

# Information on our whistleblowing policy

OCORIAN

Ocorian Fund Management S.à r.l. (the "**Company**") is committed to provide an internal reporting channel and procedure in order to give the opportunity to report misconduct and breaches ("**the Report**") of international or national law (the "**Misconduct**") in a simplified way.

This Report can be done by any legal person or natural person that is aware of any Misconduct (the "**Whistleblower**"), for instance: employees, including those whose employment contract has not started or has ended, volunteers and trainees, subcontractors, suppliers, self-employed persons, shareholders and members of the administrative, management or supervisory body.

The Company is also obliged to have in place enhanced protection measures for Whistleblowers. This includes to keep the identity confidential and protect the Whistleblower from any retaliation.

Whistleblowers are requested to consider to first use this internal channel described below before using any external or public channels. In case it is not possible for Whistleblowers to use OFM's internal channel, they can also contact the CSSF and send a written statement to the CSSF ([whistleblowing@cssf.lu](mailto:whistleblowing@cssf.lu)) as described on the CSSF's website (as applicable): <https://www.cssf.lu/en/whistleblower-protection/>.

The Whistleblower can file the Report in writing by addressing it to [whistleblowing@ocorianfunds.com](mailto:whistleblowing@ocorianfunds.com) or verbal by using the phone number +352 26 48 52 40 or in a physical meeting. Please describe the facts as precisely and detailed as possible. The written message

will only be received by the employee in charge of whistleblowing within the Company (the "**Investigating Officer**") and will be handled confidentially.

In case of a written Report, the Investigating Officer will confirm the receipt of your Report within 7 days and will also inform and support the Whistleblower during the process. The final feedback to the Whistleblower will in principle be provided within three month from the date of the initial notification. In case this is not possible and the appropriate follow-up is still being determined, the Whistleblower will be informed about this and about any further feedback to expect.

Your personal data is optional for the Report, but may help to clarify the case of Misconduct. If the processing of your personal data should be necessary in order to clarify the case, you will be asked to confirm the disclosure beforehand.

Any Report or request for advice addressed to the Investigating Officer is free of charge.

#### **Ocorian Fund Management S.à r.l.**

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