



Reporting channel

12 of December, 2025

Disclaimer

This document is updated annually or, if deemed necessary, whenever there is a need or requirement to do so. This document shall be updated in respect of changes within business requirements or other regulatory changes, changes in the market where the company operates, and internal changes within the company. Any changes to this document are subject to approval by the Board of Directors.

INFORMATION CLASSIFICATION
PUBLIC

IDENTIFICATION

Document type	Policy				
Version	Date	Issued by	Reviewed by	Approved by	Revision comments
PSA.0033.01_EN	2022.02.02	Eduardo Cruz (RCC)	Renato Cardoso (CCID)	Renato Oliveira (CEO) João L. Pinto (Board Member)	First version
PSA.0033.02_EN	2023.07.31	Eduardo Cruz (RCC)	Renato Cardoso (CCID) Helena Castro (HR)	Renato Oliveira (CEO) João L. Pinto (Board Member)	Revision after PWC GAP analysis.
PSA.0033.03_EN	2025.12.12	Ana Carvalho (RCSC)	Renato Cardoso (CCID) Helena Castro (HR) Carlos Fernandes (ISM)	Renato Oliveira (CEO) João L. Pinto (Board Member)	DPO/CCID conflict of interest. ISM ensures that ombudsman email is active.



Name: Renato Oliveira

Title: CEO



Name: João Lima Pinto

Title: Board Member

PSA.0033.03en

Table of Contents

Disclaimer.....	2
INFORMATION CLASSIFICATION	3
IDENTIFICATION	3
INTRODUCTION.....	5
DEFINITIONS AND APPLICABLE PROVISIONS	5
MEANS OF REPORT	8
REPORTING CHANNEL.....	9
FOLLOW-UP OF INTERNAL REPORTS	9
EXTERNAL REPORT.....	11
TRAINING	11
ANNUAL REVIEW	11
REPORTING WORKFLOW	12

INTRODUCTION

ebankIT is guided by ethical and transparency principles and the existence of a whistleblower channel increases the ability to detect potential fraud situations that may occur.

To avoid unwanted recurring behavior in its universe of influence, it was created a whistleblower channel to allow all interested parties to freely and anonymously, if they wish, register behaviors that violate legislation, the culture where we are included, the ebankIT Code of Ethics and Business Conduct, Money Laundering Policy, Privacy of Personal Data, among other subscribed and applicable principles.

ebankIT is subject to EU and Portuguese laws, including Law n.º 109-E/2019 from 9th December which establishes the general regime for the prevention of corruption, which refers, in Chapter I, Section I, Article 5, the existence of a whistleblower channel, and Law n.º 93/2021 from 20th December which establishes general regime for the protection of whistleblowers of infractions.

With this channel, ebankIT intends to eliminate illegal and inappropriate behavior that causes a negative environment for the achievement of its objectives, risks to its reputation, fines, and to ensure another control mechanism for its policies and procedures.

This channel considers the following documents:

- Code of Ethics and Business Conduct;
- Anti-Corruption and Conflict of Interest Policy;
- Reporting Channel Privacy Notice;
- AML Policy;
- Prevention Plan for Risks of Corruption and Related Infractions;
- Third Parties Management Policies;
- No Conflict of Interest Form;
- Commitment Term.

DEFINITIONS AND APPLICABLE PROVISIONS

Whistleblower

A natural person who denounces or publicly discloses an infringement based on information obtained in the context of his professional activity, regardless of the nature of this activity and the sector in which it is carried out.

The following are considered whistleblowers:

- a) Workers in the private, social, or public sector;

- b) Service providers, contractors, subcontractors, and suppliers, as well as any person acting under their supervision and direction;
- c) Holders of shareholdings and persons belonging to administrative or management bodies or tax bodies, or supervisory bodies, including non-executive members;
- d) Volunteers and trainees, paid or unpaid;
- e) Natural persons whose fact that the complaint or public disclosure of an offense is based on information obtained in a professional relationship that has ended, as well as during the recruitment process or during another phase of pre-contractual negotiation of a professional relationship established or not constituted.

Confidentiality

The identity of the whistleblower, as well as the information that, directly or indirectly, allow the possibility to deduce his identity, are confidential in nature and are of restricted access to the persons responsible for receiving or following up on whistleblowing.

The obligation of confidentiality extends to anyone who has received information about complaints, even if they are not responsible nor competent for their reception and treatment.

The identity of the whistleblower is only disclosed as a result of legal obligation or court decision.

Without prejudice to the provisions of other legal requirements, the disclosure of information is preceded by a written communication to the whistleblower, indicating the reasons for the disclosure of the confidential data in question, unless the disclosure of this information jeopardizes the investigations or related legal proceedings.

Data protection

The processing of personal data under the Law n.º 58/2019, of 8th August, including the exchange or portability of personal data by the competent authorities, complies with the provisions of the General Data Protection Regulation, approved by Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27th April 2016. This Law ensures the implementation, in the national legal system of the EU Regulations and Laws previously mentioned, which approves the rules on the processing of personal data for the purposes of prevention, detection, investigation or prosecution of criminal offenses or the execution of criminal sanctions.

