

1.1. Introduction

Whistleblowing is an intentional disclosure recorded in the Branch's 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 Branch, which are communicated to the competent Unit for the latter to act repressively. The purpose of the T.C. Ziraat Bankası A.Ş. Whistleblowing Policy is to establish the framework for the timely detection of irregularities, oversights, or punishable acts with respect to the operations of the Branch. Under the framework of the Policy, T.C. Ziraat Bankası A.Ş. employees have the obligation to disclose serious irregularities, oversights or punishable acts which come to their attention concerning employees or executives of Branch.

This policy contributes to the identification of risks and adoption of appropriate corrective measures including, among others, the strengthening of our internal audit division, the early detection of incidents of fraud or other serious offenses and the application of appropriate measures to the relevant parties.

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 the Branch, to ensure that neither their present position nor their future professional development is threatened.

Ensuring an environment of trust and security for employees and costumers, the Bank encourages the good faith reporting of illegal acts, which come to their knowledge.

1.2. Regulatory Framework

Disclosures are made without promise of payment or any consideration, with the scope to, on the one hand, comply with and observe the Institutional and Regulatory Framework especially Par. 10 chapter II of Bank of Greece Governor's Act 2577/9.3.2006 and par. 3 of Article 35 of Law 4557/2018 (implementing articles 8 and 61(3) of EU Directive 2015/849) and on the other hand to consolidate the need to safeguard the image and assets of the Branch and clients, from irregularities performed by staff and executives which can affect its prestige and reputation.

In addition, the policy complies with the requirements of the regulatory and legislative framework and is aligned with the principles and provisions of European Directive 2019/1937 on the protection of persons reporting violations, which was transposed into national law by Law 4990/2022.

2 Personnel Information & Consent

The written policy of the whistle blowing procedure has been registered in the portal (ortak) of the Branch in which all the members of staff have access. All the members of the staff have the responsibility and the obligation to read the present policy & procedure and subsequently fully comply with its requirements. After reading of the procedure, each one agrees and undertakes the responsibility to comply with any provisions & this commitment force on the day of its notification. No one is excluded from this commitment for failure and / or refusal to read this policy. For any clarification and / or further information Personnel should contact the Operations Department.

3 Field of application

Reports are submitted on the condition of faithful and reasonable belief that a crime or offense has been committed or is likely to be committed. Employees, clients, and suppliers of the Company are encouraged to report crimes, cases of suspected illegal behavior, instances of misconduct, or serious omissions regarding regulations, policies, and procedures, as well as concerning the submission of financial reports and the preparation of consolidated financial statements. Reports of an irregularity, oversight or punishable act include – but not exclusively – the following:

a. Violations of European law rules, as specifically defined in Part I of Annex to Law 4990/2022, in the areas of:

- public contracts
- financial services, products, and markets, as well as the prevention of money laundering and terrorist financing,
- taxation, accounting, and auditing matters, banking and financial crimes (Theft, Fraud), and violations concerning laws against bribery, such as embezzlement of Company or client assets,
- product safety and compliance,
- transportation safety,
- environmental protection,
- protection of privacy and personal data, as well as network and information security,
- radiation protection and nuclear safety,
- food and feed safety, as well as health and the welfare of animals,
- public health and compliance with health and safety rules,
- consumer protection,

b. Violations affecting the financial interests of the EU under Article 325 of the Treaty on the Functioning of the European Union (TFEU) and as specifically defined in the relevant Union measures,

c. Violations of rules related to the internal market, as referred to in paragraph 2 of Article 26 of the TFEU, including violations of Union rules on competition and state aid, as well as violations concerning the internal market regarding acts that violate rules on corporate taxation or arrangements, the purpose of which is to ensure a tax advantage that frustrates the object or purpose of the applicable corporate tax legislation.

d. Violation of bank confidentiality, Violation of Bank policies, Violation of the legal framework governing the Bank, Code of Conduct breaches, Un-recognized or not-reported conflicts of interest and Breaches of Regulation 575/2013.

