



# **Whistleblowing Policy**

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## KEY STAKEHOLDERS

<b>Management</b>	<ul style="list-style-type: none"><li>□ Members of the Management Committee</li></ul>
<b>Department Heads</b>	<ul style="list-style-type: none"><li>□ Heads of key Bank's business units or departments (Director or above)</li></ul>
<b>Operational Management</b>	<ul style="list-style-type: none"><li>□ An operational manager (a.k.a. middle manager) is often recipient of escalated issues within their teams</li><li>□ She or he is then responsible to diffuse, remind, enforce and lead by example as per these rules</li><li>□ The operational manager can also escalate further to Department Heads, Management, Compliance and/or Risk</li></ul>
<b>RMD</b>	<ul style="list-style-type: none"><li>□ The Risk Management Department, under the authority of the Chief Risk Officer</li></ul>
<b>Legal</b>	<ul style="list-style-type: none"><li>□ The Legal Department of the Bank</li></ul>
<b>CIA</b>	<ul style="list-style-type: none"><li>□ Chief Internal Auditor of the Bank</li></ul>
<b>HR</b>	<ul style="list-style-type: none"><li>□ Human Resources of the Bank under the authority of the Head of Chief Human Resources Officer</li></ul>
<b>Compliance</b>	<ul style="list-style-type: none"><li>□ Compliance Department of the Bank under the authority of the Chief Compliance Officer</li></ul>
<b>Staff</b>	<ul style="list-style-type: none"><li>□ All EWUB employees.</li></ul>

## 1. BACKGROUND

A whistleblower is an employee who informs, in good faith and under specific conditions, on a person or an organization regarded as engaging in unlawful, improper or unethical activities, relative to legal, appropriateness and/or ethical standards governing such activities. The **Whistleblowing Policy** (“the Policy”) established the conditions under which whistleblowing takes place, who can act as a whistleblower, as well as the rights, protections and obligations afforded to a whistleblower.

The Employee Whistleblowing Program (“the Program”), outlined in this Policy, was developed and approved as part of a holistic set of initiatives, measures and actions taken by East West United Bank S.A. (hereafter “EWUB”, or “the Bank”) to promote ) to promote ethical conduct and practices throughout its operations and at all levels of its organization.

Bank Management views this Program as an integral element of a wider framework<sup>1</sup> established under the premise that each employee of the Bank is expected to conduct him/herself in adherence to the Bank’s Code of Conduct’s provisions and in conformance with all applicable ethics and compliance standards<sup>2</sup> governing the Bank’s activities.

The Program aims to provide a mechanism for East West United Bank S.A. (hereafter “EWUB”, or “the Bank”) employees to raise genuine and legitimate concerns, whilst offering protection from victimisation, harassment or disciplinary proceedings for employees who do so.

Reportable concerns about a risk, malpractice or wrongdoing that affect Bank staff can cover a wide range of areas including (but not limited to):

- Discrimination and harassment
- Bribery and corruption
- Financial accounting
- Danger to health and safety
- Danger to the environment
- Market manipulation and insider trading

The Whistleblowing Policy (“the Policy”) establishes and documents the standards according to which the Program outlined above is operationalized.

## 2. PURPOSE OF THE POLICY

The underlying objective of this Policy is to protect the Bank and its employees against the adverse effects of inadequate or improper practices.

To this end, the Policy aims to:

- Allow safe reporting by staff of non-acceptable behaviour and action as defined in the Code of Conduct or in this Policy.
- Enhance the standards of corporate governance.
- Timely identify potential violations of law, ethical breaches, misuse or abuse of sensitive or confidential information.
- Minimize human, financial, legal, corruption and/or reputational risk exposures.

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<sup>1</sup> Which includes notably the Bank’s Code of Conduct, Environmental Health and Safety Policy and Employee Handbook.

<sup>2</sup> Either internal (e.g. policies, procedures or manuals, etc.) or external (e.g. laws, regulations, etc.)

