

Citibank Europe Plc, Bulgaria branch GUIDELINES FOR RAISING CONCERNS

1. OBJECTIVE

Citi is committed to fostering and reinforcing a culture of ethical conduct and decision-making, and to promptly addressing issues that may put Citi, its employees, customers, and other stakeholders at risk.

These interim guidelines are being put in place as a result of the Bulgarian Whistleblower Protection Act (the Act) which transposed Directive (EU) No. 2019/1937 of the European Parliament and of the Council, of 23 October 2019 regarding the protection of persons who report breaches of EU Law and Bulgarian law (together the “**Bulgarian Whistleblower Protection Law**”).

Processing of personal data pursuant to these Guidelines will be carried out in accordance with Citi’s EU & EMEA Employee and Non-Employee Privacy Policies.

These Guidelines apply with respect to Citibank Europe Plc, Bulgaria branch (CEP Bulgaria).

2. SCOPE

These Guidelines apply to persons who acquire information on possible breaches in a work-related context (listed in section 4 and referred to in these Guidelines as Qualifying Concerns), and who report one or more Qualifying Concerns via the Bulgarian Reporting Channel (see section 5), including current or former: employees, civil servants*, or other persons*, in such relationships, regardless of the activity engaged, remuneration payment and the source of funding; any persons working under the supervision and direction of contractors, subcontractors and suppliers, freelancers*, persons having self-employment status*, agency staff, trainees shareholders, volunteers or trainees, job applicants, who participated in recruitment process or other pre-contractual relations, acquiring the breaches in that context members of the administrative, management or supervisory body, audit committee of an undertaking (including nonexecutive members*), individuals involved in pre-contractual negotiations (other than the recruitment process) and those on work experience, employees or civil servants who report or publicly disclose information on breaches acquired in a work-based relationship which has since ended. (the “**Reporting Person**”).

3. WHAT IS THE PROCESS FOR ESCALATING ISSUES AT CITI?

Notwithstanding the implementation of these Guidelines, individuals may continue to raise issues (including any Qualifying Concerns) to other channels set forth in Citi’s Escalation Policy, including via Citi’s Ethics Hotline (where issues can be raised anonymously):



Calling the Citi Ethics Hotline, available 24 hours per day, seven days per week in multiple languages by looking up the dialing options available in your location in the [Country Dialing Instructions](#).

Calls made with a mobile phone may result in charges from your carrier. Please check with your carrier before dialing. Alternatively, you may use one of the submission methods below to report your concern.



Website submission - [Click here to report a concern](#).

Please note that when an individual reports a concern, including a Qualifying Concern, to a channel other than the Bulgarian Reporting Channel, the concern will be handled in accordance with the processes and procedures governing the relevant Escalation channel, and not necessarily in accordance with the requirements of the **Bulgarian Whistleblower Protection Law**.

* To the extent such individuals may file a Qualifying Concern to Citibank Europe Plc, Bulgaria branch.

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4. WHAT TYPES OF CONCERNS CAN BE REPORTED?

The Qualifying Concerns that can be raised via the Bulgarian Reporting Channel are as set out in legislation, which currently provides for:

<ul style="list-style-type: none">• Public procurement• Financial services, products and markets, prevention of money laundering and terrorist financing• Product safety and compliance• Transport safety• Protection of the environment• Radiation protection and nuclear safety• Food and feed safety and animal health and welfare Public health• Consumer protection• Protection of privacy and personal data and security of network and information systems	<ul style="list-style-type: none">• Wrongdoings affecting the financial interests of the EU• Wrongdoings relating to the EU internal market including breaches of Competition and State aid rules• Rules on corporate tax including any tax arrangements• Committed crimes when discovered by a Reporting Person within the performed work or service.• Breach of rules regarding payment of public state and municipality receivables;• Breach of labour and clerical rules;
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These Guidelines does not apply in case of breaches of:

- a) the rules for the public procurement in the defense sector and related with the national security when they fall within the scope of art. 346 of the Treaty on the Functioning of the European Union;
- b) the protection of classified information within the meaning of art.1, para.3 of the Law on the Protection of the Classified Information;
- c) the confidentiality of health information within the meaning of art. 27 of the Law on the Health;
- d) the rules of a criminal proceeding.

5. HOW TO RAISE A CONCERN VIA THE BULGARIAN REPORTING CHANNEL?

If a Reporting Person wishes to report a Qualifying Concern via the Bulgarian Reporting Channel, they may do so either orally, or in writing, or by emailing.

In case the Qualifying Concern is submitted in writing the Reporting Person should complete the Qualifying Concern template (attachment 1).

In case the Qualifying Concern is submitted orally the Qualifying Concern template should be completed by the Whistleblowing Reporting Officer, and the Reporting Person may sign it.

When the Qualifying Concern template is not completed in compliance with the requirements of the Bulgarian Whistleblower Protection Law within 7 days of receiving it the Whistleblowing Reporting Officer sends a message to the Reporting Person to correct the irregularities. If the irregularities are not corrected within this term the Qualifying Concern with all the documents attached to it is to be returned to the Reporting Person. The confidentiality of the report is fully guaranteed.

