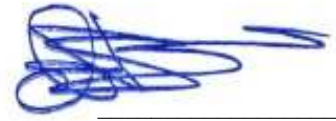


Approved  
By the resolution of the Board of  
TBC Bank Group PLC



Chairman of the Board  
Date: December 8, 2022

## **Incident Response Policy**

**INFORMATION SHEET**

<b>Target audience:</b>		All employees (temporary or permanent) of all majority owned TBC Bank Group PLC businesses (or business units).
<b>Department responsible for the document</b>		Chief Compliance Officer
<b>Corporate units engaged in the implementation</b>		Group Companies
<b>Reviewed by</b>		Chief Compliance Officer
<b>Approved by</b>		TBC Bank Group PLC Board of Directors
<b>Effective Date</b>		To be determined following the TBC Bank Group PLC Board of Directors decision
<b>Replaces</b>		Incident Response Policy 2021
<b>Related procedures (subordinate documents)</b>		1. Whistleblowing process
In the event of any discrepancies between the English version of this Policy and a translated version, the English version shall prevail.		
<b>Version</b>		<b>Date</b>
<b>Current version</b>	<b>1.0</b>	<b>December 2022</b>
<b>Revision frequency</b>		<b>Annual/Ad hoc</b>

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### 1. Definitions

**TBC:** TBC Bank Group PLC and its Group Companies.

**Group Companies:** TBC Bank Group PLC, TBC Bank, and any company or legal entity, including branches and representative offices, of which TBC Bank Group PLC, directly or indirectly, owns more than 50% of the issued share capital, has 50% or more of the voting power at general meetings of shareholders, has the power to appoint or remove the majority of the member of the board of directors or equivalent governing body or cast the majority of votes at meetings of the board of directors or equivalent governing body.

**Staff:** all employees, workers, agency workers, consultants, directors, members and others.

**Incident/Violation** - Any inappropriate activity, including financial crime, theft, fraud, harassment, affecting TBC's interests or reputation, or any conduct relating to the discharge of professional duties by Staff.

**Whistleblower** – a person who reports activity/persons believed to be or suspected of fraudulent or dishonest conduct

**Retaliation** – Retaliation means any act of discrimination, revenge or harassment directly or indirectly taken against a whistleblower, by any person, for making a disclosure under the Policy.

### 2. PURPOSE AND SCOPE

An effective whistleblowing policy is the important part of TBC's approach to be fully compliant with regulatory requirements and maintaining strong corporate culture.

The aim of the Incident Response Policy is to establish a general framework at TBC for implementing and maintaining responsible and honest conduct within TBC, as well as to create an environment where staff is encouraged to identify and report, without any fear of retaliation,

about any fraudulent, improper or unethical conduct, which may cause financial and reputational loss to TBC or jeopardize ethical working atmosphere.

### **3. Policy Statements**

- Staff is responsible to report any suspected violations.
- TBC's internal procedures/policies ensure that staff has different channels to freely raise a concern regarding any suspected violations and incidents
- TBC has in place anonymous hotline alternative to standard reporting lines, for raising a concern regarding any suspected violations and incidents
- Staff doesn't need any approval or authorization to raise a concern.
- The Policy and related documents are easily accessible for the Staff.
- The Whistleblowing process, including how to report suspected or actual misconduct or unlawful activity and the protections afforded to whistleblowers, is known and understood by all senior executives, managers, employees and other across the Group companies
- Any type of pressure and reproach, any other reprehensive or depreciating/adverse actions, as well as any violations of confidentiality other than in the instances envisaged by TBC internal policies/instructions towards the whistleblower are strictly prohibited and are subject to financial and disciplinary sanctions
- Any reported violation is analyzed and investigated in the appropriate and timely manner.
- Internal procedures ensure periodic reporting to Management.
- The identities of Whistleblowers (if known) is kept strictly confidential and will be shared only when required by law or on a strict need-to-know basis.
- A whistleblower has right to escalate the claim to the Supervisory Board directly if the whistleblower is not satisfied with the resolution.
- Access rights regarding incidents/reports are strictly defined.
- Authorized staff who are in a conflict of interest with the reported incident/violation do not receive any information on the case.

### **4. Clear Guidelines**

TBC internal Policies should cover the followings:

- Clearly documented Incident reporting and investigation process
- Detailed definitions of the incidents
- The anonymous channels for reporting incidents
- Roles and responsibilities
- Employee protection
- Sanctions for Policy/instruction violations
- Employee awareness and training
- Record keeping procedures

### **5. Disciplinary proceedings**

Any infringement of any of the provisions of the Policy may lead to disciplinary proceedings.

