

Bitpanda Custody MENA FZCO

Whistleblowing Policy

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Background

Bitpanda Custody MENA FZCO ("**Bitpanda**") is committed to maintaining an open culture with the highest standards of honesty, transparency, integrity and accountability, where all customers can report any legitimate concerns in any area of operation in confidence and at any time they deem appropriate, but preferably as soon as possible upon becoming aware of an event.

For this reason, this policy is designed to allow the disclosure of information that may indicate malpractice, unethical conduct, or illegal practices within Bitpanda, without the fear of prosecution or any type of repercussions on the reporting individual as long as the notification is made in good faith. The reporting channel includes principles for protecting all subjects of this policy from any harm or discrimination if they do report improper or illegal conduct within Bitpanda, provided that they act in good faith.

Scope

This Policy is intended to allow reporting of concerns that relate to suspected wrongdoing or are considered unethical, illegal or against applicable Bitpanda policies and values. The main purpose of this policy is to set out a mechanism for reporting, investigating, and remedying any such misconduct.

What is Whistleblowing?

Whistleblowing is the act of reporting suspected wrongdoing, improper practice, concerns, or dangers in relation to companies' activities. Whistleblowing is the courageous act of an individual revealing information or misconduct that is illegal, unethical, or poses a threat to public interest. It may involve the disclosure of sensitive information, such as fraud, corruption, safety violations, or any form of wrongdoing within a company or government entity. Whistleblowers expose these actions driven by a sense of moral duty or concern for the greater good. Their disclosures aim to shed light on hidden truths, preserve accountability, and bring about necessary changes to rectify the wrongs they have identified. Whistleblowing serves as a critical

mechanism for transparency, accountability, and upholding ethical standards within organizations and society at large.

Anonymity is often employed by whistleblowers to shield their identity and protect themselves from potential harm when disclosing sensitive information. However, Whistleblowing on a named basis is possible. Protecting good faith whistleblowers from retaliation and ensuring confidentiality is paramount, as it fosters an environment of trust, encourages individuals to come forward with crucial information, and safeguards them from adverse repercussions, thereby upholding the integrity of the whistleblowing process.

What can be reported

A reportable conduct consists of any serious concerns that a whistleblower could have about service provision or the conduct of Bitpanda or its representatives, or of others acting on behalf of the Bitpanda, including that which:

- contradicts Bitpanda's core values and policies;
- does not comply with established standards of practice of Bitpanda; or
- is generally considered unlawful, unethical, or otherwise improper behavior.

Such concerns may relate to (without limitation) the following matters, or attempts to conceal any of them:

- violation of applicable laws, regulations, or statutory requirements;
- money laundering, terrorist financing, or sanctions violations;
- market manipulation or insider trading;
- fraud, embezzlement, or theft;
- corruption, bribery, or breach of trust;
- financial malpractice, impropriety, or fraudulent financial reporting;
- breach of professional conduct standards or Bitpanda's policies and procedures;
- unauthorised use of data, information, funds, or assets;
- disclosure of confidential or proprietary information without authorisation;
- violation of data protection, data privacy, or data security obligations;
- bullying, harassment, discrimination, or victimisation;

- failure to declare conflicts of interest;
- actions endangering the health, safety, security, or wellbeing of employees, customers, or the public; and
- environmental damage or failure to comply with environmental regulations.

A disclosure will be treated confidential (unless Bitpanda is required to make a disclosure pursuant to applicable law) and will be protected from retaliation provided that the whistleblower acts in good faith and has reasonable grounds to believe that the information disclosed is true at the time of the disclosure.

Data to be included in the report

Although the whistleblowing might be anonymous, in order to perform a proper investigation, every whistleblower must provide Bitpanda with the following information (as applicable):

- the general nature of the concern;
- relevant and/or material facts and reasonable grounds giving rise to the concern, including dates and times;
- how the whistleblower became aware of the issue;
- the names of any persons or representatives involved, their roles and their respective departments;
- the whistleblower's relationship to the person(s) involved;
- possible other witnesses' names; and
- prior efforts to address the problem, if any.

Making a report

To facilitate anonymous reporting and ensure the confidentiality of the sender, use the following whistle blowing tool:
https://bitpanda.integrityline.app/