

Enclosure No 1
to the Ordinance of the Management
of National Westminster Bank Plc
Spółka Akcyjna Oddział w Polsce

Internal Reporting Procedure
in National Westminster Bank plc SA
Oddział w Polsce

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1. General

This Internal Reporting Procedure in National Westminster Bank plc SA Oddział w Polsce (hereinafter referred to as the "Procedure") is introduced in connection with the Act of 14 June 2024 on the Protection of Whistleblowers (Journal of Laws of 2024, item 928, as amended) (hereinafter referred to as the Whistleblower Act).

The purpose of this Procedure is to introduce the rules for the possibility of reporting breaches of law in National Westminster Bank plc SA Oddział w Polsce ("hereinafter referred to as NatWest Poland").

Reporting a breach of law to NatWest Poland does not preclude external reports and Group reports. There are also no restrictions on the number and choice of the method of filing report.

1. This Procedure does not apply to information (Article 5 of the Whistleblower Act):
 - 1) covered by the provisions on the protection of classified information and other information that is not subject to disclosure by virtue of the provisions of generally applicable law for reasons of public security;
 - 2) professional secrecy of medical and legal professions;
 - 3) covered by the secrecy of judicial deliberation;
 - 4) covered by criminal proceedings – with regard to the secrecy of preparatory proceedings and the secrecy of court hearings conducted with the exception of public nature.
 - 5) procurement in the fields of defence and security;
 - 6) concerning violations of the law directly related to the performance by the special services of statutory tasks aimed at ensuring national security.
2. This Procedure does not provide for the receipt of anonymous reports of breaches of law at NatWest Poland.

2. Definitions

1. members of the NatWest Poland Directorate – persons who are part of the management staff of NatWest Poland, i.e. MT (Management Team). Information about the composition of the Directorate is available on the intranet: NatWest Poland / About NatWest Poland.
2. follow-up action – an action taken by NatWest Poland or a public authority to assess the accuracy of the information contained in the report and to prevent the violation of the law that is the subject of the report, in particular by means of an investigation, initiation of an inspection or administrative proceedings, prosecution, action taken to recover funds or closure of the procedure carried out as part of the internal reporting procedure for violations of the law and the follow-up or procedure for receiving external reports and follow up.
3. retaliation – a direct or indirect act or omission in a work-related context that is caused by a report or public disclosure and that violates or is likely to violate the rights of the Whistleblower or causes or is likely to cause unjustified harm to the Whistleblower, including the unjustified initiation of proceedings against the Whistleblower.
4. Director of NatWest Poland – Director of NatWest Poland, entered in the National Court Register as a person representing a foreign entrepreneur in the Branch.
5. NatWest Group - National Westminster Bank Plc and any entity that is currently (i) a holding company, (ii) a subsidiary, and (iii) a subsidiary of a company within the holding company of NatWest Group Plc.
6. information on a violation of the law – information, including a reasonable suspicion of an existing or potential violation of the law, which has occurred or is likely to occur at NatWest Poland, in which the Whistleblower participated in the recruitment process or other pre-contractual negotiations, works or has worked, or in another legal entity with which the Whistleblower maintains or has maintained contact in a work-related context, or information regarding an attempt to conceal such a violation of law.
7. feedback – information provided to the Whistleblower on the planned or taken follow-up actions and the reasons for such actions.

