



WHISTLEBLOWING CHANNEL MANUAL

March 2024

A. Purpose

This Whistleblowing Channel Manual (hereinafter Manual) guides how the whistleblowing channel of **Plural Markets – Empresa de Investimento, SA** (Plural Markets) operates, establishing a set of rules and procedures relating to communication, reception, registration, analysis, and treatment/follow-up of complaints.

This document will be reviewed whenever deemed to be necessary and it should be made known to all employees and delivered to new hires.

B. Definition

The Whistleblowing Channel is a secure means of communication, which allows the presentation of internal and external complaints, with the possibility of anonymous reports.

Complaints may refer to the following situations, among others:

- a) Improper use of funds, theft, fraud, embezzlement or bribery;
- b) Failure to comply with duties related to anti-money laundering and financing of terrorism;
- c) Failure to comply with the rules for sale of investment products and services;
- d) Failure to comply with the duty of confidentiality and protection of privacy and personal data;
- e) Non-compliance with or serious offenses related to the employee's employment relationship or the workplace itself, such as safety conditions and harassment;
- f) Conflict of interest situations.

The following individuals may report infractions through the Whistleblowing Channel:

- Employees, interns, and members of Plural Markets' management bodies.
- Individuals who report an infringement based on information known during the recruitment process, or during another phase of pre-contractual negotiation, or during the period and scope of work as employees of Plural Markets.
- Customers, service providers, subcontractors, and suppliers, as well as any persons acting under the supervision and guidance of Plural Markets.

The process comprises the following steps:

- (i) Receipt of the report: the whistleblower must be notified of the receipt of the report, unless there is an express request to the contrary or if there are reasonable grounds to believe that the notification may jeopardize the protection of their identity;
- (ii) Preliminary assessment by the Compliance area: the whistleblower may be asked to provide additional clarifications to complete, clarify or support the infraction and the facts reported;

- (iii) Verification of the complaint, when applicable, taking the necessary actions to cease the infringement or the facts reported;
- (iv) Notification to the whistleblower of the measures planned or adopted to follow up on the complaint, with the respective grounds.

The means available to submit the complaint are:

- By mail, in a closed envelope marked “Confidential” to Plural Markets Compliance area; or
- In person, by prior appointment of a face-to-face meeting with Plural Markets Compliance area.

The in-person report will be recorded in minutes. The whistleblower should read, rectify, and approve the transcript of the minutes of the face-to-face meeting by signing it.

The complaint may be anonymous or with identification of the whistleblower. In the case of an anonymous report, Plural Markets suggests that the whistleblower indicate at least one method through which they can be contacted at a subsequent stage, if this is necessary within the scope of the investigation.

C. General requirements for the complaint

- The most detailed and objective description possible of the infraction and the facts.
- Presentation of information on dates/period, people, entities, amounts, and others related to the infraction and facts.
- Whenever possible, any evidence of the infraction and the facts mentioned in the complaint may be added.
- Any form of retaliation against the whistleblower or third parties who assist or are linked to the whistleblower is strictly prohibited.
- The whistleblower should act in good faith, provide true information or documentation about the facts communicated and not hide facts that may be relevant to the verification of the facts communicated.

The whistleblower may be held liable if the report made constitutes an offense in itself or if the information or documents relating to the report were obtained through a criminal act, such as trespassing on someone's property or computer piracy.

The complaint may be dismissed upon a reasoned decision and communicated to the whistleblower, if known/identified, specifically when:

- The complaint refers to an infraction of insignificant gravity or if no evidence of an infraction can be found therein;
- The complaint is repeated and does not contain new elements of fact or law that justify a different follow-up from that given in relation to the previous complaint;
- Information is insufficient or Plural Markets is not competent to resolve the identified problem.

D. Information security

Access to the record and content of complaints is carried out strictly by duly authorized people, with the aim of guaranteeing the integrity and preservation of the complaint, as well as the confidentiality of the whistleblowers' and third parties' identities.

Complaints received are maintained and retained for a period of at least five (5) years and, regardless of this period, while related judicial, administrative, or disciplinary proceedings are pending.

Regarding the processing of personal data, the Privacy Policy should be checked.

E. Revision and Disclosure

The Compliance area is responsible for managing the Whistleblowing Channel.

The Plural Markets Whistleblowing Channel Manual is published on its website.

Version History:

Version	Date	Description of changes
1	03/2024	Initial release.