Whistleblowing procedure & the whistleblowers plays an essential role in exposing corruption, fraud, mismanagement, and other wrongdoing that threaten the Bank and the other employees' safety, the financial integrity, and the human rights. The right of employees to report wrongdoing is a natural extension of the right of freedom of expression and is linked to the principles of transparency and integrity and in some cases, they have the duty to report wrongdoing.

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

4.1. The Head of Internal Audit is the "Responsible for the assessment and management of confidential claims" made by employees or third parties regarding of T.C. ZIRAAT BANK A.S./Athens Central Branch. The Bank has established procedures and makes available to the whistleblower alternative ways of making a disclosure via:

- Mail to a post office box (T.C. ZIRAAT BANKASI A.S., Ermou 2, P.C. 10563, Athens, Recipient: Head of Internal Audit)
- E-mail to a specific e-mail address of the Bank (athens.whistleblowing@ziraatbank.com).
- Via fax (210-3221796, Attention to Head of Internal Audit)
- Via phone call within the working hours from 8:00 to 15:00 daily, except Saturday and Sunday (210- 3223038 with Head of Internal audit).

4.2. Alternatively, and especially for breaches of code of conduct or possible conflicts of interest, the Bank 'staff can report directly to the Compliance Function of the Bank, according to Chapter II, paragraph 23.1 of Bank of Greece Act 2577/2006. The contact details are the following:

- Mail to a post office box (T.C. ZIRAAT BANKASI A.S., Ermou 2, P.C. 10563, Athens, and Recipient: Head of Compliance)
- E-mail to a specific e-mail address of the Bank (athens.whistleblowing@ziraatbank.com).
- Via fax (210-3221796, Attention to Head of Compliance)
- Via phone call within the working hours from 8:00 to 15:00 daily, except Saturday and Sunday (210- 3223038 with Head of Compliance).

According to guidelines EBA/GL/2017/11 of the European Banking Authority, par. 125, if there any doubt as to the effectiveness of the institution for investigating/ reporting the evidence of breach, the employee/ third party has the possibility of reporting breaches through the competent authorities' mechanisms. To this end Bank of Greece has a website available for all kind of third party reporting at the web address : <https://www.bankofgreece.gr/kiries-leitourgies/epopteia/pistwtika-idrymata/kataggelies-sthn-tte>

4.3. Submission of external report to the national authority for transparency:

The reporter submits an external report/complaint directly to the National Authority for Transparency (N.A.T.). This report can be submitted in writing, orally, or through an electronic platform, accessible even by individuals with disabilities, particularly:

- Electronically: by sending an email to the address kataggelies@aead.gr or by completing the relevant complaint form: <https://aead.gr/submit-complaint/>
- By mail: by sending it to the postal address of N.A.T., Lenorman Avenue 195 & Amfiaraou Street, Athens, 10442.
- In person (or by an authorized representative) at the premises of N.A.T. 195, Lenorman & Amfiaraou. Athens, 10442.

5 Confidentiality/Anonymity/Protection of the Whistleblower

5.1 Confidentiality/ Anonymity

T.C. ZIRAAT BANK A.S 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. T.C. ZIRAAT BANK A.S 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. Specifically, the whistleblower is informed before their identity is disclosed, unless such disclosure undermines the relevant investigations or judicial proceedings. When informing the informant, the Company provides explanations for the disclosure of specific confidential information. 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.

Revelation is only made if it is necessary to serve the purposes of Law 4990/2022 or to safeguard the defensive rights of the person against whom the reference/complaint is made, following prior written notification to the informant/complainant regarding the reasons for disclosing their identity and other confidential information, with the sole exception being the case where such notification undermines investigations or judicial proceedings.

5.2 Protection from Retaliatory Actions

The Bank commits to protecting 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 set out in Annex 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, s/he 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.

5.3 Protection of Individuals Subject to Reporting

Individuals subject to reporting are also entitled to protection and covered by the presumption of innocence.

