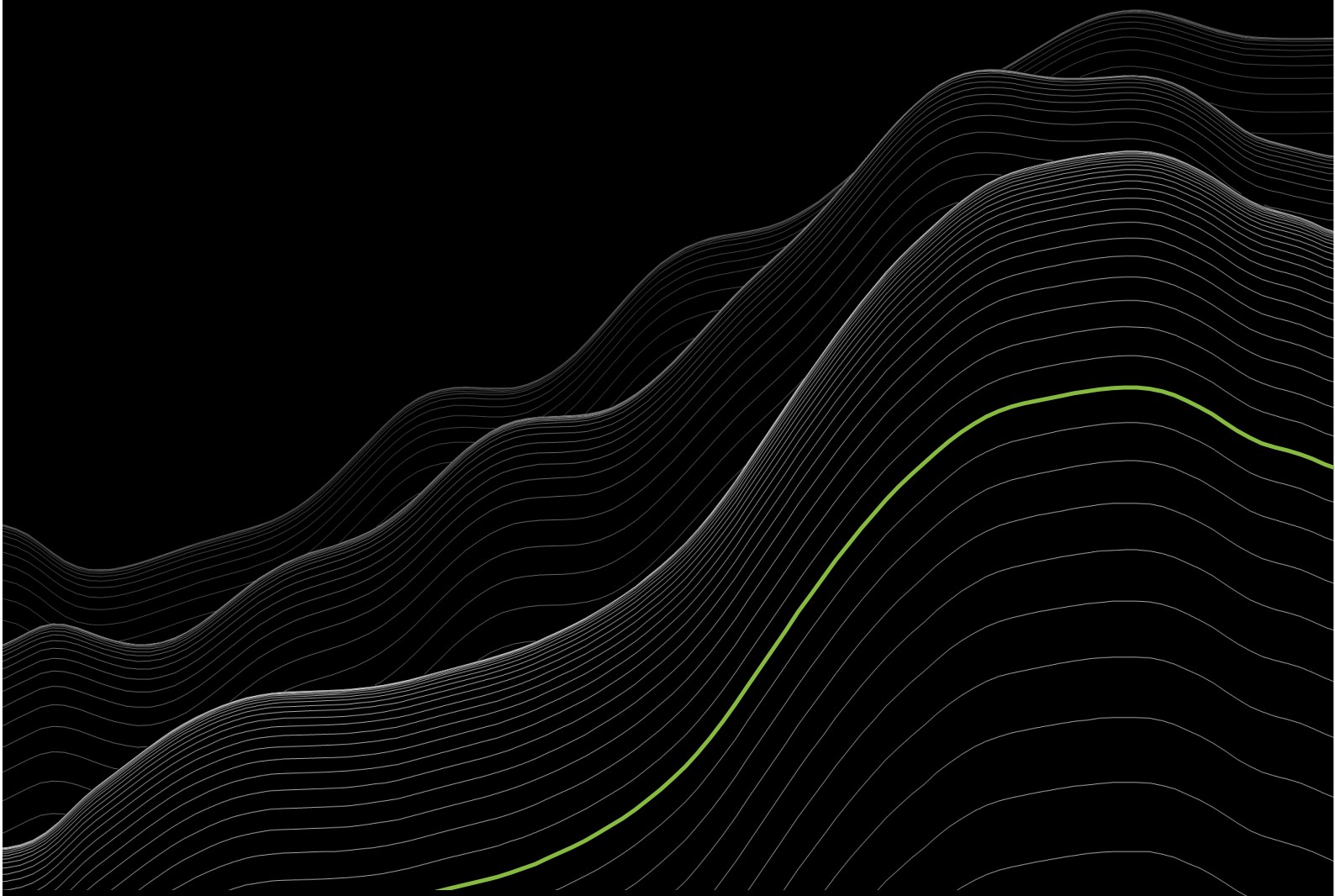
Whistleblowing Procedure

Legal, Compliance and Non-IT Risk



18 December 2025

Version 3.3

ORTEC FINANCE

Policy Information

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3.2	July 2025	Third version
3.3	December 2025	Final version

Approval

This whistleblowing procedure has been formally approved by the Executive Team as of 18 December 2025.

