



## 11. Whistleblowing Policy

### 11.1 Introduction

Whistleblowing is an intentional disclosure 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 the competent Unit in order for the latter to act repressively.

The purpose of the PFH Group Whistleblowing Policy is to establish the framework for the timely detection of irregularities, omissions, or punishable acts with respect to the operations of the Company and its Group.

Under the framework of the Policy, PFH Group employees have the obligation to disclose serious irregularities, omissions or punishable acts which come to their attention concerning employees or executives of the Company and its Group.

The basic and inviolable principle of the Whistleblowing Policy is to protect anonymity and confidentiality of the identity of individuals who make such disclosures and, provided they are employees of PFH or of its Group companies, to ensure that neither their present position nor their future professional development is threatened.

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, the Group companies and their shareholders and clients from irregularities performed by staff and executives which can affect the Group's prestige and reputation.

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

By authorisation of the Audit Committee, the Piraeus Bank Whistleblowing Committee (the "Committee") is responsible for the management of confidential claims made by employees or third parties regarding PFH Group.

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 BoD Audit Committee or to the Internal Audit or to the Human Resources.

The Group has established procedures and 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);
- ✓ e-mail to a specific Piraeus Bank e-mail address ([whistleblowing@piraeusbank.gr](mailto:whistleblowing@piraeusbank.gr)).

The Whistleblowing Committee is responsible for handling reports of irregularity, omission or punishable act including - but not limited to - the following:

- Theft;
- Fraud;
- Corruption;
- Intimidation;
- Misappropriation of assets;
- Violation of bank confidentiality;
- Misleading presentation of information;
- Violation of PFH Group policies and procedures;
- Violation of the legal framework governing the Piraeus Financial Holdings and its Group companies;

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■ Bribery;

Transactions that may constitute market abuse do not fall within the scope of this Policy. In such cases the internal procedures regarding disclosure to the Hellenic Capital Market Commission shall be followed pursuant to the applicable legislation and the relevant clarifying decisions of the Hellenic Capital Market Commission.

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".

### **11.3 Confidentiality/Anonymity/Protection of the Whistleblower**

#### **11.3.1 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 anonymity of the whistleblower and not proceeding with actions which may reveal his/her identity. It is noted that the revelation of the whistleblower's identity may be required by a court or legal procedure, in the framework of the investigation of the case. The anonymity of any other persons involved in the case will be retained, subject to the above restrictions.

The maintenance and processing of personal data is carried out in accordance with the applicable legislation on the protection of personal data.

#### **11.3.2 Protection from Retaliatory Actions**

PFH and the 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.

In case the allegation is not confirmed by the investigation there shall be no consequences for the whistleblower. In case the whistleblower was a participant in the disclosed wrongdoing, he/she will not be excused from his/her responsibilities, but his/her contribution to the detection and investigation of irregularities, oversights or punishable acts will be taken into consideration.

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