

Whistleblower Policy

EmergX Finance Corporation

Date: July 2025

1. Policy Statement

EmergX Finance Corporation (EFC) is committed to the highest standards of integrity and accountability. This policy enables staff, consultants, and third parties to report serious concerns without fear of retaliation. It supports a culture of openness and transparency in line with FCA expectations and UK whistleblowing legislation.

2. Scope

This policy applies to all EFC staff, directors, suppliers, partners, and consultants. It covers disclosures relating to:

- Financial impropriety or mismanagement
- Bribery, corruption, or fraud
- Breach of legal or regulatory obligations
- Ethical misconduct
- Environmental or health & safety violations
- Concealment of wrongdoing

3. Reporting Channels

Disclosures may be made via:

- Confidential email: whistleblow@emergxfinance.com
- Direct report to the Chief Risk & Compliance Officer (CRCO)
- Independent Non-Executive Director (oversight)
- External FCA Whistleblower Line (if appropriate)

4. Protection and Confidentiality

Whistleblowers are protected under UK law. EFC prohibits retaliation or discrimination against any individual raising a concern in good faith. All reports are handled confidentially and can be submitted anonymously if preferred.

5. Investigation and Outcomes

All disclosures will be reviewed by the CRCO and, where necessary, escalated to the Board. Investigations will be fair, timely, and fully documented. Outcomes will be communicated to the whistleblower where appropriate.

6. Review and Communication

This policy is reviewed annually. All staff are trained on whistleblower rights and reporting procedures. The policy is included in onboarding and accessible via the staff portal.