Group Whistleblowing Policy

2025

Authors:

Group Compliance

Document Governance

Version	Reference	Summary of Changes	Author	Approved By	Date
1.0		Initial version	Gurpreet Chahal Lisa Mann	-	February 2020
2.0		1. Introducing a new breach category (i.e., a breach of the FCA's conduct rules). 2. The replacement of the phrase 'case to answer' with 'issued to investigate'. 3. Increasing the period to investigate from 25 to 30 business days.	Becky Odlin	Carla Stent	October 2021
3.0		Change of Group Head of Compliance contact details.	Preena Tanna	Carla Stent	March 2023
4.0		Policy extended to include all regulated activity carried out in group.	Preena Tanna	Robert Pickering	March 2024
5.0		Branch appendices added (Spain, Italy, Germany)	Preena Tanna	-	May 2024
6.0		Change of Group Head of Human Resources contact details.	Preena Tanna	-	July 2024
7.0		Annual review, Abu Dhabi, New Zealand and Brazil appendices added, minor changes to other jurisdictional appendices	Preena Tanna		March 2025
8.0		Added additional whistleblowing channels for Spain and Italy as part of Hamilton Court Group integration	Tetiana Suddia	N/A	December 2025

Policy Owner	Group Head of Compliance
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MAREX

WHISTLEBLOWING POLICY

1. INTRODUCTION

Marex (the Firm) is committed to maintaining the highest standards of honesty and integrity in the conduct of its business and recognises the importance of the employee's vigilance and ability to report any concerns in achieving this goal.

Regulated firms appoint a Whistleblower's Champion to ensure there is senior management oversight of the integrity, independence, and effectiveness of the Firm's whistleblowing arrangements. The Whistleblower's Champion is the Group Chair.

This policy provides guidance on how to report any concerns an employee may have including all relevant contact details. This policy does not form part of an employee's contract of employment and may be amended from time-to-time.

Please note, this policy applies to all regulated Marex Group entities and its branches.

2. OBJECTIVES

The objective of this policy is to:

- Encourage employees to report any suspected wrongdoing as soon as possible
- Provide employees with guidance as to how to raise those concerns
- Reassure employees that they should be able to raise concerns without fear of reprisals even if they turn out to be mistaken

3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of a genuine concern(s) regarding suspected wrongdoing or dangers in relation to the Firm's activities. The wrongdoing can be past, present, prospective, or merely alleged.
In the instance an employee has a concern or complaint relating to their own personal employment situation or allegations of poor treatment at work towards them, this should be addressed though the Firm's Grievance Policy (see Intranet/Employee Handbook). If an employee is unsure under which policy a concern should be raised, they should refer their queries to the Group Head of HR, Group Head of Compliance, or the Whistleblower's Champion.

Please refer to the Appendices for further details on what could be deemed reportable based on jurisdictions where we have a regulatory presence.

4. RAISING A WHISTLEBLOWING CONCERN

We hope that in many cases employees will be able to raise any concerns they have with their line manager, in person or in writing. The line manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the Compliance Department and/or Human Resources Department.

Where the matter is more serious or employees feel that their line manager has not addressed their concern/s, or the employee prefers to not raise it with them for any reason, they should contact one of the following:

- Whistleblower's Champion
- Group Head of Compliance
- Group Head of HR

Employees are encouraged to raise their concerns with the Firm in the first instance. The law recognises that in some circumstances, it may be appropriate for employees to report their concerns to an external body such as their local regulator.

The Firms reporting channels are designed, implemented, and managed in a secure manner which guarantees the confidentiality of the whistleblower and any third party

A concern may be raised with or without anonymity.

Please refer to the Accounting Complaints Procedures for all Accounting related Complaints.

5. CONFIDENTIALITY

Employees are encouraged to voice any concerns openly under this policy. The Firm will make every effort to keep the identity of the whistleblower confidential. If it is necessary for anyone investigating the disclosure to know the identity of the whistleblower, the consent of the whistleblower will be requested. The whistleblower may remain anonymous if they prefer.

A disclosure can also be made anonymously. However, please be aware that it can be more difficult or impossible to investigate where a disclosure is made anonymously should we need to obtain further information. Employees who want to raise their concerns anonymously are encouraged to include as much detail as possible in any report made.

6. INVESTIGATION AND OUTCOME

Once an employee has raised a concern, a preliminary assessment will be carried out to determine the scope of any investigation and whether there is a reportable concern under any local regulatory whistleblowing obligations.

In the instance that the disclosure is deemed to be a reportable concern, an investigator or team of investigators may be appointed, including employees with relevant experience of investigations or specialist knowledge of the subject matter. The Firm will aim to keep the whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Firm providing specific details of the investigation, or any disciplinary action taken as a result.

Employees are reminded to treat any information about the investigation as confidential.

Meeting(s) may be arranged with the whistleblower at the preliminary assessment and/or investigation stage. The whistleblower may bring a colleague or an appropriate representative to any such meeting. The representative must respect the confidentiality of the disclosure and any investigation that takes place. A written summary of all meetings will be prepared, and a copy provided to the whistleblower.

This policy is for individuals to raise genuine concerns. Disciplinary action will be taken if the Firm concludes that false allegations have been made maliciously.

7. IF THE WHISTLEBLOWER IS NOT SATISFIED

The Firm endeavours to deal with all concern fairly and appropriately. In the instance that a whistleblower is dissatisfied with the way in which their disclosure has been handled or would like to challenge the outcome of their disclosure, they are encouraged to contact one of the group internal whistleblowing contacts detailed in Section 9. If it is believed there are good reasons or new grounds for doing so, the review process will be re-instituted. The result of this follow-up will be final. Alternatively, the whistleblower may get in touch with any of the contacts detailed in the section corresponding with their jurisdiction in the Appendices.

8. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes worried about possible repercussions. The Firm aims to encourage openness and will support those who raise genuine concerns under this policy, even if they turn out to be mistaken.

The Firm will not tolerate any retaliatory action against the whistleblower for speaking up, including any detrimental or unfavourable treatment. Detrimental and unfavourable treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. Any whistleblowers who believe that they have suffered any such treatment should inform the Whistleblower's Champion immediately.

Employees must not threaten or retaliate against whistleblowers in any way. Any employees involved in such conduct will be subject to disciplinary action.

Please refer to the Appendices for further details on protection and support for whistleblowers based on jurisdictions where we have a regulatory presence.

