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INTERNAL SYSTEM FOR THE REPORTING OF IRREGULAR PRACTICES AT  
BANCO INTERATLÂNTICO, S.A.

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November 19, 2025



## FRAMEWORK

The Internal Reporting System for Irregular Practices (SCIPI) adopted by BI establishes the characteristics, the treatment given to reports, the reporting circuit as well as the intervening parties in the system, which is regulated in their internal regulations.

The adoption of an Internal System for the Reporting of Irregular Practices (SCIPI) at Banco Interatlântico, S.A. is in line with the guidelines issued by international and national authorities (such as the Bank of Cabo Verde).

Verde, the General Audit of Securities Markets, the European Banking Authority, the European Commission or the Securities and Exchange Commission), which generally recommend that companies, and in particular banking institutions, adopt internal procedures, alternative to the usual reporting chain, that allow employees to report legitimate and significant concerns about matters related to the activity of their organisations.

In addition to the aforementioned recommendations, the adoption of an SCIPI complies with the prescription provided by Law no. 62/VIII/2014, of 23 April, regulating the activities of financial institutions regarding the need for financial institutions to implement adequate means of receiving, processing and filing reports of serious irregularities related to the administration, accounting organisation and internal supervision of the credit institution, which are likely to place them in a situation of financial imbalance, in order to ensure that they are reported to the responsible entity of the Bank by the employees of the credit institution, their agents, commissioners or other persons who provide them with services on a permanent or occasional basis.

It also observes the legal framework established by Law no. 81/IX/2020, of 26 March, which regulates the legal framework applicable to the reporting of irregularities in financial institutions and in companies issuing securities admitted to trading on a regulated market that have their head office or permanent establishment in our territory and to the author of the report.

The SCIPI also complies with the provisions of the Securities Code by being an independent and autonomous means for employees to report facts, evidence or information regarding breaches or irregularities that concern the violation of duties with regard to, inter alia, financial instruments, venture capital funds, regulated market management entities and the market abuse scheme.

Further under the scope of best practices, standards and regulations that CGD is obliged to follow with material impact on BI as an entity of the Caixa Geral de Depósitos Group, SCIPI implements the requirements of Law no. 93/2021 of Portugal, of 20 December, which establishes the general regime for the protection of whistleblowers, transposing into national law Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

This system is also the specific and independent channel for employees to report possible violations of the law that establishes measures to combat money laundering and the financing of terrorism (Law no. 120/VIII/2016,



of 24 March), of the regulations that implement it and of the policies, procedures and controls internally established in this area.

With regard to reports within the framework of Law no. 120/VIII/2016, the anonymity of the reports made is established.

Moreover, taking into account that irregularity reporting systems raise issues related to the protection of personal data, the definition of the SCIP, to be adopted in BI, takes into account Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, 'GDPR' on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and other data protection legislation.

Furthermore, an SCIP at BI is introduced in accordance with its own Code of Conduct (SO on the Code of Conduct of Banco Interatlântico), which establishes that BI provides a circuit that is duly regulated by specific internal regulations, enabling the internal reporting of irregular practices allegedly occurred as part of its activity.

## PURPOSE

The internal system for the reporting of irregular practices has the following objectives:

- Detect potential offences in advance, fostering a preventive and corrective attitude and a culture of integrity;
- Provide a complementary communication channel that allows for voluntary and confidential reporting of facts and evidence relating to the areas set out in item 4;
- Reduce costs and avoid losses due to non-compliance with legal, regulatory or conduct standards, protecting the legitimate interests of all stakeholders;
- Strengthen a reputation of transparency and align with international best practices in corporate governance;
- Comply with the obligations established in national and international legislation.

## DEFINITIONS

For the purposes of these regulations, the following definitions are considered:

- i. **Offence** - The act or omission contrary to the rules and regulations set out in item 4 of the SCIP.
- ii. **Employee** - The members of BI's governing bodies, its employees and trainees, on a permanent or occasional basis, regardless of the nature of their relationship with BI.



- iii. **Author of the report** - A natural person who reports or publicly discloses an offence on the basis of information obtained in the course of their professional activity, regardless of the nature of this activity and the sector in which it is carried out.
- iv. **Internal complaint channel** - Primary means of reporting irregularities and offences, made available internally by BI to its employees.
- v. **External complaint channel** - Complementary means of reporting irregularities and offences, made available by the external authorities identified in item 1 of the SCIPi.

