Global Compliance Policy – Whistleblowing

Regulation type: GP - Global Policy
Area: Group Compliance

Applicability	Perimeter	Exception
UniCredit S.p.A. Directed controlled Legal Entities[1], Foreign Branches and Permanent Establishment[2] perimeter destination	*AION BANK S.A.* *AO UniCredit Bank* *Cordusio Società Fiduciaria per Azioni* *UniCredit Bank a.d. Banja Luka* *UniCredit Bank Austria AG* *UniCredit Bank Czech Republic and Slovakia, a.s.* *UniCredit Bank GmbH* *UniCredit Bank Hungary Zrt* *UniCredit Bank S.A.* *UniCredit Bank Serbia Jsc* *UniCredit Banka Slovenija d.d.* *UniCredit Bulbank AD* *Unicredit Factoring SpA* *Unicredit International Bank (Luxembourg) SA* *UniCredit Leasing SpA* *UniCredit Life Insurance S.p.A. "ULI")* *UniCredit myAgents S.r.l.* *UniCredit RE Services S.p.A.* *UniCredit Vita Assicurazioni S.p.A. ("UVA")* *VODENO SP.ZO.O.* *Zagrebacka Banka* *Foreign Branch - Czech Rep.* *Foreign Branch - Hungary* *Foreign Branch - London (UCI)* *Foreign Branch - Madrid (UCI)* *Foreign Branch - New York (UCI)* *Foreign Branch - Paris (UCI)* *Foreign Branch - Poland* *Foreign Branch - Romania* *Foreign Branch - Slovakia* *UC Branch Germany SpA*	

1 See IR 'UniCredit Banking Group Update'
2 See IR 'Governance Mechanisms'

	Vienna Permanent Establishment	
Indirectly controlled Entities / Other Indications	*Bank Austria Real Invest Immobilien-Management GmbH* *FactorBank Aktiengesellschaft* *Food & more GmbH* *Human Resources Service and development GmbH* *HVB Immobilien AG* *HVB Secur GmbH* *OOO UniCredit Leasing* *SchoellerBank Aktiengesellschaft* *SchoellerBank Invest AG* *Structured Invest Société Anonyme* *UCITS FUND MANAGEMENT COMPANY* *UNICREDIT INVEST JSC BELGRADE* *Unicredit Bank d.d.* *UniCredit Biztositasközvetitö Kft* *UniCredit Broker S.R.O.* *UniCredit Capital Markets LLC* *UniCredit Center am Kaiserwasser GmbH* *Unicredit Consumer Financing EAD* *UniCredit Consumer Financing IFN SA* *UniCredit Direct Services GmbH* *UniCredit Factoring Czech Republic and Slovakia, a.s.* *UniCredit Fleet Management EOOD* *UniCredit Fleet Management s.r.o.* *UniCredit Fleet Management s.r.o.* *UniCredit Insurance Broker e.o.o.d.* *UniCredit Insurance Broker srl* *UNICREDIT INVEST BH DRUSTVO ZA UPRAVLJANJE FONDOVIMA D.O.O.* *UniCredit Jelzalogbank Zrt.* *UniCredit Leased Asset Management S.p.A.* *UniCredit Leasing (Austria) GmbH* *UniCredit Leasing Corporation IFN S.A.* *UniCredit Leasing Croatia d.o.o. za leasing* *UniCredit Leasing CZ a.s.* *UniCredit Leasing EAD* *UniCredit Leasing Fleet Management s.r.l.* *UniCredit Leasing Hungary Zrt* *UniCredit Leasing Insurance Services s.r.o.* *UniCredit Leasing Slovakia a.s.* *UniCredit Leasing Srbija d.o.o. Beograd* *UniCredit Pojistovaci Maklerska Spol. S R.O.*	

