

## WHISTLEBLOWING CHANNEL

Considering the legal obligations in this matter, the legitimate interest of the Bank, as well as the fact that the National Bank of Romania encourages the staff of the credit institutions to resort to the internal whistleblowing procedures within them for reporting violations, GARANTI BANK S.A. has implemented Whistleblowing Channels, and the resolution of the complaints received through these channels is carried out by the designated staff of the Corporate Compliance Department - Compliance Division.

Taking into account the requirements of the legislation in force, GARANTI BANK S.A. has organized itself in such a way that reporting can be done by the following means: in writing, on paper or in electronic format, by communication on the telephone lines or, at the request of the reporting party, by a face-to-face meeting at the Bank's head office in Sos. Fabrica de Glucoza nr. 5, Novo Park 3 Business Center Novo Park 3, Cladirea F, Etajele 5, 6, Sector 2, Bucuresti.

The paper report shall be sent to Garanti Bank SA, at the bank's head office registry, to the attention of the Compliance Division - Corporate Compliance Department, with the mention on the envelope that it is "**CONFIDENTIAL**", which implies that the envelope will be opened only by the employees of the Corporate Compliance Department responsible for handling reports received through the Whistleblowing Channel. Postal address: Sos. Fabrica de Glucoza nr. 5, Novo Park 3 Business Center, Cladirea F, Etajele 5, 6, Sector 2, Bucuresti, 020331.

Reporting the incident through the Whistleblowing Channel of Garanti Bank S.A. you can do it by email on [whistleblowingchannel@garantibbva.ro](mailto:whistleblowingchannel@garantibbva.ro) or by telephone on +4 021 409 2021.

If you consider, for whatever reason, that it is not appropriate or opportune to use this channel, or if you are unsure whether it is the most suitable way to resolve the situation,

Report the incident through the T. Garanti Bankasi Whistleblowing Channel by email on [etikbildirim@garantibbva.com.tr](mailto:etikbildirim@garantibbva.com.tr) or by telephone on +90 216 662 5156 or

Report the incident through the BBVA Whistleblowing Channel, through the link: [BBVA Whistleblowing Channel](#).

At your request, reporting can be done at the bank's head office, through a face-to-face meeting with the designated individuals in charge of managing the specific Whistleblowing Channel of Garanti Bank S.A. and who are part of the Corporate Compliance Department - Compliance Division.

The Whistleblowing Channel provided by Garanti Bank S.A. complies with the regulations and standards applicable in Romania, BBVA Group Whistleblowing Channel Policy, Garanti Bank SA Whistleblowing Channel Policy and internal procedures, the measures to ensure confidentiality and security of information in accordance with internal regulations and the regulatory framework applicable in Romania and it allows anonymity.

The Whistleblowing Channels provided by the T. Garanti Bankasi (Compliance Unit) and Compliance Holding BBVA, namely [etikbildirim@garantibbva.com.tr](mailto:etikbildirim@garantibbva.com.tr) or telephone +90 216 662 5156 and/or by the link: [BBVA Whistleblowing Channel](#) comply with the regulations and standards applicable in Turkey and Spain respectively, regarding measures to ensure the confidentiality and security of information.

Taking into account the legal provisions on the processing of personal data and in order to protect the fundamental rights and freedoms of data subjects, the principle of data minimization will be taken into account when making reports through Whistleblowing Channels.

Therefore, the personal data reported, processed within the Whistleblowing flow will not be excessive, respecting the principle of data minimisation.

As far as possible, limit the reported data to that which you consider strictly necessary in relation to the subject matter of the report and in order to document the allegations made (e.g. the religious denomination, health status, ethnicity, etc. of the person concerned by the report may be irrelevant). Therefore, in the context of using this channel, avoid processing sensitive personal data, if you consider that it is not relevant to the reported case.

In order to respect the same principle of minimizing the processing of personal data within the Whistleblowing flow, consider the possibility of sending various complaints that are not subject to the Whistleblowing Channel through the methods specified on the Garanti Bank SA website, in the contact Section: Useful links / Contact: <https://www.garantibbva.ro/en/about-us/contact/> .

Garanti Bank S.A. ensures the protection of whistleblowers, so that individuals who report facts or actions in good faith through the Whistleblowing Channel will not suffer retaliation or other adverse consequences for submitting the report, will not be held liable or criticized as a result of a negative solution.

The Bank respects the rights of the reported individuals, namely: the presumption of innocence, the right to honor, defense, the right to be heard, as well as the right to information at the time and in the manner considered appropriate to avoid the destruction, concealment or alteration of evidence and to ensure the proper conduct of the investigation. Under no circumstances the identity of the whistleblower will be communicated without his or her prior consent.

To the extent that you consider the related regulations of the Whistleblowing Channel to be applicable, use this channel whenever you consider it necessary and appropriate, according to your own judgement.