



## **NBG Group Whistleblowing Policy**

**NBG GROUP CORPORATE GOVERNANCE DIVISION**

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**Definitions**

<b>NBG Group</b>	<ul style="list-style-type: none"> <li>○ National Bank of Greece SA and its Group Companies operating in Greece or abroad.</li> </ul>
<b>Bank</b>	<ul style="list-style-type: none"> <li>○ All NBG head office units and network branches.</li> </ul>
<b>Unit</b>	<ul style="list-style-type: none"> <li>○ Self-contained administrative entity of NBG and/or a Group Company which reports to a member of senior management and is either:             <ul style="list-style-type: none"> <li>- an Administrative Unit (Central/Head Office Service), or</li> <li>- a Network Unit (Branch).</li> </ul> </li> </ul>
<b>Staff</b>	<ul style="list-style-type: none"> <li>○ Members of the Board, senior management, employees of the Bank and its Group companies, and in general any other person working for NBG Group, whether under a labor contract or otherwise (e.g., Management Advisors, Special Associates, staff of partner companies of the Bank or of its Group Companies).</li> </ul>
<b>Whistleblowing/ Violations of Legislation Report</b>	<p>Oral or written or submitted online or signed or anonymous provision of information in good faith relating to an incident or incidents that the whistleblower discovers, which indicate that "serious irregularity" has occurred.</p>
<b>Whistleblower</b>	<p>The individual that files a report providing information relating to serious violations of legislation/irregularities.</p>
<b>Who can file a report</b>	<p>As per the present policy, whistleblowing/violations of legislation reports can be submitted by:</p> <ul style="list-style-type: none"> <li>○ The Bank and Group’s staff (as defined hereinabove), including:             <ul style="list-style-type: none"> <li>● employees providing to the Bank or a Group company services for which they receive remuneration, regardless of whether their employment is full-time or part-time, or whether they are seconded from another body;</li> <li>● volunteers and paid or unpaid trainees;</li> <li>● individuals whose employment relationship has been terminated for any reason whatsoever, including</li> </ul> </li> </ul>

	<p>retirement, as well as individuals whose employment relationship has not yet begun (in cases where information about violations has been obtained during the recruitment process or at another stage of negotiation before the conclusion of an agreement);</p> <ul style="list-style-type: none"> <li>○ the Bank’s shareholders;</li> <li>○ the Bank’s and the Group’s suppliers and any individual working under their supervision and direction;</li> <li>○ the Bank’s and the Group’s customers, as well as</li> <li>○ any interested third party (regardless of whether they have or had an employment relationship with the Bank or the Group).</li> </ul>
<p><b>Misconduct/Serious irregularity/Violation of Legislation</b></p>	<ul style="list-style-type: none"> <li>○ Irregular activity or omission relating to breaches with regard to internal policies and procedures, Codes of Conduct or breaches of the national and European legal and regulatory framework.</li> </ul> <p>Such breaches may relate to:</p> <ul style="list-style-type: none"> <li>- accounting, auditing and financial reporting (i.e., financial misconduct, internal controls, reporting of expenses);</li> <li>- business integrity (i.e., bribery, forgery/falsification of documents, fraud, corruption, conflicts of interest, customer issues);</li> <li>- the Bank's and Group's Anti-Bribery Policy, NBG's Code of Ethics, Group's Policy for Prevention of Market Abuse, Policy on Conflict of Interest, as well as other policies and regulations governing the Bank's operation financial services, products and markets, as well as the prevention of money laundering and financing of terrorism;</li> <li>- protection of consumers;</li> <li>- the protection of confidentiality, privacy and personal data, as well as the security of network and information systems;</li> <li>- environmental protection;</li> </ul>