Personal data that are clearly not relevant to the handling of the complaint of whistleblower, are not kept and must be immediately deleted.

Retention of the complaints

ebankIT keeps a record of the complaints received and keeps them for at least 5 years and, regardless of that period, during the pendency of judicial or administrative proceedings related to the complaint.

If the complaint is presented in a face-to-face meeting, ebankIT ensures, after obtaining the consent of the whistleblower, the recording of the meeting by means of: a) Recording the communication on a durable and retrievable medium; or b) Trustworthy minutes.

In the case of complaints submitted orally, ebankIT allows the complainant to see, rectify and approve the transcript or minutes of the communication or meeting, signing it.

Prohibition of retaliation

Retaliation against the whistleblower is prohibited.

An act of retaliation is the act or omission that, directly or indirectly, occurring in a professional context and motivated by an internal or external complaint or public disclosure, causes, or may cause the whistleblower, in an unjustified way, property or non-property damage.

The following acts are presumed to be motivated by internal or external complaining or public disclosure, until proven otherwise, when practiced within two years after the complaining or public disclosure:

- a) Changes in working conditions, such as functions, hours, place of work or remuneration, non-promotion of the worker or non-compliance with work duties;
- b) Suspension of employment contract;
- c) Negative performance evaluation or negative reference for employment purposes;
- d) Non-conversion of a fixed-term employment contract into an open-ended contract, whenever the worker had legitimate expectations in this conversion;
- e) Non-renewal of a fixed-term employment contract;
- f) Dismissal;
- g) Inclusion on a list, on the basis of sector-wide agreement, which may lead to the impossibility of that, in the future, the whistleblower will find employment in the sector or industry in question;
- h) Termination of a supply or service provision contract.

Legal support

Whistleblowers are entitled, in general terms, to legal protection. Whistleblowers may benefit, in general terms, from measures for the protection of witnesses in criminal proceedings.

Whistleblowers accountability

The complaint or public disclosure of an infraction, made in accordance with the requirements imposed by the law, does not, in itself, constitute grounds for disciplinary, civil, administrative, or criminal liability of the whistleblower.

Without prejudice to the safeguarded secrecy regimes, the whistleblower who publicly denounces or discloses an infringement in accordance with the requirements imposed by the law is not liable for the violation of any restrictions on the communication or disclosure of information contained in the denunciation or public disclosure.

A whistleblower who publicly complains or discloses an infringement in accordance with the requirements imposed by the law is not responsible for obtaining or accessing the

information that motivates the complaint or public disclosure, except in cases where obtaining or accessing the information constitutes a crime.

The provisions of the previous numbers do not affect the eventual liability of the whistleblowers for acts or omissions unrelated to the complaint or public disclosure, or which are not necessary for the denunciation or public disclosure of an infraction under the terms of the law.

Protection of the reported person

The regime provided in this legislation does not prejudice any procedural rights or guarantees recognized, in general terms, to persons who, in the complaining or public disclosure, are referred to as perpetrators of the infraction or who are associated with it, namely the presumption of innocence and the guarantees of defense of the criminal process.

Regarding the confidentiality of the whistleblower's identity, it is also applicable to the identity of the persons referred to in the previous paragraph.

The natural person who assists the whistleblower is jointly and respectively liable with the whistleblower for damages caused by the whistleblowing or public disclosure made in violation of the requirements imposed by this legislation.

MEANS OF REPORT

ebankIT guarantees full anonymity of the whistleblower if he does not identify himself at the time of the report.

Whistleblower complaints are filed by the whistleblower through internal or external reporting channels or publicly disclosed.

The privileged internal reporting channel is carried out in <https://www.ebankit.com/reporting-channel> in written form or in person with a request for a meeting but with the need to register in the internal reporting channel.

The whistleblower can only proceed with an external report when:

- a) There is no internal reporting channel;
- b) The internal reporting channel only admits the submission of complaints by workers, not being the whistleblower;
- c) Has reasonable grounds to believe that the infringement cannot be effectively known or resolved internally or that there is a risk of retaliation;
- d) Has initially lodged an internal report without having been informed of the measures planned or adopted following the complaint for up to 3 months; or,
- e) The offense constitutes a crime or misdemeanor punishable by a fine of more than €50,000.

A whistleblower may only publicly disclose an infringement when:

- a) It has reasonable grounds to believe that the infringement may constitute an imminent or manifest danger to the public interest, that the infringement cannot be effectively known or resolved by the competent authorities, given the specific circumstances of the case, or that there is a risk of retaliation even in the event of an external report; or
- b) It has filed an internal report and an external report, or directly an external report under the terms provided for in the law, without adequate measures having been taken within the prescribed periods of up to 3 months or 6 months when the complexity of the complaint justifies it.

