

## **Reporting of Illegal or Unethical Conduct Policy Statement**

### **Introduction**

Eurobank Cyprus Ltd (the “Bank”) is committed in doing business ethically and in this context implements a Reporting of Illegal or Unethical Conduct Policy (the “Policy”) and relevant internal procedures. This policy is aligned with the provisions of the Central Bank of Cyprus Directive on Internal Governance in Credit Institutions, the Law on the Protection of Persons Reporting Breaches of European and National Law and the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union Law.

The Policy intends to inform and facilitate Bank’s staff members, as well as any concerned third party (“Reporting Persons”) to submit Reports on incidents or suspected incidents of wrongdoing of actual, attempted or reasonably suspected illegal or unethical conduct, while setting out measures for their protection.

### **Content of the Reports**

The report may, indicatively and not exhaustively, refer to:

- violations of laws and regulations
- incidents of serious misconduct or serious violations of the Bank’s procedures, policies, guidelines or of the Bank’s Code of Conduct and Ethics or anything that could damage the reputation of the Bank, as well as any attempt to cover up any of the abovementioned incidents.
- various forms of criminal behaviour, integrity violations and/or unethical behaviour (including theft, embezzlement, corruption, bribery, conflicts of interest, money laundering, abuse or improper use of inside information, abuse or improper use of the Bank’s property, etc).

Such incidents may concern staff members, customers, contractors, suppliers, beneficiaries or other persons or entities that participate or seek to participate in activities that involve Eurobank Cyprus Ltd.

### **Reporting Channels**

The Bank has established the following channels for submitting such Reports:

- a) Send an email to [cypruscodeofconduct@eurobank.com.cy](mailto:cypruscodeofconduct@eurobank.com.cy).
- b) Send a letter to the address, 28 Spyrou Kyprianou Avenue, 1075 Nicosia (to the attention of the Compliance Department).
- c) Call the relevant telephone “ERB Reporting Line”: (+357) 22208209 and leave a message on the answering machine, which is available 24/7, all year round.

Reports can be made by the Reporting Person/s, either in name or anonymously, in writing and/or verbally.

### **Treatment of Reports**

A confirmation of the receipt of the written report is provided to the reporting person within a period of seven (7) working days from the day of receipt and feedback is provided to the reporting person within a reasonable period of time, which shall not exceed three (3) months from the confirmation of receipt of the report.

### **Confidentiality & Protection**

The Bank will treat all Reports as confidential and will take all reasonable measures (to the extent permitted by the applicable legislation) to protect the identity of persons who report wrongdoing and persons that reports are made against. The Bank will also protect Reporting Persons against any abuse or reprisals including threats and attempts of retaliation, as a result of a Report submitted, provided that reporting is done in good faith and in compliance with the provisions of the Law. Moreover, persons that reports are made against are presumed innocent and have the right of defence, including the right to be heard and the right to access their file.