### 3. REGULATORY REFERENCES

#### 3.1. Overview

**CSSF Circular 12/552** as amended provides specific provisions regarding internal communication protocols and whistleblowing for credit institution.

**Laws of the 13<sup>th</sup> of February 2018 and of the 25<sup>th</sup> March 2020** provide specific protections for individuals who report suspicions of financial crimes to the authorities.

The **Labour Code** (art. L. 271-1 et seq) stipulates that no employee's employment contract can be terminated in relation with the report of a suspicion done in good faith.

The **Collective Bargaining for the Employees of the Banking Sector** provides specific provisions regarding the prevention, detection and/or reporting of moral or sexual harassment for employees of Credit Institutions.

**EU Directive 2019/1937** (or the Whistleblower Protection Directive) provides a consistent regulatory framework with respect to whistleblowers for all EU states and outline minimal guarantees on the protection of persons who report breaches of ethical standards. It is currently being transposed into Luxembourg law through the Bill of Law 7945.

**Bill of Law 7945's** key objective is the integration of EU Directive 2019/1937. It has, however, a wider scope and is intended to complete specific pre-existing frameworks in place notable in the financial and insurance sectors.

#### 3.2. CSSF Circular 12/552

According to **CSSF Circular 12/552** as amended, **Section 5.2.4** – Internal communication and whistleblower arrangements –, the Program should adhere to the following provisions:

- ❑ 88. – *“The internal communication arrangements shall ensure that the strategies, policies and procedures of the institution as well as the decisions and measures taken by the board of directors and authorised management, directly or by way of delegation, are communicated in a clear and comprehensive manner to all staff members of the institution by taking into account their information needs and responsibilities within the institution.*

*The internal communication arrangements shall enable staff to have easy and constant access to this information.”*

- ❑ 89. – *“The management information system shall ensure that the management information is, in normal circumstances and in times of stress:*

⇒ *Transmitted in a clear and comprehensive manner and without delay to*

- *All members of the board of directors,*
- *The authorised management and*
- *Staff of the institution, by*

⇒ *Taking into account their information needs, responsibilities within the institution and the objective to ensure sound and prudent business management.”*

- ❑ 90. – *“The institutions shall maintain internal whistleblower arrangements, which enable the entire staff of the institution to draw attention to serious and legitimate concerns about internal governance.*

*These arrangements shall respect the confidentiality of the persons who raise such concerns and provide for the possibility to raise these concerns outside the established reporting lines as well as with the board of directors.*

*The warnings given in good faith shall not result in any liability of any sort for the persons who issued them.”*

### 3.3. Labour Code

**Article L.271-1** of the **Luxembourg Labour Code** states that:

- ❑ Any termination of the employment contract based on whistleblowing will be declared null and void;
- ❑ This protection only applies to protestations made in good faith. If not, the whistleblower can face disciplinary sanctions or penalties for slander or defamation.

More broadly, under Articles 245 to 252 and 310-1 of the Luxembourg Penal Code, an employee cannot be a victim of reprisal for protesting against any act considered as constituting an illegal conflict of interest, corruption, or undue influence in the workplace.

This includes acts committed by his or her employer, or any other person senior in rank, or any colleague or external person who has any relationship with the employer.

### 3.4. Collective Bargaining for the Employees of the Banking Sector

**Article 11** of the **Collective Bargaining for the Employees of the Banking Sector – Whistle blowing and protection of the persons concerned** – provides that:

- ❑ *“Establishments falling within the scope of application of this agreement shall put in place an internal whistle blowing arrangement in compliance with the CSSF circulars (amended CSSF circular 12/552) and having regard to Art. L.271- 1 et seq of the Labour Code. “*
- ❑ *“A guarantee is given that the whistle blower who reports suspicions in good faith shall suffer no adverse consequence of any kind whatsoever for having acted in this way while respecting the procedure laid down in the code adopted in the enterprise. However, an employee who makes a report in bad faith shall not benefit from this protection. A guarantee is given that the person who is accused will be protected, having due regard to the interests and rights of all the parties concerned.”*

**Article 34** establishes protocols specifically for the prevention, detection and handling of sexual and moral harassment and provides for employee protections against instances of such harassment.

