

# CISION® Whistleblowing Policy

Adopted on January 1, 2022.

## If you are aware something is wrong, let us know.

Cision is committed to fairness and integrity to the highest standards. We don't tolerate any form of misconduct during our business operations, as it puts our integrity, reputation, and business at risk.

**If you work with Cision, you can help us by reporting any actual or potential violations of the law or unethical behaviors, or, if we ask you to, by participating in an investigation.**



### Speak up!

- Your complaint will be confidential
- Make sure you have all the facts you need to prove your claim: this will help the investigation
- You will be protected from retaliation



### What does this Policy cover?

- **Part 1 – Making a complaint and giving testimony**  
Learn how to make a complaint or what to do when you participate in an investigation
- **Part 2 – How we manage investigations**  
Further details on the processes and rules we have in place to carry out fair and thorough investigations

**Let's get started! →**

## Part 1

# Making a complaint and giving testimony

**You can become part of an investigation as a:**

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**Complainant**, when you submit a complaint

**Participant**, when we ask you to give information or take any part in an ongoing investigation of a complaint  
*(this includes employees who are the subject of an investigation)*



### What we expect:

#### Complainant

- Submit your complaint in writing, if possible: it's the best way to avoid misunderstandings
- Make sure you have evidence: focus on the facts, not on speculation, and be as specific as possible
- Be candid and share all the information you have in your complaint and any follow-up

#### Participant

- You must cooperate fully with the Company Contact, Counsel and the Investigation Team and assist in the investigation



### Our promise

#### You and your career are safe

- We protect from retaliation complainants and participants who disclose information related to a complaint in good faith.

#### We keep it confidential

- If you ask for confidentiality, we will honor your request if this can be reasonably done without breaking the law or harm the investigation.
- If your name becomes visible (e.g., in your e-mail address), we will keep it confidential.



### Beware!

**In some exceptional circumstances we can't guarantee full confidentiality.**

For example when:

- It is **impossible to proceed or properly investigate** the matter without knowing your identity
- Keeping your identity anonymous is a **violation of the law** or **harms the investigation**
- Your identity may become known for **reasons outside of our control**
- You **self-disclose** your identity **to someone who is not** the Company Contact, members of the Audit Committee, or members of the Investigation Team.

**If you are complicit** in the matters that are the subject of a complaint or an investigation, **you have no right to immunity and protection from retaliation.**

However, **coming forward can help mitigate potential disciplinary measures against you** (depending on the severity and nature of the complaint).

**If your complaint or testimony are intentionally false**, you may be subject to disciplinary action.

**If you are a participant**, you must not discuss any aspect of the investigation or your testimony with:

- People who aren't connected to the investigation
- The Complainant, if you know their identity.

# How to file a complaint

## There are 2 internal channels for you to file a complaint:

Additionally, various state and federal entities also offer whistleblower protections and reporting channels. You can research these online to see if your complaint should be brought to one of these entities.

## Our Company Contact

- This is usually the Chairperson of our Audit Committee

## Anonymous whistleblower hotline 24/7

- This hotline is managed by an independent third-party
- They will ask you to confirm you are a Cision employee, but won't identify you
- They will receive your complaint and forward it anonymously to the Company Contact, who will decide how to address it
- They will give you an ID number so you can check the status of your complaint
- They will forward the response of the Audit Committee to you



### Contacts

#### Company Contact

##### In writing

**Post:** Attn: Legal Dept. 1785 Greensboro Station, 8th Floor McLean, VA 22102.

**E-mail:** [whistleblower@cision.com](mailto:whistleblower@cision.com)

##### By telephone

866-459-2593

##### In person

#### Anonymous whistleblower hotline

**Our hotline is managed by Issuer Direct. Please use the company identifier "CISN"**

- **US and Canada:** 800-916-7037
- **UK:** 800-652-3673
- **Sweden:** 020-793-030
- **Germany:** 800-180-2137
- **Italy:** 800-799-622
- **France:** 080-091-4677
- **Brazil:** 800-891-6705
- **China:** 400-120-0690
- **Japan:** 053-112-2792



### Note!

You can use the hotline if you believe your complaint is best handled anonymously, but **it is less likely that we will start an investigation in response to an anonymous complaint.**

This is because it is more difficult to interview anonymous complainants and evaluate the credibility of their complaints.

## When to file a complaint

Please report issues as soon **as you aware of them** and you have **sufficient details and facts** to explain the situation.



### Types of issues

- Actual or potential violations of law, regulation, or provisions of the Cision's Code of Ethics
- Fraud or deliberate error in the preparation, evaluation, review, or audit of any of Cision's financial statements
- Fraud or deliberate error in the recording or maintaining of Cision's financial records
- Deficiencies in or noncompliance with Cision's internal accounting controls
- Misrepresentations or false statements to or by a senior officer of the Company or an accountant regarding a matter contained in Cision's financial records, financial reports or audit reports
- Deviation from full and fair reporting of Cision's financial condition



**DON'T!**

**Don't conduct your own investigation.** You don't have a right to take part in any investigative activities, except if we ask you to do so.

**Don't try to obtain evidence relating to a complaint** if you don't have the right of access. Improper access may itself be an illegal or improper activity and it can result in disciplinary action.

## What to include in your complaint

**Give as many factual details as possible, including:**

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- The alleged event, matter, or issue that caused the complaint
- The name of each person involved
- The approximate date and location of each event mentioned in the complaint
- Any additional information, documentation, or other evidence available to support the complaint



### **Your collaboration is crucial!**

- We **won't investigate** complaints containing **unspecified wrongdoing** or broad allegations **not supported by evidence**.
- If you provide **vague or insufficient information**, we won't be able to assess the nature, extent, and urgency of the matter.
- **If you don't agree** to provide further information related to the complaint or to be interviewed during the investigation, **the investigation may stop, fail, or not happen at all.**

## Last but not least...

**If you want a response** about your complaint, make sure to **ask for it** and **provide your contact information**.

## Part 2

# How we manage investigations

### An investigation is a neutral fact-finding process

- Our decision to investigate a claim is not an accusation against anyone.

### We won't tolerate retaliation

- Nobody at Cision is allowed to discharge, demote, suspend, threaten, harass or in any manner discriminate against any whistleblower or witness.
- Initiating or encouraging retaliation is a serious violation of Cision's policies and, under certain circumstances, of federal or local law.