	Universale International Realitaten GmbH *WealthCap Kapitalverwaltungsgesellschaft mbH* *Zagreb Nekretnine DOO* *Zane Bh DOO* *Zb Invest D.o.o. Za Upravljanje Ucits Fondovim* *Foreign Branch - Milan (HVB)* *Foreign Branch - London (HVB)* *Foreign Branch - New York (HVB)* *Foreign Branch - Paris (HVB)* *Foreign Branch - Singapore (HVB)*	
Non-applicability	*Legal Entities:* *- non-operational* *- without employees* *- in liquidation* *- not included in Compliance Coverage perimeter*	
Approval date	*September 2025*	
Proponent Functions (Rule Owner) Approved by	Click or tap here to enter text.	
Approving Functions Approved by	Click or tap here to enter text.	
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Covered risks (according to Group Risk Taxonomy)	*Compliance Risk*	
Covered external regulation requirements	*European Directive 2019/1937*	
Process Tree	Governance & Control:MG: Risk and Control Framework:MP: Compliance management	

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1 POLICY REQUIREMENT AND PURPOSE

The purpose of this Policy is to promote a corporate environment where Employees and Third Parties are encouraged to make Reports on Unacceptable Conduct within the Group in recognition of their significant contribution to self-correction and excellence. ("Report" or "Whistleblowing").

This Policy should be read in conjunction with the "Global Policy - Code of Conduct" and the "Global Policy - Policy against Harassment, Sexual Misconduct, Bullying and Retaliation", as implemented in each Legal Entity.

Unacceptable Conduct refers to any action and/or omission occurring in the course of work activities, or having an impact on them, that causes or may cause harm or detriment to the Group and/or its Employees and that:

- is illegal, unfair or unethical; or
- breaches laws and regulations, including but not limited to EU Union laws; or
- is not compliant with internal rules.

2 APPLICABILITY AND SCOPE

The Group respects - and all Employees and all Third Parties are required to comply with – all applicable international, national, and local laws and regulations, and may also prohibit certain behaviors regardless of whether they are expressly forbidden by law. The Group applies the highest standards set out in this Policy, regardless of whether the reported conduct is prohibited by law, and even if in certain countries the Group's standards and requirements may be broader than those of the local jurisdiction.

This Policy applies to all Group Legal Entities and all Third Parties.

This Policy applies to all matters or alleged matters reported under Group Policies and not only, among which are the following:

Violations and/or irregularities relating to the matters governed by the Group Rules and external regulations may be reported.

More specifically, by way of example and without limitation:

- Bribery and corruption;
- Money Laundering;
- Violation of Financial Sanctions;
- Unethical or unprofessional business conduct;
- Violation of anti-trust laws;
- Insider trading and/or market manipulation;

- facilitation of fraud or tax evasion also for clients and Third Parties;
- Harassment;
- Sexual misconduct;
- Bullying;
- Incorrect adherence to the principles of Diversity and inclusion;
- Fraud;
- Misuse of confidential customer and Company data;
- Violations of local laws and regulations;
- Non-compliance with Group policies and procedures;
- Violation of the Codes of Conduct and/or other Code of Ethics adopted by Group Legal Entities;
- Other illegal or improper practices or behaviors.

3 MINIMUM GOVERNANCE REQUIREMENTS

	Minimum Requirements	Owner
Identification of the Responsible of the internal system for reporting violations	The local Compliance identifies the **Responsible of the internal system for reporting violations** ("**Whistleblower's Champion**"), usually a reference person of Compliance function. He/she has the role of ensuring and overseeing the integrity, independence and effectiveness of the Legal Entity's Whistleblowing policies and procedures. The Whistleblower's Champion has a level of authority and independence within the Legal Entity, and he can access all information and personal data referred to the whistleblowing reports received.	*Local Compliance*
Set up of Whistleblowing Managerial Forum	Each Legal Entity sets up a Whistleblowing Managerial Forum usually composed by: • Head of Compliance • Head of People & Culture • Head of Risk Management • Head of Internal Audit[3] The Whistleblowing Managerial Forum: • **periodically** monitors main trends, indicators and actions aimed at enhancing awareness on the process and culture of reporting misconducts; • must be timely involved in case of Serious report ("Serious case"). At Group Level, the Whistleblowing Managerial Forum is: • convened **quarterly** by the Chief Compliance Officer to review indicators and trend analyses prepared based on Whistleblowing reports received at the UniCredit Group level; • timely involved in case of serious report, also if they are received by Subsidiaries.	*Local Compliance*

