



Whistleblowing Notice

Itaú Europe S.A.

1. General Information

Itaú Europe S.A. (the "Bank") has established internal arrangements enabling employees and other relevant persons to report, in confidence, potential breaches of applicable laws, regulations or internal rules, including those arising in connection with activities carried out through its Portuguese branch.

2. Scope of Whistleblowers

In accordance with the Luxembourg law of 16 May 2023 implementing Directive (EU) 2019/1937, applicable from 17 December 2023, the following persons may submit a whistleblowing report:

- Employees and self-employed workers who work or have worked for the Bank;
- Prospective employees;
- Workers or external collaborators who supply goods or services or perform works for the Bank;
- Volunteers and apprentices (paid or unpaid);
- Contractors, subcontractors and suppliers;
- Shareholders (natural persons);
- Individuals with administrative, management, supervisory or representative functions, including non-executive members.

3. Protection and Confidentiality

Reports are handled with due regard for confidentiality. Individuals who report concerns in good faith are protected against retaliation, discrimination or any adverse consequences, in accordance with applicable legal and regulatory requirements.

The whistleblowing arrangements are distinct from the Bank's customer complaints process.

4. Reporting Channels

Reports may be submitted through the following internal channels:

- Compliance Channel: Whistle.IBBAE-Compliance@itaubba.eu
- Generic Channel: Whistle.IBBAE-Helpline@itaubba.eu



Reports may also be submitted by letter addressed to the Head of Compliance of Itaú Europe, S.A. or to the Compliance Officer of the Portuguese branch, on an anonymous or identified basis.

5. Processing of Reports

Reports are handled in accordance with applicable legal requirements. The Bank applies the following standard timelines:

- Acknowledgement of receipt: the Bank will acknowledge receipt of the report within 7 days, where legally required.
- Follow-up: the Bank will diligently assess the report and, where appropriate, request additional information from the reporting person.
- Feedback: the reporting person will be informed of the outcome or status of the investigation within a reasonable timeframe, and in any case within a maximum period of 3 months from the acknowledgement of receipt, in accordance with applicable law.
- Delays: where the complexity of the case requires additional time, the Bank will inform the reporting person accordingly, subject to confidentiality constraints.

6. External Reporting to the CSSF

The Commission de Surveillance du Secteur Financier (CSSF) is the competent authority for the supervision of Itaú Europe, S.A. Persons wishing to report breaches falling within the CSSF's remit may contact the CSSF through the following channels:

- Online form available on the CSSF website (preferred channel);
- Email: whistleblowing@cssf.lu ;
- In person at the CSSF head office - Visitor reception, 271, route d'Arlon, L-1150 Luxembourg;
- Telephone: +352 2625 1 2757 (during office hours for first contact).

The CSSF online form is the preferred reporting channel, as it ensures compliance with independence and autonomy requirements for the receipt and handling of reports in accordance with Article 17 of the Law of 16 May 2023.

7. Disclaimer

This notice is provided for information purposes only and summarises the Bank's whistleblowing arrangements. It does not limit any rights granted under applicable laws and regulations.

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