

Version: 1.1

Effective date: October 27, 2025

Owner: Jamie Saveall (VP Operations, ESG & Compliance Lead)

Review cycle: Annual

1. Purpose

Stratavor is committed to the highest standards of ethics, compliance, and transparency. This policy enables anyone who works with Stratavor—employees, contractors, interns, advisors, and vendors—to report suspected wrongdoing or risks safely and, if desired, anonymously.

2. Scope

This policy applies to all Stratavor personnel and third parties working with or on behalf of Stratavor in any country.

3. What to Report

- Financial misconduct, fraud, bribery, corruption, or kickbacks
- Breaches of law or policy (e.g., data protection, cybersecurity, human rights)
- Harassment, discrimination, bullying, retaliation, or conflicts of interest
- Health & safety risks, environmental harm, or unsafe work practices
- Manipulation of data, accounting irregularities, or misrepresentation to clients/investors
- Any attempt to conceal, destroy, or tamper with evidence of the above

4. How to Report

You may use any of the following channels:

- Dedicated email: privacy@stratavor.com (access restricted to ESG & Compliance Lead)
- CEO/Founder escalation (if the issue involves the ESG Lead): jgoodwin@stratavor.com
- Anonymous web form: link to be provided on the internal wiki and contractor onboarding pack
- In emergencies or imminent risk of harm, contact local emergency services first.

5. Non-Retaliation & Confidentiality

Retaliation against anyone who raises a concern in good faith is strictly prohibited and will result in disciplinary action, up to and including termination of contract. Stratavor will treat reporter identity and report details as confidential, sharing only with those who need to know to investigate and remediate.

To make a confidential or anonymous report please use our Confidential Reporting Questionnaire: <https://forms.gle/AKFdQz5LSzWNDmS47>

If you prefer, reports may also be made to the ESG & Compliance Lead (Jamie Saveall) or to the Chair of the Board. We will acknowledge receipt within 5 business days.

6. Investigation Process & Timelines

- Acknowledgement: We aim to acknowledge receipt within 5 business days.
- Triage & Assignment: The ESG & Compliance Lead (or designee) assigns an investigator not implicated in the matter.
- Fact-Finding: Interviews, document review, and evidence gathering (target completion within 30 calendar days where practical).
- Outcome & Actions: Findings and corrective actions will be documented; a summary (to the extent legally possible) will be provided to the reporter.
- Escalation: Serious or criminal matters may be escalated to the Board and/or relevant authorities.

7. Records & Data Protection

Investigation records will be retained securely for at least seven (7) years, or longer where required by law. Personal data will be handled in accordance with Stratavor's Privacy Notice and applicable data protection laws (e.g., GDPR).

8. External Reporting

Nothing in this policy restricts your right to report concerns directly to competent regulators or law enforcement, or to seek independent legal advice.

9. Roles & Responsibilities

- ESG & Compliance Lead: Owns this policy, receives and triages concerns, ensures fair investigations, and reports annually to the Board.
- Managers: Foster a speak-up culture, promptly escalate concerns, and support investigations.
- All Personnel & Vendors: Raise concerns in good faith and cooperate with investigations.

10. Related Policies

Code of Conduct; Anti-Corruption & Anti-Bribery; Human Rights; Health & Safety; Cyber Security; Customer Privacy Notice; Environmental Policy.