	<ul style="list-style-type: none"> <li>- breaches of public procurements, European Union competition rules and acts that breach rules on corporate tax, environment, health and safety;</li> <li>- misuse/misappropriation of corporate assets.</li> </ul>
<p><b>Good faith</b></p>	<p>The belief that the reported events are correct, i.e., the whistleblower believes reasonably and honestly that the communicated information is true. Good faith is presumed to exist unless (and until) otherwise proven.</p>
<p><b>Retaliation</b></p>	<p>Any direct or indirect act or threatened act or omission to act and aimed against the whistleblower, which is due to the report or public disclosure, occurs in a work-related context and causes or may cause unjustified detriment to the whistleblower or put them at an undue disadvantage including, inter alia, harassment, discrimination, negative evaluation or any vengeful act. Retaliation includes, indicatively, the following:</p> <ul style="list-style-type: none"> <li>○ suspension, lay-off, dismissal or equivalent measures;</li> <li>○ demotion, withholding or deprivation of promotion, transfer of duties, change of location of place of work, reduction in wages, change in working hours;</li> <li>○ withholding of training;</li> <li>○ negative performance assessment or employment reference;</li> <li>○ reprimand, imposition of any disciplinary measure, or other penalty, including a financial penalty;</li> <li>○ coercion, intimidation, harassment or ostracism;</li> <li>○ discrimination or unfair treatment;</li> <li>○ failure to convert a temporary employment contract into a permanent one, where this is due to the report submitted;</li> <li>○ failure to renew, or early termination of, a temporary employment contract, where this is due to the report submitted;</li> <li>○ harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;</li> <li>○ blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;</li> </ul>

	<ul style="list-style-type: none"> <li>○ early termination or cancellation of a contract for goods or services where this is due to the report submitted;</li> <li>○ psychiatric or medical referrals;</li> <li>○ denial or withdrawal of reasonable accommodations to persons with disabilities.</li> </ul>
<b>Secrecy/Confidentiality of identity</b>	<ul style="list-style-type: none"> <li>○ When the report is not anonymous, the whistleblower's identity shall be kept secret by the recipient of the information from the person(s) implicated in the misconduct/breach/serious irregularity that has been reported, and shall be used only as absolutely necessary.</li> </ul>
<b>Anonymity</b>	<ul style="list-style-type: none"> <li>○ When the identity of the information source is not known to the recipient.</li> </ul>
<b>Public disclosure</b>	<ul style="list-style-type: none"> <li>○ The direct disclosure of information to the public relating to breaches of law.</li> </ul>
<b>Receiving and Monitoring Reports Officer (RMRO)</b>	<ul style="list-style-type: none"> <li>○ The person assigned as per Article 9, Law 4990/2022 on the “Protection of persons reporting breaches of Union law”, with the responsibilities expressly set out in Article 10 of the same Law.</li> </ul>



## Introduction

National Bank of Greece S.A. (hereinafter “the Bank” or “NBG”) attaches the highest importance to ensuring the highest standards of ethical, moral and legal business conduct, while it expects all Board Members, senior management, employees of the Bank as well as of its subsidiaries to adhere to a high standard of personal and professional integrity and to avoid any conduct that might reflect unfavourably upon the Bank and Group’s operation and reputation.

In that context, the Bank, recognizing the key importance of lawful, clear and up-to-date processes regarding both internal reporting and the protection of those submitting such reports (whistleblowers), has adopted by virtue of Board resolution **29.11.2018** the NBG Group Whistleblowing Policy (updating the previously adopted on 24.10.2013 Policy on Whistleblowing and following the existence of established whistleblowing reporting arrangements) to provide guidance to its Staff for the reporting, while acting in good faith, of an incident or incidents that they discover while performing, or relating to, their duties, which indicate the existence of misconduct/ /serious irregularity, and declare that it ensures **full confidentiality and protection** of whistleblowers as part of its overall responsibility to its Staff, shareholders and customers.

The Policy was further updated on 26.05.2023 in alignment with the provisions of Law 4990/2022 on the "Protection of persons reporting breaches of Union law". The Board of Directors, with a view to ensure compliance with recent regulatory requirements further specifying and strengthening the existing procedures for the submission of reports and the protection of whistleblowers, on **28.06.2024**, following the proposal of the Board Compliance, Ethics and Culture Committee, adopted the present Policy.

In developing and reviewing the present Policy, the following have been taken into account, as well as further European<sup>1</sup> and international<sup>2</sup> instruments, guidelines and best practices including, among others:

- ▶ Law 4990/2022 on the protection of persons reporting breaches of Union law - transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (L 305) and other emergency regulations, which provides for the establishment of a system of internal and external reporting of breaches of

<sup>1</sup> Council of Europe Recommendation CM/Rec(2014)7 of 30 April 2014 on the protection of whistleblowers; Resolution 2171 (2017) of the Parliamentary Assembly of the Council of Europe of 27 June 2017; guidelines of the European Commission to its staff regarding whistleblowing ([http://europa.eu/rapid/press-release\\_IP-12-1326\\_en.htm](http://europa.eu/rapid/press-release_IP-12-1326_en.htm))

<sup>2</sup> 2004 UN Convention against Corruption, to which all EU Member States are parties; the G20 Anti-Corruption Action Plan; the OECD report of March 2016: “Committing to Effective Whistleblower Protection”



Union law, protection of the persons reporting such breaches, organization of the procedure for submitting, receiving and monitoring the reports and the sanctions imposed in the event of breaching thereof.

