# WHISTLEBLOWING

In order to encourage and facilitate the reporting of offences and, in so doing, reduce the risk of irregularities, the Banco BPM Group has adopted a set of corporate policies governing its internal whistleblowing system, as required by the most recent legislative and supervisory regulations to which it is subject.

The Banco BPM Group's Whistleblowing system offers **protection from harmful consequences** to anyone intending to report violations of national or EU regulatory provisions that harm the public interest or the integrity of the public management or a private entity, of which they become aware in a work context, while **ensuring** the **confidentiality and protection of the personal data** of the whistleblower, the reported person and all persons involved.

## What to report

A report may concern conduct that:

- breaches the provisions of national law (civil, administrative, criminal and accounting offences) and European law pursuant to Art. 2 of Italian Legislative Decree 24/2023, harming the public interest or the integrity of the company;
- breaches or evades EU restrictive measures pursuant to Italian Legislative Decree 211/2025;
- relates to (i) potential liability arising from criminal offences, including the commission of – or reasonable belief that offences have been committed – the crimes and offences to which Legislative Decree 231/01 applies for the benefit of the company, (ii) cases of breach of trust or fraud committed to the detriment of BANCO BPM or Group companies, or customers; or, in any event, (iii) situations liable to result in a possible complaint, legal action or report being lodged with the judicial authorities or the police;
- has resulted in non-compliance with mandatory (national or supranational laws or regulations) or self-regulation rules (Articles of Association; Code of Ethics; Organisation, Management and Control Regulations pursuant to Italian Legislative Decree 231/01; rules of conduct and, in general, other internal regulations);
- entails acts or omissions that harm the financial interests of the Union or that concern the internal market and acts or conduct that undermine the object or purpose of the provisions referred to in the Union acts;
- involves the bringing of disciplinary proceedings, provided for by labour legislation or by applicable collective agreements;
- is likely to cause financial loss or trigger a reputational risk to BANCO BPM or to the Group companies.

### Internal reporting channel

The internal reporting channel envisages the preferential use of the EQS Integrity Line platform, which can also guarantee complete anonymity of whistleblowers and can also be accessed by non-employees, at the address:

https://bancobpm.integrityline.io

Through the platform, it is possible to request a direct meeting or to be contacted by telephone.

Alternatively, it is possible to submit paper reports. In this case, to ensure confidentiality, reports must be placed in two closed envelopes: the first with the identifying data of the whistleblower together with a photocopy of his/her identification document; the second with the report, in order to separate the identifying data of the whistleblower from the report. Both must then be included in a closed third envelope that bears the wording "confidential" on the outside in addition to the address[1] and indicates that it contains a whistleblowing report[2];

The postal address of the Supervisory Bodies pursuant to Italian Legislative Decree 231/01 is stated in the 'Regulations

on the Organisation, Management and Control Model' of each company, available on the company's official website.

Should the whistleblower consider that the SISV Manager (identified as the Head of the Audit Function): (i) is hierarchically or functionally subordinate to the person against whom the report is made; (ii) is themselves the alleged perpetrator of the breach; (iii) has, or is deemed to have, a potential interest in the report such as to compromise their impartiality and independence of judgement, they may submit their report on a paper form sent by ordinary or internal post to the Deputy (Head of the Compliance Function) or to the Company's Board of Statutory Auditors in the event that one or more members of the Board of Directors are involved. In such cases, it is also possible to submit a report via ANAC's external channel (for details of how to use ANAC's external channel, please see the website https://www.anticorruzione.it/-/whistleblowing).

### Methods for managing reports to the internal channel

- notification to the whistleblower that the report has been received within 7 days;
- discussions with the whistleblower;
- investigation necessary to follow up on the report, including through hearings and document acquisition;

[1] The postal address to which reports should be sent regarding reasonable grounds to believe that offences or unlawful acts subject to Italian Legislative Decree 231/01 have been committed is indicated in the 'Regulations on the Organisation, Management and Control Model' of each company (in the chapter on the Supervisory Body) and is monitored exclusively by the body's support unit, in accordance with the provisions of the law.

[2] The note on the envelope stating that it is a whistleblowing report indicates that the whistleblower wishes to keep their identity confidential and to avail themselves of the protections provided for under Italian Legislative Decree no. 24 of 10 March 2023. Without this clear indication, the report could be treated as an ordinary report.

- a response, which may be merely provisional, to the whistleblower within 3 months of the acknowledgement of receipt or, in the absence of such an acknowledgement, within 7 days of receipt;
- communication to the whistleblower of the final outcome of the report.

### Protection of the confidentiality of whistleblowers

- The whistleblower's identity may not be disclosed to persons other than those competent to receive or follow up on the reports;
- This protection applies not only to the whistleblower's name but also to all elements of the report from which the whistleblower's identity might be deduced, even indirectly;
- confidentiality is extended to the identities of the persons involved and those mentioned in the report until the conclusion of the proceedings initiated as a result of the report, in accordance with the same safeguards envisaged for the whistleblower.

### Compliance with personal data protection legislation

The personal data relating to the receipt and handling of reports is processed in accordance with European and national data protection principles, by providing appropriate information to the whistleblowers and those involved in the reports, and by taking appropriate measures to safeguard the rights and freedoms of the data subjects.

Reports and related documentation are retained for the time necessary to process the report and in any case for no more than 5 years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations pursuant to European and national legislation on the protection of personal data.

### Reporting of reports forwarded to the internal channel

The Internal Whistleblowing System (SISV) of the Banco BPM Group requires publication of an annual 'SISV Report', the document for reporting violations. This report is available on the company intranet and is accessible to all personnel. This information is also contained in the Sustainability Report.

### Other reporting channels

To make the reports pursuant to Italian Legislative Decree no. 24 of 10 March 2023, it is also possible to use the following channels:

- external (managed by ANAC)[3];

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[3] For the methods and conditions of use of ANAC's external channel, see the website https://www.anticorruzione.it/-/whistleblowing.

[4] For details of the protection measures guaranteed by this method of communication, please see Art. 15 of Italian Legislative Decree no. 24 of 10 March 2023.

- public disclosure (through the press, electronic means or means of dissemination capable of reaching a large number of people);[4]
- report to the judicial or accounting authorities.

### Retaliation following a report

Management of notifications of retaliation (understood as *any behaviour, act or omission, even if only attempted or threatened, carried out in response to a report, complaint to the judicial or accounting authorities or public disclosure and which causes, or may cause, unjust (or unjustified) damage to the whistleblower or to the person who filed the complaint, directly or indirectly)* is entrusted exclusively to ANAC, which may rely, for matters within their remit, on the cooperation of the Public Service Inspectorate and the National Labour Inspectorate.

The report, public disclosure or complaint must be closely linked to the adverse conduct, act or omission suffered, either directly or indirectly, by the whistleblower, the person against whom the complaint is made or the person making the public disclosure, in order for it to constitute retaliation and, consequently, for that person to be entitled to protection.

The Italian National Anti-Corruption Authority (ANAC) has established a list of Third Sector Entities[5] that provide whistleblowers with support measures consisting in information, assistance and consultancy free of charge:

- on reporting methods;
- on protection from retaliation;
- on the rights of the person involved;
- on the methods and conditions of access to legal aid.

5 The Register is available from the ANAC website at the following link https://www.anticorruzione.it/-/whistleblowing.