

WHISTLEBLOWING POLICY

Compliance | Business Ethics



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POSTAL SERVICES

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INTRODUCTION

Hellenic Corporation of Assets and Participations S.A. (**Growthfund or the Company**) is committed to ensuring the highest level of ethical and professional conduct and zero tolerance for illegal or irregular actions which affect its prestige and reputation.

Growthfund encourages its executives, employees and partners to immediately report cases of violations and inappropriate conduct, as well as any act or conduct that may be considered inappropriate, as necessary. This is the only way to ensure that the principles and values of Growthfund, as well as the rules of ethical and professional conduct, will continue to be applied, but also that the Company will be able to take any corrective action required.

1. PURPOSE

The purpose of the Whistleblowing Policy (Policy) is to create the framework for the early detection of irregularities, omissions or offences in the conduct of Growthfund business. This Policy sets out the principles and the operating framework based on which Growthfund receives, manages and investigates reports of irregularities, omissions or other offenses that have come to the attention of its staff or third parties and concern Growthfund.

The Company takes all reports of possible misconduct seriously and, in any case, ensures the confidentiality of reports and conducts investigations to identify any violation. All violations shall be subject to the necessary corrective measures and penalties determined in accordance with the nature of the violation, the applicable law and the employment/partnership agreements.

2. SCOPE

This Policy concerns (i) the members of the Supervisory Board and the Board of Directors of Growthfund, (ii) all Company executives and staff, (iii) partners, vendors as well as all Growthfund service providers, but also (iv) third parties who have relevant information about any unlawful acts concerning Growthfund.

The Policy also sets out the guidelines for Growthfund subsidiaries that establish and implement similar policies and procedures.

3. GENERAL PRINCIPLE

The fundamental and inviolable principle of the Whistleblowing Policy is to protect the identity and confidentiality of whistleblowers and, if they are Company employees, to ensure that their position and/or their future professional development is not threatened. The Company guarantees the confidentiality of the personal details of whistleblowers and of the persons allegedly involved in offences or omissions.

The Company will protect persons reporting in good faith. However, it reserves the right to take any action it deems appropriate against any executive, employee or partner if it has proof that they intentionally/fraudulently provided false information when submitting a report.

4. SUBJECT OF REPORTS

Reports of irregular, unethical, illegal or criminal behaviour in relation to the work of the Company include – but are not limited to – the following:

- Fraud
- Corruption / abuse of power
- Bribery, violation of the Gifts and Hospitality Policy
- Conflict of interests
- Theft, embezzlement
- Forgery
- Confidentiality and personal data breach
- Money laundering
- Breach of competition legislation
- Irregularities in accounting for financial data
- Misuse of Company funds
- Breach of safety and health regulations
- Breach of environmental legislation
- Discrimination of workers
- Harassment
- Threat, blackmail, use of force
- Insult, slander

- Breach of legislation and corporate policies
- Unethical behaviour

Personal data not related to the conduct described in the report should not be included in the latter and in any case will not be further processed and will be deleted without delay. Particular attention should be paid to sensitive personal data not related to the reported conduct (e.g. data on racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, health, or concerning an individual's sex life or sexual orientation, etc.).

5. ANONYMITY AND WHISTLEBLOWER PROTECTION

Open and Anonymous Reporting: Growthfund has established communication channels to enable whistleblowers submit their report either openly or anonymously. However, Growthfund encourages whistleblowers to openly submit reports, as this enhances the credibility of the report's content and the whistleblower's intentions, while also creating a communication channel both for further clarifications and to inform the whistleblower on the report's progress.

Whistleblower Protection: The Company is committed to protecting whistleblowers, provided they submitted a report in good faith, from any discrimination or undue treatment, from being targeted, or from any acts aimed at punishing them and cause them to sustain a demotion/transfer or termination of employment. After the investigation of the report is over, there will be no sanctions or consequences for persons not proven to have committed or contributed to an unlawful act. If the whistleblower was involved in the act, his/her contribution to the detection and investigation of criminal offences will be taken into account when assessing liability and consequences.

Informing the Reported and Other Persons: Reported persons should be informed of the content of the report, the persons involved in the processing and evaluation of the report, their relevant rights and how to exercise them in accordance with the applicable framework. In principle, all persons affected by a report, in addition to the reported person, such as the whistleblower, witnesses, third parties included in the report as per the conditions and terms set out in the applicable framework, also have the right to information-access. In this context, information should be provided at the appropriate time, e.g. to the whistleblower when

submitting the report, to witnesses before any interview is held, etc.

Deviations from the Obligation to provide information-access: The provision of information-access will be considered on a case-by-case basis as cases may arise where the above information-access may, among others: a) obstruct the investigation of the case and hinder the evaluation of the report as well as the collection of information and evidence required; b) directly or indirectly reveal the identity of whistleblowers; c) lead to the disclosure of confidential information which, due to its nature and in particular due to the overriding legitimate interests of Growthfund, must remain confidential; d) obstruct the substantiation, exercise or support of legal claims of Growthfund and/or any criminal proceedings. Each case will be judged separately and the reasons for the delay in providing information-access will be presented in writing. The nature of the information and the risks associated with its disclosure will be considered in all cases. If a request is met, in principle personal data of third parties will be redacted from the relevant documents.