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1.Introduction

This whistleblowing procedure (the '**Procedure**') is applicable for Ortec Finance B.V. and all its affiliates and subsidiaries (together, '**Ortec Finance**'). The Procedure is primarily based on compulsory law, being the Dutch Whistleblowing legislation, the English Public Interest Disclosure Act 1998 (PIDA) and the Australian Corporations Act 2001. In addition, local guidance has been implemented for other countries in scope. An overview of the legal basis for each country is shown in Annex IV.

Definitions used in this chapter have been defined in chapter 2 and 3.

In this Procedure, the term '**you**' is used when addressing the person making a Report directly, particularly in the main procedural sections. In formal role descriptions and annexes, the term '**the Reporter**' is used."

1.1. Ortec Finance values

Ortec Finance strives to be independent and reliable. This enables us to offer our clients the best service, our Employees a safe working environment and a positive contribution to society. Integrity and transparency are critical for achieving these goals. One important tool to safeguard the integrity of Ortec Finance is to offer our Employees and Third Parties the possibility to Report any (suspected) Reportable Conduct within the company without the fear of Unfair Treatment.

1.2. Goal of the Procedure

The goal of this Procedure is to provide guidance and rules for our Employees and applicable Third Parties to make a Report about (suspected) Reportable Conduct within Ortec Finance while being protected against possible Unfair Treatment of making such a Report.

1.3. Contents

This Procedure is divided into multiple parts to make it more easily understandable.

- Definitions and the Procedure in general
- Annex I: Responsibilities of the different roles in this Procedure
- Annex II: The Investigation
- Annex III: The protection against Unfair Treatment
- Annex IV: Legal basis
- Annex V: Visual of the internal Procedure

Whenever this Procedure refers to actions Ortec Finance must take, it means the Managing Board, or in case a member of the Managing Board is involved, it means that the non-executive members of the Board will take these actions.

2. Definitions

Advisor	A person who has a duty of confidentiality by virtue of their position and who is consulted by an Employee in confidence regarding concerns about (suspected) Reportable Conduct.
Confidential Counsellor	An independent party that can be consulted by Reporters or people who need more advice regarding the possibility of making a Report.
Contact Person	The person appointed as the contact person by the Compliance Officer in consultation with the Reporter, after receiving the Report and with the aim of preventing Unfair Treatment.
External Body	The body to which the Reporter reasonably believes it is most appropriate to make an external Report of the (suspected) Reportable Conduct. Examples are: • **Australia**: Australian Securities and Investments Commission (ASIC); • **Canada**: Office of the Public Sector Integrity Commissioner; • **Switzerland**: Schweizerisches Bundesgericht; • **Singapore**: Workforce Singapore (WSG); • **The Netherlands**: DNB, AFM, House for Whistleblowers (*Huis voor klokkenluiders*) or the Dutch National Police; • **United Kingdom**: Serious Fraud Office (SFO).
Investigation	The actions taken by the Investigators to verify the accuracy of the Reporter's claims and, if necessary, conduct further inquiries or take appropriate measures.
Investigators	Those people whom the Compliance Officer appoints to carry out the Investigation into the (suspected) Reportable Conduct.
Personal Work-related Grievance	A grievance about any matter in relation to an Employees' current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for Ortec Finance. Examples are: • interpersonal conflicts; • A decision relating to the engagement, transfer or promotion of the Employee; or • A decision relating to the terms and conditions of engagement of the Employee. A decision to suspend or terminate the engagement of the Employee, or otherwise to discipline the Employee.

