

Eurobank Reporting of Illegal or Unethical Conduct Policy Statement

Scope & Applicability of the Policy for Reporting Illegal or Unethical Conduct

The Policy intends to encourage and facilitate Eurobank Equities' staff members, as well as any concerned third party to submit Reports on incidents of illegal or unethical conduct, while setting out measures for their protection.

This Policy applies to all Eurobank Group staff, permanent or temporary, full time or part time, including persons working remotely, as well as paid or unpaid trainees (jointly "staff members"). Moreover, it applies to ex-employees, volunteers and job applicants that have acquired information on breaches during the recruitment process or other pre-contractual negotiations, persons having self-employed status, or consultants, any persons working under the supervision and direction of contractors, subcontractors and suppliers, as well as to shareholders and board members, including non-executive members (hereinafter "concerned third parties" and together with the staff members "reporting persons").

Basic Principles of the Policy for Reporting Illegal or Unethical Conduct

The basic principles of the Policy are as follows:

- a) All staff members and concerned third parties are encouraged to communicate their concerns by submitting a Report.
- b) There are a number of channels that can be used for submitting a Report.
- c) The handling of reports is subject to strict confidentiality and personal data protection rules.
- d) Reporting persons can choose to submit a report anonymously.
- e) Reports of wrongdoing are dealt with in a proper and timely manner.
- f) Persons who report wrongdoing and have reasonable grounds to believe that the information they provide is true at the time of reporting, are protected against any form of retaliation, including threats and attempts of retaliation.
- g) Eurobank Equities appoints a responsible officer for the Receiving and Monitoring of Reports (RRMO), who is a member of staff with reporting access to the Board of Directors.

The Board of Directors of Eurobank Equities is responsible for ensuring the existence of a robust framework for reporting illegal or unethical conduct, promoting continuous improvement of the Policy, committing to, promoting and practicing a speak-up/listen-up culture and ensuring the appointment of the RRMO.

Treatment of Reports

Group Compliance is responsible for the design, implementation, operation and improvement of the reporting system as well as for the reporting on the performance of the reporting system to top management.

The RRMO, for the reporting persons/entities within his/her responsibility, is responsible for:

- Providing appropriate guidance as to how to submit a report;
- Receiving the reports;
- Ensuring that a confirmation of the receipt of the report is provided to the reporting person within a period of seven (7) working days from the day of receipt;
- Performing an initial assessment of the report;
- Designating the competent unit or person to handle the report;
- Ensuring, to the extent possible, that the confidentiality of the reporting person's identity and of any third party named in the report, is protected;
- Monitoring the progress of the investigation and maintaining contact with the reporting person;
- Ensuring that 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;
- Planning and coordinating relevant training efforts.

Confidentiality & Protection

Reports are treated as confidential. All provisions of law and this Policy, as regards the protection of the identity of reporting persons and persons concerned, shall apply.

Eurobank Equities takes all reasonable measures (to the extent possible in the capacity, capability and competence of the organization) to protect persons who report wrong doing (whether staff members or not) against any abuse or reprisals as a result of a report submitted, provided that reporting is done in good faith and in compliance with the provisions of law and this Policy.

Transparency

The Policy is accessible by all staff members and concerned third parties.

Staff members are given this Policy as part of the Group's induction pack. They also have access to this Policy through the Intranet site.

The "Eurobank Reporting of Illegal or Unethical Conduct Policy Statement" is published on Eurobank's website, in order to be accessible by all concerned third parties.

Reporting Unethical Conduct

All staff members and all concerned third parties are encouraged to submit a report regarding any incident of actual, attempted or reasonably suspected illegal or unethical behavior which affects and/or may be harmful to Eurobank Equities and its mission, Eurobank Equities' staff members or concerned third parties. The report may, indicatively and not exhaustively, refer to incidents of serious misconduct or serious violations of Eurobank's procedures, policies, guidelines or of the Code of Conduct and Ethics or anything that could damage the reputation of Eurobank Equities, as well as any attempt to cover up the above. It may also include violations of laws and regulations and various 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 Equities 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 Equities.

The channels for submitting such Reports are as follows:

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