

TOKO FZE

Whistleblowing Policy

Last Updated: March 20, 2023

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Variations, Dispensations and Exceptions: there are no permitted variations, dispensations or exceptions to this policy.

Policy Manager: James Holding

Date: 20/03/2023

Version: 1.0

TOKO FZE Whistleblowing Policy

Category: Risk Management

Entity This Policy Applies To: TOKO FZE

Purpose

TOKO FZE (hereafter 'TOKO') is committed to developing an integrated framework for whistleblower protection. The main objective of this policy is to ensure that no whistleblower, for reason of having made the disclosure:

1. be subject to civil or contractual liability;
2. have any contractual, civil, or other remedy or right enforced against them by another person; or
3. be dismissed from their current employment, or otherwise subject to action by their employer (or its related parties) that is reasonably likely to cause them detriment.

Who does the Whistleblowing Policy apply to?

This policy applies to all employees (including temporary agency workers, interns and secondees), officers and directors of TOKO and third parties who deal with TOKO (for example, customers and suppliers).

What qualifies a disclosure?

A qualifying disclosure is a disclosure of information that is made in good faith and relates to a reasonable suspicion that an entity, or any of its employees or officers, has or may have:

- contravened a provision of any applicable law administered by the Dubai Financial Services Authority (DFSA); or
- engaged in money laundering, fraud, or any other financial crime.

Suspected cases to be reported

Whistleblowing cases may vary from corruption, to fraud, to money laundry.

Fraud

Fraud is commonly used to describe a wide range of misconducts including theft, corruption, embezzlement, bribery, forgery, misrepresentation, collusion, money laundering and concealment of material facts. It often involves the use of deception to make a personal gain for oneself, a connected person or a third party, or a loss for another - intention is the key element that distinguishes fraud from irregularity. Fraud does not just have a potential financial impact, but it can cause damage to the reputation of an organisation responsible for managing funds effectively and efficiently.

Money Laundering

Money laundering is the illegal process of making large amounts of money generated by a criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source. The money from the criminal activity is considered "dirty", and the process "launders" it to make it look clean.

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Whistleblower protection

TOKO is committed to ensuring the protection of whistleblowers who are covered by TOKO Whistleblowing Policy through the detection of violations, ensuring full confidentiality and dealing with the report covered by this policy based on specific and credible information or documents, without violation of any ethical rules recognized by TOKO.

A whistleblower will have the following protection:

- Non-disclosure of information concerning his identity and whereabouts
- No whistleblower will be considered to have violated the provisions of legalization, agreements & representations related to disclosure of confidential information, whether in the entity for which the whistleblower works or deals with, unless the report is false.

Damage or injury from which the whistleblower may be protected:

- Revenge, harassment or prosecution by other employees.
- Bias against the whistleblower (internally/externally) in the present or the future.

How do I report a concern under the Whistleblowing Policy?

There are a variety of channels through which a whistleblower may report their concerns under this policy:

To TOKO's compliance officer

Concerns regarding actual or suspected wrongdoing may be raised via the following confidential reporting channels. All reports will then be routed directly to TOKO's compliance officer:

By email	[contactus@toko.network]
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Employees may report to supervisor or other management personnel

Employees may also raise concerns of suspected wrongdoing in writing, with their line manager. If an employee does not feel comfortable to raise the concern with his/her manager, this can be raised with an alternative manager. The matter should then be immediately referred to TOKO's compliance officer by the manager who has received the report.

Important Notes:

- (1) TOKO is required by the applicable law to keep a log of any disclosures and whistleblowing details made in this regard. TOKO will investigate all credible concerns that are reported. When submitting a report, please provide as much detail as possible, including names and dates, etc., in order to help facilitate fact finding/investigation process.
- (2) TOKO recognises that in some cases whistleblowers may not feel comfortable identifying themselves. In these cases, reports may be submitted anonymously. Please note, however, that anonymous reports could limit our ability to thoroughly investigate a concern.
- (3) If a knowingly false report is made, for personal gain or any other ulterior motive, the person making the report will be investigated. This may result in disciplinary action in the case of employees, including termination of employment.

Investigation process and reporting

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Upon receiving a concern raised under this policy, our compliance officer and relevant team will evaluate whether the concern is within the scope of this policy, and will assess the severity of the concern and determine whether a further investigation is required to properly resolve the matter.

Investigators will be completely detached from any teams related to the subject matter of the reports; investigations may, in certain circumstances and particularly where the matter is sensitive or serious, be conducted by external parties and/or relevant regulators and authorities.

TOKO is committed to the fair treatment of all individuals who are involved in an investigation, including those who are under investigation or those whose identity becomes relevant in the course of an investigation.

Reporting to authorities

If the result of the investigation and legal advice results in evidence of criminal activity, applicable laws and procedures shall be followed.

Penalty and policy violation

If a TOKO employee violates this policy, action will be taken according to the relevant laws and regulations of Department of Dubai Government Human Resources (DGHR)(to the extent applicable).

Responsibilities of TOKO's compliance officer

TOKO's compliance officer will be primarily responsible for

- overseeing the management, implementation and compliance of this policy;
- where required, referring concerns raised to, or seeking assistance from, other departments or teams in connection with investigations, or obtaining advice on TOKO's internal policies, guidelines and procedures;
- communicating with relevant employees and third parties to whom concerns within the scope of this policy have been raised directly;
- monitoring the quality of services of the reporting channel, including the confidentiality and record keeping obligations; and
- managing and maintaining oversight of investigations and other departments are likely to be called upon to assist.

How to contact us

If you have any questions about this policy or want to exercise your rights set out in this policy, please contact us by sending an email to contactus@toko.network.

Review and Updates

This policy will be reviewed each calendar year by TOKO FZE Compliance Officer and updated as needed.

Further Information

Questions regarding this policy should be directed to James Holding, TOKO FZE Compliance Officer.

Version Control:

Date of Publication	Version No.	Description	Prepared or modified by
March 20, 2023	1.0	Initial construction of TOKO FZE Whistleblowing Policy	James Holding, Compliance Officer

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