8. work-related context – past, present or future activities related to the performance of work on the basis of an employment relationship or other legal relationship constituting the basis for the provision of work or services or performance of functions in NatWest Poland or for NatWest Poland, or the performance of service in a legal entity, as part of which information about a violation of the law was obtained and there is a possibility of experiencing retaliation.
9. NatWest Poland; Branch - National Westminster Bank Plc Spółka Akcyjna Oddział w Polsce, 26 Iłżecka Street, building E, 02-135 Warsaw, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for m.st. Warsaw, XIII Commercial Division of the National Court Register, under KRS number 0000677815.
10. violation of the law - an act or omission that is illegal or aimed at circumventing the law, concerning:
 - 1) corruption;
 - 2) procurement;
 - 3) financial services, products and markets;
 - 4) counteracting money laundering and terrorist financing;
 - 5) product safety and compliance;
 - 6) transport safety;
 - 7) environmental;
 - 8) radiation protection and nuclear safety;
 - 9) food and feed safety;
 - 10) animal health and welfare;
 - 11) public health;
 - 12) consumer protection;
 - 13) protection of privacy and personal data;
 - 14) security of networks and ICT systems;
 - 15) the financial interests of the State Treasury of the Republic of Poland, local government units and the European Union;
 - 16) the internal market of the European Union, including public law rules on competition and state aid, and corporate taxation;
 - 17) constitutional freedoms and rights of man and citizen – occurring in the relations of an individual with public authorities and not related to the areas indicated in point 2.10 subsection of the Act on Civil Liberties. 1-16.
11. public authority – supreme and central government administration bodies, local government administration bodies, local government units, other state authorities and other entities performing public administration tasks by virtue of law, competent to take follow-up actions in the areas indicated in Article 3(1) of the Whistleblower Act.
12. a person to whom the report relates – a natural person, a legal person or an organizational unit without legal personality, to which the law grants legal capacity, indicated in the report or public disclosure as a person who committed a violation of the law, or as a person with whom the person who committed the violation of the law is related.
13. a person who helps in making report – a natural person who assists the Whistleblower in a report or public disclosure in a work-related context and whose assistance should not be disclosed.
14. a person associated with the Whistleblower – a natural person who may experience retaliation, including a co-worker or a person closest to the Whistleblower within the meaning of Article 115 § 11 of the Act of 6 June 1997 – the Penal Code (Journal of Laws of 2024, item 17).
15. employer, private entity - NatWest Poland
16. legal entity – a private entity or a public entity.
17. private entity – a natural person conducting business activity, a legal person or an organisational unit without legal personality, which is granted legal capacity by law, or an employer if they are not public entities;
18. public entity – an entity indicated in Article 3 of the Act of 11 August 2021 on open data and re-use of public sector information (Journal of Laws of 2023, item 1524).

19. Speak Up policy – The NatWest Group's policy on reporting wrongdoing within the Group is available on the Natwest Group's Intranet (Useful sites / Speak Up) and on the Internet (<https://www.natwestgroup.com/>).
20. legal proceedings – proceedings conducted on the basis of generally applicable law, in particular criminal, civil, administrative, disciplinary proceedings or proceedings for violation of public finance discipline, or proceedings conducted on the basis of internal regulations issued in order to implement the provisions of generally applicable law, in particular anti-mobbing laws.
21. Whistleblower – a natural person who reports or discloses to the public information about a violation of the law obtained in a work-related context, including:
 - 1) employee (including, in the case of reporting or disclosing to the public information about a violation of the law obtained in the context related to work before the establishment of an employment relationship or other legal relationship constituting the basis for the provision of work or services or performance of functions in or for a legal entity, or performance of service in a legal entity or after their termination);
 - 2) temporary worker;
 - 3) a person performing work on a basis other than an employment relationship, including on the basis of a civil law contract;
 - 4) entrepreneur;
 - 5) proxy;
 - 6) shareholder or partner;
 - 7) a member of a body of a legal person or an organizational unit without legal personality;
 - 8) a person performing work under the supervision and direction of a contractor, subcontractor or supplier;
 - 9) trainee;
 - 10) volunteer;
 - 11) apprentice;
 - 12) an officer within the meaning of Article 1(1) of the Act of 18 February 1994 on Pension Provision for Officers of the Police, the Internal Security Agency, the Foreign Intelligence Agency, the Military Counterintelligence Service, the Military Intelligence Service, the Central Anti-Corruption Bureau, the Border Guard, the Marshal's Guard, the State Protection Service, the State Fire Service, the Customs and Tax Service and the Prison Service and their families (Journal of Laws of 2023, item 1280, 1429 and 1834); a soldier within the meaning of Article 2(39) of the Act of 11 March 2022 on the Defence of the Homeland (Journal of Laws of 2024, items 248 and 834).
22. public disclosure – providing information about a violation of the right to the public.
23. Whistleblower Act – Act of 14 June 2024 on the Protection of Whistleblowers (Journal of Laws of 2024, item 928, as amended).
24. Management Board – persons entered in the National Court Register as the Management Board of NatWest Poland.
25. report – an oral or written internal report or an external report, submitted in accordance with the requirements set out in this Procedure or in the Whistleblower Act.
26. anonymous report – a report made by a Whistleblower who has not disclosed their identity.
27. Group reporting - Reporting wrongdoing through the NatWest Group Speak Up process and system. Anyone who makes a report using the NatWest Group's process and system is not covered by the provisions of the Whistleblower Act and the regulations under this Procedure, but is subject to the regulations and rules resulting from the Speak Up policy.
28. internal reporting – oral or written communication of information about a violation of the law to NatWest Poland.
29. internal report not justified – a report as a result of which the follow-up action did not confirm the violation.

