

PUBLIC-FACING SUMMARY OF THE WHISTLEBLOWING POLICY¹

¹ Public Disclosure Note: This document is an excerpt from the officially approved Whistleblowing Policy of Freedom Holding Corp. For public disclosure purposes, it excludes any content containing personal data or details of internal control procedures. All other provisions remain unchanged from the approved version.

1. PURPOSE

The purpose of this Whistleblowing Policy (the “**Policy**”) is to establish a clear, confidential, and reliable mechanism for reporting actual or suspected fraud, misconduct, wrongdoing, and other violations of applicable laws, regulations, or Company policies.

This Policy reflects Freedom Holding Corp. and its subsidiaries’ (the “**Company**”) unwavering commitment to the highest standards of integrity, accountability, and ethical conduct. It reinforces a zero-tolerance approach to wrongdoing and supports a culture of transparency and responsible business practices.

By implementing this Policy, the Company aims to:

- Encourage individuals to report concerns about potential violations promptly and without fear of retaliation.
- Protect those who report in good faith from any form of discrimination, harassment, or other adverse treatment.
- Ensure that all concerns are addressed in a fair, objective, and consistent manner.
- Promote a culture of openness, accountability, and ethical behavior across all operations.

This Policy applies globally to all jurisdictions in which the Company operates and is aligned with applicable international and local legislation, including the Foreign Corrupt Practices Act (FCPA), the Sarbanes-Oxley Act (SOX), the EU Whistleblowing Directive 2019/1937, and data protection regulations such as the General Data Protection Regulation (GDPR).

Definitions:

- **Whistleblower(s):** Any individual, including employees, directors, contractors, suppliers, or other third parties, who raises a concern in accordance with this Policy. Whistleblowers must act in good faith and with an honest belief that the reported conduct is illegal, unethical, or otherwise improper.
- **Retaliation:** Any adverse action taken against a person for reporting concerns in good faith or for participating in related proceedings. This includes dismissal, demotion, threats, harassment, or other forms of unfair treatment.
- **Discrimination:** Unfair or unlawful treatment based on protected characteristics such as race, gender, or age.
- **Harassment:** Unwanted conduct that creates a hostile, intimidating, or offensive environment.

- **Misconduct:** Violations of laws, regulations, or Company policies, including fraud, corruption, or abuse of authority.
- **Fraudulent Activity:** Any intentional act of deception that may result in financial or reputational harm to the Company or its stakeholders.
- **Good Faith Reporting:** Reporting concerns with a sincere belief in the accuracy and relevance of the information, even if the report is ultimately unsubstantiated.
- **Confidentiality:** Protecting the identity and personal information of individuals involved in reporting, except where disclosure is required by law or necessary to resolve the matter.

2. SCOPE

This Policy applies to all employees, directors, officers, and relevant third parties, including clients, contractors, suppliers, and business partners of Freedom Holding Corp. and its subsidiaries.

It covers reports concerning:

- Breaches of the Company's Code of Ethics, internal policies, or procedures.
- Misconduct involving accounting practices, internal controls, financial reporting, or fraudulent activity.
- Violations of applicable laws, regulations, or external standards, including those related to anti-bribery, anti-corruption, sanctions, and data protection.
- Retaliation, discrimination, or harassment against individuals who report concerns in good faith or participate in related proceedings.

Exclusions:

This Policy does not apply to routine employment-related matters such as compensation questions or interpersonal conflicts, unless they involve potential violations of legal obligations, Company policies, or ethical standards. Such issues should be addressed through appropriate employee relations or management channels in accordance with applicable procedures.

3. CORE PRINCIPLES

At Freedom Holding Corp., we are committed to fostering a culture of transparency, accountability, and ethical conduct. This Whistleblowing Policy is founded on the following principles:

- **Confidentiality and Protection:** all reports are handled with the utmost confidentiality, in accordance with applicable laws. Freedom Holding Corp. prohibits

any form of retaliation against individuals who report concerns in good faith or participate in the resolution of such concerns. We are committed to protecting whistleblowers from discrimination, harassment, or other adverse treatment.

- **Good Faith and Integrity:** reports must be made honestly and with a genuine belief that the information disclosed is true and relevant. Even if the reported concerns are later found to be unsubstantiated, individuals acting in good faith remain fully protected. However, knowingly submitting false or malicious reports is strictly prohibited and may carry serious consequences.
- **Timely and Fair Resolution:** the Company strives to ensure that all concerns raised under this Policy are assessed promptly and impartially. Allegations are taken seriously and addressed in a fair, respectful, and objective manner.
- **Ethical Responsibility:** confirmed violations or misconduct will lead to appropriate corrective actions. Freedom Holding Corp. holds itself and its representatives to the highest standards of ethical responsibility and accountability.
- **Commitment to Improvement:** this Policy reflects our dedication to continuous improvement in ethical governance. It is reviewed regularly to ensure ongoing alignment with legal requirements and evolving best practices.

