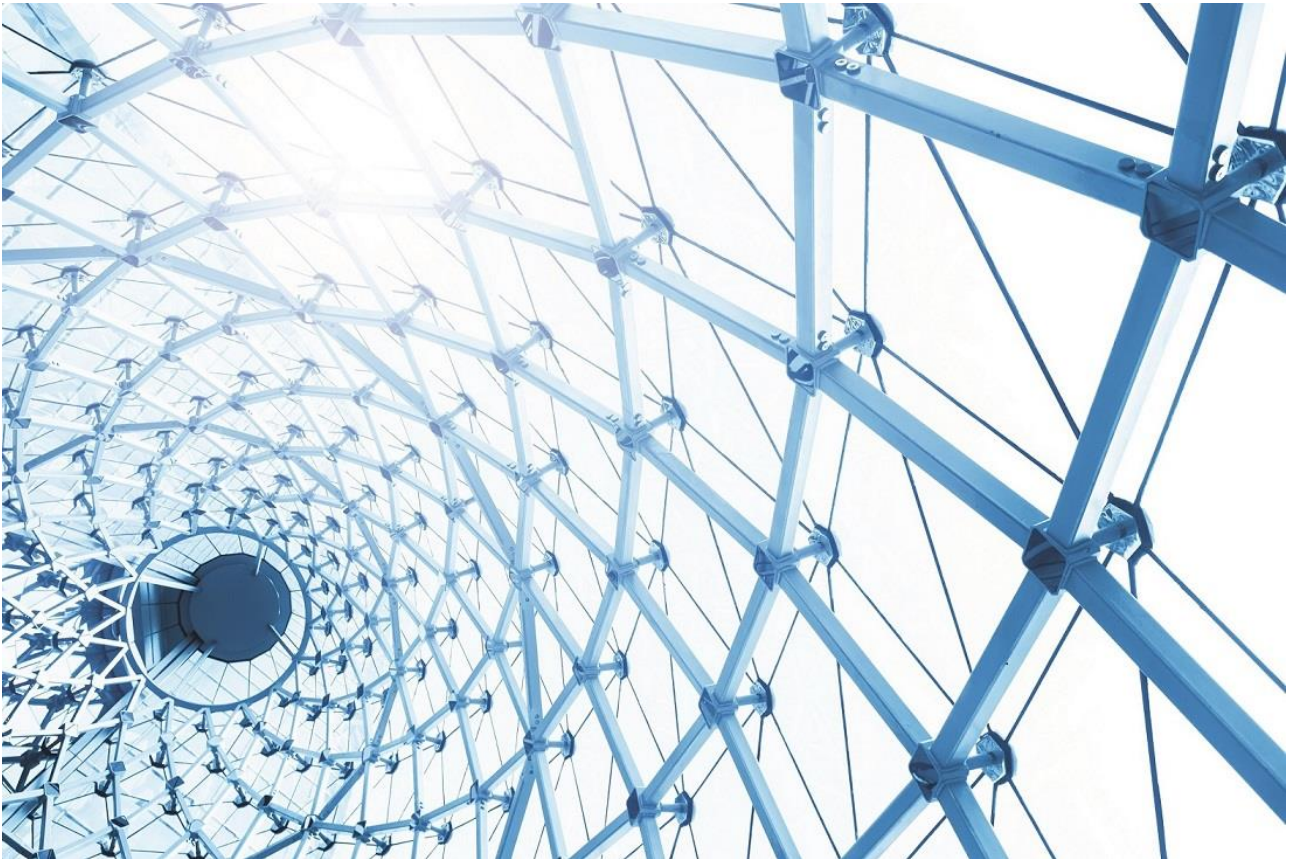


BOSWME Whistleblowing Policy

BOS Wealth Management Europe SA

Approved by BOSWME Executive and Board of Directors

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Recommended by:	Magalie Bovry, BOSWME Head of Compliance
Reviewed by:	Joanne Ting Chai Inn (BOS RCU) Antonio Salas, BOSWME UK Head of Compliance
Endorsed by:	Allen Tan Sang Wee, BOS Regulatory Compliance (on behalf of Adriel Loh, Group Head of Regulatory Compliance)
Approved by:	BOSWME ERC BOSWME Board of Directors

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1. Introduction

BOS Wealth Management Europe SA ("BOSWME" or "the Company") with its UK branch have adopted the Whistleblowing Policy to define the rule for escalating any wrongdoing an employee of the company and/of its branch may be witness of or could be aware of.