9. CONTACTS

Internal Contacts

Whistleblower's Champion	Robert Pickering Whistleblowing@marex.com
Group Head of HR	Anna Philbrick aphilbrick@marex.com +44 203 017 2682

Group Head of Compliance	Ann Marie Bull ambull@marex.com +44 (0) 207 655 6032

9.2 External Contacts

Please refer to the Appendices for further details on making an external whistleblowing report based on jurisdictions where we have regulated entities and/or subsidiaries.

9.3 Employees within branches of the Firm

All employees sitting in branches of the Firm should report any concerns in line with this policy to the internal contacts (referenced above).

MAREX

APPENDIX A – UNITED KINGDOM

Jurisdictional Overview

In the UK, whistleblower rights and protections are detailed in the Public Interest Disclosure Act 1998 ('PIDA'). The Financial Conduct Authority ('FCA') also sets out certain requirements in its Handbook at SYSC 18.

Under PIDA and SYSC 18, it is generally understood to relate to one or more of the following (collectively, a 'reportable concern'):

- A breach of the Firm's policies and procedures
- A breach of the FCA's conduct rules
- Behaviour that harms or is likely to harm the reputation or financial well-being of the Firm
- A criminal offence
- A failure to comply with any legal obligation
- A miscarriage of justice
- Danger to the health and safety of an individual(s);
- Damage to the environment
- Deliberate concealment in relation to any of the above

Protections

Employees are protected if they make a 'qualifying disclosure.' A qualifying disclosure means any disclosure of information which, in the reasonable belief of the worker making the disclosure is made in the public interest and tends to show one or more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject
- that a miscarriage of justice has occurred, is occurring or is likely to occur
- that the health or safety of any individual has been, is being or is likely to be endangered
- that the environment has been, is being or is likely to be damaged or
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed

Making a Report

Body	Details
Financial Conduct Authority (FCA)	**Address:** Intelligence Department (Ref: PIDA), Financial Conduct Authority, 12 Endeavour Square, London E20 1JN. **Email:** whistle@fca.org.uk **Telephone:** +44 (0)207 066 9200 **Web Form:** https://webform.clue.co.uk/fcawb **Website:** https://www.fca.org.uk/firms/whistleblowing
Protect (for advice)	**Address:** The Green House, 244-254 Cambridge Heath Road, London, E2 9DA **Telephone:** +44 (0)203 1172520 **Web Form:** https://protect-advice.org.uk/contact-protect-advice-line/ **Website:** https://protect-advice.org.uk/

APPENDIX B – FRANCE

Jurisdictional Overview

In France, whistleblower rights and protections are detailed in the below:

- Law no. 2016-1691 of 9 December 20106 on transparency, the fight against corruption and the modernisation of economic life.
- Law no. 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers.
- Organic law no. 2022-400 of 21 March 2022 aimed at strengthening the role of the Défenseur des droits in terms of whistleblowing.
- Decree no. 2022-1284 of 3 October 2022 on procedures for collecting and processing whistleblower reports.
- Labour Code: articles L1132-1 to L L1132-4
- Labour Code: articles L4133-1 to L4133-4

A whistleblower can be any current or former staff member, shareholder, administrative body member, external or occasional collaborator, co-contractor, sub-contractor, or, for legal entities, the staff and administrative body members of co-contractors and sub-contractors of Marex SA.

According to French legislation, the concerns that can be reported are the following:

- A crime.
- A misdemeanour.
- A threat or harm to the public interest.
- A violation or an attempt to conceal a violation of:
    - a law or regulation.
    - European Union law.
    - an international commitment duly ratified or approved by France.
    - a unilateral act of an international organisation taken on the basis of such a commitment.

Protections

Whistleblowers are not civilly liable for any damage caused by their disclosure, as long as they reasonably believed it was necessary to protect the relevant interests.

The whistleblower cannot legally face reprisals including:

- Suspension, lay-off, dismissal or equivalent measures.
- Demotion or refusal of promotion.
- Transfer of duties, change of workplace, reduction in salary, change in working hours.
- Suspension of training.
- Negative performance appraisal or work certificate.

- Disciplinary measures imposed or administered, reprimand or other sanction, including a financial sanction.
- Coercion, intimidation, harassment or ostracism.
- Discrimination, disadvantageous or unfair treatment.
- Non-conversion of a fixed-term employment contract or a temporary contract into a permanent contract, when the worker could legitimately expect to be offered permanent employment.
- Non-renewal/early termination of a fixed-term employment contract/temporary contract.
- Damage to a person's reputation or financial loss.
- Blacklisting on the basis of a formal or informal agreement at sectoral or industry level, which may imply that the person will not find employment in the future in the sector or industry.
- Early termination or cancellation of a contract for goods or services.
- Cancellation of a licence or permit.
- Improper referral for psychiatric or medical treatment.

Making a Report

Body	Details
Autorité des marchés financiers (AMF)	**Address :** AMF - Délégué à la protection des données - 17 place de la Bourse, 75002 Paris **Telephone :** (+33)1 53 45 64 44 **Web Form :** https://www.amf-france.org/fr/lanceur-dalerte **Website:** https://www.amf-france.org/en/forms-and-declarations/whistleblowing
Defender of Rights	**Address :** Défenseur des droits – libre réponse 71120 – 75342 Paris CEDEX 07 **Telephone :** +33 (0)9 69 39 00 00 **Web Form :** https://formulaire.defenseurdesdroits.fr/formulaire_saisine/ **Website :** https://www.defenseurdesdroits.fr/fr/saisir-le-defenseur-des-droits

APPENDIX C – IRELAND

Jurisdictional Overview

The rights and protections of a whistleblower in Ireland are detailed in the Protected Disclosures Act 2014 ('2014 Act'). The 2014 Act was further updated by the Protected Disclosures (Amendment) Act 2022 ('the 2022 Act'). The 2022 Act also transposes the EU Whistleblowing Directive into Irish law.

Where the wrongdoing relates to breaches of financial services legislation, a protected disclosure may also be made to the Central Bank of Ireland under the Central Bank (Supervision and Enforcement) Act 2013. This policy has been drafted in accordance with the Code of Practice and Model Whistleblowing Policy, which was published by the Workplace Relations Commission ('the WRC').