[3] Internal Audit is a permanent guest and without voting right

Set up of Whistleblowing Working Group[4]	Each Legal Entity sets up the "**Whistleblowing Working Group**" composed by two or more of the following individuals[5]: • Head of People & Culture[6]; • Head of Compliance (for example of Anti-Corruption and/or Anti Financial Crime); • Head of Legal; • Head of Security; • Head of Risk Management; • Head of Internal Audit; • Any other person nominated by competent Corporate Bodies.[7] The Whistleblowing Working Group has the goal to: • analyze the report received in order to verify its admissibility. This means that such report shall be related to an unacceptable conduct in accordance with this Policy and with the internal regulations; • verify that such report has sufficient elements in order to start an investigation. In case of positive evaluation, it identifies the appropriate function to carry out the investigation. In case of lack of relevant elements or if it is not possible to obtain sufficient information to start an investigation, it should archive the report.	*Local Compliance*
Annual Reporting	The Whistleblower's Champion prepares an Annual Report of the proper functioning on the Internal Whistleblowing system, highlighting the results of the activities carried out and of the controls performed on the respect of confidentiality, protection of the Whistleblower and absence of retaliation. The **Whistleblowing Annual Report** is approved by the Corporate Bodies and the relevant information is made available to the employees of each Legal Entity.	*Whistleblower's Champion*
Reporting to UC S.p.A.	Each Legal Entity sends to UniCredit SpA the **quarterly report** showing, on an anonymous basis, cases, metrics and trends of the whistleblowing received in the referring period.	*Local Compliance*
Protection measures for involved persons in Whistleblowing process	• UniCredit Group **grants the protection**[8] of the person submits the report ("Whistleblower") and of the witness **against any form of retaliation**, including threats of retaliation and attempts of retaliation, discrimination or penalization as a result of having made the Report in good faith. • Any act of retaliation or discrimination against the whistleblower and the witness is forbidden and, if	*Local competent Functions and/or Local Authorities*

[4] The members of the Whistleblowing Working Group and the Members of the WB Managerial Forum may be coincident

[5] To preserve objectivity in the evaluation of the Report, Members of the Whistleblowing Working Group must represent at least two different Competence Lines.

[6] With respect to the Head of P&C there may be local restrictions, such as in Spain. Where there is no Head of function in a LE, the role may be covered by other employees belonging to the same functions.

[7] About Italian Legal Entities, if a Report refers to any breach of the Organizational Model implemented as per Legislative Decree no. 231/2001 or refers to a crime under such Legislative Decree, the Report could be directly submitted to the Supervisory Body 231/01.

[8] The measures for the protection of the Whistleblowers shall also apply, where relevant, to: (a) facilitators, who are persons assisting the Whistleblower in the reporting procedure; (b) third persons who are connected with the reporting persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting persons; and (c) legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context.

	ascertained, it may lead to a **disciplinary proceeding** against the responsible individual and it could lead to **sanctions and criminal proceeding** by Authorities according to local laws[9]. • The employee who reports or witnesses the existence of an unacceptable conduct may request that the Group Legal Entity **relocates** him/her to a different department and, when necessary, to provide independent counselling for any distress caused by the Report. The Group grants the fulfillment of such requests wherever it is reasonably practical and justified to do so. • UniCredit Group ensures that the person reporting the misconduct is **not adversely affected in terms of work assignments or other work-related activities** as a consequence ("Retaliation"). • UniCredit Group **ensures the confidentiality** of the personal data of the Whistleblower, of the witness and of the concerned person (natural or legal person who is referred to in the Report or as a person to whom the breach is attributed or as a person involved in the reported breach) in all phases of the reporting procedure. The Group maintains the confidentiality of Whistleblowers, unless: o the Whistleblower consents to the disclosure; o the disclosure is required by local laws (e.g. the need to involve authorities/police or it is essential for the defense of the concerned person); or o the disclosure is necessary to prevent or reduce a serious threat to a person's health or safety.	
Sanctions measures	Unauthorized disclosure of the identity of the Whistleblower, the witness or the concerned person (or information from which their identity could be inferred) is considered as a breach of this Policy and **sanctions laid down** against those who violate the protection measures. Any action aimed to illegally uncover the identity of a Whistleblower, of a witness or of a concerned person, is considered a breach of this Policy and is subject to relevant disciplinary proceedings and it could lead to **sanctions by Authorities**.	*Local competent functions and/or local Authority*
Record keeping and data protection	The documentation must be **stored securely** by the nominated person in a material and/or electronic repository in compliance with the rules in force within the Group on the classification and handling of the confidential information and in compliance with relevant local laws and regulations. These records stored in Compliance and in any functions involved in any investigation must be accessed only by the Employees that based on their role have to access to the records. Only information that is required to be stored by applicable local law or by internal rules of the Group Company is retained. The Legal Entities may establish **record retention times related to the severity of the report** (e.g. 3 years for not -serious cases and 5 years for serious cases).	*Local competent functions*

[9] Member States, in accordance with national law, shall take additional measures to ensure that remedies and full compensation are provided for damage suffered by persons.