6. PERSONAL DATA

The processing of personal data included in the reports is conducted in accordance with national and European legislation on personal data and with the relevant Company policies. Specifically:

For what purpose does Growthfund process personal data? The personal data of all parties involved in the report are protected and processed solely in the context of preventing, detecting or investigating irregular, unethical, illegal or criminal conduct.

Is it legal for Growthfund to process personal data? For the alleged offenses that are directed against the public interest or concern violence and harassment in the workplace, processing is a legal obligation of Growthfund. For all other alleged offences, it is in the legitimate interest of the Company or third parties to disclose illegal or irregular conduct that exposes it to financial and legal risks, damage to its reputation and corporate culture and create a negative working environment.

Who can access the personal data? Only persons involved in the management and investigation of an incident, and only to the extent required, may have access to the data included in the reports. In particular, recipients of personal data included in the reports may

be the members of the Growthfund Whistleblowing Committee, the Director of Legal Department, the Data Protection Officer, the Audit Committee, the Board of Directors, other companies in the Growthfund portfolio, external consultants bound by confidentiality clauses, lawyers, the electronic reporting platform provider, as well as judicial and/or administrative authorities.

How long will Growthfund retain personal data? Growthfund retains personal data for a specific period after the end of the investigation, which varies depending on the outcome of the investigation. Specifically:

- If the report was found to be unfounded, the personal data will be deleted from the report within two (2) months after the case is closed.
- If the reported situation is referred to court, the personal data will be deleted once a final court judgement is issued.
- Where the report reveals substantiated findings against an executive of the Company, the personal data will be retained throughout his/her employment/ relationship with the Company and deleted twenty (20) years after the termination/ end of the relationship in any way.
- Where the report reveals substantiated findings against an external partner or vendor of the Company, the personal data will be retained for the entire duration of this partnership and deleted five (5) years after the expiry/ end of the partnership in any way.

Is personal data secure? The Company implements the necessary technical and organizational measures to ensure a high level of data security (such as access to information “on a need to know basis”, commitment to confidentiality of staff with access, recording of access, monitoring of access and access rights, use of encryption, confidentiality of passwords, etc.), in accordance with its applicable policies and procedures.

7. PROCEDURE FOR SUBMITTING REPORTS

Each report should include: the main reason for submitting the report (acts that may cause or have caused an incident worth reporting), with specific information (e.g. names, dates,

location) and substantiation using relevant documents or other records. Evidence need not be included but any relevant information to facilitate the evaluation of the report will be considered.

Reports may be:

- a. filed to the whistleblowing platform via email to <https://safevoice.growthfund.gr/#/> or
- b. sent to the e-mail address of the Company safevoice@growthfund.gr or
- c. sent by post to the Company's address, namely Hellenic Corporation of Assets and Participations S.A., 4, Karageorgi Servias str., Postcode 10562 - 4th floor, to the attention of the Compliance Officer, marked "Confidential".
- d. submitted in writing or orally directly to the Compliance Officer.

The above communication channels serve as reporting lines and are available 24/7. Issues that may arise from complaints by supervisory authorities or through complaints or grievances submitted among vendors and partners or concerning members of the Board of Directors and which have been submitted through other communication channels, as well as from relevant press articles, are not the subject of this policy and will be reviewed by the competent department.

The Compliance Officer of Growthfund is responsible for receiving the various reports and informing the Whistleblowing Committee on the reports to be reviewed, in accordance with the provisions set out below. Where a report has not been received through the whistleblowing platform, it will be recorded by the Compliance Officer of Growthfund.

Any complaint or grievance or opinion is not a report within the meaning of this policy.

8. MANAGEMENT OF SUBMITTED REPORTS

Submitted reports will be managed by the Whistleblowing Committee consisting of (i) the Compliance Officer of Growthfund as head of the Whistleblowing Committee having overall responsibility, (ii) the Internal Audit Director of Growthfund, (iii) the Human Resources Director of Growthfund. A Legal Adviser may attend meetings following an invitation from the Whistleblowing Committee, for specific issues where the Whistleblowing Committee feels it

needs legal support.

Growthfund has appointed alternate members to replace any members in case of a conflict of interest, namely the Director of the Legal Service and the Director of Financial Services.

It is recommended that the above composition be applied to Growthfund subsidiaries provided the respective roles exist, otherwise they may be replaced by other executives, such as members of the Disciplinary Boards, etc. The stages of (a) submission, (b) management, (c) evaluation, (d) outsourcing, (e) resolution and (f) follow-up of the report are included in the Whistleblowing Reports Management Procedure.

The Whistleblowing Committee may deviate from this procedure in addressing matters that have arisen, if said matters require dedicated handling. It is clarified that in case a complaint concerns members of the Board of Directors, it shall be managed exclusively by the Compliance Officer.

9. POLICY UPDATES AND REVISIONS

This Policy is approved by the Company's Board of Directors and is updated by the Compliance Officer, who is also responsible for communicating the Policy to the Company's executives and staff. The Policy must be available on the Company's website. For any questions or doubts regarding compliance with this Policy, you may consult the Company's Compliance Officer.