By adhering to these principles, Freedom Holding Corp. creates an environment where individuals are encouraged to raise concerns safely and responsibly, and where integrity is upheld at every level of the organization.

4. REPORTING MECHANISM

To Freedom Holding Corp. is committed to ensuring that individuals can report concerns confidentially, securely, and without fear of retaliation. The Company provides several accessible and user-friendly reporting channels that operate 24/7 and support anonymous submissions where permitted by law.

Available Channels:

Employees, contractors, suppliers, business partners, and other stakeholders may report concerns through one of the following methods:

- **Compliance Hotline:** A dedicated multilingual hotline available around the clock (+1 951 309 2273).
- **Online Reporting Platform:** A secure platform managed by an independent provider that allows for anonymous submissions

(<https://freedom-holding.whispli.com/lp/hotline?locale=en>).

- **Email:** Reports may be submitted to the Company's secure compliance email address (compliancehotline@frhc.group).
- **Local Channels:** Where applicable, subsidiary companies may provide local reporting options aligned with this Policy.

Anonymity and Confidentiality: individuals may choose to report anonymously, and Freedom Holding Corp. will make every reasonable effort to maintain confidentiality, consistent with applicable laws. While anonymous reports are welcomed, providing contact information can facilitate more effective follow-up and resolution.

Good Faith Reporting: reports must be made in good faith, meaning with an honest belief that the information is accurate and relevant. Individuals are fully protected, even if their concerns are later found to be unsubstantiated. However, knowingly false or malicious reports are strictly prohibited and may result in disciplinary or legal consequences.

Accessibility: all reporting options are free of charge and available in multiple languages to ensure accessibility across jurisdictions where the Company operates.

External Reporting: Policy does not restrict individuals from reporting directly to regulatory authorities or enforcement agencies. However, the Company encourages the use of internal reporting mechanisms whenever feasible, as this enables prompt resolution and supports continuous improvement. Individuals are also encouraged to seek independent legal advice to understand their rights under applicable laws.

5. REPORTING PROCESS

The reporting process ensures that all concerns raised under this Policy are handled promptly, fairly, and in compliance with applicable laws and Company standards. The process includes the following key phases:

Acknowledgment of Receipt

- When the reporting individual provides their identity, the Company will confirm receipt and issue an initial response.
- The acknowledgment includes confirmation of receipt and assurance that the report will be handled confidentially and reviewed without undue delay.

Preliminary Assessment

- Upon receiving a report, the Company will evaluate its relevance and severity to determine appropriate next steps.

- If the concern falls within the scope of this Policy, it will be assigned for further handling. Concerns outside the scope may be redirected to other appropriate internal channels.
- Where required, immediate steps may be taken to address legal obligations or mitigate potential risks. Concerns involving serious matters may be escalated for higher-level oversight.

Investigation

- A fair, objective, and timely investigation will be conducted into the reported concern.
- The process may include reviewing relevant information, conducting confidential interviews, analyzing evidence, and documenting findings in a transparent and accountable manner.
- Additional steps may be taken depending on the nature and complexity of the concern to ensure a comprehensive resolution.

Outcome and Resolution

- Once the investigation is complete, appropriate corrective or remedial actions will be taken, where necessary.
- Feedback will be provided to the individual who raised the concern, when appropriate and feasible.

Escalation

- If the reporting individual believes that the concern has not been adequately addressed, they may escalate the matter for further independent review.
- Escalation is available for high-risk cases, including those involving senior personnel, potential legal or regulatory violations, or significant financial or reputational risks.
- Concerns involving potential breaches of anti-bribery and corruption standards, including bribery, conflicts of interest, or improper gifts, should also be handled in accordance with the Company's Anti-Bribery and Corruption (AB&C) Policy.

6. PROTECTION AGAINST RETALIATION

Freedom Holding Corp. maintains a strict zero-tolerance stance toward any form of retaliation against individuals who report concerns in good faith or who cooperate with investigations. Retaliation is a serious violation of this Policy and may result in disciplinary measures, including termination of employment or business relationships.

Any individual who believes they have been subjected to retaliation for raising a concern or participating in a related inquiry is encouraged to report the retaliatory conduct through the available compliance reporting channels as soon as possible.

Such reports should include relevant details, such as the individuals involved, potential witnesses, and specific examples of the conduct believed to be retaliatory. All retaliation reports will be reviewed promptly, treated with the utmost seriousness, and investigated in accordance with the principles of fairness, confidentiality, and applicable laws.

