

Group Whistleblowing Policy

Issued by:	Compliance, Director & DPO
Approved by:	Board of Directors of Qualco Group S.A.
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2. Purpose of this Policy

Policies and procedures of Qualco Group S.A. and its subsidiaries (the Group) are intended to promote the highest standards of openness, probity and accountability, as well as to detect and prevent or deter improper activities. However, even the best systems of controls may not provide absolute safeguards against irregularities. Therefore, an important aspect of accountability and transparency within the Group is a mechanism that enables employees and other stakeholders to voice concerns in a responsible and effective manner. When an individual comes across information, which is believed to show serious malpractice or wrongdoing within a Qualco Group Company, then this information should be disclosed internally without fear of retaliation, and independently of line management.

Qualco Group has a Whistleblowing Policy, Procedures and Reporting Electronic Platform in place, according to Greek Law 4990/2022 which incorporated into the Greek legal framework the Directive (EU) 2019/1937 of the European Parliament and of the Council “on the protection of persons who report breaches of Union Law”, to the extent that such legal and regulatory obligations particularly apply to each country of the Group Companies. The Whistleblowing Policy is a key part of Group’s risk management and corporate governance framework and supports Group’s Code of Conduct.

The present Policy sets the principles and the framework through which each Qualco company receives, assesses, and investigates anonymous and non-anonymous reports on serious irregularities, omissions or offences that came to the attention of its Personnel, Customers or Suppliers.

3. Scope of this Policy

This Policy applies to all organizational units and directorates of the Group Companies and is addressed to any person working, providing services or cooperating in any way with Group Companies, as well as any third party related to the activity of the Group Companies.

In particular, it is addressed to:

- Members of the Board of Directors,
- Members of the Management Team,
- Shareholders,
- Employees (permanent, seasonal, temporary, etc.),
- Trainees,
- Volunteers,
- Clients,
- Suppliers / Vendors,
- Persons working under the supervision and instructions of contractors, subcontractors and suppliers,
- Consultants / External Partners.

4. Glossary of Definitions

The following table shows the key terms for the Policy and their definitions:

<i>Policy Key Terms</i>	<i>Definitions</i>
Reported Person	Natural or legal person who is named in the internal or external report or public disclosure as the person or one of the persons to whom the violation is attributed or who is related to the person to whom the violation is attributed.
Whistleblower	Natural person who makes an internal or external report or public disclosure, providing information about violations that they perceived or experienced in the context of their work activities.
Report	Oral or written or via electronic platform provision of information regarding violations of the applicable Legislative and Regulatory Framework and/or the Company's Code of Ethics.
Report, External	Oral or written or via electronic platform provision of information regarding violations to the National Transparency Authority.
Report, Internal	Oral or written or via electronic platform provision of information regarding violations to the Officer Responsible for Receiving and Monitoring Reports / Whistleblowing Officer (WBO) of the Company.
Retaliation	Negative consequences that an employee may experience due to their participation in reporting or investigating a report.
Anonymity	A state where the identity of the source of information is not known to the recipient of the report.
Reasonable grounds	The justified belief of a person, of similar knowledge, training, and experience to the whistleblower, that the information they possess is true and constitutes a violation.
«General Data Protection Regulation» (hereinafter "G.D.P.R." or "EU-G.D.P.R.")	Regulation (EU) 2016/679 on the Protection of Personal Data.
Public disclosure	Direct provision of information to the public regarding a violation.
National Transparency Authority (hereinafter "N.T.A.")	Unified and Independent Authority of the National Transparency Authority, which has the necessary guarantees of independence and impartiality, in accordance with good international practices and the requirements of international law, with the aim of strengthening transparency and accountability mechanisms.
Company	The Company under the title " Qualco Group S.A. "
Group	The Companies of the Qualco Group
Group Company	The following Companies are defined as such, since they constitute subsidiaries of "Qualco Group S.A.", i.e.: <ul style="list-style-type: none"> • Qualco HoldCo Ltd • Qualco SA • Qres • QQuant • Qualco UK

Good Faith	The belief in the validity of the reported facts, when the Whistleblower reasonably and in good faith believes that the provided information is true.
Violation	An act or omission that is deemed illegal under EU / National Law or contravenes the object or purpose of the rules of EU / National Law.
Information regarding Violation	Information, including reasonable suspicions, about violations that have been committed or are very likely to be committed in the company where the Whistleblower works, has worked or is about to work or is in negotiations to work or in other entities with which the Whistleblower had contact through their work or on the occasion thereof, as well as information about attempts to conceal violations.
Monitoring actions	Any action taken by the Company as the recipient of the report/complaint in order to assess the accuracy of the allegations contained therein and to address the reported violation, such as internal investigation, research, prosecution, action for recovery of funds or termination of the procedure.
Officer Responsible for Receiving and Monitoring Reports / Whistleblowing Officer (hereinafter "WBO")	The natural person designated by the Company, as responsible for receiving, investigating and managing reports, who performs their duties with integrity, objectivity, impartiality, transparency and social responsibility, respects and adheres to the rules of confidentiality for matters of which they became aware in the performance of their duties.