30. internal report justified – a report as a result of which follow-up actions confirmed violations of the law.
31. internal report out of scope – a report that does not concern a violation of the law.
32. external report – oral or written communication of information about a violation of the law to the Ombudsman or a public authority.

3. NatWest Poland authorisation

To take actions under this Procedure, i.e. i.a. to receive internal reports in NatWest Poland, to keep a register of internal reports, to take follow-up actions, including verification of an internal report and further communication with the Whistleblower, including requesting additional information and providing feedback to the Whistleblower, NatWest Poland authorises the four persons working at NatWest in the following positions:

- Technical Compliance & Assurance Manager
- HR Advisor
- CA Risk & Controls Manager
- Customer Service & Operations Unit Leader.

The above mentioned authorised persons will be authorised by a personal authorisation to take any actions within this Procedure. A template of the authorisation can be found in point 12.

These authorised persons may grant written one-time authorisations to external and internal experts, including from the NatWest Group, whose participation would be significant in taking the follow-up necessary to best verify the legitimacy of a particular internal report. A template of the authorisation can be found in point 10.

If an internal report in NatWest Poland concerns a person authorised to take action under this Procedure, this person does not do follow up activities.

Such an authorised person becomes the person who has been identified as the person committing the violation of law (directly or indirectly) and will be treated as in the case of other persons against whom an investigation is pending, a follow-up actions.

Authorised persons are obliged to maintain confidentiality with regard to information and personal data obtained as part of the receipt and verification of internal reports, and to take follow-up actions, also after the termination of the employment relationship or other legal relationship under which they performed this work.

Authorised persons, indicated in this Procedure, are authorised to contact and correspond with authorised public authorities within the scope covered by this Procedure. Letters with public authorities are recorded in the correspondence register.

4. How to make internal reports

A Whistleblower may make a report by:

1. Internal reporting in NatWest Poland:

- 1) written report to the e-mail address: ~ zgloszenia.sygnalistow (fm-057059@rbos.co.uk). Registration should be made by filling in the report form and sending it to the above mentioned e-mail address. A form template can be found in point 11. You can also attach files to the form that can support the verification of the report, follow-up.
- 2) oral reporting during a direct meeting between the Whistleblower and the person(s) authorised to receive internal reports.

A face-to-face meeting may be organized at the headquarters of NatWest Poland (26 Iłżecka Street, building E, 02-135 Warsaw) or in the Office in Wrocław (street: Powstańców Śląskich 9; building Midpoint71, 53-332 Wrocław) within 14 days from the date of receipt of such a request.

2. External reporting

An external report is received by the Ombudsman (<https://bip.brpo.gov.pl/pl>) or dedicated public bodies (including institutions, bodies, offices or agencies of the European Union).

The Ombudsman publishes on his website in the Public Information Bulletin in a separate, easily identifiable and accessible section, and in a manner understandable to the Whistleblower, information on the terms and conditions of external reporting by the Whistleblower (including, i.a., contact details, how to protect the Whistleblower; procedure for handling external reports; confidentiality rules).

The Ombudsman and the public authority are separate controllers for the personal data provided in the external report that has been received by them.

For more information on making external reports, please refer to the Whistleblower Act.

3. Group reporting

Reporting abuse through the NatWest Group process and Speak Up.

Anyone who makes a report using the NatWest Group's process and system is not subject to the provisions of the Whistleblower Act and the regulations under this Procedure, but is subject to the regulations and rules under the Group Speak Up Policy. Group reporting allows you to make an anonymous report.

A Whistleblower may make an external report and/or a Group report without first making an internal report with NatWest Poland.

It is important that the internal report contains as much information as possible necessary to take action as quickly and effectively as possible to stop any irregularities and avoid them in the future.

