

WHISTLEBLOWING POLICY

ALTER EGO S.A

Approved by the Board of Directors of the company in its meeting of October 16,
2024.



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1. INTRODUCTION

Whistleblowing refers to the voluntary act of disclosing significant irregularities and/or omissions or criminal acts that have occurred, or are likely or expected to occur, within the scope of the COMPANY's operations (hereinafter referred to as the COMPANY). This disclosure is recorded in the COMPANY's records and is made by a person who is aware of or has reasonable grounds to suspect the aforementioned, in compliance with and in accordance with Directive (EU) 2019/1937 "on the protection of persons reporting breaches of Union law" and Law No. 4990/2022.

Reports related to this Policy are submitted in compliance with the relevant existing legal and regulatory framework to protect the interests of the COMPANY, without any promise of payment or any form of reward to the individual making the disclosure (hereinafter referred to as the whistleblower).

This Policy operates within the framework of the following COMPANY Policies that are relevant to its application. These include, but are not limited to:

- Information Security Policy
- Personal Data Protection Policy
- Anti-Violence and Harassment Policy
- Anti-Bribery and Corruption Policy
- Labour Regulations
- Internal Operating Regulations

2. PURPOSE

The purpose of this Policy is:

- To contribute to strengthening integrity and transparency, identifying and adopting appropriate corrective and/or preventive measures, as well as protecting the employees and the interests of the COMPANY.
- To establish rules and procedures that will facilitate and encourage any interested party (as referred to in Chapter 4) to make reports regarding serious irregularities, omissions, or criminal acts that have come to their attention, while maintaining the confidentiality of the individuals by submitting such reports and protecting them.

3. DEFINITIONS

For the purposes of this Policy, the following definitions are provided:

Report	The oral or written provision of information regarding violations or concerns related to an actual or potential breach of the legal and regulatory framework, as well as the procedures, policies, and circulars governing the COMPANY.
Referred	"A natural or legal person who is named in the report as the individual to whom the violation is attributed or who is related to the individual to whom the violation is attributed."
Reporter	The individual who reports or discloses information acquired in the course of their employment activities regarding violations.
Retaliation	Refers to any direct or indirect act or omission that occurs within the workplace, causes or may cause unjust harm to the whistleblower, or place them at a disadvantage, and is connected to the whistleblowing report. Retaliation may include, but is not limited to, harassment, unfavorable treatment, etc. Forms of retaliation are also outlined in Article 17 of Law 4990/2022.
Valid reasons	The reasonable belief of a person that the information or evidence they possess is true and constitutes an actual or potential violation.
Information	The provision of information to whistleblowers regarding the measures that are expected to be taken or have been taken, within the framework of monitoring and for the reasons thereof.
European Union Law	The body of European law, including treaties, regulations, directives, decisions of the European Union institutions, as well as national laws of Greece that incorporate European directives into Greek law.
Employment framework	Current, past, or expected work activities, regardless of their nature, through which individuals obtain information about

	violations and within the context of which these individuals may face reprisals if they report them.
Violations	Acts or omissions that are contrary to the legislative and regulatory framework, as well as to the procedures, policies, and circulars governing the COMPANY, and are related to actions and areas falling within the scope of this Policy.
Information related to violations	Information, including reasonable suspicions, regarding violations that have occurred or are likely to occur within the organization where the whistleblower works, has worked, or is likely to work, or is in negotiations to work, or in other entities with which the whistleblower has had contact through their work or in connection with it, as well as information concerning attempts to conceal violations.
Good faith	The indisputable belief in the truth of the reported incidents, meaning the fact that the whistleblower reasonably and in good faith believes that the information being provided is true, based on reasonable facts and/or circumstances that allow for the assumption that the report is sufficiently substantiated.

4. SCOPE OF APPLICATION

This Policy applies to all personnel, as well as any individuals providing services to the COMPANY. It applies across all organizational units of the COMPANY and is directed at any person working for, employed by, or collaborating with the COMPANY, specifically:

- Employees (permanent, seasonal, fixed-term, on-service provision contracts, through external partners, trainees),
- Consultants, Special Associates,
- Members of the Management and senior executives, and generally people holding administrative or supervisory roles,
- Candidates for employment or other forms of collaboration, meaning whistleblowers whose employment/partnership has not yet commenced, in cases where information regarding violations has been obtained during the recruitment process or at any other stage of negotiation before entering a contract,

- People who report or disclose information regarding violations acquired during an employment relationship that has ended for any reason, including retirement,
- Persons working under the supervision and direction of contractors, subcontractors, and suppliers.