REPORTING CHANNEL

The internal reporting channel <https://www.ebankit.com/reporting-channel> allows the secure submission and follow-up of complaints, in order to guarantee the completeness, integrity and preservation of the complaint, the confidentiality of the identity or anonymity of the complaints and the confidentiality of the identity of third parties mentioned in the complaint, and to prevent access by non-authorized persons. To ensure anonymity, the record should note have personal identifiable information.

The description of the complaint is free, but in order to better identify the circumstances, the complaint must document the date of the occurrence, the period in which it occurred, the place, as well as other information that will help to clarify the situation.

The internal reporting channel is operated internally, for the purpose of receiving and following up on complaints, by a non-executive Board Member and involved Area Directors who ensure independence, impartiality, confidentiality, data protection, secrecy, and the absence of conflicts of interest in the performance of duties.

Area Directors must periodically promote that any suspicious activity is reported in a timely manner and emphasize the anonymity of the whistleblowers and the lack of retaliations for them.

Whenever there is a situation of conflict of interest / impossibility of guaranteeing independence in the decision, these facts must be communicated to the Ombudsman (a person appointed to manage the investigation of individuals' complaints), in order to guarantee the due independence of all the process.

FOLLOW-UP OF INTERNAL REPORTS

The complaint through the reporting channel <https://www.ebankit.com/reporting-channel> will be registered on ombudsman@ebankit.com. This channel ensures

confidentiality, anonymity of whistleblowers, as well as the identity of third parties mentioned in the whistleblower. Information security is maintained through access control, housed in an internal domain, considering the segregation of tasks, as well as the possibility of auditing the logs of tasks performed.

Following the complaint, ebanksIT initiates appropriate internal measures to verify the allegations and, where applicable, to put an end to the complained violation, including by opening an internal investigation or communicating the competent authority to investigate the violation, including national institutions bodies, or bodies of the European Union.

Preliminary analysis

Within 7 days, ebanksIT notifies the whistleblower of the receipt of the complaint and informs, in a clear and accessible way, of the requirements, competent authorities and form and admissibility of the external complaint, pursuant to paragraph 2 of Articles 7, 12 and 14 of Law n.º 93/2021 of 20th December.

The contents of the registration made in <https://www.ebankit.com/reporting-channel> is only accessible by the non-executive Board Member appointed as Ombudsman. Based on the type of complaint, the appropriate Director to assist in the investigation of the complaint will be identified.

For redundancy and maintenance of the channel where the complaints are recorded, Information Security Manager will receive a notification of the incoming complaint and support the non-executive Board Member, if needed.

If there is no legal, contractual, or regulatory non-compliance with established internal policies and procedures or rationale, the non-executive Board Member closes the record with a response to the whistleblower if it has identified itself.

Investigation

The appointed Director to carry out the investigation must, from the beginning, be aware of the framework of this procedure to ensure confidentiality, secrecy, and the least possible impact on the normal functioning of ebanksIT.

The Director must listen to the parties involved, seek support with entities with the competence to analyze, appreciate and conclude on the legality of the matter. When doubts persist, the Director should consult the legal department for legislative framework purposes.

Communication of measures taken following the complaint

Once the investigation is completed, the conclusion of the investigation and the measures taken to resolve the complained situation and minimize its recurrence must be documented in the application.

The whistleblower can request, at any time, that ebanksIT communicates the result of the analysis carried out on the complaint within 15 days after the respective conclusion.

ebankIT communicates to the whistleblower the measures planned or adopted to follow up on the complaint and the respective grounds, within a maximum period of three months from the date of receipt of the complaint.

EXTERNAL REPORT

External complaints are submitted to the authorities that, in accordance with their attributions and powers, should or may be aware of the matter at issue in the complaint, including:

- a) Public Prosecutor's Office
- b) Criminal police bodies;
- c) The National Central Bank of Portugal;
- d) Independent administrative authorities;
- e) Public institutes;
- f) General inspections and similar entities and other central administration services directly from the State endowed with administrative autonomy;
- g) Local authorities; and
- h) Public associations.

In cases where there is no competent authority to hear the complaint or in cases where the complaint is directed at a competent authority, it must be addressed to the National Anti-Corruption Mechanism and, if this is the authority concerned, to the Public Prosecutor's Office, which follows up, namely through the opening of an investigation whenever the facts described in the complaint constitute a crime.

TRAINING

To ensure awareness of the reporting channel and its operation, internal sharing sessions are held to promote awareness of the obligations of this procedure.

In the case of new employees, ebankIT, in its onboarding process, ensures adequate training on policies, procedures and controls defined internally.

ANNUAL REVIEW

Annually, the Risk & Compliance Senior Consultant concludes on management review report about:

- a) The number of external complaints received;
- b) The number of proceedings initiated on the basis of those records and their outcome;
- c) The nature and type of the complaint violations;

d) Whatever else is deemed relevant to improve the mechanisms for submitting and following up on complaints, for the protection of whistleblowers, related persons and targeted persons, and sanctioning actions.

REPORTING WORKFLOW