Report	A report of concerns about (suspected) Reportable Conduct pursuant to this Procedure.
Reportable Conduct	Concerns based on reasonable grounds about a deficiency, injustice, or wrongdoing of a general, operational, or financial nature that arises in respect of a matter for which the organization is responsible. This includes concerns that are sufficiently serious that they are not covered by standard working procedures and exceed the responsibility of the immediate manager.
Reporter	The Employee or Third Party who has reported (suspected) Reportable Conduct pursuant to this Procedure.
Unfair Treatment	Refers to taking any measure with a negative effect, which Ortec Finance strictly prohibits. This includes actual or threatened conduct such as (without limitation): a) Dismissal of the Reporter, except at his own request; b) Early termination of a temporary employment contract or failure to renew the same; c) Failure to convert a temporary employment contract into a permanent employment contract; d) Taking any disciplinary measure; e) Alteration of position or duties; f) Discrimination; g) Harassment, bullying, or intimidation; h) Victimization; i) Harm or injury, including psychological harm; j) Damage to a person's reputation; k) Damage to a person's business or financial position; or l) Any other detrimental action that would not have been taken but for the act of reporting Reportable Conduct.

3.Scope of this Procedure

3.1. Who can file a Report?

People who can make a Report fall in one of two categories:

- Any person who carries out or has carried out work under an employment contract for Ortec Finance (an '**Employee**'); or
- Any natural person or legal entity not affiliated with Ortec Finance or that is not employed in any capacity by Ortec Finance. (a '**Third Party'**).

This policy is intended to apply to the above people in all countries in which Ortec Finance operates a business.

3.2. Issues covered by this Procedure

This Procedure covers (suspected) Reportable Conduct, which may consist of the following acts or behaviors:

- Dishonest, illegal, or fraudulent professional activity or behavior.
- Failure of another person to act appropriately or in accordance with the law when carrying out their duties.
- Criminal offences.
- Questionable accounting and audit issues.
- Deliberate concealment of abuses and irregularities.
- Breach of (client) confidentiality.
- Serious breaches of organizational rules and procedures (oppressive or gross negligent).
- Insider trading.
- Bribery and corruption.
- Fraud.
- Market abuse.
- Serious irregularities in (financial) reporting.

3.3. Issues not covered by this Procedure

For the avoidance of doubt, Reportable Conduct does not include Personal Work-related Grievances. These should be reported to the Reporter's manager or the Compliance Officer.

3.4. Making a false or misleading Report

Reporters who purposefully make a false or misleading Report will not enjoy the protection offered by this Procedure. The Reporter must comply with the terms and conditions and steps in this Procedure.

3.5. Distinction internal and external Procedure

Employees can choose to make a Report within the organization of Ortec Finance (the internal procedure) or directly to an External Body (the external procedure). Third Parties can only make a Report through the external procedure.

3.6. Who to approach for advice

3.6.1. **Advisor.** You can discuss (suspected) Reportable Conduct with an Advisor. This can be an internal or external Advisor. Your identity and the matters discussed will be treated with strict confidentiality by the Advisor. An example of an external Advisor would be the Confidential Counsellor. The Compliance Officer can assist the Advisor in identifying whether or the matters discussed fall under the scope of this Procedure. The Compliance Officer will only be involved during this stage if you agree to its involvement.

3.6.2. **Compliance Officer.** You can also directly contact the Compliance Officer about your concerns regarding (suspected) Reportable Conduct that possibly exist in Ortec Finance. Should the Compliance Officer not be available, then the Employee can voice their concerns to another Employee of the Legal & Compliance Department (whenever this Procedure refers to the Compliance Officer, it also means the person acting in the same capacity when the Compliance Officer is not available/not working on the case).

3.6.3. It is important for a Reporter to understand that by asking for advice it is NOT making a Report. The act of making an actual Report is described in the next chapter.

4. Internal Procedure

4.1. Making a Report

4.1.1. The Procedure does not require a certain form; it can be done orally, in a written letter or by e-mail. However, since it's more beneficial for the Procedure and possible Investigation into the concerns, it is advisable for the Reporter do submit the concern in writing.