- ▶ Ministerial Decision No. 47312 (Government Gazette B' 6944/11.12.2023) Specifications on the process for submitting, receiving, and monitoring reports within public and private bodies according to Article 10 of Law 4990/2022 (A' 210) pursuant to the first sentence of paragraph 4 of article 24 of the same Law.
- ▶ BoG Governor's Act No. 2577/2006, as in force, which stipulates inter alia that the submission of anonymous reports must be secured, as well as the protection of those employees that provide information by means of these reports to the Board of Directors regarding serious irregularities, failings or offences that have come to their attention; Article 63 of L. 4261/2014, which transposed into Greek legislation Article 71 of Directive (EU) 2013/36, and requires institutions to have in place appropriate procedures for their employees to report breaches of potential or actual breaches of the provisions of L. 4261/2014 and Regulation (EU) 575/2013 internally through a specific, independent and autonomous channel.
- ▶ Article 32 of Regulation (EU) 596/2014 on market abuse, which requires employers who carry out activities that are regulated by financial services regulation to have in place appropriate internal procedures for their employees to report infringements of this Regulation, in conjunction with Commission Implementing Directive 2015/2392, which includes arrangements for reporting and for following-up reports, measures for the protection of persons working under a contract of employment, and measures for the protection of personal data<sup>3</sup>;
- ▶ Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data<sup>4</sup>.

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<sup>3</sup>see NBG Group Policy on the prevention of Market Abuse

<sup>4</sup> see NBG Group Policy for the management of Personal Data

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## Purpose

By means of this Policy, the Bank seeks to:

- ▶ stress the particular importance it places on whistleblowing regarding malpractice that comes to the attention of Staff members, by adopting the relevant extant procedures at policy level;
- ▶ encourage Staff members to take the initiative and report in good faith any suspected incident of misconduct/serious irregularities/violations of legislation that may come to their attention in the course of their duties, ensuring that said information will be investigated on the basis of objectivity and confidentiality.
- ▶ strengthen the trust of its Staff in the established reporting procedures and in the protection of whistleblowers who submit reports in good faith, by ensuring that whenever it is necessary to report any misconduct/serious irregularity/violation of legislation they will be afforded the utmost protection and confidentiality as desired, without incurring any kind of retaliation.

This Policy is expected to substantially contribute to:

- ▶ harmonizing the Bank's processes with the legislative and regulatory framework in force.
- ▶ updating and modernizing the Bank's operating processes to meet its current needs and developments;
- ▶ securing effective internal procedures and organizational structures of the Bank for the prevention and management of risks related to the Bank's compliance with the regulatory framework each time applicable;
- ▶ strengthening currently applicable reporting and data collection processes, reducing the risk of double reporting to regulatory authorities and setting up clear management reporting lines;
- ▶ further enhancing the corporate governance framework and promoting whistleblowing as a mechanism of good governance;
- ▶ further enhancing management of conflicts of interest;
- ▶ preventing and handling potentially harmful consequences from possible wrongdoing by its Staff members;

- ▶ avoiding the imposition of any sanctions against the Bank and/or members of its Staff due to non-compliance with the current regulatory framework;
- ▶ preventing and averting any misconduct and irregularities that could put at risk the reputation and the interests of the Bank, its shareholders and customers; and
- ▶ enhancing a culture of regulatory compliance among the Bank’s officers and its Group companies, as a model of corporate conduct and a means of enhancing the corporate identity.

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## Scope

This Policy:

- ▶ Sets out the basic principles for reporting serious irregularities identified within the Bank and its Group.

The Boards of Group companies should adopt similar Policies to be harmonized with the principles of the present Policy, adjusted appropriately to the nature, scope and complexity of their activities, considering also the applicable regulatory framework of the country/sector in which they operate.

