

## Whistleblowing Policy

### Document purpose and scope

As required under the Whistleblowing Policy and the accompanying Internal Reporting Procedure, the Group has implemented channels that enable employees, suppliers, and customers to report various types of irregularities. These can be related to matters described in our General Code of Conduct, such as financial or accounting fraud, employment issues, and breaches of corporate behaviour standards.

### Which ESG-related issues does the Policy address?

The Policy and Procedure lay out the following principles:

- Access to whistleblowing channels. These channels include: Klakson app, the corporate app, a telephone hotline, email address, traditional mail, or a face-to-face meeting. The channels ensure that anyone wishing to report an irregularity/ breach can do so at any time (24/7), from any location and in a manner convenient to them.
- Confidentiality and anonymity are guaranteed as well as protection against retaliation. Reports can be made anonymously, and the information provided is treated as confidential. No retaliatory, discriminatory, or otherwise unfair actions may be taken against those who report a breach.
- Respect for the rights of individuals named in reports. The identity of the person concerned by the report is kept confidential and may only be disclosed to the extent necessary for the investigation (e.g., to those conducting or supporting the investigation).
- Transparent process and appropriate governance framework. The regulations set out rules for escalating cases to higher levels for review, oversight, reporting, and audits carried out by internal audit. They also address COI prevention during investigations and their maximum duration.
- Awareness of whistleblowing channels. Appropriate initiatives are undertaken to raise employee awareness of how these channels function and to encourage their use.

### The highest management level responsible for the Policy

The Policy defines the responsibilities of individual organisational units and decision-making bodies. As decided by the Supervisory Board, the Bank's Management Board member responsible for the Legal & Compliance Division oversees the whistleblowing system.

### Application across the Bank's subsidiaries

The Policy applies across the Group.