2. Scope

BOSWME overarching principle is to meet regulatory requirements such as but not limited to those arising from the Luxembourg Law dated 2023, the Circular CSSF 12/552 (as amended by circulars CSSF 13/563, 14/597, 16/642,16/647, 17/655, 20/750, 20/759, 21/785 and 22/807) on Central Administration, Internal Governance and Risk Management; Directive (EU) 2019/1937 on the protection of persons who report breaches of Union Law, and the EBA Guidelines on internal governance GL 2021/5. In addition, and in relation to the UK Branch, this policy is designed to ensure that the BOSWME meets the requirements in the UK The Public Interest Disclosure Act 1998 (PIDA) and FCA SYSC Chapter 18.

This Policy makes up one part of the Company ongoing commitment to adhere to the highest standards of ethical conduct in relation to the treatment of our clients and management of conflict integrating European and Local regulations requirements.

The Policy must be read in conjunction with other relevant Group (notably Whistleblowing Programme sub-Policy and OCBC Whistleblowing Statement) and local Policies and Procedures (including but not limited to the BOSMWE Fair Dealing code) and in particular with the Company's Code of Conduct. Where the legal and regulatory requirement differ, BOSWME must apply the higher of the two standards to the extent that the local laws and regulations permits.

3. Application

This procedure applies to BOSWME Luxembourg and the UK branch.

This Policy must be observed by all permanent or temporary staff members (i.e. contractors), including Board members and Authorized Managers (collectively the "Employees"), subject to the local applicable regulation. Trainees, volunteers, and self-employed workers are also covered by this Policy.

4. Purpose

BOSWME Whistleblowing policy aims at:

- encouraging employees to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously, investigated as appropriate and that their anonymity will be respected.
- To provide employees with guidance on how to raise those concerns and an explanation on how handling whistleblowing concerns.

- To reassure and protect the employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

5. Breach of the Policy and escalation Process

Where a breach or potential breach of this policy has been identified, the Head of Compliance and the Authorised Management (GM for the UK Branch) must be notified within 3 business days via email.

6. Guiding principles

6.1. Reporting of any wrongdoing

BOSWME has zero appetite for the risk that opportunities to prevent or stop wrongdoing in the workplace might be missed due to lack of colleague awareness of or lack of confidence in the channels by which they should report their concerns.

Wrongdoings may include (subject to local regulations), but are not limited to the following acts:

- Criminal activity.
- Any breach to criminal and civil laws and regulation.
- Breaches of regulatory or legal requirements.
- Breaches of EU Directives and Regulations, e.g. MiFID, Market Abuse Regulations, GDPR, etc...;
- Breaches of local and Group policies and procedures, including breach of anti-money laundering, fraud or financial terrorism laws and regulations.
- Breach of the codes of conduct and professionals' obligations pursuant to laws and regulations;
- Manipulating procedures and/or IT systems to achieve product sales, targets or bonuses;
- Breaches of financial accounting and auditing obligations;
- Endangering of someone's health and safety;
- Damage to the environment;
- Deliberate covering up of wrongdoing in the above categories.

Employees who suspect with a sufficient level of certainty illegal activities, grave misconduct and/or violations of the Company's regulations, policies or guidelines must, without delay, bring up the relevant facts through a specific, independent, and autonomous channel as described in this Policy.

6.2. Employee Protection by the Company

All concerns raised will be taken seriously and fully independently investigated. The identity of the Employees who raise the concern will be kept confidential as well as the identity of the one who is allegedly involved or responsible for the concern.