- ▶ Applies to all **members of the Board, senior management, employees of the Bank and its Group companies, and in general to any other person working for the Group, whether under a labour contract or otherwise** (e.g. Management Advisors, Special Associates, staff of partner companies of the Bank or Group Companies), **as well as all shareholders, customers, suppliers and any interested third party submitting a report in good faith**. In detail, the persons who fall under the scope of this Policy are mentioned in the definitions hereinabove under "Who can file a report".
- ▶ Covers all activities of NBG and the Group in Greece or overseas, including operations of any Bank Unit, subsidiary or associated company, agent, counsel or third party acting for the account or in collaboration with the Bank and the Group.
- ▶ Rounds out the framework of principles of moral conduct and ethics of NBG and the Group, as set out in particular under relevant terms of the Labour Regulation and/or Agreements, the NBG Group Code of Ethics, as well as the current Policies of NBG and the Group (e.g. Policy for avoiding conflicts of interest for Board members, Senior Executives and other Related Parties of NBG, Anti-Bribery Policy, Market Abuse Policy), by establishing principles for whistleblowing by Staff members who discover or suspect any serious irregularities or breaches of the national and European regulatory framework in the Bank. Where specific rules on the reporting of breaches are provided for in specific Group Policies, those rules shall apply, while the present

Policy complements with additional rules and safeguards, aligning them with a high level of protection, while preserving their specificities.

*Complaints that fall within the framework of the Bank's approved Policy for the Management of Internal Complaints regarding Cases of Violence and Harassment are excluded from the scope of this Policy. The said incidents related to any form of violence and harassment experienced at work, including violence and harassment based on gender and sexual harassment are reported in accordance with the procedures and are reviewed and monitored by the bodies provided for in said Policy.*

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## Governance

### **(i) Board of Directors**

The Bank's Board of Directors is responsible for:

- ▶ the approval and periodic review of this Policy, upon recommendation by the Compliance, Ethics and Culture Committee, following proposal by the NBG Group Corporate Governance Division; and
- ▶ the supervision of its implementation.

The Policy comes into force with the issuance of the relevant Administrative Act, after the completion of the approval process, as described above.

The implementation of this Policy is subject to central and independent internal control and review, as exercised by the competent Group Internal Audit Function, as per the each time applicable audit plan of the said Function.

### **(ii) Compliance, Ethics and Culture Committee of the Board of Directors**

The Compliance, Ethics and Culture Committee of the Board of Directors shall:

- ▶ be responsible for establishing and monitoring on an ongoing basis the implementation of the present Policy and the processes for the submission — on a confidential basis or even anonymously — of reports by Staff members and/or third parties regarding irregularities which fall under the scope of the present Policy and require investigation.
- ▶ evaluate the adequacy and the effectiveness of the present Policy on a regular basis and be responsible for submitting recommendations to the Bank's Board for its review, upon proposal by the NBG Group Corporate Governance Division, whenever required, for instance depending on any changes in the legal and regulatory framework, or organisational changes that may necessitate the Policy update;

- ▶ monitor and review the procedures on the basis of which complaints, whether signed or anonymous, may be filed about possible misconduct in the collection, processing and disclosure of financial information, including complaints regarding accounting, internal financial controls or auditing matters;
- ▶ review relevant reports submitted by the NBG Group Corporate Governance Division;
- ▶ review major cases of misconduct related to Board members, members of the Executive Committee, and other staff members, and oversee any required corrective measures following relevant proposals by the NBG Group Corporate Governance Division, in line with the each time applicable relevant NBG regulations/internal conduct framework provisions.

In discharging its duties, the Committee shall cooperate with other Committees of the Board, as may be required on a case-by-case basis (for example in case a notification to the Audit Committee may be required if for example a whistleblowing report concerns accounting and auditing issues).

***(iii) NBG Group Corporate Governance Division***

Under this Policy, the Group Corporate Governance Division shall:

- ▶ assist the Board of Directors and the Compliance, Ethics and Culture Committee in the development, implementation and review of the Policy, whenever required;
- ▶ monitor the institutional framework on whistleblowing and submit proposals to the Compliance, Ethics and Culture Committee in order to harmonize the Policy with the regulatory developments;
- ▶ communicate the Policy to the NBG Group companies and ensure the adoption of respective Whistleblowing Policies by subsidiaries, taking into consideration the national provisions of the country in which they operate, and the nature, size and organization of each subsidiary;
- ▶ establish procedures/systems for the submission — always on a confidential basis or even anonymously — of reports by Staff members and/or third parties regarding misconduct and/or serious irregularities/violations of legislation that fall under the scope of the present Policy and require investigation;
- ▶ provide guidelines on the Policy and its implementation to Compliance Units of Group companies;
- ▶ operate as **Reports Office**, under the supervision and coordination of the relevant Receiving and Monitoring Reports Officer (RMRO), assisting the latter in the fulfilment of their duties as set out in the following section.



