



Bank of China (CEE) Ltd. Prague Branch

Whistleblowing procedure

The whistleblowing reporting procedure of Bank of China (CEE) Ltd. Prague Branch (“BOC CZ”) is based on the Act No. 171/2023 Coll., on Protection of Whistleblowers (“Whistleblowers Protection Act”) and has been implemented in addition to the anonymous AML/CFT violations reporting procedure.

What can be reported?

The reporting under the whistleblowing reporting procedure must relate to a possible or already committed illegal act that occurred or is expected to occur within BOC CZ and meets the following criteria:

- Has the characteristics of a criminal offense;
- Has the characteristics of an administrative offence punishable by a fine with upper limit of at least CZK 100,000 (approx. EUR 4,300);
- Violates the Whistleblowers Protection Act;
- Violates the laws or regulations of the European Union in the field of financial services;
- Violates legal regulations in the area of corporate income tax;
- Violates legal regulations in the field of preventing the legalization of proceeds from criminal activity and the financing of terrorism;
- Violates legal regulations in the field of protection of economic competition;
- Violates consumer protection legislation;
- Violates legal regulations in the field of personal data protection; or
- Violates other legal regulations listed in Section 2(1) of the Whistleblowers Protection Act.

The whistleblowing report shall contain identity details of the whistleblower. Whistleblowers are protected according to the Whistleblowers Protection Act, i.e. they are protected against (threats and attempts of) any form of retaliation, including suspension, dismissal, demotion, transfer of duties, reduction in wages or working hours, withholding of a promotion or training, disciplinary measures, intimidation, harassment, discrimination, failure to convert a temporary contract into a permanent contract or to renew a contract, and early termination.

Given the circumstances and information available to the whistleblower at the time of the reporting, the whistleblower should have good reason to believe that the facts reported or published are authentic and true. It is therefore not possible to report knowingly false facts. For such behavior, the whistleblower can bear the consequences both on the part of BOC CZ and on the part of the injured person and/or authorities.

It is very important to provide as much information as possible (e.g. defining the time and place of the event, the persons concerned, provide specific documents if available and all other circumstances of the case) that will enable BOC CZ to investigate the matter effectively and then take a quick and effective remedy.



Who can report?

The reporting under the whistleblowing reporting procedure is enabled to:

- Current or former employees of BOC CZ, incl. the Management members,
- Current or former volunteers, interns or part-timers,
- Applicants for a job at BOC CZ

Whistleblowing reports are not accepted from:

- Third persons who perform or have performed work or other similar activities for BOC CZ (e.g. on the basis of a mandate or contract for the provision of supplies, services, construction work and/or other similar performance),
- Current and former business partners, suppliers performing activities for BOC CZ indirectly.
- Other third persons.

In addition to using the internal whistleblowing reporting procedure of BOC CZ, the whistleblower has the option to use external methods of whistleblowing reporting:

- Reporting through the reporting system of the Ministry of Justice (details in Czech available there: <https://oznamovatel.justice.cz/chci-podat-oznameni/>),
- Reporting through publication, for example to the media (but only in the limited cases listed in Section 7(1)(c) of the Whistleblowers Protection Act).
- Since BOC CZ is a so-called “mandatory person” according to Act No. 253/2008 Coll., on certain measures against the legalization of proceeds from criminal activity and the financing of terrorism (“AML Act”), additional specific rules apply on BOC CZ. If any of employees or management members have broken the AML Act, or if there are situations involving suspicious transactions, the whistleblowing reporting system of the Financial Analytical Authority (details in English available there: <https://fau.gov.cz/en/contacts>) must be used instead of the system of the Ministry of Justice.

To whom report?

The Whistleblowing Officer of BOC CZ is Pavel Krčál, Compliance Manager. The following methods can be used to submit a whistleblowing report to the Whistleblowing Officer of BOC CZ:

- Send an e-mail to the address pavel.krcal@bankofchina.com,
- Call +420 778 981 527 or +420 225 986 648, in both cases only on business days from 9:00 up to 17:00,
- In person on business days from 9:00 up to 17:00 at the BOC CZ's office (Florentinum D, Na Florenci 2116/15, 11000 Prague 1, Czechia) or at another location determined on the basis of a prior agreement with the Whistleblowing Officer, when the whistleblower will be allowed to file a report within a reasonable period of time from the whistleblower's request, but no later than 14 days,
- Send a letter to the address: Bank of China (CEE) Ltd. Prague Branch, Na Florenci 2116/15, 11000 Prague 1, Czechia, to the Whistleblowing Officer and mark the envelope: "DO NOT OPEN - WHISTLEBLOWING".



How reports are handled?

- The Whistleblowing Officer will confirm receipt of the whistleblowing report in writing within 7 calendar days;
- The Whistleblowing Officer will investigate the circumstances of the reported illegal act. He will then propose measures to the Management to prevent the continuation of the reported conduct and to remedy the situation.
- The Whistleblowing Officer will inform you within 30 days at the latest how the report has been assessed and what measures have been taken. If the complexity and comprehensiveness of the investigation requires more time, the deadline can be extended twice by 30 days (by 60 days in total).