

# Group Whistleblowing Policy

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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”, as well as the UK Public Interest Disclosure Act 1998 (PIDA) and other equivalent legal frameworks in jurisdictions where the Group operates.

This Policy also applies to reports concerning incidents of workplace violence and harassment, in line with Greek Law 4808/2021 and the Group’s Violence & Harassment Prevention Policy.

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, such as fraud, corruption, bribery, money laundering, tax offences, breaches of data protection and competition law, environmental violations, harassment and discrimination, or other breaches of laws, regulations or Group policies. Whistleblowers are entitled to protection provided that, at the time of reporting, they had reasonable grounds to believe, in good faith, that the disclosed information was true.

### 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,
- Group Audit Committee
- Shareholders,
- Employees (permanent, seasonal, temporary, etc.),
- Former employees, job applicants,
- Trainees,
- Volunteers,
- Clients,
- Suppliers / Vendors,
- Persons working under the supervision and instructions of contractors, subcontractors and suppliers,
- Consultants / External Partners,
- Any other persons who had or will have a work-related relationship with the Group (e.g. former contractors, suppliers, or service providers).

This Policy applies to all Group Companies, regardless of jurisdiction, and complements (rather than replaces) local legal frameworks such as Greek Law 4990/2022, Directive (EU) 2019/1937, and the UK Public Interest Disclosure Act 1998 (PIDA).

## 4. Glossary of Definitions

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

<b><i>Policy Key Terms</i></b>	<b><i>Definitions</i></b>
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, including current and former employees, job applicants, contractors, suppliers, and other persons with a work-related relationship to the Group, regardless of jurisdiction.
Violation	Violations include, among others, fraud, corruption, bribery, money laundering, data protection breaches, environmental or competition law infringements, breaches of human rights, workplace violence, harassment or discrimination incidents, or other breaches of applicable laws, regulations or Group policies.
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. Violations include, among others, fraud, corruption, bribery, money laundering, data protection breaches, environmental or competition law infringements, as well as workplace violence, harassment, or discrimination incidents.
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. Retaliation includes, indicatively, dismissal, suspension, demotion, withholding of training, negative performance evaluation, intimidation, harassment, blacklisting, early contract termination, damage to reputation, and any other direct or indirect adverse treatment linked to the report in any jurisdiction.
Anonymity	A state where the identity of the source of information is not known to the recipient of the report.
Good Faith / Reasonable grounds	The justified belief of a person, acting honestly and without malicious intent, that the provided information is true and constitutes a violation at the time of disclosure.
«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 (EU GDPR), the UK GDPR and any equivalent data protection

	legislation in other jurisdictions where the Group operates.
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.
Group	The Companies of the Qualco Group
Group/Group Companies	Qualco Group S.A. and all its current and future subsidiaries, regardless of jurisdiction.
Group Audit Committee	Collective corporate body established at the level of the Group of companies, in accordance with the applicable regulatory framework. The Group Audit Committee primarily supports the Board of Directors in fulfilling its responsibilities regarding financial reporting, the effectiveness of internal control and risk management systems, and the oversight of the Group's Internal Audit and Compliance functions.

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 become 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 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 involve serious irregularities, omissions or offenses and shall refer the cases to the competent stakeholders in order to proceed to further investigation and necessary actions.
- D. The WBO shall acknowledge receipt of the report to the Whistleblower within seven (7) days from submission and shall inform the Whistleblower of the follow-up actions and outcome within three (3) months, in line with Law 4990/2022.
- E. The WBO shall also provide clear information to Whistleblowers regarding their right to submit an external report to the National Transparency Authority (Εθνική Αρχή Διαφάνειας) or any other competent authority, in accordance with Law 4990/2022

Each Group Company appoints its own Whistleblowing Officer (WBO) and maintains a dedicated Compliance Function, in order to ensure that reports are managed locally in compliance with the applicable legal framework. In accordance with the Group Case Management Procedure, the WBO informs both the Whistleblowing Committee, which supervises the integrity and independence of the process, and the Chief Executive Officer of the respective Group Company, who in turn informs the Company's Board of Directors. The Group Audit & Risk Committee is not involved in individual cases but receives aggregated reports on risks and systemic issues arising from whistleblowing cases across the Group. To fulfil their tasks, the WBO takes into consideration:

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

## 6A. Independence and Impartiality of the Whistleblowing Committee

The members of the Whistleblowing Committee shall maintain full independence and impartiality in the exercise of their duties. To this end, Committee members shall not participate in the day-to-day operations of the legal entity in which the Whistleblower or the Reported Person is employed, in order to ensure that no undue influence or bias affects the handling of reports.

In the event that a conflict of interest arises at any stage of the procedure, the affected member shall promptly declare the conflict and abstain from any involvement in the review, investigation, or decision-making processes related to the case.

For each case, alternate members shall be designated, possessing the same qualifications and attributes as the

primary members, so that they may be immediately appointed to replace any member who must withdraw due to a conflict of interest or other impediment to their independence.

The same guarantees of independence and conflict of interest principles shall apply to any ad hoc access users and external investigators who may be designated on an ad hoc basis by the Whistleblowing Responsible for the investigation of the case.

## 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. Access to the Whistleblower's identity and to any other identifying information shall be strictly limited to the Whistleblowing Officer and those persons expressly authorised on a need-to-know basis for the management of the case, in line with the Group's Case Management and Investigation Procedures.