5. Governance / Officer Responsible for Receiving and Monitoring Reports - Whistleblowing Officer (WBO)

For the implementation of the Policy:

- A. The Companies of the Group appoint an Officer Responsible for Receiving and Monitoring Reports - Whistleblowing Officer (WBO), if required according to particular legal and regulatory requirements.
- B. Anonymous (and not anonymous) allegations are submitted to the WBO through available channels.
- C. The WBO shall resolve on whether the disclosures involves serious irregularities, omissions or offenses and shall refer the cases to the competent stakeholders in order to proceed to further investigation and necessary actions.

To fulfil their tasks, the WBO takes into consideration:

- The seriousness of the issues raised
- The credibility of the concern.

6. Protection of the Whistleblower's identity

The Group is committed to maintaining the anonymity of Whistleblowers and not disclosing personal data and any kind of information that leads, directly or indirectly, to their identification to anyone other than the WBO, unless the Whistleblower has previously agreed to this. To this end, the Group takes the appropriate technical and organisational measures when monitoring/managing each Report, in order to timely and effectively resolve the corresponding case.

The identity of the Whistleblower and any other information may be disclosed only in cases required by law in the context of investigations of the competent authorities or in the context of judicial proceedings. In such cases, the WBO will provide a prior written notice to the Whistleblower regarding the reasons necessitating the disclosure of their identity and other confidential information.

At the same time, the Group is committed to due examination of any anonymous Reports, which are examined according to the degree of their documentation and the possibility of identifying the relevant irregularity or unlawful action. In any case, Whistleblowers are encouraged to submit a Report with clear and as well-documented content as possible, to facilitate investigation and monitoring actions.

7. Protection of the Whistleblower and protection of the Reported Person

The Group is committed to protecting Whistleblowers who submit Reports in good faith from any acts or threats of retaliation and actions or threats of revenge in relation to their present and future professional treatment or from any related discrimination or any related adverse personal treatment as a consequence of submitting their Report. The Group prohibits any kind of such act, threat, or retaliatory action and encourages the immediate reporting of such incidents or concerns to the WBO.

Indicatively, retaliation is considered to be:

- suspension, dismissal or equivalent measures,
- demotion, omission or denial of promotion,
- removal of duties, change of workplace, salary reduction, change of
- working hours,
- withholding of training,
- negative performance evaluation or negative professional
- recommendation,
- reprimand, imposition of disciplinary or other measure, including
- financial penalty,
- coercion, intimidation, harassment or marginalisation,
- discrimination or unfair treatment,
- failure to convert a temporary employment contract into permanent
- non-renewal or early termination of a temporary employment contract,
- intentional damage, including damage to reputation, especially on social media, or economic loss, including loss of business and loss of income,
- blacklisting based on a sector or industry-wide formal or informal agreement, which may entail that the person will not find employment in the sector or industry in the future,
- early termination or cancellation of contract for goods or services,
- revocation or cancellation of license or permit,
- psychiatric or medical referrals,
- denial or deprivation of reasonable accommodations for persons with disabilities.

Whistleblowers are entitled to protection against retaliation, provided that, at the time of reporting, they had reasonable grounds to believe that the information on violations was true.

If the investigation of the contested Report does not result in the identification of the examined behaviour as irregular, unethical, or harmful, the Whistleblower who is in good faith cannot have any repercussions. Also, the Whistleblower is not liable under any judicial proceedings, provided they had reasonable grounds to believe that the submission of the report was necessary to reveal the violation.

In the event the Whistleblower was a party to or involved in the commission of the examined irregular behaviour, they are not absolved of their responsibilities, but the Group undertakes the obligation to positively consider their contribution to the identification and investigation of the relevant incidents under the terms of the law.

As for the Reported Persons, they have the right to be informed by the WBO about the misconduct for which they are reported. In the event there is an imminent risk of obstruction of the Procedure for managing the submitted Report and collecting the necessary evidence due to the Reported Person, which is judged on a case-by-case basis by the WBO, the latter may proceed with the postponement, within a reasonable time, of informing the Reported Person about the contested Report.

8. Confidentiality

The Group and specifically each respective Company will treat all such disclosures in a confidential and sensitive manner and assures the reporting persons that there will be no risk of retaliation. The identity and personal information of the individual making the allegation will be kept confidential as long as it does not hinder any investigation. However, the investigation process may reveal the source of the information, and the individual making the disclosure, may need to provide a statement as part of the evidence required. The Group ensures that the identity of the reporting persons and any third party mentioned in the report will not be disclosed to anyone beyond the authorised staff members competent to receive or follow up on reports, without the explicit consent of that person. The internal investigation is carried out with discretion and the privacy of the reporting person and information provided are protected.