	Personal data not useful for the processing of the report must be promptly delated. In compliance with local law or by internal rules, whistleblower, concerned person and any witness have the right to obtain a confirmation in case there is a personal data processing regarding him/her and can therefore ask for any adjustment, integration, update or cancellation if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.	
Training and communication	The Group undertakes to provide **up to date, mandatory training** on Whistleblowing to all Employees which outlines the relevant procedures to follow, and the potential consequences should misconduct occur.	*Local competent function*
Conflict of interest	Conflicts of interest may arise if the Whistleblower, the person reported, or a person involved or affected by the Report is: - one of the persons designated to handle Reports within the Company ("Designated Persons"); - a member of the Whistleblowing Working Group. If the Whistleblowing concerns individuals involved in the management of Reports, the Employee or Third Party must directly inform the Top Management[10] of their Group Company or the Chief Compliance Officer of UniCredit S.p.A.. If the Whistleblowing concerns one of the members of the Whistleblowing Working Group, that member must be excluded from participating in the examination of the report received in order to avoid conflicts of interest. In case of conflict of interest, the function that receives the Whistleblowing instead of Compliance (for example Internal Audit or P&C) must promptly inform the local Whistleblower Champion for the registration of the WB and, as soon as the case is concluded, it must inform the WB Champion on the outcome of the investigation and any proposed action. If the reported person is the WB Champion, it is necessary to send the Report to the Head of Competence Line (usually the Head of Local Compliance function) who will have to take in charge the registration of the Whistleblowing. If the Whistleblowing concerns the Compliance Officer of one's own company (or, in the absence of a Compliance function, the Head of Internal Audit), the Employee or Third Party must directly inform the Top Management of the Group Company or the Chief Compliance Officer of UniCredit S.p.A..	*Local competent functions*

4 PROCESS VALUE CHAIN

The Whistleblowing process should consider the following:

- Receipt and management of Reports;

[10] "Top Management" refers, for example, to the CEO or GECs/Competence Line Managers or other senior executives.

- Investigation of Reports;
- Outcome of the investigation of Report.

Group Legal Entities must also provide information to employees and third parties in their internal regulations regarding how to report unlawful conduct to the competent local authorities.

Please refer to the Annex 1 for the schematic representation of the Whistleblowing process.

4.1 Receipt and management of Reports

	Operational Requirements	Owner
Report submission	If an Employee or a Third Party believes that an unacceptable conduct has occurred or it is likely to occur, he/she should **report it through the Whistleblowing channels provided by the Group Legal Entity.** If a Report is submitted without using the Whistleblowing channels, the person/function receiving the Report must forward it – with the utmost urgency and confidentiality – to the persons designated to handle Reports within the Legal Entity ("Nominated Persons").	*Employee or a Third Party* *Local function (other than Compliance) receiving the Report*
Whistleblowing channels for report submission	Reports can be sent by the Employee or the Third Party either **indicating his/her identity or anonymously and in any case providing all useful information to enable investigations, through the following Whistleblowing channels** put in place by the Legal Entity: • on a dedicated website[11]; • by phone; • by an email address; • in paper form to a specific address • by physical meeting[12]. The Legal Entity is not obliged to make all the above channels available, but in any case, at least one must allow anonymous reporting	*Local Compliance*
Information to the Whistleblowing Working group	Once a Report is received, the "Nominated Persons" promptly inform the "**Whistleblowing Working Group**". If Employees have concerns about whether conduct is unlawful, they may discuss this informally with their manager or local Compliance, who will treat such discussions confidentially.	*Compliance person nominated to deal with the whistleblowing report (the "Nominated Persons")*
Preliminary evaluation of the Report	The Whistleblowing Working Group makes a preliminary evaluation of the Report. If the Report should be classified as "Serious case" it will follow the detail process as defined in Annex 1.	*Whistleblowing Working group*

[11] The website allows to write a message or record it (e.g. many UC LEs adopted a Speak Up tool managed by an external provider)

[12] In case of physical meeting and/or unrecorded telephone every LE shall ensure, with the consent of the reporting person, a complete and accurate minute of the meeting / phone call that shall be submitted for approval to the whistleblower.

