

Tassat Index Administration Whistleblowing Policy

August 9, 2019

1. Introduction

Tassat) acts as index administrator for the Tassat Fixing Price family of indices (XBTFixing and ETHFixing). As an index administrator, Tassat is fully compliant with all principles of the IOSCO Principles for Financial Benchmarks (July, 2013). In complying with Principle 4, Tassat has established the following policy and procedures for handling the reporting of suspected unethical behavior or misconduct by any parties involved in index determination or governance.

Tassat is committed to the highest standards of transparency and accountability and takes seriously the task of providing credible, reliable financial benchmarks. This policy is designed to ensure that any employee of Tassat who suspects illegal or unethical activity feels completely comfortable in raising these concerns to the appropriate designated person without fear of reprisal or retaliation in any form.

This policy is only for suspected illegal or unethical conduct or the covering up of such conduct; it is not intended as a complaint forum regarding business decisions.

2. Whistleblowing Procedure

An employee of Tassat wishing to report suspected illegal or unethical behavior under this policy should make the report in person to:

1. The COO
2. The CEO if the reported activity involves the COO
3. The General Counsel if the reported activity involves both the COO and the CEO
4. If none of these reporting lines are available, the report should be made to any other senior member of staff that is not involved in the reported activity
5. If the employee feels uncomfortable reporting directly to the COO or CEO, he or she may report to their direct manager with the understanding that their manager will immediately escalate the report to the appropriate officer.

Upon receipt of such a report, the officer of the company receiving the report will launch an investigation without delay and will inform the reporting individual of the outcome of the investigation. Senior management may decide to forward the report to regulatory agencies if deemed appropriate.

3. Protection of Whistleblower

Protection against reprisals or retaliation is guaranteed for any employee reporting suspected illegal or unethical behavior as long as:

- The report is made in good faith
- The report is made through the specified channels
- The report is not deemed to be of malicious intent toward the individual(s) reported on

Employees who make open public accusations regarding other employees or officers rather than going through the whistleblowing procedure have no such protection and may face disciplinary action.

Confidentiality as to the identity of the individual making the report will be maintained unless the investigation of the matter requires disclosure (for example, if an on the record statement is required).

If it is necessary to break confidentiality, all protections provided under this policy will extend to include retaliation against or improper treatment of the reporting individual by any employee or officer of the company.

4. External Whistleblowing

Individuals external to Tassat can report suspected illegal or unethical conduct through the following email address: indexwhistleblowing@tassat.com

As with internal reports, confidentiality will be maintained unless the investigation or resolution process requires on the record statements.

5. Records of Whistleblowing

Detailed records of all whistleblowing reports (with the reporting individual's identity redacted) and the resulting investigation, along with any actions taken as a result, will be retained for a minimum of seven years.