5. Procedure for handling internal reporting

1. Whether the Whistleblower chooses to report via email or meet face-to-face, both reporting methods rely on gathering the necessary information from the Whistleblower to process the report. The more detailed information or examples the Whistleblower provides, the better NatWest Poland will be able to verify the issues raised by the Whistleblower in a timely manner.
2. Receipt of an internal report is confirmed to the Whistleblower within 7 days from the date of its receipt, unless the Whistleblower has not provided a contact address to which the confirmation should be sent.
3. Feedback is provided to the Whistleblower within a period not exceeding 3 months from the date of confirmation of receipt of the internal report or – if the confirmation referred to in point 5.2 is not provided – 3 months from the expiry of 7 days from the date of the internal report, unless the Whistleblower has not provided a contact address to which the feedback should be submitted.
4. In the case of a direct meeting with the Whistleblower, with their consent, the report is documented in the form of minutes of the meeting, reconstructing the course of the meeting, prepared by the authorised persons participating in the meeting. The Whistleblower can check, correct and approve the minutes of the meeting by signing it.
5. After the Whistleblower makes an internal report, a follow-up action is carried out, i.e. i.a. an explanatory proceeding. In the course of such proceedings, the Whistleblower may be asked for additional information via the contact details provided.
6. After making an internal written report, the Whistleblower may correct, rectify, supplement or withdraw the reported information.
In such situations, depending on the scope of the changes, authorised persons may ask the Whistleblower whether the above-mentioned changes are not the result of retaliation.
7. During and after the follow-up, the Whistleblower will receive feedback on the progress and outcome of the investigation - subject to the confidentiality of the data. The whistleblower does not receive feedback if he or she has not provided a contact address.

This means that the information on the stage and outcome of the investigation will be general enough not to reveal the details of persons who were not part of the report, and detailed

enough for the Whistleblower to receive an answer as to whether their internal report was considered justified, not justified or out of scope.

A whistleblower is not entitled to receive all the information and records that have been obtained as a result of follow-up.

8. If it is determined that an internal report is justified, the Whistleblower will be informed of this fact, except if the Whistleblower has not provided a contact address to which feedback should be provided.

Measures will then be taken to clarify the circumstances of the violations of the law. This can result in a variety of follow-up, including process change, training, communication, disciplinary action against the person concerned, or even reporting to public authorities if the report was about a criminal offence.

9. In the event of an internal report that is not justified, the Whistleblower is informed of the outcome of the investigation, except if the Whistleblower has not provided a contact address to which feedback should be provided.

The whistleblower should know that even if the result of the follow-up shows that the internal report of NatWest Poland is not justified, they value this type of report, because the report was made in good faith.

10. In the case of an internal report out of scope, no follow-up is conducted, including a full investigation. The Whistleblower is informed of the situation, except if the Whistleblower has not provided a contact address to which feedback should be given.

If, for example, the report relates to 'Personal grievances' about employment, the Whistleblower may additionally be informed of the processes within the NatWest Group through which the grievance can be made, e.g. 'Resolving Issues at Work Process'

11. In the case of an internal report (exception: anonymous reporting), a report is prepared, which may include, i.a., information on the collected records, minutes of interviews, conclusions, information on further proceedings to remove irregularities and the final status of the report (justified, unjustified or out of scope internal report).

12. If it is found that an internal report is anonymous, the content of such a report is destroyed, and no follow-up actions are taken. Anonymous reporting is not recorded in the register of internal reports of NatWest Poland.

13. All reports of the Whistleblower are treated confidentially.

Unauthorised persons do not gain access to the information covered by the report, in particular the identity of the Whistleblower, the person to whom the report relates and the third party named in the report.

14. The Whistleblower's data is not passed on to the Management Board, Director and members of the Directorate (MT) of NatWest Poland.

15. The Whistleblower's personal data, allowing for the identification of the Whistleblower, shall not be disclosed to unauthorised persons, unless with the express consent of the Whistleblower.

This principle does not apply where disclosure is a necessary and proportionate legal obligation in connection with investigations by public authorities or preparatory or judicial proceedings conducted by courts, including to guarantee the rights of defence of the person concerned.

Before disclosing the Whistleblower's personal data, the competent public authority or competent court shall notify the Whistleblower thereof by sending an explanation in paper or electronic form of the reasons for the disclosure of his/her personal data, unless such notification jeopardises the investigation, preparatory or judicial proceedings.