A wrongdoing can relate to any number of things but is generally understood to relate to one or more of the following:

- criminal activity
- failure to comply with a legal or professional or regulatory obligation
- miscarriages of justice
- danger to health and safety of individuals
- damage to the environment
- misuse of public funds
- oppressive, discriminatory, grossly negligent, or grossly mismanaged acts by a public body
- facilitating tax evasion
- financial fraud or mismanagement
- bribery under our Anti-corruption and Bribery Policy or
- the concealment/destruction of information in relation to any of the above

Protections

The Act protections anyone who falls into the definition of a 'worker'. A worker is defined as an individual working in the private or public sector who acquired information on relevant wrongdoings in a work-related context and includes:

- employees and former employees
- persons who provide or provided services to another party under contract
- agency and former agency workers
- board and former board members (including non-executive members)
- shareholders and former shareholders
- trainees and former trainees
- volunteers and former volunteers
- job applicants
- individuals involved in pre-contract negotiations, and

- members and former members of the Defences Forces (including the Reserves)

The Act also protects workers who make a disclosure by way of an anonymous report. If a worker makes an anonymous report and is subsequently identified and penalised for doing so, for the purposes of the Act, that worker will be considered to be a worker who made a protected disclosure and is therefore entitled to the full protections of the Act.

Making a report

Body	Details
Protected Disclosures Desk, Central Bank of Ireland (CBI)	**Address:** Protected Disclosures Desk, Central Bank of Ireland, PO Box 559, Dublin 1 **Email:** confidential@centralbank.ie **Telephone:** +353 1890 130014 **Website:** https://www.centralbank.ie/regulation/protected-disclosures-whistleblowing
Transparency International Ireland	**Address:** Floor 2, 69 Middle Abbey Street, Dublin 1 **Email:** admin@transparency.ie **Telephone:** +353 1 554 3938 **Website:** www.transparency.ie
Further Information	**Website:** https://www.citizensinformation.ie/en/employment/enforcement-and-redress/protection-for-whistleblowers/#:~:text=People%20who%20raise%20concerns%20about,(pdf)%20into%20Irish%20law

APPENDIX D – GERMANY

Jurisdictional Overview

Whistleblowing in Germany is primarily regulated by the Whistleblower Protection Act (*Hinweisgeberschutzgesetz*), which was implemented in July 2023 based on the EU Directive 2019/1937.
There are further relevant whistleblower provisions set out in sections § 6 (5) and § 53 Money Laundering Act (*Geldwäschegesetz*), section 13 (1) Securities Institutions Act (*Wertpapierinstitutsgesetz*), section 58 Securities Trading Act (*Wertpapierhandelsgesetz*) and § 25a (1) sent. 6 No. 3 German Banking Act (*Kreditwesengesetz*), which supersede the Whistleblower Protection Act where they are more specific.

Personal Scope

Individuals in scope and eligible to make a report are:

- employees, including job applicants (during recruitment or pre-contractual negotiations) and former employees (when information was obtained during their employment)
- temporary workers, contractors, consultants or third-party suppliers
- shareholders, members of the administrative, management or supervisory body, including non-executive members
- volunteers and trainees
- any person working under the supervision and direction of contractors, subcontractors and suppliers
- facilitators (a natural person who assist in the reporting process in a work-related context, and whose assistance should be confidential)
- third parties who are related to the complainant and are at risk of retaliation in a professional context but are not a facilitator

Material Scope

Whistleblowing is the disclosure of information that was obtained during employment or any other professional relationship with Marex where a report is made in the context of the performance of the complainant's work-related duties, which relates to breaches of EU law and threats to public interest within specified sectors, including but not limited to:

- public procurement;
- financial services, products and markets, prevention of money laundering, terrorist financing and the financial interests of the EU
- product safety and compliance
- protection of the environment
- a criminal offence has been, is being or is likely to be committed
- breaches of Marex's policies and procedures
- breaches of regulatory or legal requirements
- breaches of financial accounting and auditing
- misconduct that harms the reputation of Marex

- any of the above types of misconduct which relate to breaches of local German law
- violations which are subject to administrative fines under EU or German law (Verstöße, die bußgeldbewehrt sind) provided the violated regulation serves to protect life, limb or health or to protect the rights of employees or their representative bodies
- offences of federal and state legislation and directly applicable legal acts of the EU and European Atomic Energy Community related to: (i) public procurement; (ii) financial services, products and markets, and/or prevention of money laundering and/or terrorist financing; (iii) product safety and/or compliance; (iv) transportation safety; (v) environmental protection; (vi) radiation protection and/or nuclear safety; (vii) food and/or food safety, animal health and animal welfare; (viii) public health; (ix) consumer protection; (x) protection of privacy and/or personal data and/or the security of networks and/or network and information systems
- offences affecting the financial interests of the EU, such as breaches of the relevant anti-fraud or anti-corruption legislation
- offences relating to the internal market, in particular breaches of the rules on competition and/or State aid

Protections

Under German law, the identity of the complainant must not be disclosed, without explicit consent, to anyone beyond those dealing with the report, unless it is necessary and proportionate in the context of the investigation in compliance with the need-to-know-principle. Information about the identity of the person to whom the complaint relates or with whom that person is associated, and information that is traceable to them, as well as information about the company's confidentiality also must not be disclosed.

There are limited exceptions to this principle under German law, e.g. upon request of the prosecutor in criminal proceedings or if an individual intentionally or through gross negligence reports wrong information.

Making a Report

Body	Details
Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	**Address:** Bundesanstalt für Finanzdienstleistungsaufsicht, Hinweisgeberstelle, Graurheindorfer Straße 108 , 53117 Bonn **Telephone:** +49 (0) 228 4108 2355 **Website:** https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html
Bundeskartellamt	**Address:** Bundeskartellamt - Externe Meldestelle – Kaiser-Friedrich-Str. 16, 53113 Bonn **Telephone:** +49 (0) 228 9499 5980 **Website:** https://www.bundeskartellamt.de/EN/Home/home_node.html
Zentrale Meldestelle des Bundes beim Bundesamt der Justiz	**Address**: Bundesamt für Justiz, Externe Meldestelle des Bundes, 53094 Bonn **Telephone**: +49 (0) 228 99 410-6644 **Web Form:** https://bfj-hinweisgeberstelle.dataport.de/#/ **Website**: https://www.bundesjustizamt.de/EN/Home/Home_node.html

APPENDIX E - ITALY

Jurisdictional Overview

Whistleblowing in Italy is regulated by the Legislative Decree no. 24/2023, transposing Directive (EU) 2019/1937, that sets out protective measures for workers in both the private and public sector.