4.1.2. You can choose to make the Report anonymously and to remain anonymous over the course of the whole Procedure and after. There are two ways of making an anonymous Report:

i. Request to remain anonymous as part of the Report.
ii. Making a Report by using anonymized channels (anonymous phone number, unrecognizable email address, written letter, etc.)

However, it should be noted that by remaining anonymous, it may limit (partially or completely):

i. the ability of Ortec Finance to acknowledge receipt of the report and to keep the whistleblower informed of the various stages of processing in some cases (i.e., due to privacy or IT security concerns, or lack of means to contact the whistleblower, etc.);
ii. the ability of Ortec Finance to investigate the Report (i.e., if there's no way to contact the Reporter to clarify the disclosure; alternatively, the success of an Investigation could be hampered by the need to maintain the anonymity of the Reporter); and
iii. the ability of Ortec Finance to take specific measures to protect the whistleblower.

4.1.3. For the Procedure to function as efficiently as possible and to make sure that Ortec Finance can perform a solid Investigation, the Reporter is encouraged to include as many details as possible about the (suspected) Reportable Conduct. The Reporter will ultimately need to provide all relevant facts, information, or documents in his/her possession, regardless of their form or medium, to support the Report.

4.1.4. You can make a Report to the Compliance Officer or the Confidential Counsellor.

Ortec Finance Compliance Officer

Ortec Finance B.V. - Compliance Department Boompjes 40 3011 XB Rotterdam	**E-mail** (clearly mark the envelope as '**CONFIDENTIAL**') compliance@ortec-finance.com

Confidential Counsellors

For the contact information of the Confidential Counsellors, we refer you to the Ortec Finance website (www.ortecfinance.com) under the section "Whistleblowing" or if you are an Ortec employee, you can also find the most up-to-date information on the Ortec Finance intranet page (Orbit).

4.2. The initial Report

4.2.1. In case you raised the concerns orally, the person that was contacted about these concerns will ensure that these concerns are recorded in writing. They will present what they've recorded to you for approval and signature and give you a copy of this Report.

4.2.2. The chosen channel will forward the Report to the Compliance Officer. After receipt of the Report, the Compliance Officer will send you confirmation that the Report has been received within one (1) week. The confirmation of receipt will include a brief description of the Reportable Conduct, the date of receipt and a copy of the Report. The Compliance Officer will appoint, in consultation with you, a Contact Person with the aim of preventing Unfair Treatment.

4.3. The Investigation

4.3.1. The Compliance Officer will set up an Investigation concerning the reported concerns unless the concerns are not based on reasonable grounds or it is clear that the matter reported does not involve Reportable Conduct.

4.3.2. If an internal Investigation is to be conducted under this Procedure, the Compliance Officer will follow the International Bar Association (IBA) Guidelines for internal investigations, unless local law prescribes otherwise.

4.3.3. In case it's decided that there won't be an Investigation, you will be notified of this in writing in the same communication manner as used for the Report. This communication shall also state as to the reasons why it was decided not to investigate the (suspected) Reportable Conduct.

4.3.4. The Compliance Officer will also decide whether or not an External Body needs to be informed about the Reportable Conduct. In case an External Body is informed, the Reporter will receive a copy of this communication.

4.3.5. The Compliance Officer will also inform people involved in the process around documenting the Reportable Conduct about the decision that an External Body has been informed.

4.3.6. If it is decided to conduct an Investigation, you will be notified of this immediately in writing. This communication will also contain the names of the appointed Investigators and the Investigation assignment.

4.3.7. The Investigators will give you the opportunity to comment on the Investigation assignment and the Investigation team. This will be recorded in writing by the Investigators and presented to you for your approval and signature.

4.3.8. After the Investigation, the Investigators will draft an investigation report and give you the opportunity to comment on it. After the investigation report has been approved by the Investigators, they will send a copy to the you.