## 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. Protection shall also extend to facilitators, colleagues or relatives of the Whistleblower, as well as to any legal entities owned by or connected to the Whistleblower, in accordance with Law 4990/2022 and Directive (EU) 2019/1937. 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 marginalization,
- 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.

The Whistleblower shall be entitled, upon request, to receive information regarding the implementation of the entire procedure and the closure of the pending matter related to their report. 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.

Reported Persons shall enjoy the right to be heard, the presumption of innocence, and the rights of defence, including the right of access to their case file, subject to the limitations necessary to protect the Whistleblower and the integrity of the investigation, in line with the Group's Investigation Procedure.

## 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. In any case, disclosure of the Whistleblower's identity or other confidential information shall only take place when required by law. 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 authorized 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.

Access to confidential information shall be strictly limited on a need-to-know basis to those persons expressly authorized to manage or investigate the Report, in line with the Group's Case Management and Investigation Procedures.

## 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, strictly on a need-to-know basis. 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.

For Group companies operating outside the European Union, including the United Kingdom, the processing of personal data shall be carried out in accordance with the applicable data protection regime (e.g. UK GDPR or other local laws), while in any case applying the stricter standard where necessary to ensure confidentiality and protection of data subjects.

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 as long as necessary and proportionate for the purposes of managing and investigating each Report and ensuring compliance with the applicable legal and regulatory requirements. As a general rule, retention shall not exceed five (5) years from the resolution of each case, unless a longer period is required due to ongoing investigations, legal proceedings, or stricter local legislation.

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<sup>A</sup>. Reporting to the Group Audit Committee

The Whistleblowing Responsible provides the Group Audit Committee with a quarterly update regarding risks associated with whistleblowing cases submitted across the Group. Such updates shall include aggregated information and risk assessments without disclosing any personal data or identifiable details related to pending or closed cases.

The Group Audit Committee does not receive detailed information about individual cases or complaints, except in the following exceptional circumstances:

- When there are pending cases which have not been addressed by the competent bodies within the legally prescribed timeframe.
- When there are repeated complaints containing the same or similar content.
- When the measures proposed by the Whistleblowing Responsible or the Whistleblowing Committee and/or the measures imposed by Management may seriously impact the operations of the organization.
- When the complaints concern members of the Management of any Group company.

In exceptional cases where the measure to be taken following the review of a case may adversely affect the operations of the Group, the Management Team of the parent company of the Group may be informed and involved accordingly. This is carried out through the notification provided to the Group Audit Committee, as stated above. Such reporting shall always respect the principles of confidentiality, data minimization and proportionality, ensuring that no personal data or identifying details are disclosed to the Group Audit Committee.

## 11. Reporting Channels (Electronic Platform and Alternative Means)

For the implementation of this Policy, the Company has clearly defined secure internal reporting channels, in line with Law 4990/2022 and Directive (EU) 2019/1937. All reporting channels are designed and operated in a manner that ensures confidentiality, data protection and secure handling of information, in accordance with the Group's Data Protection Policy.

The primary channel is the specialised Reporting Electronic Platform, available through the Qualco Group Whistleblowing Portal, which provides guidance and FAQs to Whistleblowers. Reports may be submitted anonymously, while the platform is available 24/7 and accessible to employees and third parties in all jurisdictions where the Group operates.

In addition to the Reporting Electronic Platform, Reports may also be submitted by alternative channels, including written correspondence to the Whistleblowing Officer, e-mail, telephone, or through an in-person or online meeting with the Whistleblowing Officer, in line with the Group Case Management Procedure.

The same channels may also be used for reporting incidents of violence and harassment, in line with the Group's Violence and Harassment Prevention Policy and related procedures.

## 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. This cooperation includes, where applicable, designated external authorities such as the National Transparency Authority (Εθνική Αρχή Διαφάνειας) in Greece, as well as other competent national or international competent authorities depending on the jurisdiction of each Group Company. 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. Depending on the jurisdiction where a Group Company operates, such violations may also trigger sanctions imposed by competent national authorities. Each Group Company acknowledges that failure to comply with its obligations under this Policy and the applicable legal framework may expose the organization to significant risks, including but not limited to claims for compensation, regulatory sanctions, and reputational damage.

Violation of this Policy may, particularly, 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.

Any act of retaliation against a Whistleblower or breach of confidentiality obligations shall be considered a severe violation of this Policy and of the applicable legal framework and may result in disciplinary measures, including termination of employment or cooperation, in addition to any civil, administrative or criminal liability.

## 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. Training and Awareness

Each Group Company, through its Whistleblowing Officer (WBO) and its local Compliance Function, is responsible for ensuring that all employees and relevant third parties receive appropriate training and awareness regarding this Policy and the related procedures. Training and awareness initiatives shall be designed in cooperation with the Group Compliance Director, to ensure consistency and alignment across the Group, while taking into account the specific legal and regulatory framework applicable to each jurisdiction.

Such initiatives shall include periodic training sessions, awareness campaigns and accessible guidance material, covering the purpose and use of the reporting channels, the protection granted to Whistleblowers and facilitators, the rights of Reported Persons, and the obligations arising from this Policy. Training shall be provided regularly, and in any case whenever significant changes occur in the legal framework or in the Group's procedures, in order to foster a culture of transparency, integrity and accountability throughout the Group.

## 16. 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
QCO-COM-PO02-Personal Data Protection Policy_v.02
GRP-COM-PR01- Whistleblowing - Ethics and Compliance (Helpline) Case Management.V.2
GRP-RPO-PO04_Violence & Harassment Policy
GRP-IAU-PR01_Whistleblowing Incidents Investigation Process