

# WHISTLEBLOWING POLICY

Sparinvest S.A.

January 2025

Responsible for update: Compliance

**Sparinvest**

**HISTORY:**

Date	By	Comments
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2024/12/17	PAGH	No material changes made
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## 1 BACKGROUND AND PURPOSE

Sparinvest S.A. and ID-Sparinvest, Filial of Sparinvest S.A., Luxembourg (hereafter "Sparinvest") are required to protect persons who raise concerns about violations obtained in a work-related context.

The Whistleblowing Policy and Whistleblowing Scheme (i.e. the Whistleblowing Platform) are intended to assist persons who have experienced non-conformity or illegal activities, by providing protected channels for reporting, whilst protecting the whistleblower from victimisation, harassment and retaliation.

## 2 WHEN TO BLOW THE WHISTLE?

Our Whistleblowing Scheme covers persons (both internal and external) who have, or have had, any kind of relation with Sparinvest and/or its employees, and have concerns about any violations or wrongdoings such as, but not limited to:

- Acts or omissions that are unlawful or are against the object or purpose of applicable law.
- Information, including reasonable suspicion, about actual or potential breaches, which have occurred or is very likely to occur in Sparinvest.
- Breach or violation of secrets subject to confidentiality
- Fraud or disloyalty in the performance of duties, including non-compliance or negligence in complying with employee obligations
- Attempts to cover up violations.

Our Whistleblowing Scheme is intended solely for reporting suspected misconduct or irregularities. The Whistleblowing Scheme should not be used for complaints or to report on issues related to personal disputes.

If you wish to make a complaint, please do so as per the process described in the following documents: [Complaints procedure](#) (EN/LU) [Klagevejledning](#) (DK).

If you have concerns about violations or wrongdoings connected to Sparinvest, you can file a report through our protected channel found on our dedicated platform: [Whistleblowing Scheme](#) (the "Portal").

Sparinvest encourages you to report openly, by providing your name and contact details, as all reports are handled with strict confidentiality. However, you may also choose to report anonymously through the platform.

If you wish to report violations to an external party, you may choose to do this to the CSSF (The Commission de Surveillance du Secteur Financier). The external channel can be accessed here: [CSSF - Whistleblowing](#).

### 3 HOW ARE REPORTS HANDLED?

All reports sent through the Portal remain confidential between the person sending the report and the Sparinvest Compliance Department. Therefore, any information provided under the Policy will remain confidential, regardless of choosing to report anonymously or not, through the Portal. This also means that information on identity shall never be disclosed to the person who is subject to the whistleblowing report.

However, depending on the nature of the matter raised, Sparinvest may be required by law to disclose some of the information to a third party, in case of court proceedings and the involvement of the police. You will be informed if such disclosures are made.

In case, that the violation concerns any of the persons working in the Compliance Department, the whistleblower has the option to send the report to the Sparinvest CEO through the platform. Alternatively, the external reporting channel of the CSSF can be used (see above).

Whilst investigating the matter, the Compliance Department may require you to provide further information. Your co-operation after you have raised a matter is essential for the proper investigation of your concern.

Once the matter has been investigated, you will be informed about the findings of the report. If the raised concern proves to be well founded, the Compliance Department will raise the findings to the Sparinvest Senior Management who will take appropriate actions, whilst the confidentiality of your identity and information remains confidential. If the raised concern turns out to be incorrect or unfounded, it will be rejected in the system, and you will be informed. If the report was raised anonymously, you can log on to the secure inbox by clicking on 'Log in and follow your case' on the platform, using a case number and password to see the message.

### 4 PROTECTION OF THE WHISTLEBLOWER

You are not required to prove any matters raised under the Whistleblowing Scheme. An honest and reasonable suspicion that a violation has happened or is likely to happen, is sufficient.

All information, including the reporting, provided through the platform are always kept protected, as all data transmission and data storage are encrypted, and the system does not log IP addresses and device ID.

Sparinvest will not tolerate any retaliation, victimisation, harassment or other hardship of whistleblowers, as a direct consequence of the concerns raised. Therefore, all allegations of such treatment will be taken seriously, and if proven, disciplinary actions, including the possibility of dismissal may be taken.

### 5 PERSONAL LIABILITY

Maliciously making a false report under the Policy constitutes serious misconduct and is likely to trigger disciplinary sanctions and/or legal prosecution.

## **6 RECORD KEEPING**

A central record of all alerts will be held by the Compliance Department, which will provide an annual report on the outcome of investigations to the Senior Management and the Board of Directors.

If the whistleblowing report is unjustified, all material will be destroyed to protect all parties involved. Reports that fall into scope, and lead to disciplinary or judicial proceedings will be kept until the proceedings have ended.

## **7 EFFECTIVE DATE AND REVIEW**

The Policy is subject to an annual review by the Compliance Department.

The Policy was approved by the Board of Directors of Sparinvest on, January 27, 2025, after which the Policy is in force within the Sparinvest.