4.3.9. It is important during all these phases that you are kept informed. However, it can occur that it either legally not allowed or not in the best interest of the Investigation to share specific information with you at a certain phase of the Investigation. For detailed requirements and expectations regarding the conduct of the Investigation, please refer to **Annex II: Requirements for Investigation**.

4.4. Position adopted by Ortec Finance

4.4.1. Ortec Finance will inform you about the position it has adopted regarding the (suspected) Reportable Conduct. This communication will be in the form of written communication. In case of an anonymous Report, this communication will be in the same manner as used for the Report. The communication will also state the steps taken as a result of the Report. If the communication about the position adopted by Ortec Finance exceeds a period of twelve (12) weeks after the initial Report, Ortec Finance will state the reasons of the delay.

4.4.2. Ortec Finance will decide whether or not to inform an External Body about the initial Report, the Investigation and the position adopted by Ortec Finance. A copy of this communication will be sent to you if it is decided to inform the External Body and if there are no serious objections to do so.

4.4.3. People to whom the Report relates will also receive all notifications stated above, unless it could have a detrimental effect on the Investigation.

4.5. The right of the Reporter to respond

Ortec Finance will give you the opportunity to comment on the final investigation report and the position adopted by Ortec Finance. Should you claim that the matter concerned has not been investigated properly and/or contains fundamental inaccuracies or the position of Ortec Finance contains fundamental inaccuracies, Ortec Finance will respond to these specific points. If necessary and to the sole discretion of Ortec Finance, Ortec Finance will set up a new Investigation. In case an External Body has been informed by Ortec Finance, they will also receive your comments.

For a visual of the steps that are taken in the internal Procedure, see **Annex V: Visual of the internal Procedure.**

5. The external Procedure

5.1. Confidential Counsellor

5.1.1. You can make a Report at our Confidential Counsellor. The Confidential Counsellor will have a separate procedure which they will share with you when you want to make a Report through them. Reports done directly to the Confidential Counsellor will be treated with the strictest confidentiality by our Confidential Counsellor and your identity will not be shared with Ortec Finance.

5.1.2. There are no prior requirements for directly making a Report to the Confidential Counsellor except that you do not make a false or misleading Report.

5.2. External Bodies

5.2.1. You can also make a Report to an External Body. In order to comply with this Procedure and enjoy the protection of this Procedure, it can only be reported to an External Body in the following situations:

- You disagree with the position adopted by Ortec Finance following an internal Report and believe that your concerns have not correctly been dealt with;
- You have not been notified about the position of Ortec Finance within twelve (12) weeks after the initial Report;
- You may immediately make an external Report if you cannot be reasonably required to make an internal Report first, this includes cases where there is:
  a) immediate threat, where a significant and urgent public interest necessitates an immediate external Report;
  b) a reasonable suspicion that an executive member, board-member and/or the Compliance Officer is involved in the suspected Reportable Conduct;
  c) a clearly identifiable threat of falsification or destruction of evidence; or
  d) an earlier Report about the same (suspected) Reportable Conduct made in accordance with the internal reporting Procedure that did not put an end to the Reportable Conduct.

5.2.2. The Reporter can make an external Report to the External Body of which the Reporter reasonably believes that it is the most appropriate body to make an external Report of the (suspected) Reportable Conduct within Ortec Finance.

6. The internal Procedure

A Reporter should be aware of the general requirements of whistleblowing and appreciate that the following questions will need to be addressed during the course of a Procedure:

1. Am I an eligible Reporter?
2. Is the matter to be reported in relation to Ortec Finance?
3. Have I observed/witnessed or do I have reasonable ground to suspect the alleged Reportable Conduct?

   - If your answers are '**yes**' to all the questions above, please proceed to report.
   - If any of your answers above are "**no**" or unclear, a report may not be valid and reasonable.

