

PCEF-POL-003

Whistleblowing Policy

Premier Choice Energy Fund Ltd

Version	1.0	Effective Date	May 2026
Next Review	May 2027	Classification	Controlled Document
Owner	Compliance & Risk	Approved by	Board of Directors

1. Purpose

Premier Choice Energy Fund Ltd is committed to the highest standards of openness, transparency, and integrity. This Policy provides a framework for employees, contractors, and third parties to raise concerns about wrongdoing or regulatory breaches in confidence and without fear of retaliation.

This Policy complies with the FCA's requirements under SYSC 18 of the FCA Handbook and the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998).

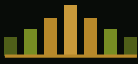
2. Scope of Disclosable Concerns

This Policy covers disclosures relating to:

- Criminal activity including fraud, theft, bribery, or money laundering
- Regulatory breaches or non-compliance with FCA rules
- Failure to comply with legal obligations
- Endangerment of health and safety
- Damage to the environment
- Deliberate concealment of any of the above
- Serious breaches of PCEF's internal policies or ethical standards

3. The Whistleblowers' Champion

PCEF has designated a Senior Manager as Whistleblowers' Champion in accordance with FCA SYSC 18 requirements. The Champion oversees the integrity and effectiveness of PCEF's whistleblowing arrangements and reports annually to the Board.



4. How to Report

Concerns may be raised through the following channels:

- Directly to the Whistleblowers' Champion (in person, by email, or by telephone)
- Via the confidential external whistleblowing service (details circulated separately to all staff)
- Anonymously via the secure online reporting portal
- Directly to the FCA via the FCA whistleblowing service (0800 111 6768 / www.fca.org.uk/whistleblowing)

5. Non-Retaliation Guarantee

PCEF will not tolerate any retaliation or detriment against any person who makes a disclosure in good faith. Any employee found to have subjected a whistleblower to detriment will face disciplinary action up to and including dismissal.

This protection applies regardless of whether the concern raised is subsequently found to be unsubstantiated, provided the disclosure was made honestly and in good faith.

6. Investigation Process

All disclosures are acknowledged within 5 working days. A preliminary assessment is completed within 10 working days. Full investigations are completed within 60 working days subject to complexity. The outcome is communicated to the reporter where identity is known and confidentiality permits.

AUTHORISATION

Role	Name	Signature	Date
Chief Executive Officer	_____	_____	May 2026
Chief Compliance Officer	_____	_____	May 2026
Board Chairman	_____	_____	May 2026

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