POLICY ON REPORTING IRREGULARITIES

June 2026

ATLANTICO EUROPA

TABLE OF CONTENTS

1. Purpose 3
2. Background 3
3. General Principles 3
4. Specific Scope of Application 4
5. Method of communication 4
6. Legal Duty to Communicate 5
7. Handling of the report 5
8. Communication with the Whistleblower 7
9. Investigation process 7
10. Reports of Harassment 7
11. Confidentiality and non-discriminatory treatment 8
12. Recording and archiving of reports 8
13. Dissemination and monitoring 9
14. Annual Report 9
15. Clarifications 9
16. Review of the Policy 9
17. Entry into force 10
Annex I 11

1. Purpose

This Policy governs and regulates the reporting by any interested parties – whether employees, customers, suppliers, partners or any other entities or individuals associated with Banco Atlântico Europa, S.A. (Atlântico Europa) or its branches – of alleged irregularities within this Group.

For the purposes of this Policy, 'irregularities' are defined as any situations detected by any interested party, of which they are aware or have reasonable grounds to suspect, involving non-compliance with Atlântico Europa's Code of Conduct and Ethics and Anti-Corruption and Anti-Bribery Policy, as well as any alleged breach of legal, regulatory and/or statutory provisions, professional ethics or standards of professional conduct, or to rules contained in any internal documents or regulations, recommendations, guidelines or directives applicable to Atlântico Europa. For the sake of clarity, provided they relate to the management of the institution and its internal oversight, any situations relating in particular to the matters identified in Annex I are deemed to be covered.

Complaints excluded from the scope of this Policy are all situations not covered by the preceding paragraphs of this article, in particular those relating to customer service and dealing with the general public.

2. Framework

This Policy has been drawn up in accordance with the legal provisions applicable to the reporting of irregularities, namely:

a) The General Regime for Credit Institutions and Financial Companies ("RGICSF"), in particular Article 115-X thereof;

b) The *European Banking Authority's* Guidelines on Internal Governance: EBA/GL/2017/11 and EBA/GL/2021/05;

c) Notice No. 3/2020 of the Bank of Portugal ("Notice 3/2020"), in its consolidated version, in particular Article 35 thereof and any other relevant provisions on the matter;

d) Law No. 83/2017 of 18 August, in particular Article 20 thereof;

e) Law No. 93/2021 of 20 December, establishing the General Whistleblower Protection Scheme.

3. General Principles

Atlântico Europa maintains a culture of accountability and *compliance*, recognising the importance of an appropriate framework for reporting and handling irregularities as a tool for good corporate practice.

Atlântico Europa implements appropriate measures for the receipt, handling and archiving of reports of irregularities allegedly committed by members of its governing bodies and by Atlântico Europa's employees.

4. Specific Scope of Application

This Policy sets out the rules applicable to the mechanisms and procedures for receiving, retaining and handling reports of irregularities covered by point 1 above.

Reports submitted that fall outside the scope of the matters covered will not be processed.

5. Method of reporting

This Policy is based on a voluntary reporting scheme for irregularities, whereby the system for receiving, processing and handling reports of irregularities operates through communication channels dedicated to this purpose and directed at Atlântico Europa, namely:

i) A specific reporting channel for reporting irregularities, available on the Atlântico Europa website (via an external platform): https://atlanticoeuropa.form.maistransparente.com/;

ii) Email address: whistleblowing@atlantico.eu;

iii) A post office box at the following address: Banco Atlântico Europa, PO Box 3820, EC Santa Marta, 1250-143 Lisbon; or

iv) In person, in which case a meeting must be arranged via the email address listed above.

The report should preferably include the reporter's identity and email address. However, the reporter may choose to report irregularities anonymously; such reports will be received and handled in the same manner, in accordance with point 7 of this Policy. This form of anonymity is specifically ensured through the use of the dedicated reporting channel at , which utilises technology designed for this purpose. This channel also prevents access by unauthorised persons or staff.

Atlântico Europa reserves the right to refuse to process reports submitted anonymously whose content falls outside the scope of the matters covered by this Policy or which do not contain a description of the facts supporting the alleged irregularity, selecting only those that provide sufficient grounds for an investigation and that relate to the subject matter of the Policy, whilst excluding irrelevant reports.