### 3.5. Laws of 13th February 13th, 2018 and of March 25th, 2020

The Laws referenced above outline specific protections for individuals who report suspicions of Money Laundering or Terrorism Financing activity (“ML/TF”) internally or to Luxembourg’s Financial Intelligence Unit (“FIU”).

According to Art. 5, 3 par. 3, the Program is designed to fulfil the following requirements: "Individuals, including employees and representatives of the professionals, who report suspicions of money laundering or terrorist financing internally or to the Financial Intelligence Unit, shall be protected from being exposed to threats or hostile action, and in particular from adverse or discriminatory employment actions."

### 3.6. EU Directive 2019/1937 as transposed in Luxembourg Bill No 745

Rules provided for by the **Whistleblower Protection Directive** constitute minimum requirements applicable throughout the EU and aimed at guaranteeing increased protection for whistleblowers, whether they are in a direct or indirect employment relationship with the disputed entity.

The **Whistleblower Protection Directive** thus provides for the establishment of reporting channels, followed by considerable protection for whistleblowers against a number of behaviours or decisions that could result in retaliation.

The **Bill of Law No 745** as tabled on the 10<sup>th</sup> of January 2022 in the Luxembourg’s Chamber of Deputies introduces accordingly the status of whistleblower with clearly defined rights and obligations in accordance with standards outlined in the Directive.

It also extends the scope of application of the **Whistleblower Protection Directive** to all Luxembourgish national law as well as beyond the current requirements under existing laws and regulations.

- ❑ Any public or private sector employee<sup>3</sup> (“the Whistleblower”) may report information about breaches, including reasonable suspicions, of actual or potential breaches, that have occurred, are occurring, or are very likely to occur in her/his work environment.
- ❑ To benefit from the protective regime, the Whistleblower needs to:
  - ⇒ Have reasonable grounds to believe that the Information is true at the time of reporting and
  - ⇒ Have complied with the reporting procedures, as described in the **Bill of Law**.
- ❑ Reporting may be done internally:
  - ⇒ Where the Breach can be effectively remedied, and
  - ⇒ The Whistleblower believes there is no risk of retaliation.

To this effect, every public legal entity and every private legal entity with more than 50 employees<sup>4</sup> must establish channels and procedures for internal whistleblowing and its follow-up, but it may also outsource these requirements.

In addition or alternatively, the Whistleblower is also given the option externally report to competent authorities.

#### **4. ETHICS AND CONDUCT PRINCIPLES AT THE BANK**

All employees have a responsibility to know, understand, and comply with the Bank’s Code of Conduct (“the Code”). Adherence to the Code ensures that all Bank employees conduct Bank’s business fairly, impartially, and in an ethical and proper manner.

The Code outlines the core principles, by which all Bank personnel must abide by in the course of Bank’s business. It is important that all Bank employees know and understand these core principles, and acknowledge that they will comply with them.

Any breach of the Code or failure to report an actual or suspected breach by a Bank employee provides ground for corrective and disciplinary action, ranging from reprimands up to termination depending on the severity of the breach.

Upon on-boarding, each new Bank employee is required to formally sign a Code of Conduct acknowledgement kept in her/his HR personal file whereby he/she acknowledges understanding and acceptance of the Bank’s Code of Conduct requirements.

To achieve the objectives outlined above, information about this Program, its objectives and terms should be communicated to all EWUB employees including non-management employees, operational management, Department Heads and Board members.

Each employee that may be in possession of important information and may want to report on facts, circumstances and potential risks that are crucial for EWUB should be empowered to do so.

