



# *Whistleblowing Policy*

## Table of Contents

1. PURPOSE OF THE DOCUMENT .....	2
2. GOALS OF THE DOCUMENT .....	2
3. RESPONSIBILITY AND AREA OF APPLICATION .....	3
4. GENERAL PROVISIONS .....	3
4.1. Scope .....	3
4.2. Key terms and principles .....	3
4.3. Target areas of Programme application and identification of potential violations: .....	4
4.4. Unacceptable use of the Programme .....	5
5. WHISTLEBLOWING CHANNELS.....	5
5.1. Channels and ways of making whistleblowing reports - ANONYMITY GUARANTEED.....	5
5.2. Channels and ways of making whistleblowing reports - NO ANONYMITY GUARANTEED .	6
5.3. General principles of accepting and processing whistleblowing messages .....	6
5.4. Additional information to whistleblowers.....	6
6. FORMAT OF THE REPORT .....	6
6.1. General .....	7
6.2. Suggested template formats.....	7

## 1. PURPOSE OF THE DOCUMENT

The Employee Whistleblowing Programme (hereafter also - "the Programme") was developed and approved as part of the initiatives, measures and actions taken by EAST-WEST UNITED BANK S.A. (hereafter "EWUB", or "the Bank") and its management with the aim of increasing the efficiency of risk fighting in order to adequately prevent misconduct, timely identify potential cases of corruption, fraud or unlawful acquisition, disclosure and /or use of information constituting commercial secret or any other irregularities in the operations of EWUB.

## 2. GOALS OF THE DOCUMENT

Based on CSSF Circular 12/552:

Section 5.2.4. Internal communication and whistleblower arrangements

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.*

The **Whistleblowing** has the following goals:

- allowing **safe reporting of non-acceptable behavior** and action as defined in Code of Conduct
- improving the **quality of corporate governance**;
- **timely identifying potential violations, misconduct** or cases of unlawful acquisition, disclosure and/ or use of information that constitutes commercial secret;
- **minimizing** financial, legal, corruption, reputation and other **risks**.

### 3. RESPONSIBILITY AND AREA OF APPLICATION

All employees have a responsibility to know, understand, and comply with the **Code of Conduct**. This code is established to ensure that we all conduct the business of the Bank fairly, impartially, and in an ethical and proper manner.

This code represents the core principles which must always be observed by all Bank personnel. It is important that we know and understand these core principles, and acknowledge that we will comply with them.

Any employee who breaches or fails to report an actual or suspected breach will be subject to corrective and disciplinary action. Corrective or disciplinary action can range from reprimands to termination of working relationship depending on the severity of the breach.

Mandatory employee acceptance is formalized by signing the Code of Conduct last page, which is kept in the HR personal file.

To ensure achievement of the goals outlined above the information about the Whistleblowing Programme, its objectives and terms should be available to the maximum possible number of employees EWUB including members of the Board of Directors, members of Committees, Managing Directors, Head of Departments and also any non-management employees that may be in possession of important information and may want to report on facts, circumstances and potential risks that are crucial for EWUB.

### 4. GENERAL PROVISIONS

#### 4.1. Scope

ANY

misconduct,  
potential violations,  
unlawful acquisition,  
unlawful disclosure and/ or  
unlawful use of information that constitutes commercial secret.

ANY behavior that you are not comfortable with, should at least deserve to be considered and discussed.

#### 4.2. Key terms and principles

- 4.2.1. The Programme is a set of measures that make it possible for the employees of EWUB to report on the facts known to them or voice their well-founded suspicions about cases of misconduct, corruption, fraud, unlawful acquisition, disclosure and/or use of information or other violations in various areas of business that result in misstatements in financial reporting, failure to comply with laws or corporate regulations, unauthorized or illegal use of assets and property, violating the rights of employees, committing any other actions that inflict or may inflict financial damage on EWUB or hurt their business reputation.
- 4.2.2. By introducing this Programme EWUB is adapting the best corporate governance practices of Luxembourg laws and to the company's long-term strategy and thus it is improving the quality of corporate governance, internal control and risk management of EWUB as a company which is traded on the international stock exchanges and which faces particularly demanding requirements to its financial reporting and transparency.

4.2.3. The communication channels provided by EWUB for whistleblowing reports guarantee total anonymity (confidentiality) for a whistleblower (if this is his or her wish). 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.

#### 4.2.4 Escalation and Whistleblowing

Escalation is expected for confirmation, validation or consulting when facing technical difficulty or seeking for guidance.

Escalation is natural and should be used as much as possible to reach excellence of services offered to clients.

Whistleblowing can occur after escalation in case a suspicion or evidence of wrong doing.

Whistleblowing can be safely done as per procedure and whistleblowers are protected for all declaration done in good faith.

Whistleblowing is key to ensure safe working environment, respect of Code of Conduct and hence reputation of EWUB.

