

Tokinvest Policy

Whistleblowing Policy

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Change History

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1 Definitions

Qualifying Disclosure; a disclosure of information that is made in good faith and relates to a reasonable suspicion that an entity, or any of its employees or officers, has or may have i) Contravened a provision of any applicable law administered by the Dubai Financial Services Authority (DFSA); or ii) Engaged in money laundering, fraud, or any other financial crime.

Staff, "You", "you", "Your", "your": All Tokinvest directors, officers, agents, employees, temporary workers, interns, consultants, contractors or any other person who is employed by or otherwise works; Vendors, for or on behalf of Tokinvest, regardless of the duration of their employment contract or other type of relationship.

Tokinvest, "We", "we", "Our", "our": All companies, including subsidiaries and joint ventures, over which Tokinvest Limited is able to exercise control, either directly or indirectly, with respect to policies and procedures.

2 Purpose

We are committed to building the whistleblower framework which includes the protection of whistleblower. The main objective of this policy is to ensure that no whistleblower, for reason of having made the disclosure:

- Be subject to civil or contractual liability;
- Have any contractual, civil, or other remedy or right enforced against them by another person; or
- Be dismissed from their current employment, or otherwise subject to action by their employer (or its related parties) that is reasonably likely to cause them detriment.

3 Scope

This policy applies to staff of all levels including third parties.

4 Compliance Officer's Role and Responsibilities

The Compliance officer will be primarily responsible for

- Overseeing the management, implementation and compliance of this policy;
- Where applicable, referring concerns raised to, or seeking assistance from, other departments or teams in connection with investigations, or obtaining advice from internal policies, guidelines and procedures;
- Communicating with relevant employees and third parties to whom concerns within the scope of this policy have been raised directly;
- Monitoring the quality of services of the reporting channel, including the confidentiality and record keeping obligations; and
- Managing and maintaining oversight of investigations and other departments are likely to be called upon to assist.

5 Qualifying Disclosure

A qualifying disclosure is a disclosure of information that is made in good faith and relates to a reasonable suspicion that an entity, or any of its employees or officers, has or may have:

- Contravened a provision of any applicable law administered by the Dubai Financial Services Authority (DFSA); or
- Engaged in money laundering, fraud, or any other financial crime.

5.1 Examples

5.1.1 Fraud

Fraud is commonly used to describe a wide range of misconducts including theft, corruption, embezzlement, bribery, forgery, misrepresentation, collusion, money laundering and concealment of material facts. It often involves the use of deception to make a personal gain for oneself, a connected person or a third party, or a loss for another - intention is the key element that distinguishes fraud from irregularity. Fraud does not just have a potential financial impact, but it can cause damage to the reputation of an organisation responsible for managing funds effectively and efficiently.

5.1.2 Money Laundering

Money laundering is the illegal process of making large amounts of money generated by a criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source. The money from the criminal activity is considered "dirty", and the process "launders" it to make it look clean.

6 Protection of Whistleblower

We are dedicated to safeguarding whistleblowers, ensuring their full confidentiality. Disclosures made under this policy will be handled based on specific and credible information or documents, without breaching any of our recognized ethical standards.

A whistleblower will have the following protection:

- Non-disclosure of information concerning his identity and whereabouts;
- No whistleblower will be considered to have violated the provisions of legalization, agreements & representations related to disclosure of confidential information, whether in the entity for which the whistleblower works or deals with, unless the report is false.

Damage or injury from which the whistleblower may be protected:

- Revenge, harassment or prosecution by other employees;
- Bias against the whistleblower (internally/externally) in the present or the future.

7 Reporting Concerns

Concerns regarding actual or suspected wrongdoing may be raised via the following confidential reporting channels. All reports will then be sent directly to our Chief Compliance Officer by email: compliance@tokinvest.capital

Employees may raise concerns of suspected wrongdoing in writing, with their line manager. If an employee does not feel comfortable to raise the concern with his/her manager, this can be raised with an alternative manager. The matter should then be immediately referred to the Chief Compliance Officer by the manager who has received the report.

7.1 Recordkeeping of Concerns

We keep a log of any disclosures and whistleblowing details. We will conduct investigation into all credible concerns that are reported. When submitting a report, please provide as much detail as possible, including names and dates, etc., in order to help facilitate fact finding/investigation process.

We recognize that in some cases whistleblowers may not feel comfortable identifying themselves. In these cases, reports may be submitted anonymously. Please note, however, that anonymous reports could limit our ability to thoroughly investigate a concern.

If a knowingly false report is made, for personal gain or any other motive, the person making the report will be investigated. This may result in disciplinary action in the case of employees, including termination of employment.

8 Investigation Process

Upon receipt of any concerns raised under this policy, our Compliance Officer will evaluate whether the concern is within the scope of this policy and will assess the severity of the concern and determine whether a further investigation is required to properly resolve the matter.

Appointed investigators will be completely detached from any teams related to the subject matter of the reports. Investigations may, in certain circumstances and particularly where the matter is sensitive or serious, be conducted by external parties and/or relevant regulators and authorities.

We are committed to the fair treatment of all individuals who are involved in an investigation, including those who are under investigation or those whose identity becomes relevant in the course of an investigation.

8.1 Filing to Authorities

If the result of the investigation and legal advice results in evidence of criminal activity, applicable laws and procedures shall be followed including filing to the relevant authorities in the UAE.

8.2 Violations

If an employee violates this policy, action will be taken according to the relevant laws in the UAE.

9 Policy Maintenance

This policy will be reviewed each calendar year by the Chief Compliance Officer.