## Receiving and Monitoring Reports Officer (RMRO)

The Bank appoints the Head of the Group Corporate Governance Division as the Receiving and Monitoring Reports Officer (hereinafter the “RMRO”).

The RMRO must perform his/her duties with integrity, objectivity, impartiality, transparency and social responsibility. Furthermore, he/she must respect and observe the rules of secrecy and confidentiality for matters brought to their attention during the exercise of their duties, as well as refrain from handling specific cases in the event of conflict of interest, declaring an impediment.

The RMRO is supported in their work by the Group Corporate Governance Division, which, acting as a **Reports Office** under their supervision and coordination:

- provides the adequate information required for the submission of a report within the Bank and communicates the relevant information on a prominent space on its website,
- receives reports relating to breaches within the scope of this Policy and the legal framework;
- notifies the whistleblower that the report has been received within a period of **seven (7) business days** as of the day of its receipt,
- takes every action necessary in order for the competent bodies of the Bank, or the competent authorities, as the case may be, to handle the report,
- submits for review as may be required to the Compliance, Ethics and Culture Committee the most important cases of misconduct/serious irregularities/breaches of legislation, and proposes corrective measures,
- ensures confidentiality of the identity of the whistleblower and any third party named in the report, preventing access to the report by unauthorized persons,
- monitors reports and maintains contact with the whistleblower as required per case and, if necessary, requests further information from the whistleblower,
- provides information to the whistleblower about the actions taken within a reasonable period of time, which shall not exceed **three (3) months** as of confirmation of receipt of the whistleblower report.
- submits on a regular-annual basis to the Compliance, Ethics and Culture Committee a report/information on the implementation of this Policy.

In the context of this Policy, the **RMRO** reports directly to the Bank's Board of Directors through the competent Board Compliance, Ethics and Culture Committee, while in the event of serious violations being identified, which may entail civil, administrative or criminal sanctions for the Bank or a Group company or for senior management of the Bank or a Group company, the **RMRO** informs the Board accordingly through the Board Compliance, Ethics and Culture Committee.

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## General Principles

- ▶ All Staff members have the moral duty to report serious irregularities/regulatory breaches and thereby assist the Bank in order to identify and investigate them. This duty is safeguarded through the strong protection afforded to whistleblowers who act in good faith.
- ▶ In the event that a member of Staff discovers any serious irregularity caused by actions taken by (or omissions of) another Staff member that affects the proper operation and interests of the Bank, he/she must report it without delay to the RMRO, in line with the reporting process set out hereinbelow.
- ▶ Staff members may choose among a number of available reporting channels for whistleblowing, bypassing if they wish in any case their hierarchy entirely. The whistleblowing channels are designed, set up and operate in a manner that ensures the confidentiality of the identity of the whistleblower and prevents access to unauthorised staff members.
- ▶ The review of reports is carried out in such a way that objectivity and confidentiality are ensured, while at the same time care is taken to ensure that in the event of conflict of interest for the person reviewing the report, the information in the report shall be reviewed by another person.
- ▶ The imposition of reprisals on whistleblowers shall not be tolerated. **Whistleblowers shall be protected and their identity kept confidential and inaccessible to unauthorized persons.** Reports submitted should not be included in the personal record of the whistleblower that is kept with the competent NBG Group HR Division, while particular attention should be placed on ensuring that whistleblowers are not subject to retaliation and reprisals during Staff performance evaluations and promotions.

- ▶ The Bank shall support whistleblowers who wish to change their job position because they have reasons to fear hostile reactions from their immediate working environment.
- ▶ To support Staff members who are unsure whether certain incidents should be reported or not, confidential and impartial guidance and support to (potential) whistleblowers is provided by the NBG Group Corporate Governance Division.
- ▶ Malicious whistleblowing aiming at harming the integrity or reputation of another person is prohibited. In any case, the Bank shall respect the right of defence of persons implicated in any report.

Finally, it is highlighted that all Staff members are obliged to comply with the Policies and procedures established by the Bank, and it is the moral duty of the Staff to report any infringement of such, so as to protect the interests of employees, shareholders and customers.

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## Reporting process

### (i) *Who may file reports*

The Bank encourages the reporting of misconduct/serious irregularities/breaches of legislation that come to the attention of Staff, Shareholders, Customers, Suppliers of the Bank and the Group, as well as any other interested third party.

### (ii) *Incidents that warrant reporting*

Given that the reporting process is widely recognized as a key tool for the detection of misconduct/serious irregularities/breaches of legislation, it is important that the Staff fully understand the kind of incidents that they are ethically bound to report.