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<sup>3</sup>Including those whose employment contract has not started or has ended, volunteers and trainees, subcontractors, suppliers, self-employed persons, shareholders and members of the administrative, management or supervisory body

<sup>4</sup> EU Member States are expected to complete or amend their frameworks to transpose the Directive into national law by:

- ❑ December 17, 2021 for the provisions relating to the internal reporting channels for legal entities in the private sector with at least 250 employees, and respectively
- ❑ December 17, 2023 for the provisions relating to the internal reporting channels of legal entities in the private sector with 50 to 249 employees.

## 5. GENERAL PROGRAM PROVISIONS & PRINCIPLES

### 5.1. Scope – What Can Be Reported

The Program puts in place a set of measures designed to enable effective whistleblowing reporting channels. It makes it possible for all EWUB employees to report on the facts known to them or voice their well-founded concerns or suspicions about:

Reportable Events – Potential Instances of:	Adverse Outcome
<input type="checkbox"/> Cases of ethical misconduct	⇒ Violating the rights of employees
<input type="checkbox"/> Hostile work conditions, harassment (sexual or other type)	⇒ Breach of Bank’s Code of Conduct
<input type="checkbox"/> Bribery and corruption	⇒ Decrease in Bank employee morale or wellbeing
<input type="checkbox"/> Fraud	⇒ Misstatements in financial reporting
<input type="checkbox"/> Unlawful business activity	⇒ Failure to comply with laws or corporate regulations
<input type="checkbox"/> Unlawful disclosure – misuse or abuse of information in various areas of Bank’s operations in breach of legal or regulatory standards	⇒ Unauthorized or illegal use of assets and property
	⇒ Committing any other actions that inflict or may inflict financial damage on EWUB or hurt its business reputation
	⇒ Fines or potential loss of Bank licence

### 5.2. Circumstances when-, or Areas of the Bank where Reportable Concerns May Arise

Potential reportable instances can occur in any department of the Bank. Notably in the following circumstances or business areas:

- Sexual (or other type of) harassment or discrimination may occur in all Bank areas;
- Accounting, tax records and preparing the respective financial, management and other statements
- Asset management, use or disposal of property, compliance with the acts and regulations on stock trading;
- Financial, credit and investment operations, M&A deals, procurement and logistic operations;
- Contractual relations, settlements with third parties, other processes that are crucial for the business and operating activities;
- Compliance with the requirements of the legislation (including anti-corruption laws) of Luxembourg and other countries where the Bank conducts its business, trades its stock, or makes deals;
- Compliance with the principles and requirements of the Code of Conduct and the Anticorruption policy of the Bank;
- Compliance with the banking secrecy, data confidentiality and the inside information requirements including the issues of unlawful disclosure and use of information.

### 5.3. Who can report

The Bank has zero tolerance for improper or unethical behaviour. Bank Management is fully committed to empower any Bank employee to bring any legitimate concern to their attention. If you see something, say something.

The Bill of Law stipulates that the following categories of individuals constitute employees for purposes of this Policy and therefore are entitled to report suspected instances of misconduct:

- All Bank employees – not only current employees, but also former and prospective workers, volunteers and trainees.
- Bank shareholders and contractors, subcontractors and suppliers.

#### **5.4. Key Program Benefits and Commitments**

By establishing this Program, EWUB is committed to:

- Ensuring a safe working environment for all its employees and stakeholders.
- Adopting the best corporate governance practices in adherence with all applicable Luxembourg laws and in alignment with best-practice industry standard, thus securing the Bank’s ability to achieve its long-term strategic objectives.
- Improving the quality of corporate governance, internal control and risk management in line with industry standards pertaining to financial reporting and transparency.
- Providing clear and effective protocols by which each Bank employee (and those who are entitled to do so) can safely voice their concerns in the face of adverse events that may harm them, their well-being, the integrity of Bank’s operations, and/or the Bank’s reputation.

#### **5.5. Confidentiality**

- Communication channels provided by EWUB allow for whistleblowing reports with total anonymity guaranteed (confidentiality) for the Whistleblower if he or she decides to remain anonymous.
- Members of the governance bodies and executives of EWUB have no right to impede the operation of the allocated communication channels or try to determine the identity of the anonymous Whistleblower with the exception of cases when there are legal grounds for doing this.

