



**DAMAN
VIRTUAL**

Seamless. Secure. Safeguarded

Daman Virtual Asset Brokerage LLC

WHISTLEBLOWING POLICY

Date: 10 December 2025

Introduction

Daman Virtual Asset Brokerage LLC (“Daman”) prioritises creating an open, transparent, and accountable environment across all aspects of our business. To uphold the highest ethical standards, we have established this Whistleblowing Policy to provide employees and stakeholders with a safe and secure means of reporting any misconduct, illegal activity, or unethical behavior.

This policy encourages persons (natural/legal) to raise concerns about practices that may harm the company, its clients, or the broader community, ensuring that such issues are addressed in a timely and confidential manner.

Purpose

The purpose of this policy is to:

- **Encourage employees, partners, and stakeholders to report suspected misconduct, fraud, or other irregularities.**
- **Ensure that reports are handled confidentially, professionally, and without fear of retaliation.**
- **Provide clear procedures for raising concerns and following through with appropriate investigations.**
- **Promote a culture of transparency and ethical behavior in alignment with Daman values.**

Scope

This policy applies to all employees, contractors, stakeholders, and any individuals/natural person(s)/legal person(s) associated with Daman. It covers concerns related to:

- **Breaches of laws or regulations.**
- **Fraud, corruption, or financial misconduct.**
- **Breaches of internal policies, including health and safety violations, harassment, and unethical conduct.**
- **Risks to the security and privacy of client data.**
- **Any action that could negatively impact the reputation or integrity of Daman.**

Reporting Channels

Daman offers multiple channels for raising concerns to ensure accessibility and anonymity where required:

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- **Direct Reporting:** Employees can report concerns directly to their line manager or the Compliance Officer.
- **Anonymous Reporting:** For individuals/any person who prefer not to disclose their identity, anonymous reports can be submitted through an independent whistleblowing hotline or a secure online platform maintained by the company i.e., whistleblowing@damanvirtual.com.
- **Confidential Reporting:** individuals/any person can submit reports confidentially to Senior Management or the Board of Directors, ensuring their identity remains protected throughout the investigation process.

Handling of Complaints

When a report is received, it will be reviewed promptly to determine the appropriate course of action. The Compliance Team will assess the nature of the concern, evaluate the credibility of the complaint, and decide whether an investigation is warranted. The process will include:

- **Initial Screening:** The report will be screened to determine its legitimacy.
- **Investigation:** If the report is deemed credible, an impartial investigation will be conducted by the HR, Compliance, and Risk team.
- **Outcome and Action:** The findings will be shared with appropriate decision-makers, and any necessary corrective or disciplinary actions will be implemented.

Throughout this process, confidentiality will be maintained, and whistleblowers will be kept informed of the status of the investigation as appropriate.

Whistleblower Protection

Daman is committed to ensuring that individuals who report concerns in good faith are protected from any form of retaliation, discrimination, or adverse consequences. This includes protection from dismissal, demotion, or any form of harassment. The identity of the whistleblower will be kept confidential unless disclosure is required by law or necessary for the investigation process.

Preventing False or Malicious Claims

While we encourage openness, Daman practices zero tolerance for intentional filing of false or malicious reports. Any employee found to have deliberately made a false claim for personal gain or harming others may be subject to disciplinary action, including termination of employment.

Record Keeping

All reports, investigations, and outcomes will be documented and securely stored by the Compliance team. These records will be retained for a minimum of five years, or longer if required by legal or regulatory standards, ensuring accountability and traceability of all whistleblowing activities.

Continuous Improvement

To maintain the effectiveness of this policy, Daman will conduct periodic reviews to ensure that the whistleblowing process remains relevant and aligned with best practices. Updates to this policy will be communicated to all employees and stakeholders.

Guidance and Support

Employees and stakeholders are encouraged to seek advice from the Compliance Team or HR Department if they are unsure about whether a particular concern warrants a whistleblowing report. We strive to create an environment where everyone feels comfortable raising their concerns without fear of retaliation or judgment.

Examples of Reportable Concerns

The following are examples of issues that may be reported under this Whistleblowing Policy:

- **Financial mismanagement or fraud.**
- **Breach of client confidentiality or misuse of sensitive data.**
- **Discriminatory practices or workplace harassment.**
- **Corruption, bribery, or conflicts of interest.**
- **Health and safety violations.**
- **Cybersecurity risks or data breaches.**

This Whistleblowing Policy ensures that individuals feel empowered to raise concerns about potential misconduct while being assured of protection from retaliation. We believe that by addressing issues early and openly, we can continue to foster a culture of integrity and accountability.