The identity of the individual against whom a complaint has been filed shall be treated with absolute confidentiality and shall only be disclosed in certain exceptional cases, such as when required by EU law or national law, within the framework of investigations by competent authorities, or in the context of judicial proceedings, and when necessary to serve the purposes of this policy or to safeguard defense rights. Any information regarding other individuals mentioned in the report shall remain confidential, subject to any legal restrictions.

Notification of the individual against whom a complaint has been made may be delayed if there is a significant risk of undermining the company's ability to effectively investigate the complaint due to such disclosure. This will be assessed on a case-by-case basis, considering the broader interests at stake. Specifically, notification may be delayed for as long as necessary and deemed necessary for the purpose of preventing and addressing attempts to obstruct, hinder, annul, or delay monitoring measures, particularly concerning investigations, or attempts to identify reporters, as well as for their protection against retaliation.

Individuals subject to reporting are entitled to the same protection concerning the protection of personal data, with the reservation that these rights are subject to any overriding security measures required to prevent the destruction of evidence during the investigation stage of the case.

5.4. Law Protection

According to United Nations CAC article 33 Each State Party shall consider incorporating into its domestic legal system appropriate measures to provide protection against any unjustified treatment for any person who reports in good faith and on reasonable grounds to the competent authorities any facts concerning offences established in accordance with this Convention (ratified by Law 3666/2008).

By Law 4990/2022 (Government Gazette A' 210/11.11.2022), which incorporated EU Directive 1937/2019, the issue of protecting "whistleblowers of public interest" (persons reporting violations of EU Law) is addressed. Also, Whistle-blowers in Greece have legal protection under

article 45B of Law 4257/2014 as public interest witnesses. All banking institutions are considered as entities of public interest according to Law 4449/2017, thus the protection of Law 4257/2014 applies also to whistleblowers in the Banking section of economy. Additionally, the GDPR provisions, especially article 23 of Regulation 2016/679 sets the limitations in cases of public interest.

5.5. Data Processing

Any processing of personal data under this policy is carried out in accordance with the national and European legislation applicable to personal data as well as the Bank's personal data protection policy. The data of all involved parties are protected and processed solely in relation to each report and solely for the purpose of verifying the validity of the report and investigating the specific incident. The Personal Data of the subjects included and related to the reports (e.g., the person against whom the report is filed) will be processed solely for the proper handling and further investigation of the report.

The Company takes all necessary technical and organizational measures to protect personal data, following the Company's personal data protection policy. Sensitive personal data and other data not directly related to the report are not considered and are deleted.

Access to the data included in the reports may only be granted to those involved in the management and investigation of the incident.

The aforementioned information and personal data may be disclosed to the competent supervisory and investigative authorities or other competent public authorities in cases where there is a legal obligation or in the event of judicial or other legal proceedings in the context of investigating the report, e.g., to be used as evidence in administrative, civil, and criminal cases.

6 Internal Audit Division

The Head of Internal Audit is responsible for the assessment and management of confidential claims/ disclosures/ allegations and is headed of the investigative procedures. Any receivable reports from whistleblower should be categorized as "high priority" issue and has to be settled immediately, as far as possible.

Specifically, the Head of Internal Audit receive from inside of the Bank (or by third parties) confidential or even anonymous written or verbal reports and observations on irregular actions or omissions or violations and criminal offenses for the Bank. Also, the auditor is examining & whenever necessary, investigating through special process (interviews, onside audit etc.) any documents, event or orally complaints. Furthermore, the delegated auditor draws written conclusions which are specifically (& with strictly confidentiality) notify to the responsible management bodies, which are the Audit Committee of the Group (through Internal Audit Department/ Inspectors of the head office) & Senior County Manager of Greece (upon circumstances). Any data & report are notified to the aforementioned under conditions & principles of confidentiality and security.

The Head of Internal Audit is obliged to ask for an extra (or outsourcing) support from specialized partners (such as consultancy firms, lawyers, other auditors, IT specialists, technician etc.) always under the principle of confidentiality. The cost of this support is approved by the Senior County Manager of Greece (upon circumstances).