According to Italian legislation, the concerns that can be reported are the following:

- public procurement
- financial services, products and markets and the prevention of money laundering and terrorist financing
- product safety and conformity
- transport safety
- environmental protection
- radiation protection and nuclear safety
- food and feed safety, animal health and welfare
- public health
- consumer protection
- protection of privacy and personal data, and the security of networks and information systems
- breaches affecting the financial interests of the EU, such as breaches of the relevant anti-fraud or anti-corruption legislation
- breaches relating to the internal market, including breaches of EU competition and State aid rules
- relevant misconduct pursuant to Legislative Decree no. 231/2001 (i.e., any conduct that may entail the company's liability for any of the crimes relevant under Legislative Decree no. 231/2001), such as:
    - corruption-related crimes
    - counterfeiting
    - money laundering, crimes against industry and trade
    - fraud against the state
    - IT crimes
    - violations of the Model 231 adopted by Marex's Italian entity (the "Italian Company"). Reports must be grounded on "accurate and consistent elements of fact" (Article 6, paragraph 2-bis, lett. A, Legislative Decree no. 231/2001)
- any other relevant breaches of Italian administrative, criminal, civil and accounting laws

Personal Scope

In Italy, the following people can raise a concern through the Italian Company's internal reporting procedure: the Italian Company's employees and former employees (where the information reported was obtained in the course of their employment), job applicants, consultants, self-employed contractors, any individual working under the supervision and direction of contractors, subcontractors or suppliers, paid or unpaid trainees, shareholders and members of the managing, governing or supervisory body of the Italian Company (including non-executive members) and volunteers.

Protections

Italian law prohibits any act of retaliation or discrimination, direct or indirect, against the reporting person for reasons directly or indirectly related to the report. Additional protections for the whistleblower include the protection of their identity during any proceedings, and from subject access requests and other exercises of the rights in Articles 15- 22 GDPR.
For a concern to be in-scope of the Italian legislation applicable to internal reporting and relevant protection, the following conditions must be met:

- The concern relates to a breach set out in the “Material scope” section above
- The person raising the concern must fall within the “Personal scope” section above and
- The reporter must act in good faith, having reasonable grounds to believe that the concern reported was true at the time of reporting

The judicial authority shall take all necessary measures, including provisional measures, to ensure the protection of the subjective rights asserted, such as:

- compensation
- reinstatement in the workplace
- an order to cease the retaliatory conduct
- a declaration of nullity of the retaliatory measures taken

The reporting person shall qualify for protection even if they made the disclosure anonymously but are subsequently identified.

The protections provided by the Italian legislation against retaliation apply to the reporting person and also extend to: (i) individuals within the organisation who assist the whistleblower in the process; (ii) individuals close to the whistleblower and who may suffer reprisals, such as co-workers or relatives of the whistleblower, and (iii) individuals for whom the whistleblower works (the "facilitators”).

Protection applies to public disclosures under EU Directive 2019/1937 (Whistleblowing Directive) where prior reporting has not resulted in appropriate action, or where there are reasonable grounds to believe the matter presents a serious risk to the public or that external reporting may lead to retaliation or be ineffective. This protection does not extend to disclosures made directly to the press under national laws governing freedom of expression and information.

Making a Report

Internal (Only relevant to Hamilton Court FX Payments S.r.l and Hamilton Court SIM S.p.A)

Body	Details
Anonymous whistleblowing reporting system	https://hcfx.integrityline.com/
Postal Mail	Via E. De Amicis 49, 20123 Milano, Italy

External

Body	Details
National Anti-Corruption Authority (ANAC)	**Address:** National Anti-Corruption Authority - All rights reserved, c/o Palazzo Sciarra, Via Minghetti, 10 00187, Rome **Email:** protocollo@pec.anticorruzione.it **Telephone:** +39 06 62289571 **Website:** https://www.anticorruzione.it/-/whistleblowing
Bank of Italy	**Address:** Banca d'Italia, Via Nazionale, 91 - 00184 Rome **Online Reporting Platform:** Servizi online **Telephone:** +39 06 47921 **Website:**https://www.bancaditalia.it/compiti/vigilanza/whistleblowing/index.html
Consob	**Address:** Consob - Via G. B. Martini, 3 - 00198 Rome or Consob - Via Broletto, 7 - 20121 Milan **Email:** protocollo@consob.it **Telephone:** +39 02 724201 **Website:** https://www.anticorruzione.it/-/whistleblowing

APPENDIX F – SPAIN

Jurisdictional Overview

In Spain, whistleblower's rights and protections are detailed in Law 2/2023 of 20 February on the Protection of Persons Reporting Breaches of the Law and the Fight against Corruption. Law 2/2023 transposes Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October into Spanish law.
This law applies to whistleblowers working in the private or public sector who have obtained information on offences in an employment or professional context, including:

- public employees or employees
- self-employed individual
- shareholders, unit holders and persons belonging to the administrative, management or supervisory body of a company, including non-executive members
- any person working for or under the supervision and direction of contractors
- subcontractors and suppliers

The law also applies to whistleblowers who communicate or publicly disclose information on wrongdoing obtained in the framework of an employment relationship that has already ended, volunteers, students in practice, employees in training, whether or not they receive remuneration, as well as to individuals whose employment relationship has not yet begun, in cases where the information on wrongdoing has been obtained during the recruitment process or pre-contractual negotiation.

Protection applies to public disclosures under EU Directive 2019/1937 (Whistleblowing Directive) where prior reporting has not resulted in appropriate action, or where there are reasonable grounds to believe the matter presents a serious risk to the public or that external reporting may lead to retaliation or be ineffective. This protection does not extend to disclosures made directly to the press under national laws governing freedom of expression and information.

