email ([compliance@epiqglobal.com](mailto:compliance@epiqglobal.com))
- Submit a report online via our external site: [www.epiqglobal.com/en-us/integrityhotline](http://www.epiqglobal.com/en-us/integrityhotline) or intranet site: <https://epiqsystems3.sharepoint.com/SitePages/Growing-with-Integrity--Epiq-Hotline.aspx>
- Speak confidentially or anonymously to someone by calling the toll-free number assigned to the reporter's location/country
- Submit a report via text/SMS for those in North America.

A meeting may be scheduled to discuss the concern. The reporter may bring a colleague or other representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

An electronic summary of the concern will be stored in Epiq Integrity (linked [here](#)) where the reporter will have access to view the report and status updates.

## Confidentiality

The Epiq Investigator shall keep the identity of the whistleblower confidential, whenever possible, unless the reporter wishes for reporter's identity to be known. In rare circumstances, disclosing the identity of the whistleblower maybe necessary depending on the complaint. Epiq hopes that employees will feel encouraged to voice whistleblowing concerns openly under this policy. However, if the reporter wants to raise concerns confidentially, the Investigator will make every effort to keep the reporter's identity secret. If it is necessary for anyone investigating the concern to know the identity of the reporter, the Investigator will discuss this with the reporter.

Proper investigation may be more difficult or impossible if the Investigator cannot obtain further information from the reporter. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if the reporter's identity is revealed should come forward to the contact points listed above and appropriate measures can then be taken to preserve confidentiality.

Epiq will ensure appropriate technical and organizational measures are in place to secure any data that has been disclosed or gathered during the investigation.

Personal data gathered during an investigation would usually only be kept until the end of the investigation and/or subsequent legal or disciplinary proceedings. Where data is archived in order to mitigate the risk of future liability or harm to the company, those systems are secure and the data should be kept to a minimum.

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## Investigation and Outcome

Once a concern has been reported, an initial assessment will be completed to determine the scope and if an investigation is required. The assessor may request additional information.

In some cases, a formal investigator or team of investigators may be engaged. The investigator(s) may make recommendations for change to enable Epiq to minimize the risk of future wrongdoing.

Any information about the investigation should be treated as highly confidential. Additionally, the need for confidentiality may prevent specific details of the investigation or any disciplinary action from being provided to the reporter.

## Dispute

Specific outcomes cannot be guaranteed. All concerns will be approached fairly and in an appropriate way.

If the reporter is not satisfied with the way in which a concern has been handled, please report to Internal Audit via email at [internalaudit@epiqglobal.com](mailto:internalaudit@epiqglobal.com)

## External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. It is recommended that reports should be submitted to Epiq before alerting any external

The law recognizes that in some circumstances it may be appropriate for the reporter to report concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. Epiq strongly encourages reporters to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of Epiq staff, but they may sometimes relate to the actions of a third party, such as a client, customer, supplier/vendor, contingent worker, intern, or job applicant. In some circumstances the law will protect reporters if they raise the matter with the third party directly. However, Epiq encourages reporters to report such concerns internally first. The Reporter should contact the reporter's manager or human resource business partner or one of the other individuals set out above for guidance.

## Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. Epiq aims to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

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Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If a reporter believes that they have suffered any such treatment, they should inform the Vice President of Compliance, Vice President of Human Resources or Vice President of Legal immediately. If the matter is not remedied, the reporter should raise it formally using the Integrity Hotline.

Epiq will not tolerate retaliation against any Employee who in good faith reports or provides information about an incident of alleged harassment in the workplace. Additionally, Epiq will not knowingly permit retaliation against any Employee who complains of harassment or who participates in an investigation. Engaging in retaliatory behavior is in violation of this policy and is grounds for disciplinary action, including termination under appropriate circumstances.

Our confidential support and reporting hotline is available to whistleblowers who raise concerns under this policy.

## Document Control

Version	Date Published	Author	Description
1.0	11/12/2021	Kate Stark	Whistleblower Policy with Epiq Integrity Hotline FAQs/employee training attachments
1.0	2/17/2022	Lori Blackley	Approval