Whistleblowing Policy

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STAKE RWA FZE

Whistleblowing policy

1. Purpose

STAKE RWA FZE ("Stake" or the "Company") is committed to maintaining the highest standards of ethics, transparency, and integrity in all aspects of its operations within the virtual assets sector. In line with the relevant guidelines and rulebooks issued by the Virtual Assets Regulatory Authority ("VARA"), the Company has established this Whistleblowing Policy (the "Policy") to provide a clear and secure framework for reporting concerns. Stake encourages all employees, ex-employees, clients, subsidiaries, affiliates, and relevant third parties to raise, in good faith, any serious concerns related to suspected fraud, misconduct, irregularities, unethical activities, or illegal business practices, without fear of retaliation.

2. Definitions

Term	Definition
Business Days	Means days of the week when most businesses and government offices are open and operational, excluding weekends and public holidays.
Compliance Officer	Means an employee of Stake who shall be responsible in making necessary enquiries and undertake appropriate investigation under this policy and for the concerns raised by anyone in the Company. As defined in VARA Compliance and Risk Management Rulebooks. Throughout this policy, the term 'Compliance Officer' refers to the individual holding the roles of both Compliance Officer and MLRO.
Compliance Department	Means the department that identifies, assesses, advises on, monitors and reports on the Company's compliance risk to ensure compliance with applicable laws, regulations, and regulatory requirements, including those issued by the Virtual Assets Regulatory Authority (VARA).
Chairman	Means the Chairman of the Board of Directors of the Company.
Fraud	Means irregularities and illegal acts characterised by intentional deception to secure unfair or unlawful gain. It can be perpetrated for the benefit of or to the detriment of the organisation and by persons outside as well as inside the Company.
Misconduct	Means the failure on part of the staff members of the Company to abide by the rules and regulations. Reports may be submitted anonymously or with identification, through any of the designated reporting channels. A report may take written or electronic form, including emails, hotline

	submissions, web forms, complaints, or physical documents, as specified by the Company's reporting procedures.
MLRO	As defined in VARA Compliance and Risk Management Rulebooks. Throughout this policy, the term "MLRO" refers to the individual holding the roles of both Compliance Officer and MLRO.
Non-Fraud Irregularities	Means Non-Fraud irregularities encompass identification or allegations of personal improprieties or irregularities whether moral, ethical, or behavioral.
Personnel(s)	Means any employee(s), ex-employee(s), contractors, interns, worker(s) of Stake (including outsourced, temporary and on-contract), director(s), agent(s) engaged by or on behalf of Stake.
Report(s)	A formal or informal disclosure made by a Personnel or any individual under this Policy, regarding suspected misconduct, unethical behavior, legal violations, or breaches of Company policies.
Third-Party(ies)	Means someone who is not part of the Company but is or can be associated with any activities mentioned under this Policy.
Whistle-Blower	Means Personnel of Stake or any third party who makes a qualifying disclosure of information or any allegation conveying any fraud, corruption or any other misconduct that is happening or is suspected to take place in the Company and which is made in good faith and that relates to a reasonable suspicion that has taken place in the Company or through the actions of third party. Any personnel who may make disclosure under this Policy.
Unethical or illegal activity	Means any act by Staff or others that violates accepted standards of ethics or laws applying in the jurisdiction where Company and its subsidiaries operate. Such acts may include Fraud, defalcation, embezzlement, theft or impropriety.

3. Reporting Mechanism

3.1. Personnel may raise concerns through the following secure and confidential channels:

Email: whistleblowing@getstake.com

Physical Mail: Marked Confidential, addressed to the Compliance Officer

3.2. Any Personnel who becomes aware of suspected fraud, unlawful conduct, or other forms of misconduct is strongly encouraged to report their concerns. Open communication is vital for ensuring timely and effective resolution of such issues.

To report a concern, Personnel should follow the steps outlined below:

3.2.1 Familiarize with the Policy:

Personnel are encouraged to review and understand this Policy, including the available reporting channels, procedures, and protections in place for Whistleblowers.

3.2.2 Gather Relevant Information:

Compile all pertinent details related to the concern, such as dates, times, individuals involved, and any supporting documentation or evidence.

3.2.3 Select a Reporting Method:

Choose the preferred method of reporting from those provided in this Policy. Options may include an online reporting platform, a designated email address, a confidential telephone line, or a physical reporting form.

3.2.4 Submit the Report:

Submit the concern through the selected channel, ensuring that the information is clear, factual, and complete. Avoid emotional language and remain objective.

3.2.5 Confidentiality and Anonymity:

Whistleblowers may choose to remain anonymous by following the procedures outlined in this Policy. If the individual opts to disclose their identity, the Company guarantees protection from retaliation, in line with this Policy.

3.2.6 Role of the Compliance Officer:

The Compliance Officer will receive and review the submitted report, assess its credibility and seriousness, and determine the appropriate next steps.

3.2.7 Investigation Process:

If an investigation is warranted, the Compliance Officer will initiate it, which may involve gathering further information, interviewing involved parties, and reviewing evidence.

3.2.8 Resolution and Findings:

Upon completing the investigation, the Compliance Officer will communicate the findings to the Compliance Department and the higher management of the Company. Accordingly, an appropriate decision will be determined. The results and any necessary remedial actions will be documented and acted upon in accordance with Company policy.

3.2.9 Protection from Retaliation:

In line with this Whistleblowing Policy, any individual who reports a concern in good faith is protected from retaliation. Any form of retaliatory action will be treated as a serious violation and addressed accordingly.

