

Annual report on the correct
functioning of the violation
reporting system
(whistleblowing)

Year 2023

Premise

As is known, Banca Ifis, as the Parent Company and in accordance with the law, with the regulatory provisions and with industry best practices, has defined its internal system aimed at allowing the Group's staff members, to report either acts or facts that may constitute a violation of the rules governing activities being carried out and / or even irregularities of a management nature, while ensuring the confidentiality of the reporting party's personal data and of the alleged responsible party for the violation.

This report has been prepared by the Chief Internal Auditor of Banca Ifis in his capacity as head of internal systems for reporting violations, in application of the provisions of the Bank of Italy's provisions, contained in Circular 285/2013 "Supervisory provisions for Banks" where it is indicated that: "In compliance with the provisions of the regulations on the protection of personal data, the manager of the internal reporting systems draws up an annual report on the proper functioning of the internal reporting systems, containing aggregate information on the results of the activity carried out following the reports following the reports received, that it is approved by the corporate bodies and made available to the bank's staff. ".

Operational Outline of the whistleblowing reporting system

The reporting system is regulated by the "Group Policy for the management of reports of violations (whistleblowing)", published on the company portal (IFIS4YOU). Said Policy governs, in particular, the reporting methods and channels and the procedure that is established when a report is made, moreover it provides with particular protection in favour of the reporting party's privacy and against retaliation.

Updated in July 2023, as a result of the entry into force on 15th July 2023 of the Legislative Decree 24/2023, the Policy provides for an integrated set of tools and communication channels for whistleblowing reports, such as:

- a specific application available on the websites of all Group Legal Entities;
- a dedicated toll-free number (800-59-18-36) through which one can record a message on a voice-mail and/or request an appointment with the Head of Internal Systems for Reporting Violations;
- sending a letter through the postal service to the attention of the Head of Internal Systems for Reporting Violations, in this case the communication shall include the statement "STRICTLY CONFIDENTIAL" ;
- reporting the violation to ANAC (the Italian National Anti-Corruption Authority);
- public disclosure.

With regard to this set of tools and reporting channels, relying on the test carried out during 2023, no issues were found regarding the correct functioning of the internal reporting systems and recent checks on the availability of the whistleblowing application service and toll-free number were successful.

Reports received - year 2023

Number of reports received, divided by admissible and inadmissible:

Reports received	Admissible	Inadmissible
0	0	0

Number of reports broken down by company and by level of severity:

Company	High	Medium	Low
Banca Ifis	0	0	0
Banca Credifarma	0	0	0
CapitalFin	0	0	0
Ifis Npl Investing	0	0	0
Ifis Npl Servicing	0	0	0
Revalea*	0	0	0
Ifis Rental Services	0	0	0
Ifis Finance IFN SA.	0	0	0
Ifis Finance Sp. z o.o.	0	0	0

* Company acquired by Banca Ifis Group on 31 October 23

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