

Global Whistleblowing Policy

Funding Circle is committed to the highest standards of openness and accountability. All Employees are expected to act with integrity and in good faith. As such, any Funding Circle Employee who has serious concerns about any aspect of Funding Circle's business, operations or activity should come forward and express those concerns and their views.

Funding Circle seeks to foster an environment where Employees are encouraged and feel safe to raise issues of concern without fear of repercussion, retaliation or victimisation. Our Global Whistleblowing Policy (the "Policy") provides employees with guidance for disclosing any concerns or suspicions regarding possible violations of laws, rules or regulations. Any employee may submit a report of misconduct, unethical behaviour, or possible violations of law or policy without fear of retaliation. The Policy applies to all Funding Circle employees within each business unit. All employees are required to comply with this Policy.

The Funding Circle Board and senior management are ultimately responsible for establishing a culture and environment whereby every employee feels safe to speak up and raise their concerns or escalate potential misconduct, unethical behaviour or possible violations of law or policy, without fear of retaliation. The Board or the Audit Committee to which it has delegated this authority reviews and approves the Policy at least annually, and ensures the Policy is updated accordingly.

Whistleblowing disclosures are reviewed by the Whistleblowing Officer under the direction and oversight of the Global General Counsel.

Funding Circle has various internal channels for the Whistleblower to communicate and report issues of concern:

- Directly communicate with the manager (who must then inform the Whistleblowing Officer); or
- Directly notifying in writing, by email, or by phone, the Whistleblowing Officer, (the latter provides the option of anonymity).

Funding Circle encourages employees to speak out against poor practices or behaviours. As such, Funding Circle is committed to ensuring that no Whistleblower faces repercussion, retaliation, detriment or victimisation for Whistleblowing, provided the report of complaints or concerns are made in good faith. Funding Circle will not tolerate harassment of, or retaliation against any Whistleblower making a good faith report pursuant to this Policy, or any other person participating in any investigation in good faith.

The Policy is shared with all employees via Funding Circle's internal website and other memos, as appropriate. The Policy concepts are also communicated through on-line training to ensure employees understand how to voice their concerns. New employees are provided with whistleblowing awareness training at induction.