

1 Purpose

MarTrust Europe, S.A. ("**MarTrust**"), part of the Marcura Group (the "**Group**"), undertakes to comply with Whistleblowing rules and regulations.

This Policy establishes the series of internal rules and procedures regarding the communications of serious irregularities, in compliance with the applicable legislation and regulations, in particular Article 116-AA of the General Regime of Credit Institutions and Financial Companies (the "RGICSF"), Article 35 of Bank of Portugal Notice no. 3/2020, Article 20 of Law no. 83/2017, of 18 August and Chapter V of Instruction 18/2020 and Law no. 93/2021, of December 20.

2 Scope

This Policy must be complied with by all MarTrust employees and is alongside the Group Whistleblowing Policy.

3 Policy

This Policy describes and establishes guidelines that enhance a transparent ethical environment, disclosing channels where individuals can raise their concerns, irregularities, poor practices, and behaviours, as well as the process on handling this information.

4 Definition of whistleblowing

Whistleblowing is the disclosure of information that relates to suspected wrongdoing, dangers or other irregularities at work and may be reported under the following categories:

Abuse of power	Embezzlement	Procurement fraud
Auditors act	Ethics and integrity	Protection of privacy and personal information
Bribery	Finance reporting and accounting	Rights and protection of individuals
Company reputation	Fraud	Security of network and information systems
Conflict of interests	HR related matters	Serious breaches of work safety
Corruption	Money laundering	Sexual exploitation, abuse, or harassment
Criminal offenses	Occurrences involving an employee	Theft
Discrimination	Other	Unacceptable behaviour

If you are uncertain whether something that you have knowledge about or have witnessed is reportable within the scope of this Whistleblowing Policy, you can seek advice from the Responsible for the Compliance Function ("RFC") for MarTrust Europe or Line Manager, or alternatively, you can submit the report.

If, when submitting the report, you are unsure of which category would be the best suited to the specific situation, you can submit under the category "Other". In any case, even if you selected a category which the person responsible for the investigation believes is incorrect, this does not mean that your submission will not be investigated but reclassified accordingly and investigated as such.

5 Communication channels

Irregularities should be presented through the following channels, at the choice of the person who is communicating ("Whistleblower"):

- (i) Internal channels:
 - a. Whistleblower Software, available via:

<https://whistleblowersoftware.com/secure/MarTrust/new>

- b. In a meeting - the meeting must be scheduled by e-mail to mlro@martrust.com, within a reasonable time in advance (but as soon as practicable, considering the severity of the breach or irregularity communication).
- (ii) External channels:
- a. Banco de Portugal – to report breaches or irregularities related to the Legal Framework of Credit Institutions and Financial Companies (RGICSF), available via: <https://www.bportugal.pt/>
 - b. DGAJ (“*Diretoria-Geral da Administração da Justiça*”) – to report corruption and fraud related issues, available via: <https://dgaj.justica.gov.pt/Formularios/Denuncia-de-pratica-de-atos-de-corrupcao-ou-fraude>

The Whistleblower Software permits the irregularity to be reported in writing or orally and grants the possibility of reporting it confidentially or anonymously, in accordance with the laws and regulations on this subject.

By selecting the “Report confidentially” option, the identity of the Whistleblower will only be known to those who handle the case confidentially, and it will appear anonymous to others in cases under processing.

By selecting the “Report anonymously” option, the Whistleblower chooses not to provide the identity to anyone in the process. The Whistleblower will have the option to include an e-mail to receive updates, which will not be disclosed to any individual involved in the process.

The RFC, together with the Sole Auditor, is responsible for monitoring the procedure for reporting irregularities and for ensuring that the registration and analysis process is properly implemented and that the measures deemed appropriate are effectively adopted.

5.1. Whistleblower Software – Outsourcing

GLCD is responsible for contracting the outsourcing of the Whistleblower Software, and all relevant aspects to the outsourcing of this service, including but not limited to the monitoring of service level agreements, key performance indicators and incidents.

MarTrust's Compliance team is responsible for the annual assessment of the service provider based on what GLCD team has reported.

Any incidents related to this Whistleblower Software must be informed immediately by GLCD to the RFC and Responsible for the Risk Management Function (“RFRM”), who will determine the next steps.

The outsourcing of the whistleblowing software should follow MarTrust’s Outsourcing Policy.

6 Investigation and handling of irregularities

When an irregularity is submitted, it will be directly sent to MarTrust’s RFC, who will be responsible for its analysis and investigation. The RFC can delegate the analysis and investigation, if necessary, to a member of Compliance Team of MarTrust.