	If, in the Whistleblowing working group's opinion, an Employee or a Third Party makes a Report not in good faith, such conduct may be reported to the relevant functions and may lead to disciplinary and/or legal actions.	
Appointment of the Investigation function	In case there is sufficient evidence of unacceptable conduct to establish a reasonable basis for an investigation, the Whistleblowing Working Group will appoint a person/function in charge of such investigation (hereinafter, the "Investigation function") according to the specific matter reported	*Whistleblowing Working group*
Information to Whistleblowing Managerial Form	In the case of Reports classified as "Serious cases", the members of the **Whistleblowing Managerial Forum must be promptly informed** (if the Head of Internal Audit is not a member of the Whistleblowing Managerial Forum, he/she must be informed in parallel of the start of the investigation). In addition, Group Compliance must be informed, ensuring the highest level of confidentiality.	*Whistleblowing Working group*
Whistleblower's notification	All Reports, whether oral or written, will be taken into serious consideration by the Group and the Nominated Person has to send an acknowledgment of receipt of the Report to the whistleblower **within no more than seven days receipt** (if the Whistleblower has used a channel that allows communication with the Legal Entity). If the Report does not contain sufficient information to carry out an investigation, the Designated Persons may request additional information/documentation from the whistleblower. If it is not possible to obtain sufficient information to initiate an investigation into the unlawful conduct, the Designated Persons shall inform the Whistleblower (where possible).	*Nominated Person*

UniCredit Group guarantees absolute confidentiality at all stages of the process and prefers to encourage named reports rather than anonymous ones, since it is more difficult:

- to investigate the concern if people cannot ask follow-up questions;
- to protect the Whistleblower; and
- to give feedback on the result of the investigation to the Whistleblower.

Reports must be as complete, detailed and comprehensive as possible, attaching, if possible, any documents (images, chats, Word files, invoices, etc.) that may be useful in following up on the report. Reports are accepted in English or in local language.

If the Employees or a Third Party consider that a Report is not being taken seriously in consideration within their Group Company, they should use the Whistleblowing channels of their direct Holding Company or the channels available for UniCredit S.p.A.

Exclusions

If reports are received through the Whistleblowing channels that do not fall within the scope of this Policy, they must not be marked as Whistleblowing but, depending on the case, must be treated as follows:

- Claims must be addressed in accordance with the Claims management process defined in the Global Claims Policy (Claims are defined as disputes between the Customer and the Bank relating to banking and financial products and services, the provision of payment services, investment services or the distribution of insurance products).
- Reports relating to facts or disputes concerning the employment relationship between employees and Group companies (e.g. complaints relating to annual appraisals, disputes relating to salary or role) must be addressed to the People & Culture department.
- Reports relating to external fraud perpetrated by third parties that do not involve employees of Group companies (e.g. phishing emails or messages received by users, calls from fake bank operators) must be reported to the competent local authorities.

4.2 Investigation on Reports

	Operational Requirements	Owner
Involvement and support	For the execution of the necessary checks/investigation, the Whistleblowing Working Group can propose **the appointment of Internal Audit[13] or another designated function ("Investigation function").** Any produced reports issued by Investigation function and received by the Whistleblowing Working Group must be managed with the maximum level of confidentiality	*Whistleblowing Working Group*
Fairness and impartiality	Where required by local regulations, the investigating function **may inform** the individuals involved in the investigation about the statements made and the evidence gathered against them, and allow them the opportunity to respond to them	*Investigation function*
Advice and assistance	It is possible to obtain **specialist advice** (for example external legal advice or internal advice from specialist groups) on particularly technical/specialized matters outside its expertise.	Investigation function *and/or Whistleblowing Working Group*
Appropriateness and confidentiality	The investigation must be **thorough**, of **reasonable duration**, and **respect the anonymity** of the whistleblower and the persons involved, including any person eventually involved in the report. **Serious cases**, even if anonymous, must be timely managed and in a confidential way according to the specific Group process that ensures Whistleblowing Managerial Forum of the Group Company and the Compliance function of UniCredit S.p.A. in the	*Investigation function*