### 4.3. Target areas of Programme application and identification of potential violations:

4.2.1. Accounting, tax records and preparing the respective financial, management and other statements

4.2.2. Asset management, use or disposal of property, compliance with the acts and regulations on stock trading;

4.2.3. Financial, credit and investment operations, M&A deals, procurement and logistic operations;

4.2.4. Contractual relations, settlements with third parties, other processes that are crucial for the business and operating activities;

4.2.5. 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;

4.2.6. Compliance with the principles and requirements of the Code of Conduct and the Anticorruption policy of the Bank;

4.2.7. Compliance with the banking secrecy, data confidentiality and the inside information requirements including the issues of unlawful disclosure and use of information.

#### 4.3 Contacts and information relay

Any employees who could need assistance with ethics and compliance matters, and to report potential violations, could use at their own convenience any of the following reporting lines:

- Your Head of Department
- Human resources
- Chief Compliance Officer
- The Management
- The Chief Internal Auditor

- The Head of Legal
- The Chairman of the Board of Directors

All matter reported directly or via these information relay will be factually investigated by the Chief Compliance Officer as part of the Programme process and result in a documented report to Management and BoD.

This information reply 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 Chief Compliance Officer.

#### 4.4. Unacceptable use of the Programme

4.4.1.Proliferation of deliberately misleading, discrediting the honor and dignity information, etc.

4.4.2.Settling of personal scores, advancement of personal goals, profiting from making whistleblowing reports under the Programme or attempts to resolve irrelevant matters with the management of EWUB.




4.4.3.Any other goals of whistleblowers that contradict the goals of EWUB and the purpose of this Programme which has been adopted with a view to prevent misconduct and address the risks of corruption, fraud or any other violations.

The employees of EWUB that are responsible for the Program's operation reserve the right, upon the results of initial investigation, not to act on the reports and information that are clearly inconsistent with the goals and objectives of the Programme and also to take all the measures provided by the law with respect to the reports and information that have been given with obviously dishonorable, defamatory or illegal intentions.



### 5. WHISTLEBLOWING CHANNELS

EWUB provides the following channels for making reports in various ways available to different groups of whistleblowing.

#### 5.1. Channels and ways of making whistleblowing reports - ANONYMITY GUARANTEED

 (anonymously)	- by sending a letter to EWUB - HEAD OF COMPLIANCE 10 Bld Joseph II, L-1840 Luxembourg with the mention "CONFIDENTIAL"
 (anonymously)	- by sending an e-mail from private/dummy email (e.g. <a href="mailto:123456@yandex.ru">123456@yandex.ru</a> ) to the following dedicated address  @ewub.lu

## 5.2. Channels and ways of making whistleblowing reports - NO ANONYMITY GUARANTEED

	- by sending an e-mail by corporate mail to the following dedicated address <span style="background-color: black; color: black;">[REDACTED]</span> @ewub.lu
	- by sending a letter by internal mail in a closed envelop with name and signature of the whistleblower with the mention "CONFIDENTIAL" and addressed to the HEAD OF COMPLIANCE.

## 5.3. General principles of accepting and processing whistleblowing messages

5.3.1. Acceptance, processing and consideration 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.

5.3.2. In the course of internal investigations the facts that resulted in the problems are analyzed and measures are taken to prevent their occurrence in the future.

5.3.3. 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).

5.3.4. Members of the governance bodies, managers and employees of EWUB are forbidden from taking actions aimed at identifying the whistleblower or breaching the anonymity of the reports sent for the purposes of this Programme, provided that they did not breach the existing laws, or to impose any sanctions or take actions in retribution for sending the whistleblowing reports.

Compliance with the requirements set out in items 5.3.1. -5.3.4 shall be monitored by Chief Compliance Officer of EWUB, within the available technical capabilities on a "best effort basis".

Where deemed necessary the Chief Compliance Officer will report to Management, Board of Directors or local authorities depending on the nature of the event.

All reporting will be formally documented and dated. Absence of reporting will be formally explained, documented and dated for audit purposes.

## 5.4. Additional information to whistleblowers

The aim of the Programme is to make the process as efficient as possible. It provides all reasonably possible procedures and recommendations for protecting the anonymity of the whistleblower. But the real level of your anonymity primarily depends on your actions when reporting and compliance with the below recommendations which should ensure your absolute anonymity if desired.

For ordinary letter, do not sign it with your name; do not indicate details that could help to directly or indirectly identify you; do not sent the letter from the office mail service, if this may help to identify the whistleblower, use public places and mail service for sending the correspondence.

## 6. FORMAT OF THE REPORT

## 6.1. General

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.

## 6.2. Suggested template formats

To ensure the most efficient processing of reports related to deficiencies of 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):

- 6.2.1. **Indicate the type of the issue:** if possible, please choose one or several types out of 4 key issue types which relate, in your opinion, to your report.
- 6.2.2. **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;
- 6.2.3. **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 judgements;
- 6.2.4. **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";
- 6.2.5. **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 the information in the free format, preferably taking into account the above suggested template formats about key types of issues you are reporting about, because it is important for ensuring efficient and prompt official investigation.

---