For a clearer and more visual representation of the steps involved, please refer to **Annex V: Visual of the internal Procedure.**

Annex I: Responsibilities of the different roles in the Procedure

I.1. The Advisor

The Advisor will consult with the Employee about the suspected Reportable Conduct. The matter discussed and the identity of the Employee will be treated confidentially.

The role of Advisor can be fulfilled by an employee of Ortec Finance, the Confidential Counsellor or the advisory department of an External Body. Note that these are just some examples of parties that can fulfil this role. Other people or bodies can also fulfill this role.

I.2. The channel that receives the Report

The channel (Manager/ Compliance Officer) that's been approached by the Employee will explain the Procedure to the Reporter. If the Reporter decides to submit the suspected Reportable Conduct in a Report, the channel will forward the Report immediately to the Compliance Officer. If the concerns were voiced orally, the channel will record the communication in writing and present the document for approval and signature of the Reporter. The channel will immediately forward the Report to the Compliance Officer.

I.3. The Contact Person

I.3.1. The initial meeting with the Employee

The Contact Person is appointed by the Compliance Officer after consultation with the Reporter. Immediately after being appointed by the Compliance Officer, the Contact Person will discuss the risks of Unfair Treatment, how those risks can be reduced and what the Reporter can do if they believe that they are being treated unfairly. This discussion will be recorded in writing by the Contact Person and presented to the Reporter for approval and signature; the Reporter will receive a copy of this document. The Contact Person operates under the coordination of the Compliance Officer and is appointed to support and protect the Reporter. The Compliance Officer remains ultimately responsible for the overall handling of the Report and the implementation of any protective measures.

I.3.2. If the Reporter feels he is treated unfairly

If the Reporter believes that they are being treated unfairly, they can discuss this with the Contact Person. The Contact Person will make sure that this meeting will take place immediately or as soon as possible after the Reporter has contacted them. The Reporter and Contact Person will discuss the matter and which measures can be taken to prevent Unfair Treatment. This discussion will be recorded in writing and presented to the Reporter for approval and signature. The Contact Person will send this document to the Compliance Officer and a copy to the Reporter.

I.4. The Investigators

I.4.1. Appointment and the Investigation

The Investigators for the internal Procedure are appointed by the Compliance Officer. The Investigators will carry out their Investigation in an independent and impartial manner. They will give the Reporter the opportunity to voice their concerns. The Investigators have a right to interview other people. The Investigators will make sure that all interviews are recorded in writing and that the people they interviewed are presented

this recording for approval and signature, these people are also given a copy of this document. Further procedural requirements for Investigators are outlined in Annex II: Requirements for Investigation.

I.4.2. The investigation report

The Investigators shall prepare a draft of the investigation report and give the Reporter the opportunity to comment on the draft investigation report, unless serious objections exist to do so.

The Investigators will send the final investigation report to the Compliance Officer after they have approved the investigation report. They will also send a copy to the Reporter, unless serious objections exist to do so.

I.5. The Compliance Officer

I.5.1. Responsibility

The Compliance Officer is ultimately responsible for the handling and resolution of all Reports submitted under this Procedure. He is the case manager and central coordinator of all whistleblowing cases.

I.5.2. Appointment of a case chair

If the Compliance Officer deems it necessary, he may appoint an executive member as case chair to coordinate and/or lead the Investigation of a Report. The case chair will act as chairperson of the Investigation team and may involve other executive members as appropriate. This ensures independence and careful handling of complex or sensitive cases.

I.5.3. The person receiving the Report

If the Reporter has a preference regarding the gender of the person receiving the Report, the Compliance Officer will ensure that this preference is respected.

I.5.4. Receipt of the Report

The Compliance Officer will receive the Report and, upon receipt, send the Reporter confirmation that they have received the Report. This confirmation will contain the date of receipt, a brief description of the Report and a copy of the Report.

I.5.5. Assignment of a Contact Person

After receiving the Report the Compliance Officer will also, in consultation with the Reporter, assign a Contact Person with the aim of preventing Unfair Treatment.

