



COWRY SECURITIES LIMITED

Whistleblowing Policy

Whistleblowing is the act of disclosing a violation of any rule, regulation or law to an authority that has supervisory or regulatory authority; and has the responsibility to take action to impose sanctions against such violation.

The firm takes malpractice seriously and encourages all employees to report any suspicion of malpractice to the Chief Compliance Officer. In the event of any such report, the confidentiality of the member of staff in question will be respected and the employee making the report will be supported and protected from any form of victimisation. COWRY will therefore take all reasonable steps to ensure that no individual under its control victimises any member of staff who makes a whistle blowing notification.

Misconducts that could be reported include:

- Market abuse.
- Conducts which is inconsistent with COWRY's stated vision and values, its code of ethics and policies and procedures.
- Financial fraud.
- Deliberate concealment of information.
- Violation of law.
- Abuse of company resources and assets.
- Undeclared conflicts of interest on suspected misconduct.
- Danger to the health and safety of any individual.

In the event that an employee feels uncomfortable or unable to make an internal notification to the Chief Compliance Officer, they should consider making a confidential report to – misconducts@cowryasset.com and/or compliance@cowryasset.com.

Reports will be treated with utmost confidentiality.