

# **ČSOB** WHISTLE-BLOWING POLICY

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# 1. Introduction

This regulation is based on the KBC Group Whistleblower Protection Policy applicable to all members of the KBC Group - see *KBC GCR No.14 Policy for the Protection of Whistleblowers in the KBC Group* and regulates the rules for reporting suspected harmful conduct and the rules for the protection of persons, making such notification (hereinafter referred to as "whistleblower").

ČSOB creates and develops a corporate culture marked by honesty and openness, where any persons have the opportunity to report potential Breaches that may cause financial or reputational loss in the earliest possible stages without fear for any reprisals and they are assured that they will receive fair treatment and their concerns will be investigated properly.

ČSOB expects its employees and contractual partners defined in Personal Scope to follow the terms of their contracts in a loyal, co-operative manner and in a Good Faith. This general duty of care also encompasses the basic moral obligation to report any reasonable suspicion that these subjects might commit a Breach.

Whistleblowing is one of effective techniques used for prevention and detection that mobilizes the employees and contractual partners to communicate their suspicions and reasonable doubts to the management about malicious activities without fear and prejudice.

This Policy is also based on the requirements expressed in the latest European legislation (*2019/1937 EUD on protection of persons who report breaches of Union law*), Whistleblower Protection Act No 171/2023, international standards and principles of corporate governance.

## 1.1 Objectives

This Policy is aimed to provide a Framework for Whistleblowers to voice their concerns to Dedicated Unit about any suspicious on undesired events / activities, which are against the law, ČSOB rules or may have an adverse impact on the business or goodwill of ČSOB.

The intended objective of this Policy is that ČSOB becomes fully compliant with the latest EU legislation in this area.

## 1.2 Definitions

**Breach:** means act or omission – in work-related context - that violate duties imposed by law, regulations, professional standards, internal policies, rules and procedures of KBC Group or defeat their object or purpose.

**Whistle Blowing:** is a reporting (either internal or external) to a Dedicated Unit of ČSOB by any person to expose and/or inform on a Breach.

**Reporting person ('Whistleblower')**: is any person or legal entity, who reports the Breach to the Dedicated Unit of ČSOB.

**Competent person:** an individual who is of good character, of legal age, and of full legal capacity, and who is responsible for receiving, investigating, monitoring reports and other activities under section 11 of the Whistleblower Protection Act.

**Dedicated Unit:** is an independent unit within which a Competent Person is designated.

**Good Faith:** is sincere belief of the Whistleblower that content of the report on a Breach is true and made in the interest of KBC Group, without consideration of personal benefit and not based on personal grudges.

**Retaliation:** means any act of discrimination, revenge or harassment directly or indirectly taken against a Whistleblower, by any person, for reporting the Breach.

**Protection:** means all reasonable steps taken by ČSOB Group to ensure confidentiality of the Whistleblower's name as well as measures enforced to protect Whistleblowers from retaliation and financial losses.

**Work-related context:** information on breaches which relate to work and for which the Whistleblower could be subject to retaliation if he reports such information.

## 2. Scope

### 2.1. Personal Scope

This Policy applies to Whistleblowers who acquired information on Breaches in a work-related context.

This Policy also applies to Whistleblowers where information on Breaches acquired in a work-based relationship which has ended or persons whose work-based relationship is yet to begin in cases where information acquired during the recruitment process or other pre-contractual negotiations.

The measures for the protection of Whistleblowers also apply, where relevant, to:

- third persons who are connected with the Whistleblower and who could suffer retaliation in a work-related context, such as colleagues or relatives;
- legal entities that the Whistleblower owns, work for or are otherwise connected with in a work-related context.

### 2.2. Material Scope

This Policy lays down common **minimum standards for the protection of Whistleblowers** reporting Breaches of law or KBC Group's Policies, Rules or Procedures. Examples of such Breaches include, but are not limited to, fraud, money laundering, bribery and corruption, insider trading and other misconducts, immoral or unethical behavior or malicious practices, negligence of duty (especially matters that jeopardize the credibility and reputation of KBC Group as a trusted financial services provider).

### 2.3. Out of Scope

This Policy is not designed to question financial, or business decisions taken by KBC Group nor should it be used to reconsider any other matters which have already been addressed under other procedures, rules or regulations of ČSOB Group.

## 3. Principles

### Basic principles

Notifiers who suspect that fraud, serious misconduct or other harmful conduct has occurred or is likely to occur have the opportunity to report their suspicions without fear of any negative consequences.

However, protection cannot be granted to persons who have not acted in good faith, i.e. they have made a fictitious notification only with the intention of harming the persons against whom the notification is directed.

All reported suspicions of fraud, serious misconduct or other harmful conduct will be assessed fairly, objectively, in strict confidence and will be thoroughly and fairly investigated within a reasonable time.

