



Whistleblower Policy

September 22, 2025

Purpose and scope

This whistleblower policy (this “**Policy**”) defines the commitment of Burford Capital Limited and its subsidiaries (collectively, “**Burford**”) to respect and protect the right of employees to report suspected illegal or unethical behavior. This Policy applies to all Burford operations.

Introduction

1. Burford endeavors at all times to conduct its business with honesty and integrity and in line with all applicable laws in all its places of business. However, in all organizations, there is a risk of error or oversight, or of unknowingly harboring illegal or unethical behavior. Consequently, Burford has developed this Policy on whistleblowing to ensure that its culture of openness and accountability is on solid footing.
2. Whistleblowing is the disclosure of information by an employee (the “**whistleblower**”) that such employee reasonably believes evidences a violation of a law, rule or regulation; gross mismanagement; gross waste of funds; an abuse of authority; or a substantial and specific danger to public health or safety.¹
3. Whistleblowing is protected by law, both at the federal level in the United States and nationally in the United Kingdom. Burford is convinced of the value of transparency and is committed to respecting and upholding the rights of whistleblowers.

Burford procedures

Making reports

4. In brief, violations or suspected violations of any of Burford’s obligations or any obligations on any Burford employee should be reported promptly to the Chief Compliance Officer (or, if the suspected violation relates to the Chief Compliance Officer, to the Chief Executive Officer).
5. Burford partners with an external vendor to operate a hotline, which is available 24/7 and allows Burford employees to make anonymous confidential reports at any time about any concerns that they may have about how Burford is conducting its business or to identify any workplace behavior that they believe violates any of Burford’s policies. Training for all new

¹ US Securities and Exchange Commission definition, available at <https://www.sec.gov/eeoinfo/whistleblowers.htm>.

employees covers the hotline, and information about the hotline is available to all employees on Burford's internal employee portal.

6. Employees are not prohibited from reporting violations of law, rule or regulation to any governmental agency (such as the US Department of Justice, the US Securities and Exchange Commission or the UK Financial Conduct Authority), nor do they need prior authorization to make any such reports or disclosures, nor do they need to notify Burford that they have made any such reports or disclosures.

How Burford will deal with reports

7. Burford will treat all disclosures, whether made privately, officially or outside Burford, consistently and fairly and will take all reasonable steps to maintain the confidentiality of any whistleblower who requests it, except where applicable law requires Burford to break that confidentiality.
8. No one who makes a good faith report, or who cooperates in good faith with Burford's investigations, shall be subject to retaliation, including dismissal, sanctions, harassment or any other adverse consequences, as a result of making a good faith report.
9. Any retaliation against a whistleblower is a violation of applicable laws and Burford's Compliance Manual. Any cases of retaliation will be thoroughly investigated, and appropriate action will be taken.

Training and publicity

10. The above matters are outlined in Burford's Employee Handbook and Burford's Compliance Manual and consequently form part of all new employees' training. Employees must acknowledge their understanding of the Employee Handbook to Human Resources and certify to the Legal and Compliance department their agreement to abide by Burford's Compliance Manual, when required.
11. Flyers outlining the hotline are posted in a public place in applicable Burford's offices. An annual reminder email about the hotline is sent to all Burford employees.

Further information

12. Burford employees should contact their direct manager or the Legal and Compliance department for any further information about this Policy or any procedures outlined in this Policy.
13. Sources of information available outside Burford include:
 - In the **United States**:
 - The US Department of Labor's information page on whistleblower protections: <https://www.dol.gov/general/topics/whistleblower>
 - The Whistleblower Protection Program administered by the US Department of Labor: <https://www.whistleblowers.gov/>

- The SEC Office of the Whistleblower: <https://www.sec.gov/whistleblower>
- In the **United Kingdom**:
 - UK government guidance: <https://www.gov.uk/whistleblowing>
 - Detailed guidance from the Advisory, Conciliation and Arbitration Service (archived at <https://webarchive.nationalarchives.gov.uk/ukgwa/20210104111253/https://archive.acas.org.uk/index.aspx?articleid=1919>)
 - Protect, the UK's whistleblowing charity: <https://protect-advice.org.uk/>