

Ceffu Custody FZE's Whistleblowing Guideline

Ceffu Custody FZE ("**Ceffu**") is committed to conducting our business with honesty and integrity. Ceffu expects all its Employees to maintain high standards in accordance with its Code of Conduct.

Confidentiality

Ceffu's Employees are encouraged to report suspected wrongdoings to their line manager or the local Compliance Officer as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate. Ceffu's Employees are assured that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Ceffu assures that the confidentiality of the whistleblower will be protected. In the event Employees want to raise their concerns confidentially, Ceffu will make every effort to keep their identity a secret. Ceffu does not encourage Employees to make disclosures anonymously unless they deem it absolutely necessary, although Ceffu will make every effort to investigate anonymous disclosures. It is more difficult or impossible to conduct proper investigation if Ceffu is unable to obtain further information from you in the case of an anonymous disclosure. In practice, it can also be more difficult to establish whether any allegations are credible where the disclosure is anonymous.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoings or dangers in relation to the activities of Ceffu. This may include:

- a) A criminal offence;
- b) Failure to comply with any legal or professional obligation or regulatory requirement;
- c) A miscarriage of justice;
- d) Danger to health and safety;
- e) Damage to the environment;
- f) Breach of our internal policies and procedures including our Code of Conduct;
- g) Conduct likely to damage our reputation or financial wellbeing;
- h) Bribery;
- i) Facilitating tax evasion;
- j) Financial fraud or mismanagement;
- k) Violation of Employees' dealing policy;
- l) Money laundering and/or terrorist financing;

- m) Sanctions violations;
- n) Market abuse;
- o) Unauthorised disclosure of information, including but not limited to Confidential Information (as defined in our Communications Policy); and
- p) 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. Any Ceffu's Employees with genuine concern related to suspected wrongdoing or danger affecting any activities should report the concern.

Raising a Whistleblowing Concern by Member of Public

Should any member of public become aware of any of Ceffu's employees or individuals acting on behalf of Ceffu engaging in acts of suspected misconduct, you can report your concerns through the following channels:

- Email to: compliance_dubai@ceffu.com
- Phone +971-4-5232416
- Mail to: Ceffu Custody FZE: Office 229 - Level 2, The Offices 1, One Central District, Dubai - UAE

Whistleblowing Investigation

Once a concern is raised, Ceffu will carry out an initial assessment to determine the scope of any investigation and the whistleblower may be required to provide additional information. Ceffu will appoint an investigator or team of investigators, including Employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable Ceffu to minimise the risk of future wrongdoing.