
Eurobank Private Bank Luxembourg SA Whistleblowing and Reporting of Illegal or Unethical Conduct Policy Statement

Scope & Applicability of the Whistleblowing and Policy for Reporting of Illegal or Unethical Conduct

The Policy intends to encourage and facilitate staff members of Eurobank Private Bank Luxembourg SA (“the Bank”), as well as any concerned third party to submit reports on incidents of whistleblowing and illegal or unethical conduct, while setting out measures for their protection.

This Policy applies to all staff of Eurobank Private Bank Luxembourg SA, permanent or temporary, full time or part time, including persons working remotely, as well as paid or unpaid trainees (jointly “staff members”). Moreover, it applies to ex-employees, volunteers and job applicants that have acquired information on breaches during the recruitment process or other pre-contractual negotiations, persons having self-employed status, or consultants, any persons working under the supervision and direction of contractors, subcontractors and suppliers, as well as to shareholders and board members, including non-executive members (hereinafter “concerned third parties” and together with the staff members “reporting persons”).

Basic Principles of Whistleblowing and Reporting of Unethical Conduct Policy

The basic principles of the Policy are as follows:

- a) All staff members and concerned third parties are encouraged to communicate their concerns by submitting a report.
- b) There is a number of channels that can be used for submitting a Report.
- c) The handling of reports is subject to strict confidentiality and personal data protection rules.
- d) Reporting persons can choose to submit a report anonymously.
- e) Reports of wrongdoing are dealt with in a proper and timely manner.
- f) Persons who report wrongdoing and have reasonable grounds to believe that the information they provide is true at the time of reporting, are protected against any form of retaliation, including threats and attempts of retaliation.
- g) The Bank appoints the Compliance Department as the Responsible Department for the Receiving and Monitoring of Reports (RRMD), who has a reporting access to the Board of Directors of the Bank.

The Board of Directors of the Bank is responsible for ensuring the existence of a robust framework for whistleblowing and reporting illegal or unethical conduct, promoting continuous improvement of the Policy, committing to, promoting and practicing a speak-up/listen-up culture and ensuring the appointment of the RRMD.

Treatment of Reports

The Compliance Department of the Bank is responsible for the design, implementation, operation and improvement of the reporting system as well as for the reporting on the performance of the reporting system to top management.

The RRMD, for the reporting persons/entities within his/her responsibility, is responsible for:

- Providing appropriate guidance as to how to submit a report;
- Receiving the reports;
- Ensuring that a confirmation of the receipt of the report is provided to the reporting person within a period of seven (7) working days from the day of receipt;
- Performing an initial assessment of the report;
- Designating the competent unit or person to handle the report when an investigation requires so ;
- Ensuring, to the extent possible, that the confidentiality of the reporting person's identity and of any third party named in the report, is protected;
- Monitoring the progress of the investigation and maintaining contact with the reporting person;
- Ensuring that feedback is provided to the reporting person within a reasonable period of time, which shall not exceed three (3) months from the confirmation of receipt of the report;
- Planning and coordinating relevant training efforts.

Confidentiality & Protection

Reports are treated as confidential. All provisions of law and this Policy, as regards the protection of the identity of reporting persons and persons concerned, shall apply.

The Bank takes all reasonable measures (to the extent possible in the capacity, capability and competence of the organization) to protect persons who report wrong doing (whether staff members or not) against any abuse or reprisals as a result of a report submitted, provided that reporting is done in good faith and in compliance with the provisions of law and this Policy.

Transparency

The Policy is accessible by all staff members and concerned third parties. Staff members are given this Policy as part of the Bank's induction pack. They also have access to this Policy through the Department Procedure folder.

The "Eurobank Private Bank Luxembourg SA Whistleblowing and Reporting of Illegal or Unethical Conduct Policy Statement" is published on the [Bank's website](#), in order to be accessible by all concerned third parties.

Whistleblowing and Reporting Unethical Conduct

All staff members and all concerned third parties are encouraged to submit a report regarding any incident of actual, attempted or reasonably suspected illegal or unethical behavior which affects and/or may be harmful to the Bank and its mission, the Bank's staff members or concerned third parties. The report may, indicatively and not exhaustively, refer to incidents of serious misconduct or serious violations of the Bank's procedures, policies, guidelines or of the Code of Conduct and Ethics or anything that could damage the reputation of the Bank, as well as any attempt to cover up the above. It may also include violations of laws and regulations and various forms of criminal behavior, integrity violations and/or unethical behavior including, but not limited to, theft, embezzlement, corruption, bribery, conflicts of interest, money laundering, abuse or improper use of inside information, abuse or improper use of the Bank's property, etc. Such incidents may concern staff members, customers, contractors, suppliers, beneficiaries or other persons or entities that participate or seek to participate in activities that involve the Bank.

The channels for submitting such Reports are as follows:

- a) Send an e-mail to EthicsHotline@eurobankpb.lu (to the attention of the RRMD).
- b) Send a letter to the mail address, 534, rue de Neudorf L-2220 Luxembourg (attention of the RRMD, the Compliance Department).
- c) Call the relevant telephone line: + 352 420 724 111 and leave a message on the answering machine, which is available 24/7, all year round (to the attention of the RRMD).
- d) Send an email to the Eurobank Group hotline ethicshotline@eurobank.gr (to the attention of the Group RRMO).
- e) Send a letter to the mail address of the Head Office of the Bank, Eurobank SA, 2-6 Pasmazoglou Street, 105 59, Athens (to the attention of the Group RRMO).

f) Call the relevant telephone line of Eurobank SA Greece (0030 2144058990 or ext. 58990) and leave a message on the answering machine, which is available 24/7, all year round (to the attention of the Group RRMO).

g) External channels: Whistle-blowers are free to choose whether to report internally or externally, i.e. to a competent authority.

Any person, and in particular employees or former employees of the Bank in Luxembourg, may in good faith submit a report directly to the CSSF in a confidential and secured manner to the following address: whistleblowing@cssf.lu if that person has reasonable grounds for believing that the report will show breaches of applicable regulation by entities or persons of the Bank which fall under the supervision of the CSSF.

The Luxembourg Whistleblowing Office (“Office des Signalements”) responsible for providing potential whistleblowers with information and guidance is operational since 1 September 2023. If you have any questions, please contact: ods.info@mj.etat.lu. Website: [Annuaire — Etat.lu \(public.lu\)](#)