#### **5.6. Retaliation**

Protection against potential retaliation is a key element to foster an effective and safe environment for Whistleblowers acting in good faith.

- Once reasonable grounds for the allegations are established, the Bank is committed to ensure that there will be no retaliation – internal or external – against the Whistleblower.
- In case of actions perceived to be negative by the Whistleblower, the employer would have to demonstrate that the actions were justified and unrelated to the reported breaches.
- Examples of perceived retaliation may include (but are not limited to):
  - ⇒ Suspension, lay-off, dismissal or equivalent measures
  - ⇒ Demotion or withholding promotion
  - ⇒ Transfer of duties, change of location of work
  - ⇒ Withholding of training
  - ⇒ Discrimination
  - ⇒ Coercion, intimidation and harassment
- Internally, the Bank’s Program also mandates the extension of protection to facilitators, colleagues and relatives of the Whistleblower, or companies owned by them, or companies they are working for, absent unjustified negative actions unrelated to the reported breaches.

## 5.7. Whistleblowing Reporting and Escalation

Upon detection of a potential violation, reporting and escalation are paramount for effective investigation, evaluation, confirmation and/or validation of the facts and merits of the potential violation.

## 5.8. What To Do If You Have A Concern – Reporting Ethics and Conducts Concerns

Any employee in need of assistance or guidance with ethical and/or compliance matters can direct their worries or suspicions, based on their comfort level and/or the nature and sensitivity of their concerns to the following persons:

- Their Department Head
- Each of the Bank’s Managing Directors
- The Head of Human resources (R. Gossent – x330)
- The Chief Internal Auditor (G. Nikolov – x278)
- The Chief Compliance Officer (or Head of Compliance - Th. Bacquié – x338)
- The Head of Legal (A. Stoliarov - x282)
- The Chairman of the Board of Directors (“BoD”)

All matters reported directly or via these points of contact will be factually investigated by the Chief Compliance Officer as part of the Program process and result in a documented report to Management and BoD.

This transmission of information can either be formal (email, etc.) or informal (phone or in person). The name of information relay might not appear in the documented report if needed to guarantee the anonymity, but would be provided upon formal and justified request to the Chief Compliance Officer.

## 5.9. Unacceptable use of the Program

- Proliferation of deliberately misleading, discrediting, malicious or unlawful information, etc.
- Settling of personal scores, advancement of personal goals, profiting from making whistleblowing reports under the Program or attempts to resolve irrelevant matters with EWUB management.
- Any other goal of Whistleblowers that contradicts the goals of EWUB and the purpose of this Program which has been adopted with a view to prevent misconduct and address the risks of employee harassment or discrimination, corruption, fraud or any other in-scope violations.

EWUB’s employees responsible for the operationalization of this Program, its integrity, and the rigorous management of each report may exercise the right, upon the results of initial investigation, not to act on the reports and information if factually concluded to be clearly inconsistent with the goals and objectives of the Program.

Subsequently, the Bank and its Management reserves itself the right to take all necessary measures provided by law with respect to the reports and information, should they have been given with obviously malicious, dishonourable, dishonest, defamatory or illegal intentions.

## 5.10. Whistleblowing Channels

EWUB provides a significant spectrum of options or whistleblowing channels for reporting potential violations. The recommended channels and ways of transferring information for specific situations are outlined in Annex 1

### 5.10.1. Whistleblowing Channels Guaranteeing Anonymity

The Bank offers the following reporting mechanisms meeting this criterion:

 Anonymously	By sending a letter with the mention "CONFIDENTIAL" to: EWUB – HEAD OF COMPLIANCE 10 boulevard Joseph II, L-1840, Luxembourg
 Anonymously	By sending an e-mail from private/dummy e-mail (e.g. <a href="mailto:123456@gmail.com">123456@gmail.com</a> ) to the following dedicated address: <a href="mailto:whistleblowing@ewub.lu">whistleblowing@ewub.lu</a>