Managers and supervisors who become aware of potential retaliation are expected to act promptly and report such behavior through the Company's established compliance reporting procedures. Failure to report known or suspected retaliation may also result in appropriate consequences in line with applicable regulations and Company standards.

7. ROLES AND RESPONSIBILITIES

The successful implementation of this Whistleblowing Policy depends on the commitment of all individuals and entities connected to Freedom Holding Corp. The following responsibilities are outlined to promote transparency, integrity, and accountability:

- **Employees** are expected to uphold the Company's ethical standards by promptly reporting suspected misconduct, unethical behavior, or violations of laws, regulations, or Company policies. Reports should be submitted in good faith and include accurate information to support appropriate follow-up actions.
- **Managers and Supervisors** play a vital role in maintaining an open and ethical work environment. They are responsible for:
 - Encouraging a culture of openness and trust.
 - Supporting employees who wish to raise concerns.
 - Ensuring that reported concerns are addressed appropriately through designated channels.
 - Leading by example and upholding the principles set forth in this Policy.
- **Leadership** is responsible for overseeing the Policy's effectiveness and ensuring that the organization remains committed to high standards of ethics and compliance. This includes regular reviews of the Policy's implementation and promoting accountability at all levels.
- **Business Partners, Suppliers, and Contractors** are expected to comply with the Company's Code of Ethics and this Policy. They should report any known or suspected

violations of legal or ethical obligations using the available reporting mechanisms. Failure to do so may result in appropriate actions, including review of the business relationship or legal consequences in accordance with applicable laws.

8. CONFIDENTIALITY AND DATA PROTECTION

Freedom Holding Corp. is committed to safeguarding the confidentiality of all information provided through whistleblowing reports and during any related review or investigation process. All reports are handled with the utmost care, and sensitive information is shared strictly on a need-to-know basis with individuals involved in the proper handling and resolution of the concern.

In line with applicable data protection laws - including the General Data Protection Regulation (GDPR) and relevant local legislation - the Company ensures that:

- Personal data is processed fairly, lawfully, and only for purposes directly related to the review and resolution of reported concerns.
- Reasonable and appropriate measures are taken to protect data from unauthorized access, disclosure, or misuse.
- Information is retained only as long as necessary to fulfill the purpose of the investigation and to comply with legal obligations.

By maintaining these standards, Freedom Holding Corp. aims to protect the privacy of all individuals involved and support a trustworthy and secure reporting environment

9. TRAINING AND AWARENESS

Freedom Holding Corp. is committed to promoting awareness of this Policy among all employees and relevant third parties. The Company ensures that individuals understand their rights and responsibilities regarding the reporting of concerns and the importance of ethical conduct.

To support this:

- Employees receive appropriate training to familiarize themselves with the principles and expectations set forth in this Policy.
- The Company provides regular communications and reminders to reinforce awareness and ensure continued alignment with applicable legal and ethical standards.

Through these efforts, Freedom Holding Corp. fosters a culture of transparency, accountability, and integrity across its operations.

10. MONITORING AND REVIEW

Freedom Holding Corp. is dedicated to maintaining the relevance and effectiveness of this Policy through regular monitoring and review. These measures ensure continuous alignment with evolving regulations, business practices, and industry standards.

The Policy will be reviewed at least annually or whenever significant changes in regulations, business operations, or risks occur. Updates will be made as needed to maintain compliance and effectiveness.

11. TRACKING AND REPORTING

A Freedom Holding Corp. is committed to monitoring the effectiveness of its whistleblowing mechanisms and identifying areas for improvement. The Company regularly reviews aggregated information about reported concerns, outcomes, and emerging trends to support transparency, accountability, and continuous improvement in its compliance and governance practices.

Information gathered through these reviews is used to inform leadership and enhance internal controls, while maintaining confidentiality and complying with applicable data protection and legal requirements.

12. FINAL PROVISIONS

This Policy enters into force as of 29 May 2025 and is binding on all employees, directors, officers, contractors, suppliers, and other relevant stakeholders of Freedom Holding Corp.

To ensure effective communication and implementation of this Policy:

- Internal stakeholders are informed through official corporate communication channels and ongoing compliance awareness initiatives.
- External stakeholders, including contractors and suppliers, are notified through appropriate means, such as updates to agreements or formal communications.
- Subsidiaries of the Company are responsible for distributing the Policy within their local networks and taking reasonable steps to ensure its application.

Oversight for this Policy rests with the Company's compliance function, which is responsible for monitoring its implementation and ensuring that it remains aligned with applicable laws, regulatory requirements, and best practices. The Policy may be reviewed and updated as needed to reflect changes in the legal or operational environment.

Contact Information:

For any questions, clarifications, or concerns regarding this Policy, please contact Freedom Holding Corp. Compliance Team: compliance.requests@frhc.group