



CGPH GROUP WHISTLEBLOWING POLICY

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Policy Owner	Group Legal & Compliance
Approved by	Director of CGPH Group Ltd.
Applies to	All CGPH Group Companies
Classification	Internal Group Policy
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Review Cycle	Annual

1. Introduction

CGPH Group Ltd. is committed to conducting its business with integrity, transparency and accountability. An effective whistleblowing framework is an essential component of the Group's governance, compliance and risk management framework.

The Group encourages the timely reporting of concerns relating to actual or suspected misconduct, unlawful behaviour, breaches of internal policies or any activity that may expose the Group, its clients or its stakeholders to legal, financial or reputational risks.

This Policy establishes a secure and confidential framework for raising concerns, ensuring that reports are handled fairly, independently and without retaliation.

The Group recognises that individuals who report concerns in good faith contribute significantly to maintaining high ethical standards and protecting the integrity of the organisation.

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2. Purpose

The purpose of this Policy is to promote a culture of openness and accountability throughout the Group. The Policy seeks to encourage individuals to report concerns at an early stage before issues escalate into more significant legal, regulatory or operational problems.

It also establishes clear principles for receiving, assessing, investigating and resolving reports while protecting individuals who make disclosures in good faith.

3. Scope

This Policy applies to every company belonging to the CGPH Group and to every director, officer, employee, consultant, contractor, advisor, temporary worker, intern, external representative and any other person acting for or on behalf of a Group Company.

Where permitted by applicable law, this Policy also applies to former personnel, job applicants, suppliers, business partners, clients and other third parties who wish to report concerns relating to the activities of the Group.

4. Reportable Concerns

Reports may relate to any actual or suspected misconduct affecting the Group or its stakeholders.

Examples include:

1. Fraud, theft or financial misconduct.
2. Bribery or corruption.
3. Money laundering or terrorist financing concerns.
4. Violations of sanctions or financial crime regulations.
5. Accounting or auditing irregularities.
6. Conflicts of interest.
7. Misuse of confidential information.
8. Data protection or cybersecurity incidents.
9. Harassment, discrimination or workplace misconduct.

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10. Breaches of internal policies.
11. Violations of applicable laws or regulations.
12. Abuse of authority.
13. Retaliation against whistleblowers.
14. Any conduct likely to expose the Group to significant legal, financial, operational or reputational risk.

The examples above are not exhaustive.

5. Good Faith Reporting

Individuals are encouraged to raise concerns whenever they reasonably believe that misconduct has occurred or is likely to occur.

A report does not need to be supported by conclusive evidence.

However, reports should be made honestly and in good faith.

Knowingly making false, malicious or misleading reports may itself constitute misconduct and may result in appropriate disciplinary or legal action.

6. Confidentiality

The Group is committed to protecting the confidentiality of whistleblowers to the greatest extent permitted by applicable law.

Information relating to a report shall only be disclosed to those who have a legitimate need to know in order to assess or investigate the matter.

The identity of the reporting individual shall not be disclosed without consent unless disclosure is required by law or necessary for the proper conduct of an investigation.

7. Anonymous Reporting

Anonymous reports may be submitted where permitted by applicable law.

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The Group will assess anonymous reports in the same manner as identified reports, taking into account the quality, credibility and availability of supporting information.

Anonymous reporting may limit the Group's ability to seek clarification or provide updates regarding the investigation.

8. Reporting Channels

Concerns should be reported as soon as reasonably possible after becoming aware of the relevant circumstances.

Reports may be submitted through any reporting channel designated by the Group, including dedicated reporting email addresses, reporting forms, designated compliance contacts or other confidential reporting mechanisms established by the Group.

Where appropriate, reports may also be submitted directly to Group Legal & Compliance or senior management.

9. Assessment of Reports

Every report shall be assessed promptly and objectively.

An initial assessment shall determine whether the report falls within the scope of this Policy and whether further investigation is appropriate.

Where additional information is required, reasonable efforts may be made to obtain clarification from the reporting individual whenever possible.

10. Investigation Process

Where appropriate, the Group shall conduct an impartial investigation into the matters reported.

Investigations shall be proportionate to the nature and seriousness of the allegations.

Individuals responsible for conducting investigations shall act independently and objectively.

Appropriate confidentiality shall be maintained throughout the investigation process.

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11. Rights of Persons Involved

Any individual who is the subject of a report shall be treated fairly throughout the investigation process. No conclusion shall be reached until the relevant facts have been appropriately considered.

Where appropriate, individuals shall be given a reasonable opportunity to respond to allegations affecting them.

The Group recognises the importance of balancing the protection of whistleblowers with the rights of individuals who are the subject of a report.

12. Protection Against Retaliation

The Group strictly prohibits retaliation against any individual who reports a concern in good faith or participates in an investigation.

Retaliation includes dismissal, demotion, harassment, intimidation, discrimination, threats, reduction of responsibilities or any other adverse treatment connected with the making of a report.

Any act of retaliation shall itself be treated as a serious breach of this Policy.

13. Outcome of Investigations

Where an investigation confirms misconduct or identifies weaknesses in internal controls, the Group shall take appropriate corrective measures.

Such measures may include disciplinary action, improvements to internal procedures, additional training, reporting to competent authorities or any other action considered appropriate.

Where allegations are not substantiated, no adverse action shall be taken against an individual who made the report in good faith.

14. Record Keeping

The Group shall maintain appropriate records relating to whistleblowing reports, investigations and outcomes.

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Records shall be retained securely and confidentially in accordance with applicable legal requirements and the Group Record Keeping Policy.

Access to such records shall be restricted to authorised individuals.

15. Training and Awareness

The Group shall promote awareness of this Policy throughout the organisation.

Personnel shall receive appropriate information regarding the reporting process, the protections available to whistleblowers and the importance of maintaining a culture of integrity and transparency.

Managers shall encourage an environment in which individuals feel comfortable raising concerns without fear of retaliation.

16. Responsibilities

Every individual acting on behalf of the Group is responsible for reporting concerns in accordance with this Policy:

1. Managers shall support personnel who raise concerns in good faith and shall promptly escalate any report received through appropriate internal channels.
2. Group Legal & Compliance shall oversee the implementation of this Policy, coordinate investigations where appropriate and monitor the effectiveness of the Group's whistleblowing framework.
3. The Board of Directors shall oversee the effectiveness of the Group's whistleblowing arrangements as part of the overall governance framework.

17. Breaches of this Policy

Failure to comply with this Policy may result in disciplinary action, termination of employment or engagement, contractual consequences or other measures considered appropriate by the Group.

Any attempt to obstruct an investigation, destroy evidence, retaliate against a whistleblower or knowingly submit false allegations may constitute serious misconduct.

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18. Review

This Policy shall be reviewed periodically to ensure that it remains effective, appropriate and consistent with the Group's activities, applicable laws and recognised governance standards.

Material amendments shall be approved by the Board of Directors of CGPH Group Ltd.

19. Final Provisions

CGPH Group is committed to fostering an organisational culture based on integrity, accountability and transparency.

Every individual acting on behalf of the Group is encouraged to raise concerns whenever they reasonably believe that misconduct has occurred or may occur.

By encouraging responsible reporting and protecting those who speak up in good faith, the Group strengthens its governance framework, safeguards its stakeholders and reinforces its commitment to the highest standards of ethical and professional conduct.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

Signature: _____

Name: Kolyo Boichev

Title: Director

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