

Eurobank Reporting of Unethical Conduct Policy Statement

Scope & Applicability of the Reporting of Unethical Conduct Policy

The Policy intends to facilitate the members of staff of Eurobank and concerned third parties to submit Reports on any actual, attempted or suspected illegal or unethical conduct, while eliminating any concerns that their Report may result in adverse consequences for themselves.

The Policy applies to all Eurobank staff, permanent or temporary, and any other person having access to information and premises of Eurobank or providing Eurobank with services under contract or operating under any other agreement of cooperation, indicatively including but not limited to management consultants, surveyors, lawyers, insurance agents. Further, the Policy applies to all concerned third parties.

Basic Principles of the Reporting of Unethical Conduct Policy

The basic principles of the Policy are as follows:

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

Treatment of Reports

All Reports made under the Policy are received by Compliance, which is an independent function of Eurobank and reports to the Audit Committee on an annual basis. In addition, the Internal Audit Group, through its deliverables to the Audit Committee, informs it on a regular basis (approximately every 3 months) on all misconduct Reports that fall under the provisions of the Policy.

The actions taken, including the option of investigation, depend on the nature and gravity of the concern. The Chief Audit Executive can choose to investigate a Report without involving or informing Eurobank's management.

Eurobank will take all reasonable measures to protect any concerned party 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 the Policy.

Confidentiality

All Reports are treated as confidential. Anonymity is protected.

The Eurobank Audit Committee defines the procedures that ensure confidentiality and secrecy for all Reports and comments. It also systematically monitors the application of these procedures.

Transparency

The Policy is accessible by all members of staff. Members of staff are given the Policy as part of the Group's induction pack. They also have access to the Policy through the Intranet site.

Third parties providing Eurobank with services, are provided with a copy of the Policy as part of the documents that they should sign (to indicate receipt) during the business proposal or preparation stage in anticipation of doing business with Eurobank.

Any concerned party can report any actual, attempted or suspected illegal or unethical conduct through the channels available on our website (<https://www.eurobank.gr/en/group/about-eurobank/corporate-governance/group-compliance>).

Reporting Unethical Conduct

Eurobank, 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 Eurobank's Code of Conduct and Ethics and / or policies, or anything that could damage the reputation of Eurobank, as well as any attempt to cover up the above).

The channels for submitting such Reports are as follows:

- a) Send an email to ethicshotline@eurobank.gr
- b) Send a letter to the Compliance mail address, 2-6 Pasmazoglou Street, 105 59, Athens
- c) Call the relevant telephone centre line (0030 2144058990) and leave a message on the answering machine (available 24/7, 365 days/year).