finora bank

Whistleblowing Policy

We encourage everyone connected to Finora Bank to speak up safely and early about suspected wrongdoing. Whistleblowing protects clients, colleagues, and our integrity.

Scope of the Policy

- **Who?** All Bank's employees, managers/, Management Board members, interns, contractors, subcontractors, volunteers, suppliers, and other partners of Finora Bank UAB and its Estonian branch.
- **What?** Suspected or actual infringements, including fraud, bribery/corruption, misuse of assets, money laundering/financing illegal activity, serious ethics breaches, discrimination or gross mismanagement, health/safety/environment risks, concealment of violations, interference with investigations/courts, non-compliance with banking rules and EU single-market/financial interests requirements.

Principles:

- Safe, confidential channels
- Non-retaliation for good-faith reports
- Timely, impartial assessment and (where needed) independent investigation
- Proportionate actions and clear feedback (within legal limits)
- Central logging and oversight by Compliance; regular training

How to report?

- Primary internal contact: Chief Compliance Officer (CCO)
- **Channels:** In person, by email (compliance@finorabank.eu), by phone (+370 672 12687), or by letter (Žalgirio g. 90, Lithuania, 09300 Vilnius).
- If reporting to CCO is not appropriate (e.g., conflict), contact the Chairman of the Supervisory Board.
- Anonymous reporting is possible by letter; note that anonymity can limit investigation depth. Confidentiality is available if you disclose your identity.

External reporting - when appropriate?

- Bank of Lithuania, Public Prosecutor's Office (LT), or Estonia's Financial Supervision and Resolution Authority.
- Use externally when: urgent risk of serious harm; substantial public interest; managers may be involved; internal reporting failed/unsafe; or your relationship with the Bank has ended.

What to expect?

- Acknowledgment: within 2 working days (for face-to-face/phone/email submissions).
- Investigation: proportionate, typically up to 2 months (complex cases may take longer).
- Outcome: written feedback promptly, no later than 10 working days after conclusion, subject to law.
- Escalation: if unsatisfied, contact the Chairman of the Supervisory Board.

Your protections:

- No retaliation for good-faith, reasonable reports made via permitted channels.
- Identity kept confidential on request, except where law requires disclosure.
- Good-faith self-disclosure may mitigate responsibility; knowingly false reports are not protected and may lead to liability.

Questions or ready to report?

Contact Our CCO: compliance@finorabank.eu

Note: This is a public summary. The full Whistleblowing Policy prevails.