

Whistleblowers Protection

In relation to the Whistleblowers Protection Act of June 14, 2024 (the “Act”), the Bank implemented the Procedure addressing the legal requirements on receiving confidential reports. Under the Procedure, reported breaches of law specified in the Act, are handled.

Breach of the law is an act or negligence that is against the law or aimed at circumventing the law, concerning:

- 1) corruption;
- 2) public procurement;
- 3) financial services, products and markets;
- 4) counteracting money laundering and terrorist financing;
- 5) product safety and compliance;
- 6) transport security;
- 7) protection of the environment;
- 8) radiation protection and nuclear safety;
- 9) food and feed safety;
- 10) animal health and welfare;
- 11) public health;
- 12) consumer protection
- 13) privacy and personal data protection;
- 14) security of network and ICT systems;
- 15) the financial interests of the State Treasury of the Republic of Poland, the local government unit and the European Union;
- 16) the internal market of the European Union, including public law competition and state aid rules and corporate taxation;
- 17) constitutional freedoms and rights of the human being and citizen – occurring in the relations of the individual with the public authorities and not related to the areas indicated under 1-16.

Report can be done by an individual, who obtained the information about breach of the law, in the context of work for the Bank, e.g.:

- 1) an employee;
- 2) a temporary employee;
- 3) a person providing work on a basis other than employment, including a civil law contract;
- 4) an entrepreneur;
- 5) a proxy;
- 6) a shareholder or a partner
- 7) a member of a body of a corporate personality or an organizational unit without corporate personality;
- 8) a person performing work under the supervision and direction of contractor, subcontractor or supplier;
- 9) an intern;
- 10) a volunteer;
- 11) a trainee;
- 12) an officer within the meaning of the Article 1 (1) of the Act of 18 February 1994 on pension provision for officers of the Police, the Internal Security Agency, the foreign Intelligence Agency, the Military Counterintelligence Service, the Military Intelligence Service, the Central Anti- Corruption Bureau, the Border Guard, the Marshal’s Guard, the State Protection Service, the State Fire Service, the Customs and Tax Service and

the Prison Service and their families (Journal of Laws of 2023, item 1280,1429 and 1834);

13) a soldier within the meaning of Article 2 (39) of the Act of 11 March 2022 on the Defense of the Homeland (Journal of laws of 2024 item 248 and 834).

Reports can be made electronically via mailbox: sygnalista@citi.com or in writing to the following address:

Compliance Division with a note "Whistleblower"

Bank Handlowy w Warszawie S.A.

7/9 Traugutta Street

00-067 Warsaw

Report should include the personal data of reporting person and contact address.