Additionally, measures for the protection of whistleblowers also apply, as appropriate, to:

- a) Intermediaries,
- b) Third parties related to whistleblowers who may face retaliation in the work environment, such as colleagues or relatives of the whistleblowers, and
- c) Personal businesses or legal entities related to the whistleblowers, or those they work for, or with which they are otherwise associated through a work-related relationship."

5. BASIC PRINCIPLES

The Company encourages the submission of reports concerning violations that have come to the attention of any interested party or that are deemed very likely or expected to occur, regardless of hierarchical level, and from any third party, through any communication channel they deem appropriate, as specified in this document (Section 7).

However, it is acknowledged that anonymous reports may make it difficult, if not impossible, to investigate and assess the credibility of the report. For this reason, the submission of named reports is encouraged. In this context, and to encourage whistleblowers, the Company is committed to maintaining the anonymity of the whistleblower, as well as other involved parties, and refraining from actions that may result in the disclosure of their identity. Whistleblowers who report in good faith will be protected from any retaliatory actions, regardless of the outcome of the investigation.

Reports will be examined with due diligence, impartial judgment, and objectivity. If the allegations are confirmed, the Company is committed to taking all appropriate corrective measures. In the case of anonymous reports, these will be examined with due care, and their feasibility will be assessed based on the available evidence and the possibility of identifying the reported violation.

Reports are made without any promise of payment or any form of compensation. If the whistleblower was involved in the incident, they will not be exempt from responsibility, but their contribution to identifying and investigating the violation will be considered.

The rights and legal protection measures provided under Law 4990/2022 may not be restricted or waived by any clause or agreement that involves a waiver or limitation, including any arbitration clause or agreement, which is deemed invalid in relation to this restrictive effect.

6. TYPES OF VIOLATIONS

Reports of violations include, but are not limited to, the following cases:

- Criminal activity
- Theft / embezzlement
- Fraud, corruption, bribery
- Misuse of assets
- Abuse of power
- Violation of company policies
- Violations or behaviors that harm the reputation or purpose of the company
- Violation of the legal and regulatory framework of the company
- Violation of confidentiality and data protection of personal information
- Risk to the health and safety of employees or partners of the company

It should be noted that this Policy does not apply to complaints or grievances from customers or third parties regarding the quality of services provided by the company, or objections or disagreements on issues related to company policies and management decisions, or other matters that do not violate the legal and regulatory framework, or do not constitute unethical or unprofessional behavior.

7. ROLES – RESPONSIBILITIES

In the context of this policy, the following roles are defined:

- **Responsible for Receiving and Monitoring Reports (R.R.M.R.)**, who is responsible for receiving and monitoring the submitted reports.
- **Report Evaluation Committee**, which is responsible for the evaluation and handling of the reports.

Specifically:

7.1. RESPONSIBLE FOR RECEIVING AND MONITORING REPORTS (RRM)

The company has appointed Ms. Stavroula Gardiki as the Responsible for Receiving and Monitoring Reports (Υ.Π.Π.Α.). The Υ.Π.Π.Α. is responsible for receiving reports and has the following duties:

- a) Providing the appropriate information regarding the possibility of submitting a report within the company and communicating this information in a prominent location within the company.
- b) Receives reports related to violations that fall within the scope of this Policy and the relevant legislative framework,
- c) Acknowledges receipt of the report to the whistleblower within seven (7) working days from the date of receipt,
- d) Takes the necessary actions to ensure that the relevant bodies of the company or the appropriate authorities, as applicable, address the report, or closes the process by archiving the report if it is unclear, submitted abusively, or does not contain incidents that constitute a violation of EU law or if there are no serious indications of such a violation. In such cases, the relevant decision is communicated to the whistleblower, who, if they believe the issue has not been addressed effectively, may resubmit the report to the National Transparency Authority (Ε.Α.Δ.), which, as an external channel, exercises the powers of Article 12 of Law 4990/2022.

e) Ensures the protection of the confidentiality of the whistleblower's identity and that of any third party named in the report, preventing unauthorized access to it,

f) Monitors the reports and maintains communication with the whistleblower and, if necessary, requests further information from them,

g) Provides feedback to the whistleblower on the actions being taken within a reasonable period, which does not exceed three (3) months from the acknowledgment of receipt, or, if no acknowledgment has been sent, three (3) months from the end of the seven (7) working days after the submission of the report,

h) Provides clear and easily accessible information regarding the procedures under which reports can be submitted to the National Transparency Authority (E.A.Δ.) and, where applicable, to public authorities or other EU institutions or bodies, and

i) Designs and coordinates training activities related to ethics and integrity, participating in the development of internal policies to enhance integrity and transparency within the organization.