[13] The Internal Audit function has the right – in the event of disagreement or lack of resources – not to accept the assignment, in accordance with the rules in force within the Group. In this case, the function responsible for the investigation will assess whether to bring the matter to the attention of the relevant corporate bodies. If the assignment has been accepted, the Internal Audit function will operate independently and in accordance with its standard approach and objectives, which are shared with the Compliance Officer.

	analyses, action plan definition and on investigation results, recommendations and monitoring (as defined in Annex 1).	
Concerned person and whistleblower's Update	To the extent permitted by local law, Group Legal Entity **updates both the concerned person and the Whistleblower** about the development of the investigation.	*Investigation function and /or Whistleblowing Working Group*

4.3 Outcome of the investigation of Report

	Operational Requirements	Owner
Report submission after investigation	Once the investigation has been completed, the Report will be **submitted to the Whistleblowing Working Group** and managed as described in Annex 1.	*Investigation function*
Contents of the report of Investigation Function and recommendations	The report drawn up by the Investigation function must: - summarize the investigation and the **evidences collected**; - draw the conclusions reached; - provide recommendations and suggest actions to remedy the non-compliance, which aim to ensure that it does not recur in the future[14]. The Whistleblowing Working Group can also provide **recommendations and suggest actions to be taken.**	*Investigation function*
Disciplinary actions	**People & Culture has to take the final decision regarding the imposition of disciplinary measures in accordance with the Company's internal** procedures. An Employee who has committed or is involved in unacceptable conduct may NOT be subject to disciplinary action merely because for reporting their own or another person's unlawful conduct under this Policy. However, such circumstance may be taken into consideration in the assessment of any disciplinary actions to be adopted.	*People & Culture*
Follow – up	The Whistleblower will receive feedback about the follow-up to the Report, **within three months from the acknowledgment of receipt of it or**, if no acknowledgement was sent to the reporting person, **three months from the expiry of the seven-day period after the report was made**.	*Designated persons*

4.4 External Reports of unacceptable conduct

In each Country, local competent Authorities could activate dedicated Whistleblowing reporting channels ("eternal channels for reporting"). The European Directive 2019/1937 provides that Whistleblowers may provide information on violations using external channels, after using internal whistleblowing channels, or by reporting directly through external whistleblowing channels, if the conditions provided for by local laws are observed. The Whistleblower can also

[14] The investigation and analysis underlying the results must be duly traceable..

contact the local competent Authority especially when he/she believes that a Report has not been taken seriously by the Group Legal Entity.

The Whistleblowers may also choose to make a "public disclosure," making information about violations publicly available through the press or electronic media or otherwise through means of distribution capable of reaching a large number of people, according to the regulation applicable.[15]

Each Legal Entity shall provide to employees and third parties clear and easily accessible information regarding the procedures and topics for reporting externally to the local competent authorities and, where relevant, to institutions, bodies, offices or agencies of the European Union (e.g. on local institutional website).

However, **Employees and Third d Parties are encouraged to use the reporting channels made available by the UniCredit Group before making external reports of unlawful conduct**.

5 ATTACHMENTS

1. *Whistleblowing process and focus on Serious Cases*

6 REFERENCES

Definitions and acronyms	Employees	All persons linked to UniCredit S.p.A. and to Legal Entities through an employment contract
	Group	The Group, composed of UniCredit S.p.A. and of the Group Legal Entities.
	Legal Entity	Group Company directly or indirectly controlled by UniCredit S.p.A.
	Corporate Bodies	Executive, strategic and supervisory bodies of the Company
	Concerned Person	A natural or legal person who is referred to in the Report or public disclosure as a person to whom the breach is attributed or with whom that person is associated.
	Nominated Person	An impartial person competent for following-up on the reports which may