The RFC will review (with the Sole Auditor, when applicable) all the facts that fall within the scope of this Policy, in respect of irregularities, having access to all relevant documentation, as applicable, and must ensure a fast and effective treatment of such irregularities resulting in the appropriate corrective measure.

The irregularities shall also be transmitted to the higher hierarchical level of the subject of the complaint when such transmission does not jeopardize the purpose of the whistleblowing procedure, and if that's the case, to Bank of Portugal.

To ensure a rigorous and impartial review, any person that, even indirectly, may have a conflict of interest with the disclosure of the review process or with the matter subject to investigation, will be automatically prevented from access to the review process.

The RFC (or Sole Auditor, when applicable) shall inform the Whistleblower of the conclusions of the review process and of the measures (if any) that have been adopted because of the review process of the irregularity communicated. In the case of irregularities communicated anonymously, should there be a corrective action, or additional controls put in place, because of the irregularity communicated and whereas this is possible, a general communication will be made to the company highlighting the implementation of said measures. This communication can be delivered through several means, including orally.

7 Confidentiality and prohibition of retaliation

The Whistleblowers who legitimately report the irregularity, must not be subject to retaliation, discrimination, or any other type of unfair treatment.

The information received regarding the breach or irregularity, the Whistleblowers and reported persons, as well as any third party mentioned in the report shall have confidential treatment (unless disclosure is required under national law in the context of further investigations or subsequent judicial proceedings), and not authorised access is forbidden. Personal data received shall be protected under Regulation (EU) 2016/679 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and other applicable data protection legislation.

Any disclosure of information should be preceded by written communication to the Whistleblower person indicating the reasons for disclosure of the confidential data in question unless the provision of such information compromises investigations or related legal proceedings. Personal data which are manifestly not relevant for the handling of a specific report shall not be collected or, if accident tally collected, shall be deleted without undue delay by MarTrust.

The above mentioned will not be applicable in case the Whistleblower has participated in any irregularity reported if the Whistleblower has acted unfairly or deliberately reported a forged irregularity.

If we conclude that a Whistleblower has made false allegations maliciously or with a view to personal gain, the claim will be considered illegitimate, and the Whistleblower will be subject to disciplinary action.

8 Acknowledgement and communication

The RFC shall acknowledge receipt of all communications received through the Whistleblowing Software above within 7 days and shall provide a response to the reporting person within reasonable time (which shall not exceed 3 months following acknowledgment of receipt of the communication) unless the communication is anonymous. The same terms apply to irregularities reported during meetings.

9 Registration of communications and record keeping

The communications received are recorded in a specific database, and each record shall contain at least:

- i. Identification number of the communication;
- ii. Date of receipt;
- iii. Channel through which the communication was received;
- iv. Brief description of the facts communicated and analysis of the communication;
- v. Legal classification of the facts;
- vi. Steps taken to investigate the facts communicated;
- vii. Status of the matter;
- viii. Outcome of the investigation;
- ix. Date of sending the reply to the whistleblower, where the communication is not anonymous;
- x. Description of the measures taken or to be taken because of the communication or reasons for not taking any measures.

All communications received under this Policy in electronic form, as well as all reports produced, shall be kept for a period of five years, without prejudice to the time limits defined in respect of the prevention of money laundering and terrorist financing (seven years).

A report should be produced after the participations have been registered and analysed. The Compliance team will regularly present management information on the number of participations received or on the absence of participations during the period. The RFC is responsible for submitting to Banco de Portugal the Whistleblowing Annual Report by 15th of November of each year, with reference to reports received between 15th of November and 30 of September of the following year.

10 Policy reviews

MarTrust will periodically review this Policy in accordance with relevant legislation to ensure that it remains compliant and to ensure that its systems and controls are applied with due skill, care, and diligence always.

11 Policy compliance

The RFC will verify compliance with this Policy through several methods, including, but not limited to, business tool reporting, internal and external audits. All employees, contractors, suppliers, and third-party users of MarTrust's information systems are required to adhere to this Policy.

Any exception to this Policy must be approved by the RFC after consulting other relevant departments.

12 Ownership and responsibilities

Ownership of this Policy and the maintenance of its revisions are up to MLRO. It is the responsibility of all users of systems, organizations, or individuals with access to the Group's networks and resources to establish and comply with the security measures outlined in this Policy.

All inquiries and questions related to the application of this policy should be directed to the RFC.

13 Execution

An employee who has violated this Policy may be subject to:

- HR disciplinary proceedings, until termination of employment/contract; and/or
- Other actions deemed appropriate by MarTrust Management and/or Department; and/or
- Civil or criminal liability in accordance with applicable laws.