Reporting concerns and whistleblower protection

Any person who obtains information in a work-related context involving OREA Capital S.A. or its Belgian branch may report an actual or potential breach, misconduct or an attempt to conceal such matters.

A report may concern, in particular, AML/CFT, fraud, corruption, market abuse, conflicts of interest, investor protection, personal data, information systems security, or any other breach of national or European law.

How to make a report

Reports may be submitted to Compliance:

By email: compliance@oreacapital.com

Please use the subject line: **CONFIDENTIAL – WHISTLEBLOWING REPORT**

By post: **OREA Capital S.A.**
For the attention of Compliance
126, Route d'Arlon
L-8310 Capellen - Luxembourg

The envelope must be marked:

CONFIDENTIAL – WHISTLEBLOWING REPORT – FOR THE ATTENTION OF COMPLIANCE

If the report concerns Compliance, or if Compliance is unable to handle it because of a conflict of interest, it must be sent directly to the Chief Executive Officer or the Chair of the Board of Directors and marked **"CONFIDENTIAL – WHISTLEBLOWING REPORT"**.

Identity and confidentiality

Whistleblowers must disclose their identity. Their identity and any information that could identify them will be kept strictly confidential and made available only to persons authorised to handle the report.

Anonymous reports are not handled under the internal whistleblowing arrangements. However, information contained in an anonymous message may be reviewed if it reveals a risk or breach requiring action by OREA Capital.

Handling and protection

An acknowledgement of receipt will be provided within seven days. Feedback will be provided within no more than three months.

No person who makes a report in accordance with the applicable legal requirements may be subjected to retaliation, threats or attempted retaliation.

Personal data will be processed only insofar as necessary to receive, assess and follow up the report.

External reporting

Whistleblowers may also report directly to the competent authority.

For matters falling within the Luxembourg financial sector, reports may be submitted, in particular, to the CSSF. The Whistleblower Office can assist in identifying the competent authority.

Any person who becomes aware of a breach of financial legislation supervised by the NBB may report it to the NBB. LINK: Report an infringement | nbb.be

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