



ALERT NOTIFICATION (EDRAM)

This note details the "whistleblower" reporting procedures within Edmond de Rothschild Asset Management (Luxembourg). A reporting form is attached to the note.

Who can send an alert?

An alert can be sent by any individual falling into one of the following categories:

- Employee (current or former)
- Member of the administrative board, the authorized director (current or former)
- External and occasional collaborators (current or former)
- Provider with whom a business relationship is established (supplier or subcontractor) (current or former)

When may I send an alert?

You may send an alert if you have reason to believe that a violation of the law or the code of conduct applicable to Edmond de Rothschild Asset Management has been committed, is about to be committed, or in the event of a threat or prejudice to the general interest.

Complaints or claims of a commercial nature should be handled via the dedicated channel (see: <https://www.edmond-de-rothschild.com/fr/Pages/legal.aspx>).

How to send an alert ?

To send an alert , please complete the attached form and send it to one of the following addresses (as per your choice):

By email :

whistleblowing-edrameu@edr.com

OR

By postal mail, mentioning "Strictly Confidential" on the envelope, to the following address:

Compliance Alerts System, Compliance Department Luxembourg
Edmond de Rothschild Asset Management
4, rue Robert Stumper L-2557
Luxembourg Luxembourg

Upon receipt of your alert, an acknowledgment of receipt will be sent to you within 7 days. This acknowledgment will be sent to the correspondence address previously indicated in the attached form. Without contact information indicated, Edmond de Rothschild (Asset management) will not be able to send you an acknowledgment of receipt or follow up on your alert.



Based on the information provided, the alert will be subject to internal investigations. In this context, the authorized reference person for handling alerts within Edmond de Rothschild (Asset management) may send you requests for additional information.

An update on the follow-up of the alert will be communicated to you within three months following the acknowledgment of receipt communicated by Edmond de Rothschild (Asset management).

We will take great care to protect your identity and the confidentiality of your report, within the limits defined by applicable laws and regulations.

Who processes my alert?

The alert is handled by a designated reference person within the Compliance team of Edmond de Rothschild (Asset management).

Can I make an anonymous alert?

Anonymous alerts are accepted.

Is my identity protected?

Whether the alert is anonymous or not, the identity of the alert sender must not be disclosed without their express consent outside of the authorized personnel competent to receive alerts or ensure their follow-up within Edmond de Rothschild (Asset management). This also applies to any other information from which the identity of the alert sender can be directly or indirectly deduced.

The identity of the alert sender and any other information referred to in the previous paragraph can only be disclosed when it is a necessary and proportionate obligation imposed by the applicable local regulation or European Union law in the context of investigations carried out by national authorities or in the context of judicial proceedings, in particular to safeguard the defense rights of the whistleblower.

In such a case, Edmond de Rothschild (Asset management) will inform the whistleblower in writing with an explanation of the reasons before their identity is disclosed, unless such action may compromise the concerned investigations or judicial proceedings.

Am I protected when sending an alert?

To be protected against all forms of retaliation (*), the whistleblower must:

- Have had reasonable grounds to believe that the reported information on violations was truthful at the time of the alert and falls within the scope of the law of 16 May 2023 transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law; and
- Have made an alert either internally (via the following form), externally (via the reporting channels to the competent authorities set out in the texts transposing directive (EU) 2019/1937 into local law), or public (following an internal or external report without result).



The following are also protected:

- Facilitators (individuals who aid a whistleblower);
- Third parties who are connected to the whistleblower and who are at risk of retaliation, such as colleagues or close associates of the whistleblower;
- Legal entities belonging to the whistleblower, for whom they work, or with whom they have professional ties;
- People who have reported or disclosed information about violations anonymously, but who are later identified and experience retaliation;
- Individuals who report violations to competent institutions, bodies, or entities of the European Union.

() Retaliation: any direct or indirect act or omission that occurs in a professional context, triggered by an internal or external reporting, or a public disclosure, and that causes or may cause unjustified harm to the alert sender.*

Can I communicate my alert externally?

Individuals wishing to alert violation(s) are encouraged to prioritize internal reporting channels before alerting through external channels, when it is possible to effectively remedy the violation internally and they believe there is no risk of retaliation.

Competent external reporting channels are exhaustively listed in the texts transposing directive (EU) 2019/1937 into local law (example: Law of 16 May 2023 transposing directive (EU) 2019/1937 in Luxembourg, article 18).

How is my data processed in the context of this alert?

You are informed that the personal data collected by Edmond de Rothschild (Asset management) via this form (hereinafter the "personal data") will be processed in compliance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data and the free movement of such data (hereinafter the "GDPR") and with any confidentiality agreements that may have been concluded with the entities covered by this policy.

We will use the personal data transmitted via the attached form to comply with legal obligations and regulatory requirements, based on your consent. You have a number of rights in relation to personal data. These are listed under the following link: <https://www.edmond-de-rothschild.com/fr/Pages/cookies-policy.aspx>.



APPENDIX - NOTIFICATION FORM FOR THE LAUNCH OF AN ALERT

Warning: Any request not containing the necessary fields or information will be deemed incomplete and will not be processed.

Which entity does your request concern (mandatory)?

- Edmond de Rothschild Asset Management (Luxembourg)

What is your interaction with the concerned entity (optional)?

- Employee (current or former)
- Member of the administrative board, authorized management
- External or occasional collaborator (current or former)
- Provider with whom a commercial relationship is established (supplier or subcontractor) (current or former)

Provide your identity (last name, first name, employer) (optional):

If you have provided your identity, do you wish to remain anonymous (mandatory)?

- I wish to remain anonymous.
- I do not wish to remain anonymous.

Contact address (postal, email) (mandatory):

Describe the subject of your request - location, subject, date, risk or observed breach, context (mandatory):



Describe your involvement (mandatory) :

Select the type(s) of alert(s) you wish to report (mandatory):

- Market abuse / Insider trading
- Accounting controls or audit questions
- Conflicts of interest
- Corruption
- Financial crime
- Competition rights
- Fraud / Theft
- Retaliation
- Abusive selling
- Breach of confidentiality (of data)
- Other breach of the pertinent EU law or regulation

Identity of person(s) being reported (mandatory):

Identity of potential witness(es) (optional):

Is your request related to an alert you previously raised? If yes, please specify (mandatory):

Has your request been communicated to other authorities/entities/people? If yes, specify (mandatory):

Are you attaching documents to your request?

If yes, please indicate the number and give a description of the documents sent (mandatory):

- I am attaching one or more documents.
- I am not attaching any documents.



Details related to the attached documents:

Do not include non-essential personal information about individuals or entities mentioned in your request.

Solemn Declaration (mandatory):

- I hereby acknowledge that I have read the information and conditions attached to this appendix and make this report in good faith.

Date and location :