16. Personal data processed in connection with the receipt of a report or taking follow-up actions and documents related to this report are stored by NatWest Poland for a period of 3 years after the end of the calendar year in which the external report was forwarded to the public authority competent to take follow-up actions or the follow-up actions were completed, or after the end of the proceedings initiated by these actions.

NatWest Poland deletes personal data and destroys documents related to the report after the retention period expires.

The above rule does not apply if the documents related to the report are part of the files of preparatory proceedings or court or court-administrative cases.

17. Upon receipt of the report, NatWest Poland processes personal data to the extent necessary to accept the report or take any follow-up action. Personal data that is not relevant to the processing of the report will not be collected and will be deleted immediately in the event of accidental collection. Such personal data shall be erased within 14 days of establishing that they are irrelevant.

6. Register of internal reports

1. NatWest Poland maintains a register of internal reports.
2. The authorised persons indicated in this Procedure are responsible for the register of internal reports.
3. NatWest Poland is the controller of the personal data collected in the register of internal reports.
4. Entry in the register of internal reports is made on the basis of an internal report.
5. The register of internal reports includes:
 - 1) Your report number
 - 2) the subject matter of the violation of the law;
 - 3) personal data of the Whistleblower and the person to whom the report relates, necessary to identify them;
 - 4) the Whistleblower's contact address;
 - 5) the date of filing the report;
 - 6) information on the follow-up actions taken;
 - 7) the date the case was completed.
6. Personal data and other information in the register of internal reports are stored for a period of 3 years after the end of the calendar year in which the follow-up actions were completed or after the end of the proceedings initiated by these actions.

7. Whistleblower protection

1. A whistleblower is subject to the protection referred to below from the moment of making the report or public disclosure, provided that he or she had reasonable grounds to believe that the information being the subject of the report or public disclosure is true at the time of the report or public disclosure and that it constitutes a violation of the law.
2. No retaliation, attempts or threats of such action may be taken against the Whistleblower.
3. Natwest Poland bears the burden of proof that the action referred to in points 7.7 and 7.8 is not retaliatory.
4. A whistleblower making a public disclosure is protected if he or she makes:
 - 1) internal reporting and then an external report, and NatWest Poland and then the public authority within the time limit for providing feedback set in NatWest Poland's internal procedure and then within the deadline for providing feedback set in the external procedure of the public authority do not take any appropriate follow-up action or provide feedback to the whistleblower, or
 - 2) immediately the external report and the public authority does not take any appropriate follow-up or feedback to the whistleblower within the time limit set in its external procedure – unless the Whistleblower has not provided a contact address to which such information should be provided.

5. A whistleblower who makes a public disclosure is also protected if he or she has reasonable grounds to believe that:
 - 1) the infringement may constitute an imminent or manifest threat to the public interest, in particular where there is a risk of irreparable harm, or
 - 2) making an external report will expose the Whistleblower to retaliation, or
 - 3) In the case of an external report, there is a low probability of effective prevention of the violation of the law due to the special circumstances of the case, such as the possibility of hiding or destroying evidence.
6. If information about a violation of the law is provided directly to the press, the Act of 26 January 1984 – Press Law (Journal of Laws of 2018, item 1914) applies.
7. If the work has been, is or is to be performed on the basis of an employment relationship, no retaliation may be taken against the Whistleblower, consisting in particular in:
 - 1) refusal to establish an employment relationship;
 - 2) termination without notice of employment;
 - 3) failure to conclude an employment contract for a definite period or an employment contract for an indefinite period after termination of an employment contract for a trial period, failure to conclude another employment contract for a definite period or failure to conclude an employment contract for an indefinite period after termination of a fixed-term employment contract – if the Whistleblower had a reasonable expectation, that such an agreement would be concluded with him;
 - 4) reduction of remuneration for work;
 - 5) suspension of promotion or omission from promotion;
 - 6) omission of work-related benefits other than remuneration, including those resulting from Regulations on Remuneration of Employees of National Westminster Bank plc Spółka Akcyjna Oddział w Polsce, or reduction of the amount of these benefits;
 - 7) transfer to a lower position;
 - 8) suspension from the performance of employee or official duties;
 - 9) transferring the Whistleblower's current duties to another employee;
 - 10) an unfavourable change in the place of work or the distribution of working time;
 - 11) negative evaluation of work performance or a negative opinion about work;
 - 12) imposing or imposing a disciplinary measure, including a financial penalty, or a measure of a similar nature;
 - 13) coercion, intimidation or exclusion;
 - 14) mobbing;
 - 15) discrimination;
 - 16) adverse or unfair treatment;
 - 17) suspension of participation or omission from selection for participation in training to improve professional qualifications;
 - 18) unjustified referral for medical examinations, including psychiatric examinations, unless separate regulations provide for the possibility of referring the employee for such examinations;
 - 19) an action aimed at making it more difficult to find a job in a given sector or industry in the future, on the basis of an informal or formal sectoral or sectoral agreement;
 - 20) causing a financial loss, including an economic loss, or loss of income;
 - 21) causing other non-material damage, including infringement of personal rights, in particular the Whistleblower's reputation.
8. Retaliation due to reporting or public disclosure is also considered to be an attempt or threat to apply the measure specified in point 7.7
9. If work or services have been, are or are to be provided on the basis of a legal relationship other than an employment relationship constituting the basis for the provision of work or services or the performance of a function or service, sections 7.7 and 7.8 shall apply

