

## Objective

The objective of this procedure is to explain the principles of whistleblowing at PANDOO Management (the "Company" or "PANMGT").

Basis of this Whistleblowing Procedure and the Compliance-Policy 2.2.2 is the Law of 16 May 2023 transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (the "Whistleblowing Law").

## Description

Whistleblowing is defined as the exposure of any kind of information or activity that is deemed breaching applicable legal regulations by the Company and its employees.

Any Whistleblower, as defined in Article 2 of the Whistleblowing Law, no matter if internal or external to PANMGT, shall be protected as stipulated in Article 4 of the Whistleblowing Law when making a whistleblower report in accordance with the Whistleblowing Law. The protection comprises all factors listed in Article 25 of the Whistleblowing Law, inter alia, termination or suspension of an employment contract, denial of promotion, transfer of function, change of place of work, etc.

## How to proceed

The Chief Compliance Officer (the "CCO") of PANMGT is in charge of the collection and management of the issues raised according to this Whistleblowing Procedure.

There are different channels existing to perform a whistleblowing report. No matter if internal or external, the most efficient and fastest way to express and report any concerns is via the following e-mail-address:

[gunnar.nau@pandoo-management.lu](mailto:gunnar.nau@pandoo-management.lu).

Any other written whistleblowing report, shall be addressed to the CCO

<p><b>PANDOO Management</b> <b>Confidential:</b> - to the attention of the Chief Compliance Officer - ONLY 31, rue de Hollerich L-1741 Luxembourg Grand Duchy of Luxembourg</p>
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Kindly note that any other all written whistleblowing reports, being not directly addressed to the CCO, but generally addressed to PANMGT or received via an intermediary or a delegated party (in connection to services provided on behalf of PANMGT), should immediately be transmitted to the CCO who will start an investigation of the matter.

The investigation process shall be performed as rapidly as possible, as a reasonable time frame for providing first feedback to the whistleblower must be guaranteed (within 7 days). A diligent investigative approach requires a step-by-step process. It is therefore important (1) to identify all the information needed, (2) to preserve evidence that can be used to establish the facts and (3) to ensure that documents and information must not be lost or changed as it is not enough just to gather the data.

The authenticity of the evidence must be guaranteed, ensuring that the information cannot be challenged later. The data must be analysed to recreate the chain of events and the decision-making process and to identify the people involved in the issue under investigation.

This approach enables the CCO to explain what happened and why, and to establish who is responsible within the Company. Potentially intrusive information of a personal nature, such as health, political, sexual, or religious beliefs shall not be included in an investigation.

The CCO is free to establish his/ her own particular guidelines covering specific aspects of the whistleblowing process as for example the taking of and secured filing of minutes. The whistleblower must be informed within 3 months about the findings and the potential remedies put in place.

If however, the employee does not feel comfortable in informing the Chief Compliance Officer, the employee shall remit a whistleblower report to the CSSF.

Please note that the CSSF "strongly encourages employees to blow the whistle internally in the first instance".

The CSSF should be informed by either:

- <https://whistleblowing.apps.cssf.lu/index.html?language=en> or
- the e-mail-address: [whistleblowing@cssf.lu](mailto:whistleblowing@cssf.lu)