

Whistleblowing Policy

1. Directive

Sustainable management is the basis of future prospects for the environment, society & the economy and also for each individual employee or business partner of financial.com AG.

The cornerstones of the financial.com AG culture are the division of central requirements as well as their independent implementation within the subsidiaries and a common understanding of values and risk minimization for sustainable corporate development.

The whistleblower system with the legal expertise of Ratisbona Compliance creates additional trust and security through a clearly defined structure that is accessible to everyone and a legally based initial assessment, thus ensuring the sustainable success of financial.com AG and averting damage.

2. Scope

- a) This policy describes the procedure for reporting confirmed or suspected malpractice or misconduct.
- b) It applies to all employees (including temporary workers), customers, suppliers and anyone with an interest in the well-being of the Company.

3. Knowledge or reasonable suspicion of an abuse

- a) We encourage anyone who has knowledge or reasonable suspicion of material misconduct (violation of law or unethical conduct contrary to our Code of Conduct) to make a report.
- b) We encourage every employee to report such matters through the known and established reporting channels. These are (by way of example)
 - i) Confidential representative
 - ii) Human Resources
 - iii) Works Council
 - iv) Management
 - v) Internal suggestion and reporting system
 - vi) Compliance department
- c) If all these reporting channels are not suitable for your report, the whistleblower system with legal expertise of Ratisbona Compliance is available to you as a reporting channel. The whistleblower system of Ratisbona Compliance is operated by an independent third party.
- d) Through the whistleblower system with legal expertise of Ratisbona Compliance, reports are made directly to Ratisbona Compliance. Reports can be made digitally via the Ratisbona Compliance reporting platform, by telephone or in

4. Intentional Misreporting

Intentional misreporting will be considered a violation of the Code of Conduct and will be treated accordingly. It may lead to disciplinary action and/or criminal prosecution.

5. Assignment of responsibilities

- a) Through the whistleblower system of Ratisbona Compliance, anonymous communication with the whistleblower is possible and ensured if required. Upon receipt of a report of alleged misconduct or fraudulent behavior, the facts of the case are subjected to an initial review based on the information contained therein.
- b) Ratisbona Compliance shall assume responsibility for the timely review and processing of incoming reports.
- c) Further inquiries may be made to the whistleblower for further assessment of the facts while maintaining anonymity.
- d) Based on this initial assessment, the further course of action to deal with the matter is determined. Depending on the seriousness of the allegation, the group of persons affected and the area of law, the report will be passed on to the responsible unit of the relevant shareholding or shareholding group. External experts may be called in for further examination of the misconduct. There may be a duty to report if there is sufficient suspicion of a criminal offense. Ratisbona Compliance shall ensure that all reported cases are investigated and concluded with sufficient documentation.
- e) Financial.com AG expects managers and supervisors at all hierarchical levels to take such reports seriously, to treat them in strict confidence and to resolve them promptly with the appropriate guidelines and necessary measures to eliminate the malpractice.

6. No follow-up of a notification

Ratisbona Compliance may conclude that a report will not be followed up, for example, if

- a) only insufficient information is available for an adequate investigation and there is also no possibility to obtain further information
- b) the report is proven to be a false report.

7. Reporting

Reporting is carried out by the legal department of Ratisbona Compliance. Reporting is done in detail for the cases investigated by Ratisbona Compliance.

8. Protection and rights of the whistleblower

- a) The identity of all Reporting Parties will be kept absolutely confidential. Ratisbona Compliance will under no circumstances disclose voicemails, IP addresses and/or telephone numbers, unless "8 c" is applicable.
- b) No one who makes a report will suffer any negative consequences as a result. However, reporting parties (as whistleblowers) also enjoy no protection in the event of misconduct.
- c) In the following cases, whistleblower protection is not guaranteed:

- i) Upon request, e.g. by law enforcement authorities, Ratisbona Compliance is obliged to provide voice messages, IP addresses and/or telephone numbers.
 - ii) Cases where it has been determined that reports were intentionally made falsely or against better judgment and/or in bad faith;
 - iii) or where the report itself must be classified as a criminal offense or violation of the Code of Conduct (e.g., defamation or threats).
- d) If the reporter does not agree with the result of the investigation, he/she again has the possibility to make this known via the whistleblower system with legal expertise of Ratisbona Compliance.

9. Protection and rights of the accused person

- a) If investigations are initiated as a result of a report, financial.com AG will inform the parties concerned within 30 working days at the latest. This phase may also be extended under consideration of the case-specific situation, e.g. if there is a risk that evidence will be destroyed or that the initiated investigations will otherwise be impeded.
- b) Data subjects have the right to complain about investigations directed against them. For this purpose, data subjects shall contact:
 - i) Their superior or managing director
 - ii) The Ratisbona Compliance contact information can be found at the end of this policy.

10. Data Protection

Ratisbona Compliance will treat all information as strictly confidential. The protection of data of both reporting parties and affected parties is assured within the legal framework. Information will be made available on a restricted basis, both in terms of content and the group of persons concerned (so-called "need-to-know basis"). This policy requires the processing and storage of personal data. This is done exclusively in accordance with data protection regulations.