

Summary of Whistleblowing Policy

Purpose

This policy sets out the framework for enabling employees and other relevant individuals to report suspected or actual wrongdoing within Axiology DLT. It ensures reports are handled confidentially, fairly, and without risk of retaliation to the whistleblower.

What Can Be Reported

Reportable issues include criminal acts, unethical behavior, regulatory violations, and attempts to conceal such actions. Examples include:

- Fraud, bribery, corruption
- Document forgery, theft, embezzlement
- Abuse of power, misuse of company assets
- Conflict of interest, failure to follow internal or external policies
- Other similar misconduct

Key Principles

The policy is built on the following principles:

- Encouragement of reporting in good faith
- Whistleblower protection against retaliation
- Assurance of anonymity where requested
- Confidential, impartial, and timely investigations
- Support for ethical governance and compliance

Reporting Channels

Information can be submitted through the following:

- Email: whistleblowing@axiology.xyz
- Oral or written communication to the Chief Compliance Officer, CEO, or management members

Anonymous submissions are allowed and will be handled with strict confidentiality.

Responsibilities

- Our Management Board implements and oversees the policy
- Our Chief Compliance Officer ensures legal compliance, manages investigations, offers guidance, and provides updates
- Our Employees are expected to report misconduct in good faith and maintain confidentiality

Procedure

- Acknowledgement of report within 5 working days
- Investigation process initiated by CCO
- Confidential handling of all reports
- Feedback to whistleblower within 3 months, where appropriate
- Data protection and identity confidentiality are strictly maintained

Whistleblower Protection

Legal protections are provided to whistleblowers and related individuals. No liability is incurred for truthful reports made in good faith. Malicious or knowingly false reports may lead to disciplinary action.



Other Bodies

The Whistle-blower may also report the misconduct directly to the Competent Authority, i.e., the Bank of Lithuania, in accordance with its competence and the procedure laid down by law. The procedure for reporting Misconducts to the Bank of Lithuania is available at the following address: <https://www.lb.lt/lt/kaip-pranesti-apie-pazeidima>.

Final Provisions

The policy is approved by the Management Board and enters into effect on the approval date. The CCO reviews the policy annually or as needed, and ensures that training is provided to all employees. Regular reports on whistleblowing cases are submitted to senior management.