Reportable concerns

Under Law 2/2023 reportable concerns are:

- acts or omissions which may constitute infringements of European Union law (provided that they fall within the scope of Directive (EU) 2019/1937)
- any actions or omissions that may constitute a serious or very serious criminal or administrative offence. This will include all serious or very serious criminal or administrative offences that involve financial loss to the Public Treasury and Social Security

Making a Report

Internal (Only relevant to Hamilton Court SIM S.p.A Spanisg Branch)

Body	Details
Anonymous whistleblowing reporting system	https://hcfx.integrityline.com/
Postal Mail	Via E. De Amicis 49, 20123 Milano, Italy

External

Body	Details
Autoridad Independiente de Protección del Informante (A.A.I.)	**Address:** Autoridad Independiente de Protección del Informante, Calle Luis Cabrera 9, 28002 Madrid **Email:** canal.externo@proteccioninformante.es **Website:** https://www.proteccioninformante.gob.es/canales-de-presentacion-de-informaciones
Comisión Nacional del Mercado de Valores (CNMV)	**Address:** Communication of infringements - Investors Department - CNMV. C/ Edison, 4, 28006 Madrid – C/ Bolivia 56, (4 ª Planta) 08018 Barcelona - C/ Heros 3, 48009 Bilbao. **Email:** whistleblowing@cnmv.es **Telephone:** +34 900 373 362 **Web Form:** https://www.cnmv.es/Portal/Whistleblowing/Formulario.aspx **Website:** https://www.cnmv.es/Portal/whistleblowing/presentacion?lang=en
Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias (SEPBLAC)	**Address:** Sepblac, Calle Alcalá, 48, 28014 Madrid Spain **Email:** sepblac.sujetos.obligados@bde.es **Website:** https://www.sepblac.es/en/obliged-subjects/formalities/suspicious-transactions-reporting/

APPENDIX G – DUBAI

Jurisdictional Overview

In Dubai, the legal rights and protection for whistleblowers who would like to report a concern are outlined in Article 68A of the DFSA Handbook. A reportable concern includes any conduct relating to the Firm's directors, officers, employees, or contractors, whether actual or suspected, which a person in good faith believes:

- is dishonest, fraudulent, or corrupt
- involves accounting irregularities (non-compliance with regulatory requirements, fraudulent accounting entries, misstatement of accounts etc.)
- is illegal / violates or is a breach of statutory laws
- is unethical or in breach of the Firm's policies such as dishonestly altering company records or data, adopting questionable accounting practices or other policies or procedures
- involves bribery or corruption
- is potentially damaging to the Firm, an employee of the Firm, or a third party, such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources
- amounts to an abuse of authority
- may cause financial loss to the Firm or damage its reputation or be otherwise detrimental to the Firm's interests
- involves any other kind of serious impropriety
- involves harassment, discrimination, victimisation, or bullying or
- relates to:
    - Workplace violence
    - Discrimination
    - Release of proprietary information
    - Covering up deficiencies in internal control
    - Embezzlement and frauds
    - Client privacy violations
    - Market Misconduct
    - Health and safety risk, including risk to public as well as to other employees

Protections

Protections have been put in place by the DFSA for those who have reported misconduct internally, externally (to their auditor or the DFSA) or to a law enforcement agency. This protection will only apply where the disclosure of information relates to a reasonable suspicion.

The protections are from:

- liability
- dismissal and/ or
- detriment for making that disclosure

Making a Report

Body	Details
Dubai Financial Services Authority (DFSA)	**Email:** whistle@dfsa.ae **Website:** https://www.dfsa.ae/your-resources/publications-reports/explainers/dfsas-whistleblowing-regime

APPENDIX H – ABU DHABI

Jurisdictional Overview

In the United Arab Emirates (UAE), whistleblower rights and protections are primarily governed by the Federal Law No. 2 of 2015 on Combating Discrimination and Hatred and Federal Law No. 4 of 2002 on the Prevention of Money Laundering and Terrorism Financing, with specific reference to whistleblowing provisions. Abu Dhabi also has its local regulations in line with the UAE's general policies, and some entities have specific internal policies for reporting misconduct.

Under these laws and regulations, whistleblower disclosures can relate to any of the following serious concerns (collectively referred to as "reportable concerns"):

- A breach of company policies and procedures
- A violation of any legal obligation under UAE law
- Criminal offences, including corruption, bribery, fraud, or other financial crimes
- Misuse of authority or power, especially in a government or public sector role
- Danger to public health and safety
- Damage to the environment or any threat to natural resources
- Deliberate concealment or obstruction of any of the above actions

Protected Disclosures

For information to be considered a protected disclosure and be entitled to the protection under Federal Law No. 2 of 2015 on Combating Discrimination and Hatred and Federal Law No. 4 of 2002 on the Prevention of Money Laundering and Terrorism Financing and ADGM Whistleblower Protection Regulations 2024 it must be disclosed to any one or more of the following:

- Any director, officer or any person in a management position of Marex Capital (AD) Limited
- Any person or group of persons designated by the Marex Capital (AD) Limited to receive a disclosure of information under this section
- Any Registered Auditor or Registered Audit Principal or Audit Principal that provides Audit services to the Marex Capital (AD) Limited
- Any person performing a Controlling Function or acting as a Key Individual of Marex Capital (AD) Limited
- the Registrar
- the FSRA
- the Office of Data Protection
- a criminal law enforcement agency of the United Arab Emirates

Protections

Whistleblower protections in the UAE ensure that individuals who report wrongdoing are protected from retaliation include:

- Protection from dismissal or discrimination: Employees who make protected disclosures should not face any form of retaliation, including termination, harassment, or discrimination.
- Confidentiality: Whistleblower identities are typically protected under internal and legal reporting systems. However, this may depend on the nature of the disclosure and the reporting mechanism used.
- Legal remedies: Individuals who face retaliation for whistleblowing may have legal avenues to seek compensation or take action against employers who engage in retaliation
- Protection from legal actions: No contractual, civil, or other remedies or rights can be enforced against an individual by another person due to the individual's Protected Disclosure.
- Anonymity: Protection under Whistleblower Protection Regulations 2024 does not require individuals to identify themselves when making a Protected Disclosure.

Making a Report

Body	Details
Abu Dhabi Department of Economic Development (DED)	**Address:** Abu Dhabi Department of Economic Development, Abu Dhabi, UAE. **Email:** whistleblower@ded.gov.ae **Telephone:** +971 2 666 5444 **Website:** https://ded.abudhabi.ae
UAE Ministry of Justice	**Address:** Ministry of Justice, Abu Dhabi, UAE **Email:** info@moj.gov.ae **Telephone:** +971 2 639 3500 **Website:** https://www.moj.gov.ae
UAE Anti-Corruption Commission	**Email:** corruption@uae.gov.ae **Telephone:** +971 2 443 9333 **Website:** https://uaeaa.gov.ae/en/core/Pages/anticorruption.aspx#:~:text=The%20UAE%20Accountability%20Authority%20(UAEAA,corruption%20over%20the%20auditees'%20funds.