9. Due Processing of Personal Data

Any processing of personal data under this Policy is carried out in accordance with the National and European legislation in force in relation to personal data protection and each of the Companies' Personal Data Protection Policy. The data of all persons involved are protected and processed solely and exclusively in relation to the report in question and for the sole purpose of verifying the validity of the report and investigating the specific incident.

The Group takes all necessary technical and organisational measures for the protection of personal data, in accordance with each of the Company's Personal Data Protection Policy and the applicable legislation. Sensitive personal data and personal data which are manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

Records of the reports are being kept for as long as it is deemed necessary and are subject to redaction in the Reporting Electronic Platform. Any processing of personal data within the framework of this Policy is in compliance with the applicable national and EU legislative and regulatory framework, particularly with Regulation (EU) 2016/679.

The exclusive purposes of processing the personal data of all involved parties are (a) establishment of reporting channels, (b) taking necessary actions and measures to monitor the Reports, (c) verifying reliability/non-reliability of the contested Report, and (d) investigating the relevant facts.

Access to the above data is only granted to persons designated as responsible for managing and investigating each Report. Specifically, this refers to the WBO and the staff that may assist them in their work, who, however, have the right to such access only upon an explicit approval.

Each Group Company, as the data controller, takes appropriate technical and organisational measures so that, when submitting and monitoring Reports, only the necessary and appropriate personal data for achieving the aforementioned purposes are collected. Personal data that are obviously not related to the handling of a specific report, or are excessive, are not collected, or if collected, are deleted without delay.

Each Group Company, as the data controller, may not satisfy the rights of data subjects, as provided by the provisions of the G.D.P.R., when these are exercised by Reported Persons or third parties named in each Report, when it is judged by the WBO that satisfying these would compromise the position of the Whistleblower or lead to obstruction of the entire Procedure for managing and monitoring the relevant Report.

Each Group Company, as the data controller, in case of a personal data breach, does not make an announcement to the data subject if this announcement may be detrimental to the intended processing purposes, informing the competent Data Protection Authority (D.P.A.) accordingly.

10. Record Keeping

Each Group Company maintains a corresponding archive, either physical or digital, in a space designated by the WBO that meets the necessary specifications for secure and limited access.

This archive monitoring contains all the Reports received by the WBO, as well as the accompanying documents related to these cases, and documentation of the WBO's relevant actions.

These documents are kept for up to five (5) years from the time of resolution of each case they concern.

The period of five (5) years may be extended in cases of any investigations or judicial proceedings that have been initiated as a result of the corresponding Report.

11. Reporting Electronic Platform

The WBO is the internal reporting channel of the Group in receiving the relevant Reports, as mentioned in the previous chapters. For this purpose, the Company has clearly defined the reporting channel, i.e. a specialised Reporting Electronic Platform.

The platform supporting the Group's Whistleblowing policy and process is the available at [the Qualco Group Whistleblowing Portal](#) . Please follow the link to report case under this policy. Frequently asked questions and guidance is available throughout the portal.

12. Cooperation and provision of all the relevant information to the competent authorities

The Group Companies cooperate with all the competent public, administrative, or judicial authority which, either ex officio or upon request from the affected person, within the framework of its competence, requires provision of data and information. For this purpose, all the collected data, in any form, are kept in a relevant archive by the WBO, in compliance with the personal data protection provisions of the EU-G.D.P.R. and the UK-G.D.P.R. and any other relevant applicable legislation.

13. Violation of this Policy

The potential sanctions and damages resulting from violation of this Policy are serious offences - both for the person committing the violation and for the corresponding Group Company and the Group, in general.

Violation of this Policy may lead to criminal, civil, or regulatory sanctions, such as indicatively:

- The Management taking disciplinary measures.
- Cancellation of contracts due to breach of terms.
- Damage to the Group's reputation.
- Claims for compensation from collaborating companies or other third parties.
- Significant fines.
- Audits of the competent supervisory authorities.

Every Department of each Group Company is responsible for the implementation of this Policy and all the employees are separately responsible for its compliance.

14. Review of this Policy

This Policy is reviewed on a regular basis to determine the extent to which it needs to be updated, taking into account the effectiveness of its implementation, as well as any changes to the institutional and supervisory framework.

The WBO of the Company Qualco Group S.A. is responsible for developing and updating this Policy, in cooperation with the WBOs of the rest of the Group Companies.

In cases where the WBO Qualco Group S.A. identifies points for improvement in this Policy, they prepare a relevant report and send their proposals to the Board of Directors of the Company for approval.

15. References

GRP-COM-PO07-Code of Ethics and Conduct_v.02
GRP-COM-PO02 Group Anti-Bribery and Corruption Policy
GRP-COM-PO04-Conflict of Interest Policy
GRP-COM-PO02-Personal Data Protection Policy_v.02
GRP-COM-PR01- Whistleblowing - Ethics and Compliance (Helpline) Case Management.V.2