



Citco Bank Nederland N.V.
Whistleblower Policy

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CITCO

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1. Introduction

This Whistleblower Policy of Citco Bank Nederland N.V. (the “Bank”) helps employees to further establish and sustain an ethical workplace environment by describing the types of behaviours that are encouraged as well as those that should be reported. All Bank employees¹ are expected to promptly report to their management any breach or suspected breach of any law or company policy or guideline.

A suspected breach refers to a suspicion, based on reasonable grounds, that concerns the organization at which the person involved is employed and where the Bank’s interests are at issue in connection with:

- A criminal offence;
- A violation of laws, regulations and internal policies, including but not limited to those regarding anti-money laundering and counter terrorist financing;
- The offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement; the deliberate provision of false information to public offices;
- The deliberate withholding, destruction or manipulation of information relating to these offences;
- Questionable accounting, internal accounting controls or auditing manners;
- Conflict of interest.

2. The Bank’s View on Whistle Blowing

All employees wishing to raise a specific concern are encouraged to first discuss the matter with in principle their direct supervisor or manager. This method is preferred because reporting concerns to management is the fastest way to clear up any misunderstandings and also the best way to ensure a good and open working environment throughout our organization. If this option is/appears to be unfeasible or unsatisfactory, the employee should report a suspected breach internally as per the reporting procedures. Reporting can be done directly and anonymously at all times.

¹ Employees refer to permanent and temporary employees and include supervisors, managers, department heads, managing and supervisory directors etc.

3. Scope

The purpose of this policy is to detail the procedures or framework in order to report any breach or suspected breach of any law or company policy or guideline. The Bank encourages its employees to report breaches of laws, rules, regulations or the Bank's code of ethics internally.

4. Confidentiality and Anonymity

The Bank acknowledges that some employees may wish to express their concerns confidentially. Therefore, all reports of a breach will be dealt with in a confidential manner. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation of the report. The Bank encourages employees to discuss their concerns directly and openly with their manager or supervisor. It is, however, possible to report a suspected breach anonymously.

5. Non-Retaliation

Any employee who reports a breach in good faith will be given protection and shall in no way be put at a disadvantage as a result of his or her report. This means that retaliation against an individual for reporting in good faith any breach or suspected breach or for participating in any such investigation is a serious violation. If retaliation does occur, the violator will be subjected to the appropriate disciplinary action, including the possible termination of employment.

6. Investigations

The Bank is committed to investigating any purported breach reported, in an independent and objective manner. Except as provided below, the nature, scope, timing, and reporting of a special investigation will be determined and an Investigator will be appointed based on their experience and judgment who must carry out the investigation. The investigation should, where necessary, involve consultation or collaboration with other departments (e.g. Audit, Legal, Compliance or Human Resources) so that the investigation is conducted in the most comprehensive, efficient and effective manner and in the best interests of the Bank.

Investigations and the gathering of evidence should be conducted in compliance with applicable laws and regulations.

Employees may be required to assist with the conduct of investigations in accordance with their general obligation to act in the best interests of their employer.

7. Obligations of Management and the Bank

The Bank expects management at all levels to handle all matters concerning any breach seriously, confidentially and promptly. Management is obligated to fully cooperate with and assist the Investigator put in charge of the investigations.

8. Reporting

At the completion of the investigation, the Investigator will report the results of the investigation. Appropriate corrective actions based on the report's findings and recommendations which may include, but not be limited to, seeking loss recovery and disciplinary action up to and including termination of employment and reporting to the relevant Regulator.