Abu Dhabi Government	**Address:** ADGM Compliance, Office of Legal Affairs, Governance and Compliance, ADGM Authorities Building, ADGM Square, Al Maryah Island, P.O. Box: 111999, Abu Dhabi, UAE. **Email:** AMANAH.portal@adgm.com **Telephone:** +971 2 3338955 **Web Portal:** https://www.adgm.com/contact-us/speaking-up

MAREX

APPENDIX I – AUSTRALIA

Jurisdictional Overview

In Australia, the legal rights and protection for whistleblowers are outlined in Part 9.4AAA of the Corporations Act 2001 ('Corporations Act'). These protections are designed to encourage individuals with information about a company who reasonably suspect misconduct, improper state of affairs or circumstances, to come forward. Such information could pertain to the company itself or involve an officer or employee engaging in conduct that:

- breaches the Corporations Act
- breaches other financial sector laws enforced by the Australian Securities & Investments Commission ('ASIC') or the Australian Prudential Regulation Authority ('APRA')
- breaches an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more or
- represents a danger to the public or the financial system

Protections

To qualify for statutory protection, a whistleblower must disclose information directly to specific individuals or organizations. These include:

- a director or company secretary of the company
- a senior Manager of the company
- an internal or external auditor, or a member of an audit team conducting an audit
- an appointed actuary
- a legal practitioner, for the purpose of obtaining legal advice or representation under the whistleblower provisions of the Corporations Act
- ASIC, APRA, or another Commonwealth body prescribed by regulation

There are additional protections under the Corporations Act for concerns relating to matters in the public interest or an emergency.

Making a Report

Body	Details
Australian Securities & Investments Commission (ASIC)	**Website:** https://asic.gov.au/about-asic/contact-us/reporting-misconduct-to-asic/ **Web Form:** https://compliance.asic.gov.au/#/form/583b77dc397bbc319837ea2a

APPENDIX J – NEW ZEALAND

Jurisdictional Overview

In New Zealand, whistleblower rights and protections are primarily governed by the Protected Disclosures Act 2000 (PDA), which provides a legal framework for employees and workers to disclose information about wrongdoing in the workplace without fear of retaliation. In addition to the PDA, other relevant regulations and guidelines are issued by New Zealand government agencies and entities.

Under the PDA, whistleblower disclosures must involve serious wrongdoing, and it provides protections for individuals who report such conduct. Whistleblowers are protected from retaliatory actions such as dismissal, discrimination, or harassment.

A 'protected disclosure' in New Zealand refers to any information regarding the following types of serious wrongdoing:

- Criminal offences: Any criminal activity being committed, is likely to be committed, or has been committed in the workplace.
- Serious risk to health or safety: Behaviour that endangers the health or safety of any individual.
- Damage to the environment: Environmental harm caused by the actions of an individual or organisation.
- Abuse of authority: Actions where public officials abuse their authority for personal gain.
- Mismanagement or waste of public funds: Fraudulent activities involving misuse of government funds.
- Failure to comply with legal obligations: Any failure by an organisation or individual to meet legal or regulatory obligations.
- Deliberate concealment: The intentional hiding of any of the above forms of wrongdoing.

Protections

Under the Protected Disclosures Act 2000, employees are protected when they make a protected disclosure, as long as they follow the procedure outlined in the Act. The protections apply to individuals in both the public and private sectors, and they extend to workers, contractors, and certain other individuals connected to the organisation.

A protected disclosure must meet certain criteria, including being made in good faith and in the reasonable belief of the whistleblower that the information disclosed relates to serious wrongdoing. Key protections include:

- Protection from retaliation: Whistleblowers are protected from dismissal, suspension, demotion, or any other detriment as a result of making a disclosure.
- Confidentiality: Disclosures can be made in confidence, and the identity of the whistleblower must be protected.
- No loss of employment rights: Whistleblowers retain all employment rights even after making a disclosure.

Making a Report

Body	Details
New Zealand Government – Office of the Ombudsman	**Address:** Office of the Ombudsman, Level 6, 345 Lambton Quay, Wellington 6011, New Zealand. **Email:** enquiries@ombudsman.parliament.nz **Telephone:** +64 4 473 9533 **Website:** https://www.ombudsman.parliament.nz
Protected Disclosures Act – Reporting Body	**Address:** Department of Internal Affairs, PO Box 805, Wellington 6140, New Zealand. **Email:** protecteddisclosures@dia.govt.nz **Telephone:** +64 4 495 7228 **Website:** https://www.dia.govt.nz
Public Service Commission (PSC)	**Email:** info@publicservice.govt.nz **Website:** https://www.publicservice.govt.nz

APPENDIX K – SINGAPORE

Jurisdictional Overview

Singapore has no national law that specifically regulates whistleblowing.
There are however certain situations where there is an obligation to provide information about the commission or the intention of a person to commit a criminal offence. Members of the public are also obliged to provide any information relating to corrupt acts they are in possession of if the Director of the Corrupt Practices Investigation Bureau requires them to do so.
Where an informant provides information or documents relating to tax evasion, If such information or documents lead to the recovery of tax that would have been lost, he/she can request for a reward of 15% of the tax recovered, capped at $100,000.

Protections

While there are no specific protections, statutes like the Prevention of Corruption Act 1960 and Misuse of Drugs Act 1973 contain safeguards for the protection of informers. If information relating to the offences falling under these statutes is provided:

(i) The informer's name, address, or any matter which might lead to discovering his/her identity will not be disclosed to any witness.
(ii) If any evidence, such as books, documents or papers are to be inspected during proceedings, the court will ensure that the informer's details, which may be found on the evidence(s), will be concealed, or destroyed such that his/her identity will be protected.

This protection is not absolute. If it is found that the informer had knowingly made a false statement, the informer's identity may be disclosed. The following are some examples of legislation that contain safeguards for the protection of informers:

- the Workplace Safety and Health Act protects those individuals who disclose information about physical conditions, health and safety and work environment hazards. Dismissal of or threatening an employee for reporting health and safety breaches is a criminal offence.
- Prevention of Corruption Act
- Misuse of Drugs Act and
- Betting Act

Other areas of legal protection in Singapore include harassment protection and reporting employees to local labour inspectors.