### *Exceptions*

Not every kind of report submitted can be considered as whistleblowing within the meaning of this Policy. In particular, the RMRO should not proceed to further investigation of reports regarding:

- Information that has already been published (e.g., newspaper articles, the Bank's website etc.);
- unfounded stories and rumours;
- issues of a trivial nature;



- disputes about issues that do not violate the legal and regulatory framework, or do not represent ethical misconduct or where no serious indications of violation occur;
- reports that lack "good faith", such as those made abusively (e.g., when they are repeated in order to disrupt a Unit of the Bank or bring the reported person into disrepute etc.) and those made in bad faith, for frivolous reasons or for possibly defamatory purposes (i.e., untrue or unjustified accusations aiming at harming the integrity or reputation of another person);
- unintelligible reports;
- cases where investigations or legal proceedings have already been initiated.

It is noted that customer complaints regarding the quality of services provided, the Bank's products or the quality of service, as well as any queries/questions about the operation of a service (e.g., i-bank), do not fall within the scope of this Policy.

Also, reports received concerning incidents of violence and harassment that fall within the scope of the Bank's respective Policy are not further investigated by the RMRO. The reports in question, if submitted through the channels prescribed within the present Policy, are forwarded by the RMRO to the competent body of the Bank and are handled in accordance with the procedure set out in the NBG Policy for the Management of Internal Complaints regarding Cases of Violence and Harassment, or the complainant is referred to the relevant body accordingly, while the RMRO is not updated on the course or outcome of the complaint.

### ***(iii) Reporting channels***

Any Staff member or third party can file a signed or anonymous report relating to a suspected irregularity/breach as per the provisions of the present Policy, through any of the channels listed below:

- through the online whistleblowing reporting platform for the submission of signed or anonymous reports, which the Bank has in place.
- verbally by calling the dedicated whistleblowing reporting telephone line which the Bank has in place. It is noted that telephone reports are answered by an automated machine, recorded and submitted for evaluation to the Reports Office.

The above channels of communication function exclusively as report "hotlines" and are available on a 24/7 basis.

- by submitting a written report either personally or via post to the postal address of the Bank where the Receiving and Monitoring Reports Officer (RMRO) is located, or via email to the electronic address of the RMRO.

### Meeting with the RMRO

At the whistleblower's request, the report may also be submitted through a face-to-face meeting with the RMRO, within reasonable time from a respective request. In this case, it is ensured — subject to the whistleblower's consent — that complete and accurate minutes of the meeting are kept in a durable and retrievable format, either by recording the conversation in a durable and retrievable format, or by keeping accurate minutes of the meeting, drawn up by the competent Officers of the Reports Office who are responsible for handling the report, providing the whistleblower with the ability to verify, correct and agree to the minutes of the meeting by signing them. In any case of refusal to sign the minutes, a relevant note shall be made by the author of the minutes.

The contact details/links for the submission of reports through the Bank's whistleblowing reporting channels are provided on the Bank's website ([www.nbg.gr](http://www.nbg.gr) Home/NBG Group/ESG – Environment Society & Governance /Our Corporate Governance / Whistleblowing report submission).

It is noted that every relevant technical and organizational measure has been taken to ensure anonymity and data security throughout the process of submitting, receiving and processing reports.

Upon decision of the Board Compliance, Ethics and Culture Committee and within the context of this Policy, the Bank may potentially further consider cooperation with external agencies in the context of the whistleblowing arrangements it applies, e.g. reporting channel providing anonymous, confidential reporting and review possibility, having regard in any case to the provisions of the each time applicable legal and regulatory framework, including on the protection and management of personal data.

#### ***(iv) Review of reports by RMRO***

All reports that are received are carefully investigated by the RMRO in a spirit of absolute discretion and confidentiality, and ensuring impartiality.

Specifically, the RMRO, with the assistance of the Reports Office:

- confirms receipt of the report to the whistleblower within a period of seven (7) business days as of the day of receipt;
- considers whether the issue falls within their jurisdiction, taking into account its seriousness and whether the report includes enough information to enable further investigation;
- can forward, if necessary, the pseudonymized report to the Group Internal Audit Function for review;

- may forward the pseudonymized report to the Unit which is responsible for the specific subject of the report/complaint, or to any other competent Unit;
- may decide to conduct their own investigation;
- may forward the pseudonymized report to the per case competent authorities;
- provides information to the whistleblower on the actions taken within a reasonable period of time, which shall not exceed three (3) months as of confirmation of receipt of the report.