## OPERATING PRINCIPLES

The system for the reporting of irregular practices should be understood as a means to be turned to in situations where an employee believes they are in the presence of one of the situations referred to in item 4.

The system for the reporting of irregular practices is governed by the following principles:

### 1. Complementarity

The SCIPi shall be used as a communication channel complementary to the other internal communication mechanisms or those deriving from the national legal order. BI employees may turn to other internal mechanisms for reporting alleged irregular acts, such as hierarchical reporting and reporting to the internal control or corporate bodies;

SCIPi does not prevent external communication or affect the use of existing external complaint channels and procedures under national law. External reports may therefore be submitted to the competent authorities which, in accordance with their powers and competences, should or may have knowledge of the matter in question, including:

- Public Prosecutor's Office
- Bank of Cape Verde
- Securities Market Audit Office (AGMVM)

However, external communication channels can only be used in the following situations:

- a) The whistleblower is not an employee, within the meaning of point ii of the Definitions;
- b) There are reasonable grounds to believe that the offence cannot be effectively known or resolved internally or that there is a risk of retaliation;
- c) An internal report has initially been lodged without the measures envisaged or adopted following the complaint having been communicated within the established deadlines.



## 2. Voluntary Nature

The use of the internal system for the reporting of irregular practices is voluntary and optional. It is therefore a confidential option for those employees who, for some reason, feel they cannot, or should not, use the usual internal reporting channels.

## 3. Confidentiality

The system's confidentiality guarantees the protection of the author of the report, whose identity cannot be revealed to third parties and will only be known by the Chairman of the Supervisory Board or, in their absence, by one of the members of the Supervisory Board designated by them.

The identity of the author of the report is only disclosed as a result of a legal obligation or court decision and is preceded by written communication to the author of the report indicating the reasons for the disclosure of the confidential data in question, unless providing this information jeopardises the related investigations or legal proceedings.

According to law no. 81/IX/2020 of 26 March, under the terms of art. 5 no. 4 anonymous communications are not permitted.

## 4. Reporting Objectives

Report relating to the following issues can be made through SCIPi, some of which are provided for in national legislation:

- a) Any criminal, administrative or civil offences;
- b) Failure to comply with legal, regulatory or statutory rules or principles;
- c) Failure to comply with the deontological rules or professional ethics contained in the code of ethics approved by BI;
- d) Violation of the integrity of financial accounting information or information provided to the supervisory body, the institution's accounting practices and/or the integrity and effectiveness of the internal control system;
- e) Acts of active and passive corruption;
- f) Misappropriation or mismanagement of assets or other offences liable of causing damage to the institution's assets;



- g) Violation of the institution's policies on the environment, competition and workers' health and safety.
- h) Potential or actual breaches of BI's obligations as part of its financial intermediation activities;
- i) Infringements or irregularities already committed, being committed or which, in the light of the available information, may be expected to be committed, concerning the following matters:
  - i. Financial instruments, public offers of securities, organised forms of trading financial instruments, settlement and clearing systems, central counterparty, financial intermediation, credit securitisation companies, venture capital companies, venture capital funds or entities legally authorised to manage venture capital funds, insurance contracts linked to investment funds, individual subscription contracts of open pension funds, risk rating and information and publicity scheme concerning any of these matters;
  - ii. Entities managing regulated markets, multilateral or organised trading facilities, settlement systems, clearing houses, centralised securities systems, initial registration or administration of centralised registration systems, central counterparties or holding companies to these entities and providers of data reporting services;
  - iii. The market abuse regulation.

Irregularities to be reported may concern breaches that have already occurred, are being committed or which, in the light of the available information, may be reasonably expected to be committed.

## 5. Persons Subject to Reporting

Any employee may be the subject of internal reporting of irregular practices within the scope outlined in item 4.

For the purpose of this SO, the concept of Employee includes the members of BI's governing bodies, its employees, trainees, service providers and representatives, on a permanent or occasional basis.

Persons who are the subject of a report have the following rights:

- a) Right to information about the responsible entity (BI), the facts reported and the purpose of the processing. This information will be provided to the reported person after preliminary analysis of the report, where it is concluded that there is suspicion of irregular practice that warrants further investigation;
- b) However, if the provision of this information is liable to jeopardize the efficiency of the investigation of the facts reported, the moment when the information is conveyed may be different, to be determined on a case-by-case basis by the Chairman of the Supervisory Board;



- c) Right to access their personal data, as well as to request their rectification or suppression, when justified. However, in the case of data processing for the purpose of ascertaining the veracity of suspected criminal offences, the right of access is exercised through the National Commission for Data Protection (CNPD);
- d) Right to defend their good name and privacy, being able to file a complaint for the crime of slanderous accusation, under the terms provided for and punished under the Criminal Code of Cape Verde.

