

GLP Europe Management S.à r.l.

Whistleblowing policy

1. Purpose of the Policy

The Policy aims at implementing an internal system that facilitates the reporting of any wrongful, unethical or unlawful behavior, misconduct internally or externally of the Company.

2. Principles of the Policy

The internal system for whistleblowing, as laid down in this Policy, is administered by the Compliance Officer of the Company. However, it is also possible to notify the Board in case of illegal or questionable behavior noticed by a Staff member.

The use of the internal system for whistleblowing shall create a safe space for staff to report conduct that may constitute a breach in areas such as, however without limitation, to the following:

- Anti-money laundering and counter terrorist financing;
- Market abuse;
- Insider trading;
- Conflicts of interest;
- Bribery;
- Fraud;
- Discrimination and harassment in the workplace.

This system does not encourage anonymous reporting. The Whistleblower will be asked to identify himself/herself. However, the Compliance Officer, respectively any member of the Board, will keep the identity of the Whistleblower strictly confidential. A report from a person wishing to remain anonymous may only be handled as a special case, when the seriousness of the reported conduct has been established and is sufficiently detailed. In such a case, specific precautions are required to handle the report.

The internal system for whistleblowing must be used in a disinterested manner and in good faith. A report must be based on objective data. Anyone abusing the system will be subject to

disciplinary sanctions. Conversely, any Whistleblower acting in good faith, even if the reported conduct is ultimately determined to be inaccurate or is not pursued, will not be subject to sanctions or disciplinary measures.

Use of the whistleblowing internal system is not mandatory but complementary to the usual methods for communicating information and warnings within the Company. No Staff member will be disciplined for not using the system.

4.1 Minimization of risk

Whistleblowing covers situations where Staff has shared information internally or externally about an alleged wrongdoing. Therefore, it can be an important source of information about legal, regulatory and operational risks faced by the business.

The Company ensures that the following is in place in order to anticipate such situations and minimizing the risk raised by such disclosures:

- Ensure that the Staff do not suffer any detrimental treatment as a result of raising a concern in good faith;
- Provide for disciplinary action to be taken in the event of retaliation towards the Whistleblower on the part of other Staff member;
- Ensure that data protection laws are not breached by the processing of information;
- Ensure that the Policy is followed when an issue arises;
- Ensure that local legal advice is taken when an issue arises;
- Ensure that the Policy is circulated amongst all the Staff;
- Consider any issues raised by the Staff seriously by implementing an appropriate action, including an investigation if necessary;
- Ensure that a procedure is in place to store any confidential data that may be brought to the attention of the Company.

4.2 Protection of Whistleblowers

Whistleblowers are protected in case they highlight corruption or abuse of influence in their workplace. The Whistleblower's legal protection is ensured under the provisions of Article L.271-1 of the Luxembourg Labour Code on the protection of the Staff against corruption, traffic of influence and the misuse of privileged information.

The Company is not authorized to retaliate against Whistleblowers. Where a Whistleblower is victim of an adverse reaction of the Company, the Company bears the burden of proof to justify that the negative influence on the Whistleblower does not stem from retaliation against the whistleblowing action.

A Whistleblower may not be a victim of reprisals because reporting observations that they consider, in good faith, to constitute a breach in the areas mentioned in Section 4 of this Policy and which is committed by the Company or any other senior in rank, colleagues, or external people in relation to the Company. Any termination of the employment contract because of whistleblowing is therefore null and void.

3. Modus operandi

5.1 How to raise a concern

Any Staff member that becomes aware of any illegal or questionable activity within the Company in relation to the areas described under Section 4 has the possibility to promptly notify the Compliance Officer or the Board.

Such notifications may be made via the following email addresses:

Compliance Officer:

marta.kurpisz@glp.com

or

glpconfidential@glp.com

Upon receipt of a notification by the Compliance Officer, he/she will assess whether there is a need to report the matter to the Board or it can be dealt with by the Compliance Officer together with other Conducting Officers. An immediate and prompt reporting to the Board should at least be necessary in the following cases:

- A notification evidences that internal governance arrangements no longer enable sound and prudent business management or that the risks incurred are or will no longer be properly borne by the Company ability to manage these risks, by the regulatory or internal own funds or liquidity reserves;
- A notification casts doubt on the qualification or professional standing of a member of the Board or of a conducting officer.