It is emphasized that, in the context of managing and evaluating a report, the Responsible for Receiving and Monitoring Reports may request the assistance of other company personnel, depending on their area of expertise.

7.2. REPORT EVALUATION COMMITTEE

The Committee is responsible for evaluating and handling reports, as well as proposing any necessary actions on a case-by-case basis. It is composed of three members: the Responsible for Receiving and Monitoring Reports, Mr. Nikolaos Gkouskos (Deputy General Director), and Mr. Dimitrios Ziogas (Director of Finance). Decisions on how to handle reports are made by majority vote.

8. SUBMISSION OF REPORTS

The COMPANY encourages the submission of reports regarding violations that have come to the attention of any reporter or are deemed very likely or expected to occur, regardless of hierarchical level, and any third party. Reports can be submitted through the following communication methods:

1. Email: Whistleblowing@alter-ego.gr
2. Via mail at: Filellenon 35, Chalandri 15232, Attention: ΥΠΠΑ
3. In person with the ΥΠΠΑ, upon request from the reporter.

The investigation and evaluation of the report are carried out according to the process detailed in the Report Management Procedure. To ensure a more effective and thorough investigation, it is recommended that reports be submitted in writing and include at least the following information: the date of submission, details of the reporter and the reported person (the individual suspected of having committed the violation), a description of the potential violation including the time period and location, the type of reported act, as well as any documents or information that may contribute to uncovering or proving the illegal/wrongful act or omission.

It is emphasized that each violation report should be made in good faith and without delay, as soon as it is noticed by the party concerned. The reporter does not need to be certain of the validity of the report but should have reasonable concerns or suspicions about the occurrence of a violation. They should not engage in illegal actions that could put themselves, the COMPANY, or any third party, at risk to seek or collect further evidence to support their report.

If the reporter has doubts about the need to report a violation or suspicion thereof or wishes to clarify issues related to their protection or other matters not covered by this policy, they can direct their inquiries to Mrs. Stavroula Gardiki (sgardiki@alter-ego.gr, 2112110066)

9. PROCESSING OF PERSONAL DATA.

Personal Data and any kind of information that directly or indirectly leads to the identification of the reporter shall not be disclosed to anyone other than the authorized personnel responsible for receiving or monitoring the reports, namely the Responsible for Receiving and Monitoring Reports and the Report Evaluation Committee, unless the reporter has explicitly consented. To this end, the COMPANY has taken appropriate technical and organizational measures, such as pseudonymization techniques, during the monitoring of the report and communication with the competent authorities.

Personal data of all involved parties are protected and processed exclusively and solely in relation to the specific report, for the purpose of verifying the validity of the report and investigating the specific incident. Personal data, including sensitivity

information, and other details not related to the incident, must not be included in the report. If such information is included, it will be deleted and not considered.

The COMPANY is committed to maintaining the confidentiality of the reporter's identity, as well as that of other individuals involved, and refrains from any actions that might result in disclosing their identities to people outside those responsible for investigating the report. To this end, any correspondence (whether written or electronic) is addressed to the RRM. is considered confidential, and access is prohibited to anyone other than the RRM.

Notwithstanding the above, the identity of the reporter and any other information may only be disclosed in cases required by Union or national law, during investigations by competent authorities, or during judicial proceedings, and only if necessary to serve the purposes of this policy or to safeguard the defense rights of the reported individual. In such cases, these disclosures will be made after providing written notice to the reporter regarding the reasons for disclosing their identity and other confidential information, unless this notification undermines the investigations or judicial procedures. Failure to provide such notice without justification constitutes a disciplinary offense.

After the notification, the reporter has the right to submit written observations to the authority making the disclosure, which will not be communicated to anyone. Exceptionally, if the reasons presented in the observations are deemed insufficient, the disclosure of the reporter's identity and other confidential information is not prevented. Further safeguards for the identity of the reporter and the information from which it can be inferred, as provided by specific provisions of the Union or national law, are not affected. The confidentiality of the data of any other person involved in the report will be maintained, subject to the above-mentioned restrictions.

