



Whistleblower Policy

QBA Third-Party Supplier Policy

1. Purpose and Scope

QBA is committed to conducting business with honesty and integrity. This Policy enables third-party suppliers and their employees, agents, and subcontractors to report suspected misconduct connected to QBA in good faith, without fear of retaliation.

2. Applicability

The policy shall be applicable to all suppliers and vendors unless otherwise agreed.

3. What Can Be Reported

Concerns that may be reported under this Policy include, but are not limited to:

- Bribery, corruption, or fraud.
- Breaches of human rights, labor practices, health and safety, or environmental standards.
- Financial irregularities, misreporting, or insider trading.
- Discrimination, harassment, retaliation, or other misconduct involving QBA personnel.
- Data privacy, information security, or confidentiality breaches.
- Any other conduct that may breach QBA's policies, applicable law, or ethical standards.

4. Reporting Channels

Concerns may be reported through the channel speakup@qbadvisory.com with regards to any general matters, Harassment or discrimination grievances, Data breach or information security incidents

Reports may be made anonymously where permitted by local law. Suppliers shall ensure their own personnel are aware of these reporting channels in respect of concerns connected to QBA.

5. Protection Against Retaliation

QBA will not tolerate retaliation, adverse action, harassment, or discrimination against any individual arising from their reporting of a suspected violation in good faith, even where the concern is ultimately not substantiated. Suppliers must ensure their own personnel are protected from retaliation in connection with reports relating to QBA.

6. Confidentiality

Reports will be treated confidentially and information will be shared only with those who need to know in order to investigate and address the concern, subject to legal and regulatory requirements.

7. Investigation Process

QBA will assess and, where appropriate, investigate reported concerns promptly and impartially. QBA is committed to fairly assessing all issues raised and providing resolution, and may keep the reporting individual informed of general progress, subject to confidentiality and legal constraints.



8. Misuse of This Policy

This Policy must not be used to make malicious or knowingly false allegations. Such misuse may result in appropriate action under the Supplier's contract with QBA.

9. Policy Review

This Policy will be reviewed periodically. Suppliers will be notified of material changes.

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QBA-POL-WB-01	1.0	January 2026	HR Head	Global CEO