The Company commits, through this Whistleblowing Policy, to never punish, reprimand or discriminate, victimize anyone who reports these kinds of violations in good faith. The warnings given in good faith shall not result in any liability of any sort for the Employees who issued them. Victimized, harassment, discrimination, bullying or any other action to deter a colleague from

making a Whistleblowing report, or any other actions taken by way of revenge for making a report, will be regarded as gross misconduct.

BOSWME will also protect persons who have been reported from any negative consequences should the Firm find no evidence during its investigation that could justify taking measure against that person.

The making of false and malicious allegations will be regarded as a serious disciplinary offence.

7. Roles and responsibilities

7.1. Employees

It is the duty of every Employee to report any wrongdoing. Indeed, an open culture of learning, in which errors can be properly addressed, is fundamental to a successful and reliable cooperation amongst employees within the Company.

An employee using the whistleblowing process does not necessarily need to have firm evidence to report a serious concern. However, reports should always be submitted honestly and in good faith.

7.2. Reporting line

To avoid any conflict of interest, it is possible for the Employees to not report to their line manager and instead report to Chief Compliance Officer (the "CCO"), to the Human Resources Department or to the AM or to members of the BoD, if necessary. Employees can report their concerns by email, meeting appointment or telephone appointment.

Where the whistleblower has requested confidentiality or has chosen not to reveal their identity, the disclosure of reportable concerns is managed on a confidential basis (unless required by law to break that confidentiality). All disclosures are treated consistently and fairly. Should an Employee feel that he is unable to escalate internally, in case the local legislation permits this action, he/she can make an external disclosure to the regulator (Please refer to Appendix 1).

7.3. Compliance

The CCO and the local Heads of Compliance are indeed in charge of the implementation and the monitoring of this Policy. Any information received from whistleblowers shall be treated by Compliance in a confidential and sensitive manner in accordance with the applicable rules and regulations. This applies even if the information turns out to be unfounded, provided that the Employee believed the issue in question constituted a real violation at the time that it was reported.

7.3.1. Recording of concerns

Compliance should ensure that it records and maintains a record of whistleblowing disclosures received. A register is maintained by the Head of Compliance.

7.3.2. Training

Training will be provided by BOSWME (via its Group training process) to all Employees when joining the Company and when deemed necessary. Training should include:

- a statement that the Firm takes the making of reportable concerns seriously.

- a reference to the ability to report reportable concerns to the Firm and the methods for doing so;
- examples of events that might prompt the making of a reportable concern;
- examples of actions that might be taken by the firm after receiving a reportable concern by a whistleblower, including measures to protect the whistleblower's confidentiality.

8. Investigation process

The whistleblowing concern is to be treated on a strictly confidential basis by Compliance. Compliance will ensure the tracking of the outcome of the investigation.

If appropriate information provided through the whistleblowing investigation should be made available to the management body and the other internal control functions.

Where applicable and appropriate, feedback will be provided to the whistleblower, this could include an indication of timing for actions or next steps, how his or her disclosure has been handled and dealt with, and whether the disclosed issue has been resolved.

As a matter of principle, learnings from the disclosure should be shared within the Company to raise general awareness and to prevent potential breaches in the future. The internal communication must maintain the confidentiality of individual whistleblowers at all times.

Compliance will ensure that the potential or actual breaches raised is assessed and escalated, including as appropriate to the relevant competent authority or law enforcement agency.

9. Breach of the policy and escalation process

Where a breach or potential breach of this Policy has been identified and could constitute any potential issue, escalation to the Authorised Management (GM for the Branch) should be made in the shortest timeline.

10. Appendix - external reporting

Should employee feel that they are unable to escalate internally they can make an external disclosure to the following bodies:

Luxembourg

A dedicated whistleblowing procedure and reporting tool is available on the CSSF website:

- Reporting tool - <https://whistleblowing.apps.cssf.lu/index.html?lanquage=fr>
- Procedure – whistleblowing_EN.pdf (cssf.lu)

CSSF can also be contacted through the following email address: whistleblowing@cssf.lu

UK Branch

Financial Conduct Authority (FCA) may be contacted through the following email address:

<https://www.fca.org.uk/firms/whistleblowing/how-make-report>