accordingly, unless the nature of the work or services performed or the function performed or service performed precludes the Whistleblower from taking such action.

10. If the work or services have been, are or are to be provided on the basis of a legal relationship other than an employment relationship constituting the basis for the provision of work or services or the performance of a function or service, the making of a report or public disclosure may not be the basis for retaliation or an attempt or threat of retaliation, including in particular:
 - 1) termination of a contract to which the Whistleblower is a party, in particular concerning the sale or supply of goods or provision of services, withdrawal from such a contract or termination without notice;
 - 2) imposing an obligation or refusing to grant, limit or withdraw an entitlement, in particular a concession, permit or relief.
11. A whistleblower against whom retaliatory actions have been committed is entitled to compensation in an amount not lower than the average monthly salary in the national economy in the previous year, announced for retirement purposes in the Official Journal of the Republic of Poland "Monitor Polski" by the President of the Central Statistical Office, or the right to compensation.
12. A person who has suffered damage due to a deliberate reporting or public disclosure of false information by a Whistleblower is entitled to compensation or redress for infringement of personal rights from the Whistleblower who made such a report or public disclosure.
13. Making a report or public disclosure may not give rise to liability, including disciplinary liability or liability for damage due to violation of the rights of others or obligations set out in the law, in particular with regard to defamation, infringement of personal rights, copyrights, protection of personal data and the obligation to maintain secrecy, including trade secrets, taking into account point 1.1, provided that the Whistleblower had reasonable grounds to believe that the report or public disclosure is necessary to disclose a violation of law under the Act.
14. The Whistleblower accepts liability for damage caused by the deliberate reporting or disclosure to the public of false information.
15. The above rules also apply to the person assisting in making the report and the person associated with the Whistleblower. The rules apply accordingly to a legal person or other organisational unit assisting or associated with the Whistleblower, in particular owned or employing the Whistleblower.
16. The above rules also apply if information about a violation of the law has been reported to the relevant institutions, body, offices or units of the European Union in the manner appropriate for making such reports.

8. Criminal liability

1. Whoever, wanting another person not to make a report, prevents him or her from doing so, makes it significantly difficult, is subject to a fine, penalty of restriction of liberty or imprisonment for up to one year.
If the perpetrator of the act specified above uses violence, unlawful threat or deception against another person, he is subject to a penalty of imprisonment for up to 3 years.
2. Anyone who takes retaliatory action against a Whistleblower, a person assisting in making a report or a person associated with the Whistleblower is subject to a fine, restriction of liberty or imprisonment for up to 2 years.
If the perpetrator of the act referred to above acts persistently, he is subject to imprisonment for up to 3 years.
3. Whoever, contrary to the provisions of the Act, discloses the identity of the Whistleblower, the person assisting in making the report or a person associated with the Whistleblower, is subject to a fine, restriction of liberty or imprisonment for up to one year.
4. Whoever makes a report or public disclosure knowing that there has been no violation of the law is subject to a fine, restriction of liberty or imprisonment for up to 2 years.