3.2.10 Communication of Outcome:

Where appropriate and subject to legal and confidentiality considerations, the Compliance Officer or relevant authority will inform the Whistleblower of the outcome of the investigation, based on a detailed post-investigation report, which ultimately promotes transparency and accountability.

4. <u>Post Investigation Report</u>

4.1. Upon the conclusion of any investigation conducted under this Policy, especially Article 4, a comprehensive report shall be prepared to document the process and outcomes. The report will include a brief introduction summarizing the nature of the concern that initiated the investigation, followed by a description of the methodology used—such as interviews conducted, documents reviewed, and other relevant procedures. It will present a detailed account of the findings in a clear and chronological manner, concluding with an assessment of whether the reported concern was substantiated, partially substantiated, or unsubstantiated. Based on these findings, the report will outline any recommended actions or remedial measures, such as policy updates, disciplinary action, or further monitoring. Supporting materials, including key documents, evidence, or interview transcripts, will be attached or referenced as necessary to substantiate the conclusions and recommendations.

4.2. In the event that the Whistleblower is not satisfied with the outcome of the investigation, the latter may submit a written appeal clearly outlining reasonable and concrete grounds for the appeal. The appeal shall indicate the aspects of the investigation process or outcome that the Whistleblower believes were improperly handled, overlooked, or inadequately addressed. Additionally, the Whistleblower may include any new or supporting information, evidence, or documentation that may warrant a review of the case. The appeal will be reviewed by the Compliance Officer or an appropriate independent authority, in accordance with this Policy.

5. Handling Conflicts of Interest

5.1. In the event that a Whistleblower Report involves allegations against the Compliance Officer, or where there exists a perceived or actual conflict of interest, the Compliance Officer shall not be involved in handling or investigating the matter. Instead, the report shall be escalated to an independent authority, such as a designated senior official, an oversight committee, or an external third-party investigator, to ensure impartiality and preserve the integrity of the investigation process. The Compliance Officer is required to immediately disclose any such conflict of interest upon becoming aware of it.

5.2. In the event that the Report implicates any member of senior management, the Compliance Officer shall not act unilaterally. The matter will be escalated to an independent oversight committee or referred to an external investigator, as deemed appropriate by Stake. During this process, the Compliance Officer must maintain strict confidentiality and refrain from any direct engagement with the implicated individual(s) until the independent review is complete.

5.3. Stake is committed to handling all reports, particularly those involving senior personnel or potential conflicts with the highest standards of fairness, transparency, and objectivity, free from undue influence or bias.

6. Confidentiality

6.1. Confidentiality is a core principle of this Policy, ensuring that the identity of the Whistleblower and the details of any reported concern are kept strictly private and accessible only to those directly involved in handling the matter. This includes the following safeguards:

6.1.1 Restricted Access: Only authorized individuals—such as the Compliance Officer and designated members of the investigative team—are permitted to access the Whistleblower's identity and the contents of the Report.

6.1.2 Need-to-Know Basis: Information related to the report will be disclosed solely to those who are directly responsible for evaluating, investigating, or resolving the concern.

6.1.3 Non-Disclosure Obligation: The unauthorized disclosure of a Whistleblower's identity to other employees or external parties not involved in the investigation is strictly prohibited.

6.2. Data protection refers to the secure handling of all information submitted as part of a report, including related documents and evidence. Measures taken to protect this data include:

6.2.1 **Secure Reporting Channels:** Stake provides secure and confidential avenues for reporting, such as encrypted online platforms, anonymous email accounts, and dedicated hotline numbers.

6.2.2 **Data Encryption:** Any electronically submitted reports will be encrypted to prevent unauthorized access or tampering.

6.2.3 **Controlled Distribution:** Information pertaining to the report will be shared only with those involved in the investigation or decision-making process.

6.2.4 **Third-Party Confidentiality:** Should external advisors or experts be engaged in the investigation, their access to sensitive data will be strictly regulated and governed by confidentiality agreements.

6.3. Stake is committed to upholding a careful balance between protecting confidentiality and ensuring the integrity of its investigations. This approach helps foster trust in the whistleblowing process while safeguarding the rights and well-being of both Whistleblowers and the Company.

7. Recordkeeping and Audit Trail

7.1. The Compliance Officer will maintain comprehensive records of all Reports, investigative steps, related communications, findings, and remedial actions taken. These records shall be securely stored in a tamper-proof and access-controlled environment for a minimum period of seven (7) years from the closure of each case, unless a longer retention period is required by applicable laws or regulatory obligations.

7.2. Access to such records shall be strictly limited to authorized Personnel within the Compliance and Legal functions, and may be disclosed to external authorities only in accordance with applicable legal processes.

8. False Allegations

8.1. Personnel are strictly prohibited from making false or malicious allegations under this Policy, as such actions can cause significant harm to the reputation and well-being of the individuals involved. No disciplinary action will be taken against any individual who raises a concern in good faith, even if the investigation does not substantiate the claim.

8.2. In the event that a Report was made knowingly in bad faith, whether with malicious intent, to cause harm, or for personal benefit, appropriate disciplinary measures will be taken in line with Stake's Bylaws, Code of Conduct and Ethics Policy.

9. Policy Review

This Policy will be reviewed annually by the Compliance Officer or upon significant changes to regulatory requirements or business operations. Updates will be approved by the Board or designated Governance Committee.

10. Contact Information

For further details or inquiries regarding this Policy, please contact the Compliance Department at: contact@getstake.com