SAVEST FINANCIAL

WHISTLEBLOWING POLICY

1. PURPOSE

The purpose of this Whistleblowing Policy is to encourage directors, employees, and other stakeholders to report suspected misconduct, unethical behaviour, or violations of law or internal policies **without fear of retaliation**.

Savest is committed to maintaining the highest standards of integrity, accountability, and transparency, and views whistleblowing as a critical component of its governance and compliance framework.

2. DEFINITIONS

Whistleblower
Any employee, director, client, consultant, contractor, shareholder, regulator, vendor or other stakeholder who reports suspected wrongdoing under this Policy.

Protected Disclosure
A disclosure made in good faith based on a reasonable belief that misconduct has occurred or is likely to occur.

Detriment
Any adverse action taken against a whistleblower because of making a protected disclosure, including dismissal, intimidation, harassment, discrimination, threats or victimization.

Retaliation
Any action intended to punish or disadvantage a whistleblower for making a report.

3. SCOPE & APPLICABILITY

This policy applies to:

- all employees, directors, officers, and Supervised Persons of Savest; and
- third parties who interact with the Firm, including consultants, contractors, vendors, and service providers, where applicable.

The policy covers reports relating to conduct within Savest.

4. REPORTABLE MATTERS

Whistleblowing reports may relate to, but are not limited to:

- fraud, theft, or financial impropriety;
- breach of laws, regulations, or SEC Rules and Regulations;
- violation of the Code of Ethics or internal policies;
- insider trading, market abuse, or misuse of confidential information;
- corruption, bribery, or conflicts of interest;
- gross misconduct, abuse of authority, or unethical behaviour;
- money laundering, terrorist financing, or sanctions breaches;
- accounting manipulation, falsification of books and records;
- cyber security incidents, or data privacy breaches;
- discrimination, workplace harassment, or sexual harassment;
- unsafe workplace practices, or misuse of company assets;

5. REPORTING CHANNELS

Savest provides multiple confidential reporting channels to ensure accessibility and protection:

- Direct report to the **Chief Compliance Officer (CCO)**;
- The company's human resources anonymous portal (SeamlessHR);
- Confidential escalation to the **Board of Directors or a designated Board Committee**, where appropriate.

Reports may be made verbally or in writing. Anonymous reports will be accepted and reviewed, provided sufficient information is supplied to enable investigation.

6. CONFIDENTIALITY & PROTECTION

6.1 Confidentiality

All whistleblowing reports will be fully treated as confidential possible, consistent with the need to conduct a proper investigation and comply with legal or regulatory obligations.

6.2 Protection from Retaliation

Savest strictly prohibits retaliation against any person who, in good faith:

- reports suspected misconduct; or
- participates in an investigation under this policy.

Retaliation includes dismissal, demotion, harassment, intimidation, discrimination, or any other adverse action. Any retaliation will itself be treated as a serious disciplinary offence.

7. INVESTIGATION PROCEDURES

- All reports shall be promptly assessed by the **Chief Compliance Officer**, or an independent person designated by Management or the Board.
- Investigations shall be conducted objectively, fairly, and without bias.
- Individuals involved in investigations are required to cooperate fully and maintain confidentiality.
- Where appropriate, external advisers may be engaged to support the investigation.

8. ESCALATION & BOARD OVERSIGHT

- Material issues, significant breaches, or matters involving senior management shall be escalated to the **Board of Directors or the relevant Board Committee** without delay.
- The Board shall provide oversight on the handling, outcome, and remediation of such matters.

9. OUTCOMES & REMEDIAL ACTION

Following investigation, appropriate action may be taken, including:

- disciplinary measures;
- policy or control enhancements;
- recovery of losses;
- regulatory reporting, where required.

Where possible, the whistleblower may be informed that the matter has been concluded, subject to confidentiality constraints.

10. RECORDKEEPING

The Firm shall maintain secure records of:

- whistleblowing reports received;
- investigations conducted;
- findings and outcomes; and
- remedial actions taken

Access to such records shall be strictly restricted.

11. MISUSE OF POLICY

This policy must not be used maliciously or for personal grievance unrelated to misconduct. Reports made **knowingly**, **recklessly**, or **maliciously** shall attract disciplinary action.

12. TRAINING & AWARENESS

Savest shall periodically:

- communicate this policy to employees; and
- provide training on ethical conduct, reporting obligations, and whistleblower protections.

13. POLICY REVIEW

This policy shall be reviewed periodically and updated to reflect:

- regulatory developments;
- changes in business activities; or
- lessons learned from reported incidents.

Policy Approval

This Policy has been approved by the Board of Directors of Savest Financial Services Limited and shall take effect from the date of approval.

Board Signatories:

Managing Director/Chief Executive Officer
Name: Nathan Nwokoro, CFA
Signature: ____________
Date: 30/12/2025

Director
Name: Shehu Shittu
Signature: ____________
Date: December 30, 2025

Version Control

Version	Effective Date	Description	Approved By
2.0	December 30, 2025	Second edition	Board of Directors