

## 10. Whistleblowing Policy

### 10.1 Introduction

Whistleblowing is an intentional disclosure<sup>4</sup> recorded in PFH files and conducted by a person who is aware of either significant irregularities and omissions, or other punishable acts, actual, potential or expected within the Group, which are communicated to a competent body in order for it to act repressively.

The purpose of the PFH Group Whistleblowing Policy is to establish the framework for the timely detection and management of irregularities, omissions, or punishable acts with respect to the operations of the Company and its Group, as well as the adherence to the Regulatory Framework (including the Law 4990/2022 regarding “Protection of persons reporting Union Law breaches for the companies and reports in its scope).

Under the framework of the Policy, PFH Group employees have the obligation to disclose in good faith actual or potential serious irregularities, omissions or punishable acts which come to their attention concerning employees or executives of the Group. Additionally, PFH Group encourages and urges any associated third party to report any reprehensible behavior and incidents of illegal conduct, or even serious indications that the commission of such acts is imminent.

The basic and inviolable principle of the Whistleblowing Policy is the protection of the confidentiality of the Whistleblower’s identity and any third parties named in the report by preventing the access of unauthorized persons to it and avoiding actions that might result in the disclosure of their identity. Furthermore, and provided that the Whistleblowers are employees of PFH Group, they are protected from any acts of retaliation against them provided that the reports are submitted in good faith.

Disclosures are made without promise of payment or any consideration, with the scope to embed the need to safeguard the image and assets of PFH Group and their shareholders and clients from irregularities performed by staff and executives which can affect the prestige and reputation.

### 10.2 Whistleblowing of Irregularities, Omissions or Acts that are Punishable by Law

By authorization of the Audit Committee, the Piraeus Bank Whistleblowing Committee (the ‘Committee’) is responsible for the assessment of confidential reports made by employees or third parties regarding PFH Group. The reports of irregularity, omission or punishable act include- but not limited to - the following:

- Theft;
- Fraud;
- Corruption;
- Bribery;
- Misappropriation of assets;
- Violation of bank confidentiality;
- Misleading presentation of information;
- Violation of PFH Group policies, regulations and procedures;
- Violation of the legal framework governing the Groups;

It is noted that for the companies of the Group that fall within the scope of Law 4990/2022, a Responsible for the Acceptance and Monitor of Reports (RAMR) has been appointed for managing reports related to violations of European Union Law, as specified by the provisions of the aforementioned law (Annex V). Breaches falling within the scope of 4990/2022 Law concern indicatively and non-exhaustively the following areas: financial services, products and markets, product safety and compliance, public procurement, environmental protection, public health, consumer protection, privacy and personal data protection, security of network and information systems and issues relating to the financial interests of the Union. The detailed responsibilities of the RAMR are outlined in Annex

<sup>4</sup> The coverage of this definition extends to reports of violations of Union law as outlined in Law 4990/2022 on “The protection of persons reporting violations of Union Law”.

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VI and have been delegated to the Head of Group Internal Audit of Piraeus Bank Group, who also exercises the role of the Chairman of the Committee.

The Group has established a procedure<sup>5</sup> for receiving and managing reports. In this context, PFH makes available to the whistleblower alternative ways of making a disclosure via:

- ✓ mail to a post office box (Piraeus Bank PO Box 13614, Hellenic Post (ELTA) of Syntagma Sq);
- ✓ mail to a specific e-mail address (whistleblowing@piraeusbank.gr)
- ✓ letter to the attention of the Responsible Officer for the Acceptance and Monitoring of Reporting (RAMR), 37 Kritis Street, P.O.Box 10438 Athens or meeting, upon request of the Whistleblower, with physical or remote presence with the RAMR for Whistleblowers falling within the scope of Law 4990/2022

It is noted that additional reporting channels may be introduced at company level if deemed necessary. Furthermore, in case of reports that fall within the scope of Law 4990/2022, the Whistleblowers may submit them to the National Transparency Authority either initially or in the event that they consider that their reports have not been effectively addressed.

In the event that a Group employee or a third party has any doubt as to the necessity of reporting an irregularity, omission or a suspected punishable act, or requires clarifications on his /her protection or on other issues, and his/her queries are not satisfied by this policy, he/she can address any queries to the Audit Committee or to the Piraeus Bank Group Internal Audit, or to the RAMR for reports falling within the scope of Law 4990/2022.

It is noted that reports of incidents of violence & harassment are submitted through the whistleblowing communication channels. These reports are assessed by the Violence & Harassment Committee, do not fall within the competence of the Whistleblowing Committee and their management is determined according to the “Policy for the Prevention and Combating of Incidents of Discrimination, Violence & Harassment in the Workplace”.

**10.3 Confidentiality/Anonymity/Protection of the Whistleblower**

**10.3.1 Confidentiality/ Anonymity**

PFH Group encourages employees to put their names to their allegations. Anonymous allegations make it extremely difficult or even impossible to thoroughly investigate an allegation, due to the difficulty of receiving information from an anonymous whistleblower (e.g. discussion, meeting for the provision of clarifications during the investigation), and also due to the difficulty of evaluating the credibility of the allegation. Anonymous allegations are examined depending on how well founded they are and whether it is possible to identify the illegal act described.

PFH Group is committed to protecting the confidentiality of the identity of the Whistleblower and any third party named in the report and not proceeding with actions which may reveal his/her identity to unauthorized persons.

It is noted that the revelation of the identity of the Whistleblower or any third party included in the report may be required by a court or legal procedure and in accordance with the provisions of EU or national law as well as with the specific requirements on the confidentiality of the identity of the Whistleblower stipulated in Law 4990/2022 for the reports falling within its scope.

The maintenance and processing of personal data is carried out in accordance with the applicable legislation on the protection of personal data<sup>6</sup>.

<sup>5</sup> The procedure takes into account the provisions of Law 4990/2022.

<sup>6</sup> For companies and reports falling within the scope of Law 4990/2022, relevant provisions of the law regarding personal data are taken into consideration.

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**10.3.2 Protection from Retaliatory Actions**

PFH Group in general is committed to protect employees who made a disclosure in good faith, from any retaliatory actions against their current position and their future professional development.

In particular, the "Framework for the Protection of Employees - Whistleblowers against Potential Retaliatory Actions" is developed and presented in Annex III of this Policy.

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