## 6. Prohibition of Abusive Use

The author of the report must act in good faith and have serious grounds for believing that the information is true at the time of reporting the irregularity.

The use of the SCIPi for reports clearly serving purposes contrary to the objectives of the system, made with the intention of harming the person being reported and the basis of which the person reporting knows does not exist, is considered abusive and subject to disciplinary sanction.

## 7. Author of the Report

Any BI employee may report through SICPI, whenever they have knowledge, or reasonable suspicion, of a fact that may be irregular within the scope outlined in item 4.

The internal reporting of irregular practices is governed by this Service Order, and the author of the report should pay particular attention to the following aspects:

- a) SCIPi objectives;
- b) Areas that may be covered by the reports;
- c) Optional nature of the report;
- d) Absence of consequences for not using the system;
- e) Identification of the addressee of the reports, i.e. BI's Chairman of the Supervisory Board, who keeps the identity of the author of the report confidential in accordance with item 3.;
- f) Right of access and rectification of personal data by the persons identified in the report.
- g) Right to request that the information contained in the report be anonymously conveyed to all those involved in the process.

Employees who create reports within the scope of SCIPi in good faith benefit from the protection conferred herein. This protection extends, with the necessary adaptations, to:



- i. A natural person who assists the employee in the reporting procedure and whose assistance must be confidential, including trade union representatives or employee representatives;
- ii. A third party who is connected to the employee, such as a work colleague or family member, and that could be the target of retaliation in a professional context; and,
- iii. Legal persons or similar entities owned or controlled by the employee, for whom they work or with whom they are in any way connected in a professional context.

## 8. No Retaliation

- a) Employees who file reports in line with SCIPi's objectives may not be damaged, in any way, in their professional activity in the CGD Group due to this fact.
- b) BI shall refrain from any threats or hostile acts and, in particular, from any unfavourable or discriminatory labour practices against those who file reports under this Service Order, and such reports shall not, by themselves, serve as grounds for the opening of any disciplinary, civil or criminal proceedings against the author of the report, unless the report is deliberately and manifestly unfounded.
- c) The reporting of facts, evidence, information or complaints made pursuant to item 7 may not, by themselves, serve as grounds for the opening by BI of any disciplinary, civil or criminal proceedings against the author thereof, unless they are false and were made in bad faith. Any disciplinary, civil or criminal proceedings, or any other decision that devalues the employee's status, initiated or executed by BI after the date of the submission of the complaint, evidence or information, is presumed to violate this item.

## HANDLING REPORTS

Any report can be submitted in writing (letter or e-mail), verbally or in a meeting in accordance with the procedures defined in the internal regulations governing SCIPi. The meeting will take place as soon as possible, according to the severity of the report received. These internal regulations also describe the internal procedures implemented by BI to manage, analyse and record incoming reports.

The management and preliminary assessment of reports will be carried out with independence and confidentiality, ensuring that the persons with these responsibilities are limited in number and have adequate technical training.





## **REPORTS OF SITUATIONS OF FIANCIAL IMBLANCE**

Employees who, by virtue of the functions they perform at BI, namely in the areas of internal audit, risk management or compliance, become aware of any irregularity or indication of infraction that falls within the object referred to in item 4 and that may place BI in a situation of financial imbalance, are legally bound to report such irregularities to the Supervisory Body, pursuant to the terms and safeguards established in this SCIPi.

In these cases, reporting is mandatory and not voluntary, as is the case for the other situations set out in this SCIPi.

## **REPORTS OF SERIOUS FACTS WITHIN AML/CFT**

Employees who, by virtue of the functions they perform at BI, namely senior managers or equivalent overseeing compliance with the legal framework on the prevention of money laundering and terrorist financing, become aware of any serious fact that includes the irregularities referred to in item 4, have the duty to report them to the supervisory body, under the terms and safeguards established in this SCIPi.

## **COMMUNICATIONS OF CONCLUSIONS**

Employees who have been the subject of a complaint and their superiors must be duly informed of the conclusions of the case, particularly in cases where the facts complained of are not confirmed, in order to protect the reputation of employees (for example, in cases where the complaint is closed).