After processing the reports, the accuracy and importance of the information provided should be assessed to decide if there are significant reasons for initiating further investigation and corrective measures.

Information can be provided anonymously; further, it is recommended that the whistleblower does not communicate to other persons details of the issues he/she reported, given that this might have an adverse impact on any future investigation or on confidentiality.

In the event that, through the evidence submitted, the RMRO finds indications that an ex officio prosecutable criminal act has been committed, the RMRO shall forward a copy of the report to the competent Public Prosecutor as soon as possible, informing the whistleblower.

**Note that all submitted reports shall be treated as strictly confidential by all Bank Units involved.**

It is noted that, in order to avoid conflict of interest, in the event that, the RMRO receives a report which contains allegations against him/her or against another officer/individual responsible for the investigation of reports within the Bank, then the RMRO shall proceed to forward the report to the National Transparency Authority as an external whistleblowing channel, informing the whistleblower. The said report shall also be forwarded to the Bank's Internal Audit Unit.

#### Archiving a complaint

The RMRO may close the review process of the report by archiving the report, if it is concluded that:

- it is unintelligible, or
- it is submitted abusively, or
- it does not refer to incidents that constitute a violation of the regulatory framework or policies and internal regulations of the Bank and the Group, or
- no serious indications of such violation are apparent.

The whistleblower is notified of the relevant decision and if they consider that the report has not been handled effectively, they further additionally have the option of submitting a report to the National Transparency Authority (NTA) in accordance with the "Procedure for submitting external reports to the National Transparency Authority" hereinbelow.

***(v) Review of reports by the Board Compliance, Ethics & Culture Committee***

The Board Compliance, Ethics and Culture Committee reviews as may be required major cases of misconduct identified through the Bank's whistleblowing reporting channels, carries out a further assessment of such cases and examines whether corrective measures are sufficient or additional measures may be needed, upon relevant proposal by the RMRO. To carry out further assessment of an issue and any requisite investigations, the Board Compliance, Ethics and Culture Committee has the authority to set up a special team.

In discharging its duties, the Committee shall cooperate with other Board committees, as the case may be (for example with the Audit Committee if a whistleblowing report refers to an irregularity relating to accounting and audit practices).

***(vi) Follow-up process – Provision of feedback to the Whistleblower***

The RMRO assisted by the Reports Office and in cooperation with the Bank's competent Units follows-up on the report investigation and the corrective measures required (as per case deemed appropriate).

The RMRO provides feedback to the whistleblower, within a reasonable period of time, not more than three (3) months as of confirmation of receipt of the report, about the action envisaged or taken as follow up to the report (for instance, closure based on lack of sufficient evidence or other grounds, launch of an internal enquiry and possibly its findings and/or measures taken to address the issue raised, referral to a competent authority for further investigation), as far as such information would not prejudice the enquiry or investigation or affect the rights of the person concerned.

***(vii) Record keeping of reports***

The Bank keeps a record of every report it receives, in accordance with the aforementioned confidentiality requirements. Reports are stored for as long as necessary and for a reasonable period of time, so that they can be retrieved as per the applicable legislation and in any case until completion of any investigation or court proceeding that has been initiated as a consequence of the report against the reported, the reporting or any third party.

***(viii) Submitting reports to the National Transparency Authority (NTA)***

If the whistleblower considers that the report has not been handled effectively by NBG, the same may file the report directly to the National Transparency Authority (NTA). Specifically, the said report may be submitted in writing or online through the channels

the NTA has available which can be used by persons within scope of the present Policy, indicatively by email, post or in person. Information on the submission of a report to the NTA is also provided on the Bank's website ([www.nbg.gr](http://www.nbg.gr) Home/NBG Group/ESG – Environment Society & Governance /Our Corporate Governance / Whistleblowing report submission).

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## Protection of Whistleblowers

In the context of the Bank's obligation to consider the interests of its Staff, and in line with the principle of accountability, it is necessary to ensure that whistleblowers are provided, by the Bank, with the highest possible level of confidentiality and protection against any possible retaliation.

The Bank shall not tolerate retaliation against anyone who in good faith raises concerns about European or national law violation, as well as ethics violations, illegal conduct or any other misconduct/serious irregularity. Any member of Staff reporting a serious irregularity should be protected against acts of retaliation, provided that the report is made in good faith and in line with the provisions of this Policy. In the event that measures are taken against the whistleblower which can be considered retaliation, the burden of proof regarding the legality of these measures shall lie with the person taking these measures, while the whistleblower is not expected to prove that these measures are unjust.