The treatment of anonymous written or verbal reports must be subject to special attention without this meaning that there will not be given a due diligent attention. But if the auditor is not able to obtain additional information necessary for the investigation, then she has the obligation to stop the audit and make the relevant statement.

7 Disclosure

The summary of this policy will be posted at the company official website.

ANNEX - Framework for the Protection of Employees - Whistleblowers against Potential Retaliatory Actions

Scope

Recognizing that there are employees who are reluctant to report or disclose suspected wrongdoing (whistleblowing) in fear of possible retaliation, this framework ensures that T.C. ZIRAAT BANK A.S is a safe environment that protects and encourages employees to make disclosures necessary to safeguard the Bank's employment framework.

T.C. ZIRAAT BANK A.S opposes retaliation against any employee who reports or participates in investigating an actual or suspected violation of the Code of Conduct.

Under this framework, every employee is encouraged, without fear of any form of retaliation, to speak openly and provide honest and full information when s/he observes or suspects unlawful or unethical behavior or behavior contrary to the Code of Conduct.

Any well founded and promptly made disclosure shall protect both the Branch and the employee whistleblower itself.

Individuals who report or make public disclosures regarding violations anonymously, but then are identified and subjected to retaliation, are entitled to receive the protection provided.

The submitted reports are disclosed only to predetermined individuals deemed necessary for investigating, and they are bound by duty to adhere to the rules of confidentiality and trust. Compliance with the above also results in the protection of the identity of the individuals being reported.

Definition of Whistleblower Retaliation

The negative consequences that an employee may experience in the workplace because s/he is a whistleblower or participates in a relative investigation constitute whistleblower retaliation.

Possible whistleblower retaliation may indicatively be the following:

- Labor harassment (bullying)
- Unfavorable treatment
- Assigning excessive tasks beyond the hierarchical level and development plan.
- Removing duties without reasonable justification and replacing them with new ones.
- Obstructing the exercise of labor rights (for example development – training plans, leave).

Procedure for Reporting Whistleblower Retaliation

In the event that an employee is retaliated against in the workplace, the Branch encourages the employee to disclose the incident to the Head of Internal Audit in writing, along with any information substantiating the claim.

The Head of Internal Audit in collaboration with HR function assesses the credibility of the claim, investigates the incident and proceeds to the appropriate resolution. The aforementioned decide on the appropriate actions and determine whether to accept the report for further investigation or reject it and file it away.

The complaint/report may be rejected, and the process closed by depositing the report in the file if any of the following apply:

- The alleged behavior does not constitute reportable behavior according to the Policy, nor does it constitute a violation falling within the scope of this policy, or there are no serious indications of such a violation.
- The complaint/report was made in bad faith or is malicious.
- The complaint/report is incomprehensible or has been submitted in an inappropriate manner.
- There is insufficient information to allow for further investigation.
- The issue raised in the report has already been resolved.
- The claimant shall be informed at the end of the process for the outcome of the claim.

Anonymous reports are examined based on the quality of their documentation and the provided ability to identify the irregular activity being reported.

Finally, the Head of Internal Audit notifies the Audit Committee of the Group (through Internal Audit Department/ Inspectors of the head office) & Senior County Manager of Greece (upon circumstances) of the claim concerning retaliatory action against whistleblower.

It is noted, however, that if the reporting party believes that their report was not effectively addressed or if it was rejected, they may resubmit it to the National Authority for Transparency (N.A.T.), which, as an External Reporting Channel, exercises its powers, according to article 12 of Law 4990/2022.

It is clarified that reports which are proven to be clearly malicious will be further investigated at the discretion of the Administration, both regarding the motives and the involved parties, to restore order through every lawful means and method.

Restoration Actions

In addition, the Branch shall take the necessary steps to restore the labor framework within which any employee proved to have been retaliated against works, in accordance with the principles of the Code of Conduct.

These actions may include (but are not limited to): a) further investigation if it is deemed that the information is not sufficient for a full clarification of the matter, b) additional training of employees, c) establishment of new internal control mechanisms, d) modifications to existing policies and/or procedures, e) disciplinary actions including dismissal or termination, and f) legal actions.