Making a Report

There are no specific whistleblowing external reporting channels established within jurisdiction. Please refer to Section 9 for a list of internal reporting contacts. For matters relating specifically to tax evasion, please refer to:

Body	Details
Inland Revenue Authority of Singapore	**Web Form:** https://form.gov.sg/61555be493cf06001382c6ab

APPENDIX L – HONG KONG

Jurisdictional Overview

Hong Kong has no national law that specifically regulates whistleblowing.

Hong Kong Exchanges and clearing Ltd (HKEK) recommended the best practice in the Corporate Governance (the code) regarding the need for issuers to have whistleblowing policies to the status of a Code Provision (CO).

Self-reporting or disclosure obligations also set out requirements which apply to whistle blower programmes. For example, the Hong Kong securities and futures commission requires regulated companies to immediately self-report actual or suspected breaches of laws and regulations.

Protections

There are various laws that protect whistleblowers' anonymity, protect them from dismissal, discrimination, and grant immunity from breach of confidentiality claims if the disclosures are made in good faith.

Legislation	Protection
Employment Ordinance (EO)	• An employee cannot terminate an employee by reason of the employee giving evidence in proceedings or an enquiry for the enforcement of the employment ordinance or in any proceedings or enquiry in relation to the safety at work. • Employees in breach will be liable to a fine as well as paying compensation to the victim most employee.
Sex Discrimination Ordinance, Disability Discrimination Ordinance, Family Status., Discrimination Ordinance, Race (Discrimination Ordinance)	• Under the discrimination Ordinances, it is unlawful for a person to discriminate against another person on the grounds that the person victimised has brought proceedings against the discriminator or given evidence or information in connection with the proceedings brought by others. • The court has power to order the discriminator to employ, re-employ or promote the person victimised, or to pay him or her compensation for his damages.

Drug trafficking (recovery of proceeds) (DTRPO) **Organised and serious crimes Ordinance (OSCO)** **United Nations antiterrorism measures ordinance (UNATMO)**	• A whistleblower who makes a disclosure or suspected proceeds of drug trafficking, money laundering or crimes to an authorised officer under the DTRPO, OSCO and UNATMO will not be regarded as in breach of any restriction against disclosure of information imposed by contract or by enhancement, rule of conduct or other provision, all render the whistleblower liable and damages for any loss arising out of the disclosure. • Under the DTRPO, OSCO and UNATMO will not be regarded as in breach of any restriction against disclosure of information imposed by contract or by any enhancement, rule of conduct or other provision, all render the whistleblower liable in damages for any loss arising out of the disclosure. • Under the DTRPO and OSCO witnesses in any civil or criminal proceedings are not required to reveal the identity of the person making the disclosure.
Prevention of Bribery Ordinance (POBO)	The Independent commission against corruption informers are entitled to witness protection under the witness protection ordinance including protection for personal safety or well-being.
Securities and Futures Ordinance	A whistleblower will be protected against any civil liability whether arising in contract, tort, defamation, equity or otherwise for reporting any financial irregularities or non-compliance with any financial resources rules which occurred in the company.
Competition Ordinance	An employer is prohibited from terminating or threatening to terminate the employment, discriminating in any way, intimidating, or harassing, or causing an injury, loss or damage to an employee who provides material to the competition commission in connection with the cc functions, or gives or agrees to give any evidence in proceedings brought by the competition commission.

Making a Report

There are no specific whistleblowing external reporting channels established within jurisdiction. Please refer to Section 9 for a list of internal reporting contacts.

MAREX

APPENDIX M – UNITED STATES

Jurisdictional Overview

The SEC and the CFTC (collectively, the 'Commission') whistleblower program was created by the Dodd-Frank Act, and it provides monetary awards to persons who voluntarily report 'original information' of the Commodity Exchange Act (CEA) and federal securities laws if the information leads the Commission to bring an action, or if the information significantly contributes to the success of a Commission action, that results in more than $1 million in monetary sanctions. The Commission can also pay awards based on monetary sanctions collected by other authorities in actions that are related to a successful CFTC and SEC action and are based on information provided by a whistleblower.
'Original information' is information not already known to the Commission that is derived from:

(i) your independent knowledge (information in your possession that is not generally known or available to the public), or
(ii) your independent analysis (your examination and evaluation of information that may be publicly available, but which reveals information that is not generally known).

If the Commission received the same information previously from someone else, your information will not be considered original information unless you can show that you were the 'original source' of the information (relevant to Rule 165.2(k)-(l)).
Some examples of the kind of conduct the Commission is interested in includes:

- Ponzi scheme, Pyramid scheme, or a High-Yield Investment Program
- Theft or misappropriation of funds or securities
- Manipulation of a security's price or volume
- Insider trading
- Fraudulent or unregistered securities offering
- False or misleading statements about a company (including false or misleading SEC reports or financial statements)
- Abusive naked short selling
- Bribery of, or improper payments to, foreign officials
- Fraudulent conduct associated with municipal securities transactions or public pension plans
- Initial Coin Offerings and Cryptocurrencies
- Other fraudulent conduct involving securities

Sarbanes Oxley Act

The Sarbanes Oxley Act (SOX) protects employees of publicly traded companies against retaliation for providing information they reasonably believe to be a violation of federal securities law, SEC rules, or any federal law related to fraud against shareholders.
To prove a SOX claim, you must show:

- You're an employee engaged in protected activity;
- A covered employer took adverse employment action against you; and
- The protected activity at least partly caused the adverse employment action

Protections

The Dodd-Frank Wall Street Reform and Consumer Protection Act expanded the protections for whistleblowers and broadened the prohibitions against retaliation.
Retaliation includes discharge, demotion, suspension, harassment, or discrimination against an employee who has reported conduct to the Commission that the employee reasonably believed violated such relative laws or when (i) providing information to the Commission; or (ii) in assisting in any investigation or judicial or administrative action of the Commission based upon or related to such information.
The Commission has set out specific processes/protections that should be followed when communicating with either the SEC and/or CFTC including:

- Submitting Information
- Confidentiality of Submissions
- Whistleblower Retaliation Protection
- Awards
- Eligibility/Ineligibility

Making a Report

Body	Details
U.S. Securities and Exchange Commission (SEC)	**Address:** SEC Office of the Whistleblower (c/o ENF-CPU) 14420 Albemarle Point Place, Suite 102 Chantilly, VA 20151-1750 ATTN: SEC TCR SUBMISSIONS **Telephone:** +1 202-551-4790 **Web Form:** https://www.sec.gov/submit-tip-or-complaint **Website:** SEC Whistleblower Program Main Page
Commodity Futures Trading Commission (CFTC)	**Address:** Commodity Futures Trading Commission, Whistleblower Office 1155 21st Street, NW, Washington, DC 20581 **Email:** whistleblower@cftc.gov **Telephone:** 866-873-5675 (Toll Free) **Website:** CFTC Whistleblower Program Main Page
Occupational Safety and Health Administration (OSHA)	**Addresses and Telephone numbers:** Regional and State Contact Information **Web Form:** https://www.osha.gov/whistleblower/wbcomplaint **Website:** OSHA Whistleblower Program Main Page

APPENDIX N – CANADA

Jurisdictional Overview

Canada has no national law that specifically regulates whistleblowing. While regional laws passed by the autonomous regions cover some areas, there remains a lack of national regulation. Each province sets its own securities laws with corresponding whistleblowing programs.