[15] A person who makes a public disclosure benefits from the protection provided by the Whistleblowing Directive if one of the following conditions applies:
a) The reporting person first reported internally and externally, or directly externally in accordance with the provisions of the Directive, but no appropriate action was taken in response to the report within the time limit specified in the Directive; or
b) The reporting person had reasonable grounds to believe that:
(i) The breach could pose an imminent or obvious danger to the public interest, such as in the case of an emergency or the risk of irreversible damage; or
(ii) In the case of external reporting, there is a risk of retaliation or the prospects of the breach being effectively addressed are poor due to the circumstances of the case, such as where evidence may be concealed or destroyed or where an authority may be colluding with the perpetrator of the breach or involved in the breach itself.

		be the same person or department as the one that receives the reports and which will maintain communication with the reporting person and, where necessary, ask for further information from and provide feedback to that reporting person
	Retaliation	According to EU Directive 1937/2019, retaliation and attempts of retaliation include in particular the form of: a) suspension, lay-off, dismissal or equivalent measures; b) demotion or withholding of promotion; c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; d) withholding of training; e) negative performance assessment or employment reference; f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; g) coercion, intimidation, harassment or ostracism; h) discrimination, disadvantageous or unfair treatment; i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment; j) failure to renew, or early termination of, a temporary employment contract; k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; l) blacklisting on the basis of a sector or industry-wide informal or

	formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry; m) early termination or cancellation of a contract for goods or services; n) cancellation of a license or permit; o) psychiatric or medical referrals.
Whistleblower	A natural person who reports or publicly discloses information on breaches acquired in the context of his or her work-related activities
Report (Whistleblowing)	The oral or written communication of information on breaches
Reports made in bad faith	False and unfounded reports made with the aim of damaging or harming one or more Employees or the Group.
Nominative Report	Report that specifies the identity of the whistleblower.
Third Parties	• Individuals or legal entities linked to the company by contract such as, for example, suppliers, contractors, external consultants linked to the Company by a mandate contract, shareholders, etc.; • Any person working under the supervision and direction of contractors, subcontractors, and suppliers; • Former employees and former consultants/secondees; • candidates for a job who have been involved in the recruitment process or other pre-contractual negotiations; • volunteers and paid or unpaid trainees; • all members of executive, strategic and control bodies,

		including non executive members
	Serious case	A Whistleblowing can be classified as Serious when: (i) the person allegedly accused of an unacceptable conduct has relevant Top Management position (e.g. GEC - 2 and above, local CEOs or Foreign Branch Managers) or (ii) it refers to a sensitive process (e.g., AML procedures) or (iii) it has been addressed to a Supervisory Authority, a Tax Authority, a Judicial Authority and Media or (iv) it is related to an unacceptable conduct assessed as serious by Whistleblowing Working Group (e.g. High impact case as reputational risk).
	Public Disclosure	The Employees and Third Party may also choose to make a "public disclosure," making information about violations publicly available through the press or electronic media or otherwise through means of distribution capable of reaching a large number of people.
Associated Rules	*Global Policy against harassment, sexual misconduct, bullying and retaliation - UC_04133- GRETEL UC-2019-095* *Global Policy - Anti –Bribery and Anti-Corruption – UC_04443 – GRETEL UC-2024-151* *Global Policy – Anti-Money Laundering and Countering of Terrorist Financing – UC_04433 – GRETEL UC-2024-084* *Global Policy - Financial Sanctions – UC_04387 – GRETEL UC-2021-068* *Global Policy - Single Antitrust Rulebook - UC_04404 – GRETEL UC-2025-078* *Global Policy - Market Abuse – UC_04392 – GRETEL UC-2023-022* *GOR Market Abuse Trade Surveillance & Case Management - UC_04440 – GRETEL UC-2023-020* *Global Policy – Privacy - UC_04285 – GRETEL UC-2024-148* *Global Policy - Provision of investment services and activities under MIFID II – UC_03641 - GRETEL UC-2022-191*	

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Global Policy - Code of Conduct UC_03547 – GRETEL UC-2022-198</td></tr>
<tr><td rowspan="2">Revised / replaced Rules</td><td>Revised regulation code and title</td><td>Summary of main changes</td><td>Change Type</td></tr>
<tr><td>GP-Whistleblowing UC_02918 (GRETEL UC-2023-065)</td><td>Updating of references to structures and reorganization of certain parts of the document to highlight certain concepts more clearly.</td><td>☐ First Emission
☐ Replacement
✓ Minor Change</td></tr>
</table>