The internal channel shall be operated by persons (Whistleblowing Reporting Officer) or services designated for that purpose.

The Qualifying Concern reported should be as specific as possible and include details such as the type of wrongdoing the individual is reporting, where and when relevant events occurred, who is involved and who has knowledge of the matter the individual is reporting, how the individual or organisation committed the wrongdoing and any documents or other sources that support the information in the report.

Reports cannot be made anonymously to the Bulgarian Reporting Channel and any anonymous reports received will not be accepted or followed up on. Reports cannot be made for breaches committed more than two years ago and any reports received will not be accepted or followed up on.

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The Whistleblowing Contact and Whistleblowing Reporting Officer under this guidance is Bozhidara Borisova, Citi Country Compliance Officer for CEP Bulgaria and/or Marin Bonev, AML analyst for CEP Bulgaria.

The local Whistleblowing Contact will be responsible for:

- ***Acknowledging receipt of your report within seven days.***
- ***Document orally received Qualifying Concerns.***
- ***Maintain the register with received Qualifying Concerns.***
- ***Maintaining communication with you including asking for further information on the report, where necessary.***
- ***Diligently following up/investigating a report to assess the accuracy of the allegations made in the report.***
- ***Providing feedback to you on your report. Feedback will be provided within a reasonable timeframe which will not exceed three months from acknowledgement of receipt of your report.***
- ***In case the facts presented in the Qualifying Concerns are confirmed: a) organize the follow-up actions; b) advise CEP Bulgaria for the measures that should be taken to stop or prevent the breach; c) direct you to the competent authorities when your rights are affected; d) forward the Qualifying Concern to the external whistle-blowing authority if it is necessary to take action on its part, for which you will be notified in advance.***

6. PROTECTION AGAINST RETALIATION

Citi prohibits any form of retaliatory action against anyone who raises concerns or questions regarding ethics, discrimination, or harassment matters; reports suspected violations of law, regulation, rule, or breach of policy, standard, procedure, or the Code of Conduct; or participates in a subsequent investigation of such concerns.

Workers who engage in retaliation against a colleague because they have raised a concern or question, asked for a reasonable accommodation, reported a violation, or been involved in an investigation, are subject to disciplinary action, up to and including termination of employment or other relationship with Citi.

7. GOVERNING PRINCIPLES

Confidentiality

All Qualifying Concerns raised to the Bulgarian Reporting Channel are treated as confidentially as possible, consistent with the need to investigate and address the matter, and subject to applicable laws and regulations, including the Bulgarian Whistleblower Protection Law.

The identity of the Reporting Person shall be disclosed to the persons, who are responsible for executing the investigation on the submitted report only.

External Reporting

Nothing in this Addendum prohibits a Reporting Person from reporting the matter to a competent external authority – Commission for Personal Data Protection including or other prescribed persons or competent authorities under the Bulgarian Whistleblower Protection Act or otherwise providing information to, filing a complaint with, or participating in investigations or proceedings with those agencies. The details for the Commission for Personal Data Protection (the Commission) are as follows:

<p style="text-align: center;">Commission for Personal Data Protection</p> <p>The Commission for Personal Data Protection is a central body for receipt of complaints and will refer reports to the relevant competent authority (this includes: the Commission on Protection of Competition, the Financial Supervision Commission, the Director of the State Agency for Metrological and</p>	<p>Contact Details:</p> <p>Commission for Personal Data Protection Address: 2 Prof. Tsvetan Lazarov Blvd., 1592 Sofia, Tel./fax: +359 2 915 35 25;</p>
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<p>Technical Surveillance, The Minister of transport and , the Minister of Transport and Communications, the Minister of Environment and Water, the Director of Nuclear Regulatory Agency, the Chief Health State Inspector, The Commission on Protection of Consumers, the Bulgarian Computer Security Incidents Response Team, the Minister of Finances, the Executive Director of the National Revenue Agency, the Executive Director of the Executive Agency “General Labour Inspectorate, the Governor of the respective municipality, where the signal is reported or other competent authority of the Executive Power of Bulgaria, depending on the signal). Reports can also be made directly to these authorities.</p>	<p>Email: kzld@cpdp.bg.</p>
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Depending on the nature of the concern you may want to make a report to an institution, body, office or agency of the European Union. Reporting Persons are not required to notify Citi of any such communications.

DOCUMENTS CONSIDERED IN THE DRAFTING OF THESE GUIDELINES

Document	Reference	Rationale
Directive	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	To ensure the Guidelines are aligned with the Directive.
Law	The Bulgarian Whistleblower Protection Act (the Act)	To ensure the Guidelines are aligned with the national law.

The current guidance shall be revised at least once every three years. The revision of the guidance will also cover revision of the performed follow up actions and of the available practice for implementation of the Bulgarian Whistleblower Protection Law.

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