### Principle 1: Protection of Whistleblowers

Whistleblowers will qualify for protection under this Policy provided that:

- they had reasonable grounds to believe that the information on Breaches reported was true at the time of reporting and that such information fell within the scope of this Policy and
- they reported either internally or externally in accordance with this Policy

## Principle 2: Protective Measures

Any form of retaliation against Whistleblowers is prohibited particularly in the form of:

- suspension, demotion or withholding of promotion and withholding of training;
- negative performance assessment or employment reference;
- imposition or administering of any disciplinary measure, reprimand or other penalty;
- coercion, intimidation, harassment discrimination or unfair treatment;
- failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment;
- failure to renew, or early termination of, a temporary employment contract;
- harm, including to the person's reputation (particularly in social media) or financial loss, including loss of business and loss of income;
- blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may cause that the person will not find employment in the sector or industry;
- early termination or cancellation of a contract for goods or services.

The whistleblower has the right to be informed of the progress of the investigation, if this does not interfere with the investigation or prejudice the rights of other persons. However, he shall not have the right to obtain a copy of the material relating to the investigation, the findings and measures taken.

The appropriate consequences will be drawn (e.g. disciplinary action, civil or criminal complaint) according to the internal procedures towards any natural or legal persons that:

- hinder or attempt to hinder reporting;
- retaliate against Whistleblowers;
- bring vexatious proceedings against Whistleblowers;
- breach the duty of maintaining the confidentiality of the identity of Whistleblowers.

Consequences will also be drawn against Whistleblowers who knowingly reported false information and measures will be established for compensating damage resulting from such reporting in accordance with internal procedures.

## Principle 4: Reporting Channels and Procedure

Information on Breaches can be reported through various reporting channels (either internal or external) according to the procedures provided in this Policy.

### Internal notification options:

Internal notification options are set out in the CSOB internal policy.

### External notification options:

- The Whistleblowing Notification form for external notification is located on the ČSOB website [www.csob.cz](http://www.csob.cz) in the section [ČSOB Policies / Whistleblowing – Case notification form](#)  
The recipient of the notifications from this form are the **Competent persons** from the Compliance unit.
- Telephone and face-to-face meetings are also possible, in these matters the whistleblower should contact the Competent Persons via their email addresses listed below.
- You can also file a report through the Ministry of Justice.
- The notification can also be made anonymously.

### The procedures for reporting Breaches include at least:

- Acknowledgment of receipt of the report is send to the Whistleblower within 7 days of that receipt.
- Competent persons communicate with the Whistleblower and, if necessary, ask for further

information from and provide feedback to Whistleblower.

- A timeframe to provide feedback should not exceed 30 days from the acknowledgement of receipt. For complex cases, the time limit may be extended by up to 30 days, but not more than twice.

Oral reporting is possible by telephone or through other voice messaging systems, and, upon request by the Whistleblower, through a physical meeting with dedicated person.

## **Principle 5: Confidentiality, Personal Data Protection and Records Keeping of the Reports**

### **Confidentiality**

The identity of the Whistleblower cannot be disclosed to anyone beyond the authorized staff members competent to receive or handle the reports, without the explicit consent of that person. This also applies to any other information from which the identity of the Whistleblower can be deduced.

The identity of the Whistleblower and any other information referred to such a person may be disclosed only where this is a necessary and proportionate obligation imposed by law in the context of investigations by national authorities, including with a view to safeguarding the rights of the Person concerned.

### **Personal Data Protection**

Any processing of personal data carried out pursuant to this Policy, including the exchange or transmission of personal data, will be carried out in accordance with EU and national law and KBC Group Policies. Personal data which are manifestly not relevant for the handling of a specific report will not be collected or, if accidentally collected, shall be deleted without undue delay.

### **Records Keeping of the Reports**

ČSOB keeps records of every report received, in compliance with the confidentiality requirements. Reports will be stored for no longer than it is necessary and proportionate in order to comply with the requirements imposed by this Policy or by law.

Where a recorded telephone line or another recorded voice messaging system is used for reporting, ČSOB has the right to document the oral reporting.

Where a person requests a meeting with the Competent persons for reporting purposes, ČSOB ensures, with the consent of the Whistleblower, that complete and accurate records of the meeting are kept and have the right to document the meeting.

## **Principle 6: Designated Units and Persons**

### **Compliance (as a Central Point)**

Due to its independency, Compliance Unit is a central point where all whistleblowing reports and cases are received, monitored and stored.

Notifications shall be received only by the designated **Competent persons**, who are:

- Jiří Feix, e-mail: [jfeix@csob.cz](mailto:jfeix@csob.cz)
- Jaroslav Veselý, e-mail: [jvesely@csob.cz](mailto:jvesely@csob.cz)

### **Investigation Unit**

Whistleblowing notifications are only investigated by the Competent persons in the **Compliance Unit - Ethics & Fraud Prevention team**.

Competent person of this unit may contact the notifier in order to obtain additional information on the case under investigation. During the investigation, the rights of the notifiers set out in this Guideline must be respected in all circumstances, in particular the identity of the notifier must be kept secret.