I.5.6. Setting up an Investigation into the concerns reported

The Compliance Officer will set up an Investigation into the reported concerns, unless:

- The concerns are not based on reasonable grounds, or
- It is clear at the outset that the matter reported does not involve Reportable Conduct.

If the Compliance Officer decides not to set up an Investigation, they will inform the Reporter of this decision in writing within a reasonable time. The Compliance Officer will state the reasons why the concerns are not based on reasonable grounds or why the matter reported does not involve Reportable Conduct.

The Compliance Officer will assign the Investigation to Investigators who are independent and impartial. People, who are involved, may be involved or have been involved in the suspected Reportable Conduct cannot be assigned as an Investigator.

The Compliance Officer will inform the Reporter immediately in writing of the fact that an Investigation has been set up. This communication will also include the names of the Investigators and a copy of the Investigation assignment, unless serious objections exist to do so.

I.5.7. Informing external bodies and people related to the Report

The Compliance Officer will also decide whether or not an External Body needs to be informed about the Report. Should the Compliance Officer decide to do so, they will send a copy of this communication to the Reporter, unless serious objections exist to do so.

The Compliance Officer will inform people to whom a Report relates about the fact that a Report was submitted and, if applicable, that an External Body was also informed about the Report. Unless this could have a detrimental effect on the Investigation or enforcement.

I.5.8. Unfair Treatment

If the Compliance Officer receives a Report from the Contact Person that contains measures to be taken to avoid Unfair Treatment of the Reporter, the Compliance Officer will ensure that these will be implemented by Ortec Finance, provided they are reasonable and feasible within the operational and legal context.

I.6. Ortec Finance responsibilities

Ortec Finance will ensure that all documents, recordings and other related information regarding the Report is archived and stored. Furthermore, that it is stored in such a way that only people involved with the Report have access to the stored information. This means that the access is limited to the Compliance Officer, the appointed Investigators and the Contact Person, unless otherwise required by law or internal policy.

Ortec Finance will inform, in writing, the Reporter about the specific position adopted by Ortec Finance in relation to the Report. This communication will also contain the steps taken as a result of the Report. If the communication about the position adopted by Ortec Finance takes longer than a period of twelve (12) weeks after the initial Report, the notification will also contain the reasons for the delay.

Following the conclusion of the Investigation, Ortec Finance will decide whether or not to inform an External Body of the internal Report, the Investigation and the position adopted by Ortec Finance. Should Ortec Finance decide to do so, it will also inform the Reporter in writing and will send the Reporter a copy of the communication that was sent to the external party.

Ortec Finance will also send the notifications of delay and the communication to the External Body and to the people to whom the Report relates, unless this could have a detrimental effect on the Investigation or enforcement.

Ortec Finance shall give the Reporter the opportunity to comment on the investigation report and the position of Ortec Finance. In case the Reporter states that Ortec Finance did not actually investigate the suspected Reportable Conduct, or that it was not performed properly, or that there are fundamental inaccuracies in the investigation report or in the position adopted by Ortec Finance, Ortec Finance will respond to these specific points and if necessary set up a new or additional Investigation. In case Ortec Finance has informed an External Body about the Report, Ortec Finance will also send the Reporter's comments to the External Body. A copy of this communication will be sent to the Reporter.

Annex II: Requirements for Investigation

- The Investigators must be impartial and independent.
- The Investigators will have full access to all documents within Ortec Finance that they reasonably require for their Investigation. They will also give the Reporter the opportunity to voice their concerns and they may also interview other people. All interviews that they do will be recorded in writing by the Investigators and presented for approval and signature. A copy of this communication will also be given to the people interviewed.
- Other people may provide the Investigators with all documents that they reasonably consider being necessary for the Investigation.
- The Investigators will provide the Reporter a copy of the draft investigation report and give the opportunity to comment on it, unless serious objections to do so. The Investigators will then approve the investigation report and if there are no serious objections, give the Reporter a copy of the final investigation report.
- The Investigators will send the final investigation report to the Compliance Officer.

