

CFIX Whistleblower Policy

1. INTRODUCTION

CFIX Virtual Assets Broker & Dealer Services L.L.C S.O.C (“CFIX”) is committed to fostering a culture of integrity, transparency, and accountability. This Whistleblower Policy establishes a secure and confidential framework for reporting any suspected misconduct, ethical violations, regulatory breaches, or illegal activities within our operations.

This policy is published on our website in compliance with VARA’s disclosure requirements under the Broker-Dealer Services Rulebook and the Market Conduct Rulebook.

2. SCOPE

This policy applies to all individuals associated with CFIX, including:

- All employees (permanent, temporary, and contract staff)
- Directors and Board members
- Consultants, advisors, and third-party service providers
- Clients and external stakeholders who become aware of reportable misconduct

3. WHAT CAN BE REPORTED

The following categories of misconduct may be reported under this policy:

- Breaches of VARA regulations, licensing conditions, or applicable Rulebooks
- Fraud, financial misconduct, or misappropriation of assets
- Bribery, corruption, or conflicts of interest
- Money laundering, terrorism financing, or proliferation financing
- Market abuse, including insider dealing or market manipulation
- Data protection or privacy violations
- Unethical conduct, abuse of authority, or harassment
- Health and safety violations
- Any attempt to conceal or cover up any of the above

4. HOW TO REPORT

CFIX provides multiple confidential channels for submitting whistleblower reports:

- Email: whistleblower@cfix.com (marked “Confidential – Whistleblower Report”)
- Dedicated Online Reporting Form: Available on the CFIX website
- In Writing: Addressed to the Compliance Officer, Office 704, International Business Tower, Business Bay, Dubai, UAE

- On our dedicated domain located on ethics.cfix.com
- Direct Reporting to Board: Where concerns involve senior management, reports may be directed to a designated Board member

Reports may be submitted anonymously. CFIx accepts and investigates anonymous disclosures with the same rigour as identified reports.

5. PROTECTION AGAINST RETALIATION

CFIX strictly prohibits any form of retaliation against individuals who make reports in good faith. Retaliation includes, but is not limited to:

- Dismissal, demotion, or suspension
- Harassment, intimidation, or discrimination
- Reduction in duties, pay, or benefits
- Any other adverse action related to the making of a report

Any individual who engages in retaliatory conduct will be subject to disciplinary action, up to and including termination, and may face legal consequences. Individuals who believe they have experienced retaliation should report it immediately through the same channels.

6. CONFIDENTIALITY

The identity of whistleblowers is treated with the utmost confidentiality and will only be disclosed to the extent necessary for the investigation or as required by law. All records related to whistleblower reports are securely stored and accessible only to authorised personnel involved in the investigation.

7. INVESTIGATION PROCESS

All reports received through whistleblower channels are subject to the following process:

- Acknowledgment: Receipt of the report is acknowledged promptly.
- Preliminary Assessment: The report is reviewed to determine whether it constitutes a qualifying disclosure and warrants formal investigation.
- Investigation: An impartial investigation is conducted by the Compliance function or, where appropriate, by an independent external party.
- Outcome and Remediation: Findings are reported to senior management and the Board. Corrective and preventive actions are implemented as necessary.
- Feedback: The whistleblower is informed of the outcome to the extent permissible, while maintaining confidentiality of other parties involved.

8. MALICIOUS OR FALSE ALLEGATIONS

While CFI X encourages good-faith reporting, the making of deliberately false or malicious allegations is not protected under this policy and may result in disciplinary action. A report made in good faith that does not result in substantiated findings will not lead to any adverse consequences for the reporter.

9. GOVERNANCE AND OVERSIGHT

The Board of Directors oversees the effectiveness of the Whistleblower Policy. The Chief Compliance Officer is responsible for day-to-day management of the whistleblowing programme, including ensuring that reports are properly handled, investigations are conducted fairly, and outcomes are reported to the Board.

This policy is reviewed at least annually, or more frequently upon significant regulatory or operational changes.

10. REGULATORY OBLIGATIONS

CFIX will report material findings from whistleblower investigations to VARA where required under applicable regulations and Rulebooks. CFI X cooperates fully with VARA and other competent authorities in relation to any reported misconduct.

11. CONTACT INFORMATION

Email: compliance@cfix.com, whistleblower@cfix.com

Address: Compliance Officer, CFI X, Office 704, International Business Tower, Business Bay, Dubai, UAE

Phone: +971 4 7706717