In accordance with the general provisions of the law, the misuse or bad-faith use of the whistleblowing mechanism may expose the perpetrator to disciplinary sanctions and/or legal proceedings.

6. Legal Duty to Report

Employees who, by virtue of the duties they perform at the Bank, particularly in the areas of Internal Audit, Risk Management or Compliance, are under a duty to report to the Supervisory Board any serious irregularities of which they become aware and which relate to the Bank's management, accounting organisation and internal control, or which constitute evidence of a breach of the duties set out in the General Regime for Credit Institutions and Financial Companies or in Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June, which are likely to place Atlântico Europa in a situation of financial instability.

The duty to report covers, in particular, the following situations, even if they are not likely to place Atlântico Europa in a situation of financial instability:

a) Risk of breaching prudential rules and limits, in particular the minimum capital adequacy levels;
b) An abnormal decrease in deposit balances;
c) A materially significant impairment of the Bank's assets or materially significant losses on other commitments of the credit institution, even if not immediately recognised in the financial statements;
d) Risk that the Bank will be unable to provide liquid funds to meet its obligations as they fall due;
e) Financing difficulties in meeting its net liquidity requirements;
f) The existence of materially significant contingencies of a tax or reputational nature, or resulting from the imposition of measures or sanctions by administrative or judicial authorities, in Portugal or abroad.

7. Handling of the report

The receipt of a report will always give rise to an investigation, unless it is manifestly unfounded.

Reports submitted via the channels mentioned in point 5 *above* are first analysed internally by the Directors of the Internal Audit and Security departments ('investigation team').

This team shall jointly:

a) Determine whether the report of an irregularity contains the minimum grounds to trigger

an investigation. Should they decide not to proceed with such an investigation, this decision must be approved by the Chairman of the Executive Committee, or by the Supervisory Board if the reported irregularity concerns the latter. This decision must be filed alongside the case file.

b) Forward the case to the team responsible for handling reports of irregularities ("handling team").

c) Suggest the involvement of other departments whose interests are related to the investigation or which may contribute to it.

The handling team comprises the Head of the Compliance Department and the General Compliance Unit Coordinator within the Compliance Department. Whenever this team deems it appropriate for the handling of the report of an irregularity, the involvement of other departments is requested; the involvement of entities external to the Bank may also be sought.

The handling team forwards the contents of the report to the immediate superiors of the individuals named in the report (provided that this does not undermine the purposes of the whistleblowing procedure) and, where appropriate, to the relevant supervisory authority.

Furthermore, should the complainant so request in their report, the information contained therein must be forwarded anonymously by the handling team to all parties within the Bank involved in the proceedings relating to the report.

In accordance with the terms set out in this Policy, reports of irregularities are treated as confidential information, in particular by the departments involved in the investigation process and by the support staff responsible for the operational management of the mechanisms and procedures for receiving, retaining and handling reports of irregularities.

The handling team shall ensure the implementation of appropriate measures to protect the information and data contained in the reports and related records, including guaranteeing anonymity, as well as taking the necessary steps to make an initial assessment as to whether there are sufficient grounds to conduct an investigation.

Where the person named in the report is a member of the investigation team or the handling team, or where there is a conflict of interest regarding the alleged irregularity involving a member of the investigation team or the handling team, a copy of the report must also be forwarded to the Board of Directors.

The Board of Directors and the Supervisory Board must be informed of all reports received. Where reports involve a member of the Board of Directors, only the Supervisory Board must be informed. Where reports involve a member of the Supervisory Board, only the Board of Directors must be informed. Should the competent bodies deem it necessary, they shall bring these reports to the attention of the relevant supervisory authority and/or the Bank's Shareholder.

8. Communication with the Whistleblower

The handling team must acknowledge receipt of the report to the whistleblower within a maximum of 7 (seven) days, including reports made anonymously.

The handling of the report, as well as the sending of a reply to the whistleblower, must not take longer than 3 (three) months, except in particularly complex cases.

9. Investigation process

The handling team must investigate all the facts necessary to assess the alleged irregularity; the investigation process is conducted by these departments and supported by other Atlântico Europa staff members whenever necessary, and may also involve the engagement of external auditors or other experts to assist with the investigation.