In addition, the whistleblower does not lose the protection merely because the concern expressed in good faith has been proved to be unfounded. Any report that is assessed as being unsubstantiated/non-feasible to investigate and/or cannot be investigated, may eventually be archived following the provisions of the present Policy. In any case, the Whistleblower shall enjoy the protection and non-retaliation rights assigned by the Bank. The Bank shall also ensure protection of whistleblowers who make a public disclosure.

The following specific protection measures shall apply:

**(i) Confidentiality of identity of whistleblower**

The protection of persons who have reported a serious irregularity in good faith is ensured by keeping their identity secret/confidential.

This means that their identity will not be revealed to the person who might be implicated in the reported misconduct or any other person, unless the whistleblower himself/herself allows the disclosure of his/her identity or if required in the context of pre-litigation or court proceedings. In all other cases, the Bank is determined to keep the whistleblower's identity secret/confidential. Personal data and any information that

may lead, directly or indirectly, to the identification of the whistleblower shall not be disclosed to anyone other than the authorized staff members who are responsible for receiving or monitoring the reports, unless the whistleblower has consented thereto. To this end, the Bank takes appropriate technical and organizational measures, such as pseudonymization techniques if this may be required, when monitoring the report and communicating with the competent authorities.

In exceptional cases, the identity of the whistleblower and any other information may be disclosed when required by Union or national law, in the context of investigations carried out by competent authorities or court proceedings, and if it is deemed necessary for the purposes hereof or to protect the legal defence rights of the reported person.

Note that the submitted report is not included in the service record of the Staff member kept by the NBG Group Human Resources Unit.

***(ii) Mobility***

If the Staff member wishes to be transferred to another department of the Bank for his/her own protection against possible hostile reactions in his/her workplace, the Bank should take the necessary measures to enable such a transfer.

***(iii) Evaluation and promotion***

Particular care should be given to ensure that whistleblowing reports do not lead in any way to adverse effects on the Staff's evaluation and chances of promotion. To this end, the whistleblower's anonymity should be protected from any involved Unit, and the submitted reports should not be included in the service record of the Staff member that is kept with the NBG Group Human Resources Unit, while it is also noted that the submission of the report by a Staff member does not require observance of the Bank's hierarchy.

***(iv) Anonymity***

Under the present Policy, the Bank provides to Staff the option to submit anonymous reports. Nevertheless, for the Bank to be in a position to implement the protection measures it offers, the involved Staff member should reveal his or her identity in the submitted report and observe the procedures as described above. The protection provided minimizes the necessity and the reason for anonymity. In any case, the Bank takes all the necessary measures to ensure that no method is used to identify whistleblowers should they choose to remain anonymous, while it also assigns to each report a confidential identification code with which the Bank and the whistleblower may be able to communicate through the aforementioned reporting channels.

***(v) Sanctions for persons who take retaliatory measures***

No member of Staff is allowed to use his or her position to prevent another Staff member from reporting serious irregularities. Any kind of retaliatory measures taken by a Staff

member against the whistleblower is prohibited. The Bank shall investigate all retaliation allegations and, where appropriate, the NBG Group Corporate Governance Division shall take special measures in collaboration with the NBG Group HR Unit, including disciplinary actions, while considering the relevant legal and internal framework to which the Bank is subject. If a Staff member believes he or she has suffered any kind of reprisal as a result of reporting a serious irregularity, he/she has the right to ask for the protection measures set out in the present Policy. Relevant requests should be addressed to the NBG Group Corporate Governance Division, using the reporting channels provided in the present Policy.

**(vi) Processing of personal data**

Any processing of personal data carried out pursuant to this Policy shall be made in accordance with the Group Policy for the Protection of Personal Data, the provisions of Regulation (EU) 2016/679 and Directive (EU) 2016/680, as well as the provisions of Greek Law 4990/2022 regarding personal data.

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## Staff Training and Support

The Bank develops focused training programs on issues relating to whistleblowing so as to ensure that this Policy is properly communicated to all Staff and to enhance awareness and vigilance among Staff, while upon hiring Staff is informed on the Bank's Whistleblowing arrangements.

Furthermore, the NBG Group Corporate Governance Division offers confidential and impartial guidance and support to the Bank's Staff particularly when the Staff member may be unsure whether certain incidents are subject to reporting as per the provisions of this Policy.

Effective guidance to the Staff at an early stage contributes also to averting the submission of injudicious reports that could harm the interests and reputation of the Bank.