Annex III: The Protection against Unfair Treatment

When an Employee has, and in line with this Procedure, made a Report concerning (suspected) Reportable Conduct in good faith, they are protected by Ortec Finance against Unfair Treatment.

Protection against Unfair Treatment also applies if there are reasonable grounds to speak to the Reporter about their performance or to a measure with a negative effect, but the measure taken by Ortec Finance is disproportionate to the situation.

If Ortec Finance takes a measure with a negative effect within a short period after the Report was made, Ortec Finance will have to give justification as to why Ortec Finance considers the measure necessary and it will provide the reasoning and or evidence that this measure is not connected with the Report.

Ortec Finance will ensure that the managers and colleagues of the Reporter will refrain from any form of Unfair Treatment. This includes the following:

- Bullying, ignoring and excluding the Reporter;
- Making unfounded or disproportionate allegations about the performance of the Reporter;
- Imposing anything that amounts to a ban on the Reporter or their colleagues from investigating, speaking about the matter, attending their workstation and/or having contact with other people, regardless of how it is presented;
- Intimidating the Reporter by threatening to take specific measures or actions if they proceed with their Report;
- Discrimination of the Reporter;
- Harassing, bullying or intimidating the Reporter;
- Victimization of the Reporter;
- Harm or injury including psychological harm against the Reporter;
- Damage to a Reporter's property;
- Damage to a Reporter's reputation;
- Damage to a Reporter's business or financial position; or
- Any other damage to the Reporter.

Ortec Finance will speak with Employees who treat the Reporter unfairly about their actions; Ortec Finance may give the offending Employees a warning or take disciplinary actions against them.

The Contact Person will inform the Reporter about the risk of Unfair Treatment and what it entails. In case the Reporter believes that they are being subjected to Unfair Treatment by Ortec Finance, their manager or other colleagues, the Reporter can discuss this with the contact person. The Contact Person will discuss which measures can be taken to prevent Unfair Treatment from continuing or happening. Written communication will be drafted and sent to the Compliance Officer. Ortec Finance will ensure that these measures are taken.

Ortec Finance cannot guarantee immunity from disciplinary actions against the Reporter or people cooperating with the Investigation when they are or have been involved in the (suspected) Reportable Conduct.

Annex IV: Legal basis

To ensure this Procedure is compliant with local laws and regulations, we have reviewed and checked the relevant legislation in each country where Ortec Finance has offices. This review provides us with a clear understanding of the legal requirements and helps us maintain compliance across the following jurisdictions:

The Netherlands: Wet Bescherming Klokkenluiders (Whistleblowers Protection Act)

Australia: Corporations Act 2001 & Public Interest Disclosure Act 2013

United Kingdom: Public Interest Disclosure Act 1998 (PIDA)

Switzerland: No specific whistleblowing law.

Canada: Public Servants Disclosure Protection Act and Criminal Code

Singapore: No specific whistleblowing law.

In the event of any discrepancies between local legislation and this Procedure, the highest applicable standard will always prevail.

Annex V: Visual of the internal Procedure



ORTEC FINANCE

About us

We are a leading provider of technology and solutions for risk and return management. It is our purpose to enable people to **manage the complexity of investment decisions** themselves.

This is accomplished via the delivery of technologies and solutions for investment decision-making to financial institutions, wealth managers & advisors, and real estate companies around the world. Our strength lies in an effective combination of advanced modeling, innovative technology, and in-depth market knowledge. This supports investment professionals in achieving better risk-return ratios, leading to better results.

600+
Customers

96%
Retention rate

20+
Countries represented

14+
Trillion euros in assets managed by our clients

Headquartered in Rotterdam, The Netherlands, we have offices in Amsterdam, London, Zurich, Toronto, New York, Melbourne and Singapore.

contact@ortecfinance.com www.ortecfinance.com