5. Whoever, being responsible for establishing the internal reporting procedure, contrary to the provisions of the Act, fails to establish this procedure or establishes it in material violation of the requirements arising from the Act, is subject to a fine.

9. Final provision

This Procedure has been prepared in Polish and English language versions. In case of any discrepancies, the Polish version shall prevail.

10. Template of authorisation

Authorisation for the processing of personal data, access to information regarding internal reporting

Acting on behalf of National Westminster Bank Plc Spółka Akcyjna Oddział w Polsce with its registered office in Warsaw*,

I hereby authorise

Ms/Mr

Employee ID – if you have

PESEL (if there is no Employee ID)

on internal notification no..... into

verification of internal reports

follow-up

processing of personal data of the persons covered by the report, the identity of the whistleblower, the person to whom the report relates and the third party named in the report, and information on the basis of which the identity of such persons can be directly or indirectly identified

in National Westminster Bank Plc Spółka Akcyjna Oddział w Polsce with its registered office in Warsaw.

I undertake Ms/Mr to maintain confidentiality regarding information and personal data that have been obtained as part of the receipt and verification of internal reports, and to take follow-up actions, also after the termination of the employment relationship or other legal relationship under which you performed this work under the threat of a penalty referred to in Chapter 6 of the Whistleblower Protection Act of 14 June 2024 (Journal of Laws of 2024, item 928, as amended).

The authorisation is valid until...../until the date of its revocation (the earlier circumstance is decisive). Authorised persons are obliged to maintain confidentiality with regard to information and personal data obtained as part of the receipt and verification of internal reports, and to take follow-up actions, also after the termination of the employment relationship or other legal relationship under which they performed this work.

.....
(city and date)

.....
(name and signature of the authorising person)

*National Westminster Bank Plc Spółka Akcyjna Oddział w Polsce, 26 Iłżecka Street, building E, 02-135 Warsaw, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for the m.st of Warsaw, XIII Commercial Division of the National Court Register, under KRS number 0000677815.

11. Template of the internal report form in NatWest Poland

| | |
|---|--|
| Whistleblower's name* | |
| Whistleblower's contact details (e.g. email address or mailing address)* | |
| Subject matter of the violation* (e.g. corruption; environmental protection) | |
| General description of the violation of the law* | |
| Where did the violation of the law take place?* | |
| The date on which the violation of the law occurred or the date on which the violation of the law was known* | |
| Was the violation of the law a one-off or is it still ongoing? | |
| Personal data of the person affected by the violation of the law necessary to identify that person* (e.g. name, Employee ID). | |
| Are there other witnesses or people who know about the violation of the law? | |
| Has there been a violation of the law or is it just a suspicion? | |
| Details of the violation of the law (what exactly happened and when, including names)* | |
| Other relevant information regarding the violation of the law (including documents, records): | |

*Mandatory fields to be filled in

12. Template of personal authorisation

Authorisation to act under the Internal Reporting Procedure

Acting on behalf of National Westminster Bank Plc Spółka Akcyjna Oddział w Polsce with its registered office in Warsaw*,

I hereby authorise

Ms/Mr

Employee ID.....

to take any action under the Internal Reporting Procedure in National Westminster Bank Plc Spółka Akcyjna Oddział w Polsce with its registered office in Warsaw including, in particular, the right to receive internal reports, to carry out their initial verification, to take follow-up actions and the related processing of personal data.

I undertake Ms/Mr to maintain confidentiality regarding information and personal data that have been obtained as part of the receipt and verification of internal reports, and to take follow-up actions, also after the termination of the employment relationship or other legal relationship under which you performed this work under the threat of a penalty referred to in Chapter 6 of the Whistleblower Protection Act of 14 June 2024 (Journal of Laws of 2024, item 928, as amended).

The authorisation is valid until...../until the date of its revocation (the earlier circumstance is decisive). Authorised persons are obliged to maintain confidentiality with regard to information and personal data obtained as part of the receipt and verification of internal reports, and to take follow-up actions, also after the termination of the employment relationship or other legal relationship under which they performed this work.

.....
(city and date)

.....
(name and signature of the authorising person)

*National Westminster Bank Plc Spółka Akcyjna Oddział w Polsce, 26 Iłżecka Street, building E, 02-135 Warsaw, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for the m.st of Warsaw, XIII Commercial Division of the National Court Register, under KRS number 0000677815.