

Version: 1.0

Valid as of: 14/10/2021

Applicable to: Eurobank FMC-LUX

Policy

Name: Policy for Reporting Unethical Conduct

Responsible Unit: Eurobank FMC-LUX

Purpose: Definition of the framework for reporting unethical conduct.

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1. Introduction



1.1 Purpose

This document describes the principles that govern the reporting of Unethical Conduct (hereafter “Reporting” or “Report”). It is complementary to related policies such as Conflicts of Interest Policy as well as to the Rules of Conduct.

2. Description

2.1 Purpose

This Policy intends to facilitate the members of staff of Eurobank FMC-LUX (hereafter “The Company”) and concerned third parties to submit Reports on any actual, attempted or

suspected fraud or other unethical conduct, while eliminating any concerns that their Report may result in adverse consequences for themselves.

Reporting occurs when a member of staff reports suspicions of misconduct having an adverse impact on staff members or the Company.

Through the creation of an environment of trust and protection for its staff, the Company encourages staff members to fulfil their duty to report all fraud and other unethical conduct.

2.1.1 Scope

This Policy applies to all Company's staff, permanent or temporary, and any other person having access to information and premises or providing his/her services under contract or operating under any other agreement of cooperation (grouped together for the purposes of this policy under the term "members of staff" / "staff"), indicatively including but not limited to management's consultants, surveyors, lawyers, insurance agents.

2.2 Misconduct Reporting by Members of Staff

2.2.1 Basic Principles

The basic principles of this Policy are as follows:

- a) All the members of staff are encouraged to communicate their concerns by submitting a Report.
- b) Members of staff have a choice among a number of channels for submitting a Report.
- c) Members of staff are not subject to reprisals for Reports made in good faith.
- d) Members of staff who submit Reports in good faith are protected and their identity can remain confidential.
- e) All Reports are handled by the Compliance function.
- f) Members of staff who submit Reports that are not in good faith are not protected. Such behavior is considered misconduct.

2.2.2 Reporting Obligations

It is the duty of all members of staff (not just management and supervisors) to be alert for occurrences of fraud and to be aware of unusual events or transactions or behavior that could be indications of fraud or attempted fraud. Fraud may also be highlighted as a result of specific management checks, by a third party, or in the course of audit reviews by both internal and external audit.

All members of staff are required to submit a Report regarding any incident of actual, attempted or reasonably suspected illegal or irregular behavior which affects the Company, including incidents of serious misconduct or serious violations of Company's procedures, policies, guidelines or the Rules of Conduct, or any action that is or could be harmful to Company's staff or the mission or reputation of the Company.

Such incidents may involve members of staff, customers, promoters, contractors, suppliers, beneficiaries or any other persons or entities that participate or seek to participate in activities financed by the Company.

No member of Company's staff may use their position to prevent another member of staff from exercising their rights or complying with their obligations as indicated in this Policy.

2.2.3 Nature of violations to be Reported

The incident categories that are subject to Reporting are listed below (the list is indicative and not exhaustive):

- a) Violations of the law or other regulations.
- b) Violations of the Company's Rules of Conduct.
- c) Violations of internal Policies.
- d) Other forms of criminal behavior, integrity violations and/or unethical behavior including but not limited to: theft, embezzlement, corruption, bribery, conflicts of interest, money laundering, abuse or improper use of inside information, abuse or improper use of Eurobank property, ethical / psychological / physical / sexual harassment.

2.2.4 Reporting Procedures

Members of staff can make a Report by selecting one of the channels below:

- a) Contact the Conducting Officer, responsible for Compliance issues
- b) Contact the responsible for Internal Audit Conducting Officer
- c) Send an email to the e-mail address of the contacted person under a) or b)
- d) Inform the Board of Directors.

The Reports should be as specific as possible and violations should be described in sufficient detail to facilitate an investigation.

To assist the Company in the response or investigation of a suspicion, the suspicion should be factual rather than speculative, containing as much specific information as possible to allow for appropriate assessment of the nature, extent and urgency of the suspicion. It is less likely that the Company will be able to conduct a successful investigation based on a suspicion that contains unspecified wrongdoing or broad allegations without supporting evidence. In general, the Report should, to the extent possible, contain the following information:

- a) The alleged event, matter or issue that is the subject of the Report and that has led to a reasonable suspicion of misconduct.
- b) The name(s) of the person(s) involved.
- c) If the Report involves a specific event(s), the approximate time and location of each event.
- d) Any additional information, documentation or other evidence available to support the Report.
- e) Specific reference to amounts involved is usually helpful in better understanding and assessing a Report.

2.2.5 Confidentiality and Anonymity

All Reports are treated as confidential.

Anonymity is protected. Anonymous Reporting is not preferred but it is acceptable, although it may impede the successful completion of the investigation or affect the findings of the investigation.

2.2.6 Protection for Members of Staff who Report

The Company will take all reasonable measures to protect any member of staff who submits a Report against any abuse or reprisals as a result of the Report, provided that reporting is done in good faith and in compliance with the provisions of this Policy. In case members of staff consider that they have been the victim of such abuse or reasonably believe they are exposed to a risk of abuse, they can report the case to the Conducting Officer responsible for Compliance issues, Conducting Officer responsible for Internal Audit.

"Good faith" means that the member of staff making the Report explicitly believes the transmitted information to be true. Furthermore, good faith also means that the member of

staff making the Report does not do so with the intention to benefit personally. Members of staff who submit a Report not in good faith, particularly if it is based knowingly on false or misleading information are not protected. Such behavior is considered misconduct.

2.3 Misconduct Reporting by a Concerned Third Party

Eurobank FMC-LUX, through its website, encourages any interested third party to submit Reports. Reports should be about violation of policies, procedures and applicable laws (e.g. theft, embezzlement, bribery and corruption, money laundering, conflict of interest, non-compliance with Company's Code of Conduct and Ethics and / or policies, or anything that could damage the reputation of the Company, as well as any attempt to cover up the above).

The channels for submitting such Reports are as follows:

- a) Send an email to info@eurobankfmc.lu
- b) Send a letter to the Compliance mail address, P.O. Box 438 L-2014 Luxembourg

The Company's Board of Directors defines the procedures that ensure confidentiality and secrecy for all Reports and comments. It also systematically monitors the application of these procedures.

2.4 Treatment of Report

The Reports made under this Policy will be handled by Company's Compliance function, acting independently and in coordination with the relevant Internal Audit Group division and will report to the Board of Directors on occurrence. The relevant Internal Audit Group division informs the Board of Directors on a regular basis on all occurred misconduct Reports that fall under the provisions of this Policy.

The actions taken, including the option of investigation, depend on the nature and gravity of the concern.

2.5 Administration / Accessibility of the Policy

The Policy is accessible and will be communicated to all Company's employees.

Third parties providing the Company with services, as defined in the "Scope" section, are provided with a copy of this Policy.

Further, for concerned third parties, this Policy will be included on Company's internet site under "Policies" section.

3. Appendices



1.

4. References



	<ol style="list-style-type: none"> 1. Conflicts of Interest Policy 2. Rules of Conduct
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5. Terminology



6. Amendments Table

		

7. Table of Creation, Issuance and Approvals

		
Unit	Authorized Personnel	Date
Issued by:		
Eurobank FMC-LUX		
Approved by:		
BoD members		14/10/2021