

WHISTLEBLOWER POLICY

Effective date: January 01, 2025

BACKGROUND

This Whistleblower Policy is intended to encourage all owners, directors, employees, staff (paid and volunteer) and other associated with Penfold World Trade and its subsidiaries and affiliates to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution, whether occurring within Penfold, between Penfold and third-parties or solely at third parties. Any such person wishing to report such behavior, practices, or events shall be considered a **Whistleblower** and shall enjoy the rights, processes, and protections herein this Whistleblower Policy.

WHISTLEBLOWER PROCEDURE

1. The Whistleblower should promptly report the suspected or actual event, complaint, or allegation of mistreatment to his/her supervisor.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower could report the event to the next highest or another level of management, including to an appropriate director or shareholder.
3. The Whistleblower may report the event with his/her identity anonymously, via regular or express mail to either the relevant local Penfold subsidiary office or affiliate or to Penfold headquarters at the following address:

PENFOLD WORLD TRADE A.G.
Stationsstrasse 5 – Sektor C
8335 Hittnau/ZH
Switzerland
Attn: Ms. Rita Bosshard
Tel: +41 44 951 2413

4. Supervisors, managers directors, or shareholder who receive any Whistleblower reports must promptly act to investigate and/or resolve the issue(s).
5. Crimes against person or property, such as assault, rape, burglary, forced labor or other such exigent circumstances should immediately be reported to local law enforcement personnel.

WHISTLEBLOWER RIGHTS AND PROTECTIONS

6. The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith, provided that such reporting is based on discernible evidence and was not done primarily with malice to damage another or the organization.

7. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination of employee status.
8. Unless such report is submitted anonymously, the Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.
9. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
10. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.