

Whistleblower Policy

Protected Disclosure & Reporting Framework

Policy Statement

Global Dot Bank is committed to maintaining an open, accountable, and transparent culture. Employees, contractors, and external partners are encouraged to report misconduct, unethical practices, or violations of policy or law without fear of retaliation.

Scope of Reporting

- **Fraud, bribery, or corruption**
- **Regulatory breaches**
- **Insider trading or market manipulation**
- **Financial misreporting**
- **Harassment, discrimination, or workplace misconduct**
- **Data misuse or cybersecurity violations**

Reporting Channels

- **Confidential Whistleblower Hotline: Operated by an independent third party**
- Phone: +44-203-555-9999 (24/7, Anonymous)
- **Encrypted Online Portal: For anonymous digital submissions**
- Website: <https://secure.globaldotbank.org/whistleblower>
- **Direct Contact: To the Chair of the Audit Committee or Chief Compliance Officer**
- Email: whistleblower@globaldotbank.org

Protection & Confidentiality

- Absolute protection under Whistleblower Protection Acts (where applicable)
- No retaliation, victimization, or career disadvantage for whistleblowers
- Full confidentiality maintained throughout investigation and resolution
- Identity protected unless disclosure required by law

Investigation & Resolution

- All reports reviewed by the Ethics & Conduct Committee within 72 hours
- Independent investigation conducted by Internal Audit or external counsel
- Substantiated cases referred for disciplinary or legal action
- Whistleblower notified of outcome (where identity is known)
- Annual summary of cases disclosed to the Board and regulators (with anonymity preserved)

Malicious or False Reports

While GDB encourages all good faith reporting, knowingly false or malicious allegations may result in disciplinary action against the reporter.

Our Commitment

GDB is committed to fostering a culture where speaking up is valued and protected. Every report is taken seriously and handled with the utmost confidentiality and professionalism.