FAQs

What Is the Speak Up Line?

The Speak Up Line is a confidential third-party resource where State Street employees, contingent workers, clients and vendors can raise any concerns about actual or potential misconduct or policy violations.

Is the Speak Up Line confidential?

Yes. We engage a third party to receive all concerns reported on the Speak Up Line through an application called Speakfully. Your report will be treated as confidential, consistent with applicable legal and regulatory standards, and information will be disclosed only as reasonably necessary to conduct a review or investigation or to comply with the law.

What type of concerns should I report?

The Speak Up Line is intended for the reporting of any concerns you may have about potential misconduct or policy violations related to your work with or at State Street, such as fraud, bribery, corruption, conflicts of interest, insider trading, discrimination, bullying or harassment.

The Speak Up Line is not intended for general inquiries about compensation, benefits, the content of policies or other general questions. If you have a question about any of these topics, please contact your direct manager or another member of management. You also may ask your business-aligned Senior Compliance Officer, the Conduct Risk Management Office, Global Human Resources (GHR) or the Legal Division. The Conduct Risk Management Office maintains a mailbox at ethics@statestreet.com. The GHR Service Center may be contacted by clicking the link: GHR Service Center and opening a ticket. Regardless of the corporate function to which you escalate your concern, it will be reviewed by an appropriate subject matter expert.

What if this is an emergency?

If this is an emergency, such as an immediate threat of physical harm or damage to property, please contact 9-1-1 or your local emergency services, or call State Street Global Security at (North America) 617-985-5001, (EMEA) +44 203 395 4444, (APAC) +612 9323 6242 or email: csecurity@statestreet.com.

May I report my concern anonymously?

Yes. You absolutely can report anonymously (where permitted by local law). If you choose to report anonymously, you will receive a key and password. Please retain this information and follow up frequently, as we won't have another way of communicating with you.

However, we encourage you to identify yourself and any others involved, because this enables us to conduct a thorough review or investigation, and to directly follow-up with you and others. We will make a reasonable effort to hold your name in confidence, and information will be disclosed only as reasonably necessary to conduct a review or investigation or to comply with the law. State Street does not tolerate retaliation against anyone who has made a good faith report of possible misconduct.

How does Speakfully maintain anonymity?

Speakfully does not trace phone calls or use caller identification. In addition, Speakfully does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses, so no information linking your computer to Speakfully is available if you choose to make a report online. Reports from your computer are routed through a secure Internet portal that does not trace or show user screen names.

I'm not sure if what I've observed or heard is a violation of State Street policy, but it just doesn't feel right to me. What should I do?

Please file a report. We would much rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you were not sure.

If I see a violation, should I report it to my manager, the Conduct Risk Management Office or Global Human Resources?

You have many options for reporting a concern at State Street, including reporting it to your manager or other senior leaders if you are an employee. It also is perfectly acceptable for you to report a concern directly to Compliance, the Conduct Risk Management Office, the Legal Division, Global Human Resources or Global Security. We recognize however, that there may be circumstances when you are not comfortable reporting an issue in this manner. We hope that the Speak Up Line makes it easy and comfortable for you to report a concern. Ultimately though, it does not matter which channel you use to report a concern – the most important thing is that you speak up. Regardless of the corporate function to which you escalate your concern, it will be reviewed.

How can I monitor progress on my concern? What if State Street has further questions for me concerning my report?

When you file a report through the Speak Up Line, you will receive a unique key and will be asked to choose a password. You can return to the system again either by Internet or telephone to access the original report, answer questions that have been posed by a State Street representative and add further information that will help resolve open issues. We strongly suggest that you return to the site often to check the status of your report. If you

provide your contact information when you submit your report, the investigators reviewing your concern can contact you directly. Due to confidentiality, privacy, and other reasons, investigators will not provide reporters with updates regarding the status of any investigation.

Are these follow-ups on reports as secure as filing a report?

All correspondence is held in the same confidence as the initial report.

Why has State Street contracted with a third party for reporting concerns on the Speak Up Line?

Many people are more comfortable reporting concerns through a third party. Speakfully is hosted by an independent third party and provides secure, confidential, 24-hour telephone and web-based systems for those who wish to report a concern.

Is the toll-free phone line confidential and anonymous, too?

Yes. If you report a concern anonymously (where permitted by law), you will be asked to provide the same information that you would provide in an Internet-based report, and an interviewer will type your responses into the Speak Up Line web-portal. These reports have the same security and confidentiality measures applied to them.

