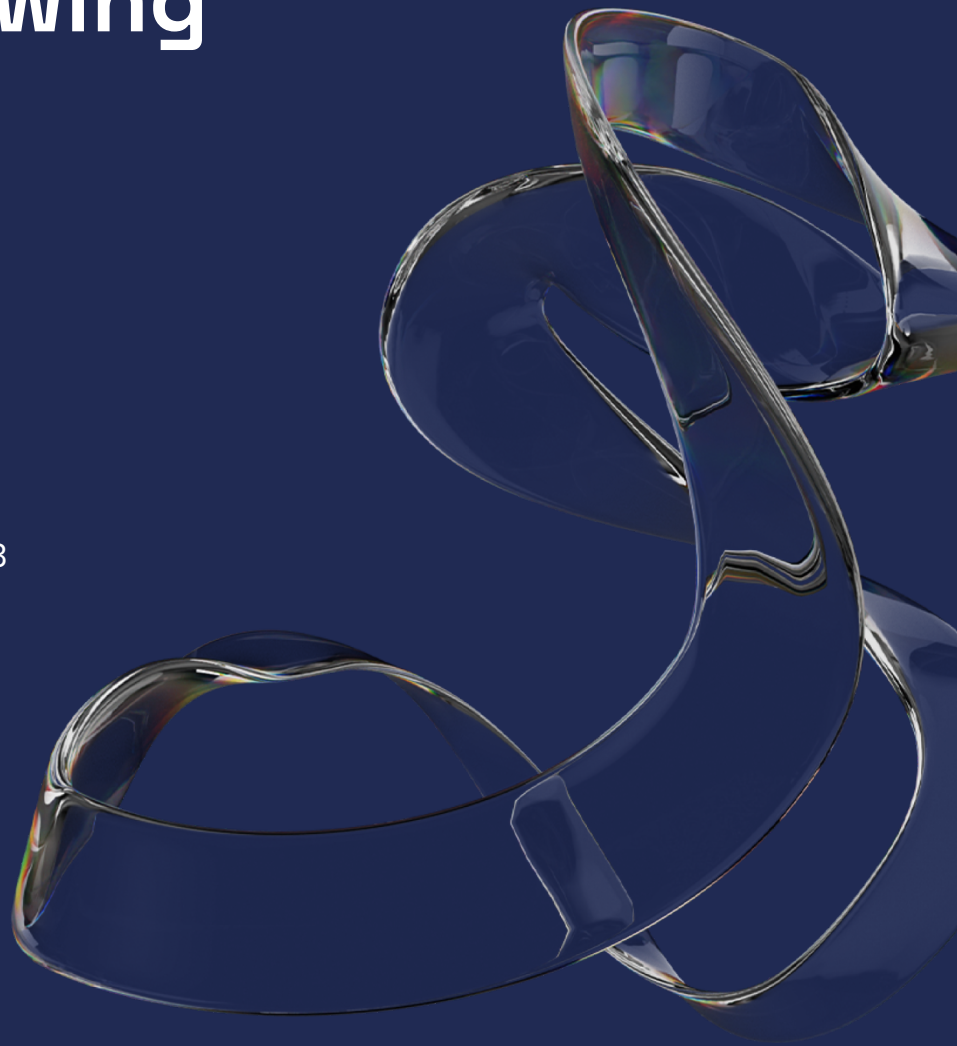


sg capital

Whistleblowing

Version 1.0 – 22 December 2023



SG Capital Partners AIFP SIA

Reg. nr: 40103946854

As the manager of alternative investment funds, SG Capital Partners AIFP Ltd. (SG Capital) is committed to ensuring a legal, fair, open, and transparent organizational operation.

Any SG Capital group employee, representative, or partner can blow the whistle on potential criminal activities, administrative violations, or other breaches of legal norms or ethical and professional standards binding on SG Capital, which may harm significant public interests.

A whistleblowing report does not include:

- Anonymous submissions or reports of personal offence.
- Personal complaints and disputes.
- The intentional provision of false information.

The whistleblower's report can be submitted electronically, in free form, signed with a secure electronic signature, and sent to the e-mail address: trauksme@sgcapital.lv

The report should include the following information:

- The whistleblower's name, surname, and contact information.
- Detailed information regarding the violation or potential violation.
- Information on how the information about the violation was obtained— performing work duties, establishing legal relationships related to the performance of work duties, during practice, or while exercising official authority or participant powers.
- Information on whether the violation has been reported previously (including any received responses).
- Whether the whistleblower wishes to receive confirmation of report receipt and a decision on the recognition or non-recognition of the whistleblower's report.

SG Capital ensures the protection of the whistleblower, and the information provided.

The initial evaluation of the whistleblowing report is conducted within 7 (seven) days of its receipt (with the initial evaluation results announced within 3 (three) days), and the decision is made within 2 (two) months from the recognition of the report as a whistleblower's report.

If the whistleblower's report falls within the competence of another institution, SG Capital will forward it with consent, and the whistleblower will be informed accordingly.

Contact person at SG Capital for whistleblowing issues: Gunta Cekule, mobile phone +371 29470754, e-mail address: gunta.cekule@sgcapital.lv.

Additional information on whistleblowing is available on the website <https://www.trauksmescelejs.lv/>, as well as at the Bank of Latvia <https://www.bank.lv/en/about-us/whistleblowing>.

Version history of the document

Version No.	Date	Type	Content of changes
1.0	22.12.2023.	Original version	The original version published.