Following the investigation of the facts and their assessment, the handling team shall draw up a reasoned report on the matter in question – including, in particular, the elements set out in Article 8(1)(b) of Bank of Portugal Instruction No. 18/2020, which must contain recommendation on the measures to be adopted (including, where applicable, the initiation of disciplinary proceedings) or a justification for not taking any measures.

The investigation process concludes either with the case being closed or with the findings being submitted to the Board of Directors and the Supervisory Board.

Where an irregularity concerns the Board of Directors, it must be submitted directly to the Supervisory Board.

10. Reports relating to harassment

For reports specifically classified as falling within the scope of workplace harassment – whether psychological or sexual – such reports may be handled by engaging an external body for this purpose, whilst ensuring that the external body treats them anonymously, confidentially and impartially.

Similarly, in these specific situations, the investigation procedure set out above is followed, namely the preparation of a reasoned report on the complaint in question, to be submitted by the external body to the Board of Directors and the Supervisory Board.

11. Confidentiality and non-discriminatory handling

The Bank guarantees the confidentiality of communications received, ensuring the anonymity of the whistleblower, whenever requested, as well as the protection of the personal data of the whistleblower, the person(s) suspected of committing irregularities and any third parties mentioned, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, and other legislation on the protection of personal data.

The reporting of an irregularity must not, under any circumstances, result in any adverse treatment of the reporting employee by Atlântico Europa or other employees, including acts of retaliation, discrimination or any other form of unfair treatment; Atlântico Europa must ensure that this does not occur**.** Reports of irregularities, in themselves, may not serve as grounds for initiating any disciplinary, civil or criminal proceedings against the whistleblower or against an employee who cooperates in the investigation of such reports; such reports must always be analysed by the Bank.

12. Recording and archiving of reports

Recording and archiving of reports A record must be kept of all reports of irregularities covered by this Policy. This record must include, at a minimum, the following information:

- Internal reference number assigned to the report;
- Date of receipt of the report;
- Channel used to report the irregularity;
- A summary description of the facts reported;
- Analysis of the report;
- Summary description of the steps taken to investigate the reported facts;
- Outcome of the investigation;
- Date on which a response was sent to the complainant;

- Description of the measures taken or to be taken as a result of the report, or the reasons for not taking any measures;
- Current status of the case (completed or pending);
- Identity of the complainant (if not anonymous);
- Identity of the person against whom the complaint was made.

All communications will be archived in a dedicated database, regardless of how the matter is handled, including the relevant supporting documentation and the report drawn up by the handling team, for a minimum period of 5 (five) years.

13. Dissemination and monitoring

It is the responsibility of the Board of Directors to ensure that this Policy is disseminated to all employees of Atlântico Europa, its subsidiaries and branches, and to ensure that it is known to all those who may work with Atlântico Europa in the future.

14. Annual Report

The compliance team shall produce an annual report summarising all reported irregularities ("Report on the Reporting of Irregularities"), which must be submitted to the Bank of Portugal within the deadlines set for this purpose.

This annual report must also be submitted to the Board of Directors and the Supervisory Board, in particular to inform them of and monitor the measures taken or to be taken as a result of the reports received, or to provide justification for the decision not to take any measures.

15. Further Information

For any clarification regarding this Policy, please contact the Compliance Department.

16. Policy Review

This Policy shall be reviewed annually, and the approval of the respective review and/or any amendments must be approved by the Board of Directors, subject to the prior opinion of the Supervisory Board.

17. Entry into force

This Policy shall enter into force on the day following its approval.

Annex I

Specific examples of what may constitute irregularities, in summary form, include those relating to the following matters:

- Moral harassment;
- Sexual harassment;
- Acts or omissions contrary to and detrimental to the financial interests of the European Union;
- Conflict of interest and/or holding multiple posts;
- Violent and highly organised crime and/or economic and financial crime;
- Consumer protection and product safety and compliance;
- National defence and security;
- Discrimination and human rights violations;
- Fraud, corruption and related offences;
- Non-compliance and/or administrative offences as provided for under the General Regime for the Protection of Whistleblowers;
- Non-compliance and/or administrative offences under the General Regime for the Prevention of Corruption;
- Protection of privacy and personal data (GDPR) and network and information systems security;
- Environmental protection, radiation protection and nuclear safety;
- Public procurement;
- European Union internal market rules, competition rules and state aid, and corporate tax rules;
- Financial services, products and markets, and the prevention of money laundering and terrorist financing.