The processing and handling of personal data is carried out in accordance with the provisions of the applicable legislation on the protection of personal data. The COMPANY, as the Data Controller, by way of exception to paragraph 1 of Article 5, Articles 12 and 13, paragraphs 1 to 4 of Article 14, and Article 34 of the General Data Protection Regulation (GDPR), does not provide relevant information regarding the processing of personal data to the reported person or any third party in their capacity as a data subject named in the report, or for personal data that arose from monitoring measures, particularly regarding the source of origin as outlined in paragraph (f) of paragraph 2 of Article 14 of the GDPR, in accordance with paragraph 5 of Article 14 of the GDPR, in combination with Article 23 of the GDPR, for as long as necessary and if deemed necessary for the purpose of preventing and addressing attempts to obstruct the report, hinder, thwart, or delay monitoring measures, particularly with regard to investigations, or attempts to identify the reporters, as well as for their protection against retaliation.

10. Protection from Retaliation Acts

The Company acknowledges that it is reasonable for employees to hesitate to make any type of report due to the fear of potential retaliation. For this reason, it aims to ensure a safe environment that protects and encourages individuals covered by the scope of this Policy to submit reports, which are necessary for safeguarding the workplace framework.

According to Article 19 of Directive 2019/1937 (Article 17 of Law 4990/2022), examples of retaliation include:

- Dismissal, termination, or equivalent measures,
- Demotion or denial of promotion,
- Reassignment of duties, change of workplace, salary reduction, change in working hours, denial of training,
- Negative performance evaluation or negative professional reference,
- Imposition or application of disciplinary action, reprimands, or other disciplinary measures, including fines,
- Coercion, intimidation, harassment, or marginalization,
- Discrimination, disadvantages, or unfair treatment,
- Non-conversion of a temporary contract to a permanent one, when the employee had reasonable expectation of permanent employment,
- Non-renewal or early termination of a temporary employment contract,
- Harm, including damage to reputation, especially on social media,
- Financial harm, including business loss and income loss,
- Listing on a blacklist based on an official or unofficial sectorial or industrial agreement, which may result in the individual being unable to find future employment in that sector or industry,
- Early termination or cancellation of goods or service contracts.

Any form of retaliation is prohibited (including termination of the employment contract), constitutes a serious violation, and may lead to sanctions (as specified in Article 23 of Law 4990/22).

The Company protects all individuals who report illegal conduct in good faith. In this context, any form of negative behavior towards anyone who has made a report is forbidden, even if the report is later found to be incorrect. In such cases (i.e., if the examination of the report does not reveal a violation), there will be no consequences for the individual who made the report.

However, while the Company will not allow retaliation against anyone who reports a potential violation in good faith, it will show zero tolerance towards individuals who intentionally submit false and obviously unfounded reports. In the case of reporters who knowingly submit false reports, disciplinary sanctions will be imposed, including the termination of the employment contract, while the affected parties retain their legal rights (such as the right to redress for defamation, etc.).

Any disclosure made under this Policy and the legislation protecting individuals who report violations will be covered by immunity from discipline, criminal, civil, and administrative actions, including offenses of defamation, insult, infringement of intellectual property, and personal data violations, with the sole exception being the case of submitting an intentionally false and obviously baseless report.

If the reporter is subjected to any form of retaliation, the employee is required to notify the Human Resources department in writing, providing all relevant details that may substantiate the complaint. The Human Resources department will evaluate the validity of the complaint, investigate the incident, and proceed with the appropriate resolution. The complainant will be informed of the outcome of the report.

The Company will take the necessary actions to eliminate any retaliation and restore the working environment of the reporter who has been subjected to retaliation. Depending on the case, these actions may include transfer, restriction of the alleged wrongdoer's actions, and ensuring compliance with the Company's Policies and Regulations.

The Human Resources department informs the RRM (Responsible for Receiving and Monitoring Reports) about any report of retaliation in a Whistleblowing report.

It is noted that the measures for the protection of whistleblowers provided in this policy also apply, on a case-by-case basis, to third parties associated with whistleblowers who may be subjected to retaliation in the workplace, such as colleagues or relatives of whistleblowers, as well as personal businesses or legal

entities with interests related to the whistleblowers, or entities they work for, or are otherwise connected with through employment or another form of working relationship.

As already mentioned, it is emphasized that any clause or agreement that leads to a waiver or limitation of the protection and rights of the whistleblower is invalid.

REVISION TABLE			
Edition.	MODIFICATION	DRAFTED BY	DATE
1st	INITIAL DRAFTING OF THE DOCUMENT	S. GARDIKI	12/07/2018
2nd	AMENDMENTS BASED ON LAW 4990/2022	GAGDPR / S. GARDIKI	16/10/2024