Marex has branches in both Alberta and Quebec.

Alberta:
The following are examples of the types of securities related misconduct which can be reported:

- Illegal distribution and /or unregistered trading
- Prohibited representations and undertakings
- Registrant misconduct
- Illegal insider trading and/or tipping
- Market manipulation
- Corporate disclosures and/or financial statements
- Fraud and related offenses
- Obstruction of justice
- Breaches of previous orders/settlements
- Other

Quebec:
A contravention of an Act administered by the AMF has been, or is about to be, committed.

Protections

Alberta:
Protections for whistleblowers include:
- Confidentiality of the whistleblower's identity as a whistleblower
- A prohibition on reprisals against whistleblowers and their relatives
- Legislated authority for the Alberta Securities Commission to investigate and take enforcement action where reprisals have occurred
- A civil right of action against employers and co-workers who engage in reprisals
- Immunity from liability for whistleblowing to the ASC, provided the whistleblower reasonably believed the information at the time of providing information to the ASC and was not involved in the misconduct.

In addition, employers cannot prohibit or obstruct anyone from becoming a whistleblower.

Quebec:

The AMF has put various measures in place to maximize the protection extended to whistleblowers by ensuring their identity is kept confidential and they are protected against reprisals:

- Confidentiality: The AMF takes all the necessary steps to protect the anonymity of anyone who makes a whistleblower report
- Immunity from civil liability: Anyone who, acting in good faith, reports a contravention of an Act administered by the AMF will not incur civil liability for doing so
- Ability to make a whistleblower report despite confidentiality obligations. Contraventions may be reported despite any restrictions on disclosure set out in Québec statutes, provisions of any contract or duties of loyalty or confidentiality—including to an employer or client—that the person making the report would normally be bound b
- Prohibition against taking a reprisal against a whistleblower acting in good faith to prevent him or her from making a report. Reprisal includes the demotion, suspension, dismissal or transfer of the whistleblower or any disciplinary or other measure that adversely affects the whistleblower's employment or working conditions
- Prohibition against threatening to take a reprisal against a good-faith whistleblower so that the whistleblower will abstain from making a report or cooperating in an AMF investigation

There is no specific legal protection aimed at preventing discrimination against or the dismissal of whistleblowers under Canadian law.

Making a Report

Alberta:

Body	Details
Alberta Securities Commission (ASC)	**Address:** OWB – Confidential, Alberta Securities Commission, Suite 600, 250 – 5th Street SW, Calgary, Alberta, T2P 0R4 **Email:** owb@asc.ca **Telephone:** +1-833-295-4387 **Website:** https://www.asc.ca/en/enforcement/office-of-the-whistleblower

Quebec:

Body	Details
Autorité des marches financiers (AMF)	**Address :** AMF - Délégué à la protection des données - 17 place de la Bourse, 75002 Paris **Telephone :** (+33)1 53 45 64 44 **Web Form :** https://www.amf-france.org/fr/lanceur-dalerte **Website:** https://www.amf-france.org/en/forms-and-declarations/whistleblowing

APPENDIX O – BRAZIL

Jurisdictional Overview

In Brazil, whistleblower rights and protections are primarily governed by the Brazilian Anti-Corruption Law (Law No. 12,846/2013), the Public Integrity Law (Law No. 13,303/2016), and the General Data Protection Law (LGPD - Law No. 13,709/2018). These laws establish clear provisions on whistleblowing in both the public and private sectors, particularly in relation to corruption, fraud, and other serious wrongdoing.

Under these laws and regulations, whistleblower disclosures can relate to any of the following serious concerns (collectively referred to as “reportable concerns”):

- A breach of company policies and procedures
- A violation of Brazilian anti-corruption laws, such as bribery or fraud
- Criminal offences, including corruption, money laundering, and embezzlement
- Misuse of public or private authority, especially in the public sector
- Danger to public health, safety, or the environment
- Damage to public or private property, particularly in relation to corporate mismanagement or governmental failures
- Deliberate concealment or obstruction of any of the above actions

Protections

Key whistleblower protections include:

- Protection from retaliation: Employees who make protected disclosures cannot face retaliation, such as dismissal, harassment, or discrimination. Employers can be held liable for retaliating against whistleblowers.
- Confidentiality: Brazilian law emphasizes the protection of the identity of the whistleblower, especially in sensitive cases involving corruption, fraud, or other financial crimes. Disclosures are often anonymous, and protections are in place to ensure privacy.
- Legal remedies: Whistleblowers who face retaliation may seek legal action and remedies, including compensation for damages or reemployment if they are wrongfully terminated.
- Government incentives: In certain cases, Brazilian laws provide incentives for whistleblowers, especially when their disclosures lead to significant results, such as uncovering corruption or other illegal practices.

Making a Report

Body	Details
Comissão de Valores Mobiliários (CVM) – Securities and Exchange Commission of Brazil	**Address:** Comissão de Valores Mobiliários (CVM), Rua Sete de Setembro, 111, 6º andar, Centro, Rio de Janeiro, RJ, Brazil. **Email:** ouvidoria@cvm.gov.br **Telephone:** +55 21 3554 8699 **Website:** https://www.cvm.gov.br
Controladoria-Geral da União (CGU) – Office of the Comptroller General	**Address:** Controladoria-Geral da União (CGU), Esplanada dos Ministérios, Bloco O, Brasília - DF, 70048-900, Brazil. **Email:** ouvidoria@cgu.gov.br **Telephone:** +55 61 3218-4500 **Website:** https://www.gov.br/cgu/pt-br