All other notifications (together with the corrective measures suggested, if any) will be drawn to the attention of the Board in the context of a quarterly report prepared by the Compliance Officer and consequently submitted to the Board for approval.

Whenever a notification gives rise to an immediate reporting to the Board, the latter will instruct the Senior Management to submit appropriate corrective measures. For that purpose, the Senior Management may rely on the assistance of the Compliance Officer. Such corrective measures will then have to be approved by the Board.

In respect of all other notifications, the Compliance Officer is required to assess whether corrective measures are necessary and to make corresponding proposals to the Senior Management. The Senior Management will then decide whether they decide to adopt such corrective measures, in which form and within which time schedule.

5.2 Categories of personal information

Only the following categories of information can be handled in the context of this Policy as the case may be, either by the Compliance Officer, the Management Committee or the Board:

- Identity, responsibilities and contact details of the Whistleblower;
- Identity, responsibilities and contact details of the persons implicated in the Whistleblower Report;
- Identity, responsibilities and contact details of the persons receiving or handling the Whistleblower Report;

- Conduct reported by the Whistleblower;
- Information collected during verification of the conducted report;
- The report resulting from the investigation;
- Any action on the Whistleblower Report.

5.3 Recipient of personal information

The Compliance Officer is the main recipient of all or part of the information. Alternatively, the Board can be the recipient if they are notified by the Whistleblower.

5.4 Holding period of personal information

The information in a Whistleblower Report that is considered, when received, out of the scope of the internal system for whistleblowing is immediately destroyed or archived.

Information handled by the recipient is destroyed within two months after verification that the Whistleblower Report is not followed by a disciplinary or legal procedure has been completed.

Information handled by the recipient is archived if, at the end of the procedure, a disciplinary action or a lawsuit is initiated against the accused person or respectively against a Whistleblower having submitted an abusive report.

5.5 Informing the person implicated in a Whistleblower Report

The Compliance Officer and respectively the Board, will inform the person implicated in a Whistleblower Report as soon as the information is recorded.

If precautionary measures are necessary, however, such as to prevent the destruction of proof related to the Whistleblower Report or to conduct the investigation, the person may be informed after such measures are taken.

4. Right to access and amend

Any person identified in the internal system for whistleblowing has the right to access, rectify and delete information about them if this information is incorrect or obsolete, in accordance with applicable regulations in Luxembourg regarding the protection of personal data.

Such request shall be sent by email to marta.kurpisz@glp.com.

In no event may a person indicated in a Whistleblower Report obtain, on the basis of his/her access rights, information about the identity of the Whistleblower.

5. Control

7.1 Regular reporting

On a yearly basis, the Compliance Officer includes in the annual compliance report, to be sent to the CSSF, a report on whistleblowing notifications including:

- An overview of notifications received during the year, and their treatment;

- An overview of all the requests from assistance received from the Board to define corrective measures in relation to notifications received directly by the Board during the year, and their treatment;
- An overview of the controls carried out in relation to the Policy, the issues detected during such controls, any action recommended to solve such issues and the status of implementation of such actions;
- A follow-up on the latest regulatory developments and their possible impacts on the Policy.

7.2 Responsibilities of the Senior Management

The conducting officers are generally responsible for the correct implementation of the Policy. Controls to ensure compliance with the Policy are performed by the Compliance Officer under the responsibility of the Senior Management.

7.3 Responsibilities of the Compliance Officer

The Compliance Officer receives whistleblowing notifications, assesses the need to take corrective measures and/or to report to the Board. They may further assist the Board in defining corrective measures in relation to notifications directly received by the Board.

The Compliance Officer performs independent controls on the adequacy and effectiveness of the handling of whistleblowing notifications, on a yearly basis.

7.4 Responsibilities of the Staff

Staff members shall notify any illegal or questionable activity within the Company they become aware of.

6. Review of the Policy

The Policy will be reviewed at least once a year by the Senior Management in committee under the supervision of the Board. In fact, the Senior Management conducts a central and independent review of the implementation of the Policy in order to assess if the Policy:

- Is operating as intended; and
- Is compliant with national, international regulations principles and standards applicable to the sector within which the Company operates.

Where no update is required, the Policy will be applied consistently over time. Where update is required, formal approval by the Board is necessary.

This Policy should be read in conjunction with a Global Operational Procedure Manual, section 6: Whistleblowing Policy.