May I report using either the Internet or the telephone?

Yes. With the Speak Up Line, you may report a concern either via the telephone or the Internet. In certain countries, reporting may be available only through the Internet until telephone reporting becomes available or other local requirements are satisfied.

What if I am okay with identifying myself?

There is a section in the report that allows you to identify yourself. In fact, identifying yourself is encouraged since it makes it easier for the investigators to contact you if they need additional information relevant to the matter you raised. Each year, many investigations are unable to proceed because due to the reporter's failure to provide follow-up information necessary for the investigation.

Where do these reports go? Who can access them?

Reports are available only to specific individuals within State Street who are charged with evaluating the report, based on the subject matter and the location of the incident. These individuals will treat the report as confidential, consistent with applicable legal and regulatory standards, and they will disclose information only as reasonably necessary to conduct a review or investigation or to comply with the law.

If I see or become aware of a violation, even if it doesn't relate to me, am I obligated to report it?

Yes. Prompt reporting of any actual, attempted or suspected violation of State Street policy is your responsibility. If an employee knows of a violation and fails to report it, that in itself is a violation. For managers, this means that when you become aware of an issue relating to an employee or contingent worker, you address, escalate and report as necessary.

What if my direct manager or other managers are involved in a violation? Will they get the report?

No. The system and report distribution are designed to maintain confidentiality so that implicated parties are not notified or granted access to reports in which they have been named.

What should I do if I reported a concern anonymously and I lose my report key or password?

Due to the high level of security that is maintained for these reports, if you reported a concern anonymously (where permitted by law) and lose your report key or password, you will need to fill out a new report. When filing the new report, you should mention that it is related to a report you previously filed.

I am having trouble placing a call to the hotline. Why is this?

There may be several reasons why your call did not go through. In these situations, please use the Speak Up Line web portal to report your concern and please also let us know about the issue you had with the hotline, so that we can determine the cause and resolve it. It also is perfectly acceptable for you to report a concern directly to Compliance, the Conduct Risk Management Office, the Legal Division, Global Human Resources or Global Security.

How should I report a concern if English is not my first language?

If English is not your primary language and you would be more comfortable reporting your concern in your native tongue, please call the phone number for your country to report your concern. The call center has staff on hand who can record your report in your native language. In the future, translations of the Speak Up Line web portal will be available in some, but not all, languages.

I am a State Street employee – where can I find more information regarding how my data is utilized?

You can find more information regarding how your data is utilized through the following resources:

Global Privacy and Personal Data Protection Standard

Data Protection and Privacy Notice

Global Data Governance Policy

What if I face retaliation?

State Street strictly prohibits retaliatory acts against any person for reporting concerns or suspected violations in good faith. These include demotion, harassment or other negative acts. Reporting in good faith means providing all of the information you have and you believe to be true. If you believe you have faced retaliation of any kind, please immediately report it so that State Street can investigate.

What if I have a question rather than a concern?

The Speak Up Line is intended for State Street employees, contingent workers, clients and vendors to report concerns about actual or potential misconduct or policy violations. The Speak Up Line is not intended for inquiries about compensation, benefits, the content of policies or other general questions.

If you have a question, please contact your direct manager or another member of management. You may also ask your business-aligned Senior Compliance Officer, the Conduct Risk Management Office, Global Human Resources (GHR) or the Legal Division. The Conduct Risk Management Office maintains a mailbox at ethics@statestreet.com. The GHR Service Center may be contacted by clicking the link: GHR Service Center and opening a ticket.

Note: Whistleblower Protection Laws

Many jurisdictions have laws that prohibit State Street from taking any action to impede an individual from communicating directly with certain government and self-regulatory authorities about possible violations of law. The Speak Up Line is not intended to prohibit or otherwise impede employees from making such direct reports. State Street will not tolerate any discipline or other retaliation against any employee who properly makes such legally protected disclosures.

EU Regulators

Note: Personal Data Processing

Personal data will be collected, processed and used only for handling the reported violation. Only as required for this purpose, State Street may share or transfer your personal data with or to relevant State Street employees and external advisors, even outside your country of residence. In many countries, in order to report you must agree to the collection, processing, transfer and use of personal data you provide. You may review the full Speak Up Line data privacy and protection notice online at any time here: https://statestreet.speakfullynow.com.