### 5.10.2. Whistleblowing Channels Without Guarantee of Anonymity

The Bank offers the following reporting mechanisms meeting this criterion:

	By sending a letter addressed to the HEAD OF COMPLIANCE by internal mail in a sealed envelope with the name and signature of the whistleblower with mention "CONFIDENTIAL"
	By sending an e-mail from corporate e-mail to the following dedicated address: <a href="mailto:whistleblowing@ewub.lu">whistleblowing@ewub.lu</a>

## 5.11. Accepting and Processing of Whistleblowing Reports

- 5.11.1. Acceptance, processing and review of reports on irregularities and leaks of trade secret information received through the communication channels ensuring protection of whistleblower' anonymity is conducted in line with the bylaws of EWUB by the authorized employees that are required to preserve the regime of strict confidentiality.
- 5.11.2. In the course of internal investigations, upon completion of comprehensive root cause analysis, measures are taken to prevent their re-occurrence in the future.
- 5.11.3. Following the completion of an internal investigation, an authorised employee of EWUB may inform the whistleblower about the results of such investigation and about the measures taken (if the whistleblower requested such information and left the respective contact details).
- 5.11.4. Members of the governance bodies, managers and employees of EWUB are prohibited from taking actions aimed at identifying the whistleblower or breaching the anonymity of the reports sent for purposes of this Program, provided that they did not breach the existing laws, or to impose any sanctions or take actions in retribution for sending the whistleblowing reports.
- 5.11.5. Compliance with the requirements set out above shall be monitored by the Chief Compliance Officer, within the available technical capabilities on a "best effort basis".
- 5.11.6. Where deemed necessary the Chief Compliance Officer will report to Management, Board of Directors and/or local authorities depending on the nature of the event.
- 5.11.7. All reporting will be formally documented and dated. Absence of reporting will be formally explained, documented and dated for audit purposes.

## 5.12. Practical Means of Protecting Whistleblower Anonymity

The aim of the Program is to make the process as efficient as possible. It provides all reasonably possible procedures and recommendations for protecting the anonymity of the whistleblower.

The level of anonymity primarily depends on the actions taken to report a concern and adherence to the following recommendations which should ensure your absolute anonymity if desired.

- Ordinary letter should not be signed by name nor indicate details that could directly or indirectly identify the sender.
- Letters should not be sent using EWUB's mail service, as this might help identify the whistleblower.
- Reliance on public places and mail services for sending the correspondence is recommended as it is more secure.

## 5.13. Whistleblowing Report Format Guidelines

### 5.13.1. General Considerations

Senders of messages related to deficiencies or facts of illegal acquisition, disclosure and/or use of information could state known facts and details in any convenient free format and in any order.

### 5.13.2. Suggested Template Formats

To ensure the most efficient processing of reports related to deficiencies or facts of illegal acquisition, disclosure and/or use of information and the best results of official investigations held by authorized

personnel of EWUB, it is recommended to use the following format and order of presenting the information (regardless of the chosen way of reporting):

- Indicate the type of the issue: if possible, please choose one or several types out of four (4) key issue types (Annex 1) which relate, in your opinion, to your report.
- Indicate the department of EWUB you will be talking about, indicate a person or persons who, in your opinion, abuse his/her office or position and commit irregularities.
- Describe in a simple format concrete material facts and important details known to you. For clarity and efficiency, please remain factual and try and avoid any subjective judgement.
- You may name the author of the message (only if this is the decision of the sender, at his/her discretion): name yourself or simply put "the employee of .... department of EWUB".
- You may provide your contact details for feedback (only if this is the decision of the whistleblower, at his/her discretion).

In e-mails or in ordinary letters you may provide information in free format, preferably taking into account the template formats referenced above about key types of issues you are reporting about, because it is important for ensuring efficient and prompt official investigation.

#### **5.14. Right of Access and Modification**

You have a right of access, opposition and correction of data that concern you and to ask for their modification or deletion if they are incorrect, incomplete or obsolete, in accordance with the applicable data protection regulations.

To exercise such right, please contact the Bank's Data Privacy Officer.

## 6. QUESTIONS AND ANSWERS

### 6.1. Need for Additional Measures

**QUESTION:** Why does the Bank and its employees need such measures to be put in place?

**ANSWER:**

As a regulated bank in Luxembourg striving for the highest level of ethical integrity, EWUB has voluntarily established this Whistleblowing Program in accordance with applicable regulations and in line with best practices of corporate governance in Luxembourg, to ensure that this mechanism is an efficient addition to traditional ways of preventing misconduct and risks of corruption, fraud and other irregularities.

Methods of reporting the facts or suspicions of misconduct, corruption, fraud, illegal acquisition, disclosure and/or use of information constituting the commercial secret or other irregularities, which could threaten the strategic goals, reputation or image of the Bank envisaged by this Program, will be used in addition to the existing internal and external control and audit measures of EWUB.

Another goal of this Program for EWUB is also to ensure the comprehensive protection for employees, counterparties, suppliers, partners and shareholders by guaranteeing mutually beneficial and open partnership, which implies eradication and prevention of the above risks, including with the help and in the interests of the above persons.

### 6.2. Anonymity

**QUESTION:** How will you protect the anonymity of Whistleblowers?

**ANSWER:**

The reporting protocols outlined in this Policy, i.e. via confidential whistleblowing channels (email boxes, letters) and possible measures for protecting the anonymity (given this is the Whistleblower's decision), together with the obligation by EWUB to protect the Whistleblower's identity, provide sufficient anonymity guarantees.

## 7. PRACTICAL GUIDANCE

### 7.1. Key Issue Types and Situations\* vs. Reporting Channel Selection\*\*

Type 1: Non-compliance with acceptable standards of behaviour, the Code of Conduct or the Anti-corruption Policy	Anonymous Letter	Email @ewub.lu	Signed Letter
⇒ If there are grounds to believe that the top management of EWUB may have something to do with this issue	Possible	Recommended	Possible
⇒ If there are grounds to believe that the middle management of EWUB may have something to do with this issue	Possible	Recommended	Possible
⇒ In other situations	Possible	Possible	Possible

Type 2: Non-compliance with requirements of internal control, internal audit or the legislation, shortcomings of the internal control procedures, etc.	Anonymous Letter	Email @ewub.lu	Signed Letter
⇒ If there are grounds to believe that the top management of EWUB may have something to do with this issue	Possible	Recommended	Possible
⇒ If there are grounds to believe that the middle management of EWUB may have something to do with this issue	Possible	Recommended	Possible
⇒ In other situations	Possible	Possible	Possible

Type 3: Fraud and misuse of assets in the sphere of accounting and reporting, etc.	Anonymous Letter	Email @ewub.lu	Signed Letter
⇒ If there are grounds to believe that the top management of EWUB may have something to do with this issue	Possible	Recommended	Possible
⇒ If there are grounds to believe that the middle management of EWUB may have something to do with this issue	Possible	Recommended	Possible
⇒ In other situations	Possible	Possible	Possible

#### Notes:

- (\*) These recommendations provide a structured approach to selecting reporting channels more effectively, based on specific set of circumstances or variables surrounding various concerns in an effort to achieve a better outcome. These purely illustrative examples were developed for sole purposes of this Policy. Under no circumstances, they should be interpreted as indications they are representative of actual workplace events.
- (\*\*) According to terms of the Program, EWUB employees have the possibility to report deficiencies with full anonymity (if this the decision of the whistleblower). The policy of EWUB on processing the information received as part of this Program stipulates that members of the governance bodies, the management and the employees do not have the right and will not be taking measures for identifying the whistleblower, excluding the cases when it is required by law (e.g., defamation, reporting crimes, etc.).