

**TITLE:**

**PROCEDURE FOR REPORTING AN INCIDENT OF VIOLATION  
OF LAW  
(Speak Up policy - Group Policy)**

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**PURPOSE:**

This policy explains the process implemented by PharOS and its Subsidiaries to establish external and internal reporting channels, to manage the internal reports and complaints and to monitor them through four (4) different internal channels 24 hours a day, 7 days a week; (a) in person meeting (b) online via the Speak Up Platform, (c) by phone and (d) by letter or e – mail. These channels and processes enable the internal reporting in a timely manner of any confirmed or potential breach of law or regulation, any irregularity, inappropriate or illegal conduct, and any questionable practice or deviation from PharOS policies and procedures.

**SCOPE:**

The procedure of reporting concerns directors, managers, Employees and workers regardless of their contractual status, including staff on a project basis, independent service providers, remunerated mandate, persons working under the supervision and direction of third-party service providers, trainees including interns, former employees, but also people seeking a position in the Company, trading or collaborating with the Company.

**KEY POINTS:**

- 1. Objective**
- 2. Definitions**

### 3. Report submission process

#### 1. Objective

PharOS is committed to conducting its business activities with integrity and always in compliance with Applicable National and European legislation, regulatory framework, Company policies and procedures, the Code of Conduct, and any other standard procedure which the Company implements and follows. Irregularities and deviations from corporate policies and procedures as well as misconduct that violates applicable national or European laws and regulations or the Code of Conduct may occur in the workplace and are not in line with Company commitments. The Company must provide its Employees with the necessary means of defense and protection against such incidents and behaviors, encouraging them to speak openly and make relevant reports and complaints.

**The purpose of this procedure is to establish external and internal reporting channels and a process for the submission and monitoring of internal reports and complaints.** In addition, the procedure reflects PharOS' commitment to an open reporting and complaint submission process, in the context of which Employees are encouraged to raise issues of misdemeanors they may have identified. In today's environment, Employees remain PharOS' first and best line of defense against misdemeanors. By detecting and reporting misconduct, Employees can help PharOS maintain all its key principles by taking immediate remedial action to correct any misconduct, preventing future incidents, and ensuring a healthy and friendly work environment for all Employees.

We acknowledge that early detection and reporting of offenses depends on maintaining a climate of trust, confidentiality and integrity, in which all Employees:

- (a) Are encouraged to report possible misconduct as soon as possible, knowing that their concerns will be taken seriously, and that appropriate action will be taken;
- (b) Are familiar with and can effectively use available channels and procedures to report breach concerns while maintaining, if they so wish, anonymous; and
- (c) Have confidence that the reporting process remains confidential, with no tolerance for Retaliation or ill-treatment of any kind.

The procedure is applied in all Company's current facilities in Greece, Malta and Poland and in any future facility in Greece and abroad as well as in places where corporate meetings, conferences and all kinds of Company events take place, either live or online including telephone interactions, and in places in which services are provided by PharOS Employees in the context of their work.

PharOS complies with all measures and obligations relating to the implementation of the provisions of Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons reporting breaches of Union law adopted on October 23, 2019 and entered into effect on December 16, 2019.

## 2. Definitions

**“Applicable National legislation”:** Greek national legislation (Law 4990/2022, implementing Directive (EU) 2019/1937 and the delegated acts) and Maltese national legislation (PROTECTION OF THE WHISTLEBLOWER ACT)

**“Company” or “PharOS”:** the company under the trade name Pharos Ltd along with all other entities controlled by the company (the “Subsidiaries”).

**“Group”:** the Company along with its Subsidiaries.

**“Report Investigation Committee”:** The Report Investigation Committee shall be the committee responsible for deciding upon the reports filed.

**“National Transparency Authority” (“NTA”):** the Greek authority competent to receive, handle and follow up on (external) reports filed directly to this authority and relating to breaches falling within the scope of the Applicable National Legislation.

**“Internal reporting”:** the oral or written communication of information on breaches within the Company’s designated channels.

**“External reporting”:** the oral or written communication of information on breaches to National Transparency Authority (NTA, for Greece) or to the to the whistleblowing reports unit (competent for Malta).

**“Facilitator”:** means a person who assists a Reporting Person in the reporting process in a work-related context, and whose assistance should be confidential.

**“Person Responsible for the Receipt and Monitoring of Reports” (“PRRMR):** The whistleblowing reporting officer. This person is registered to the Greek Labor Inspectorate, as responsible for the receipt and follow-up of reports. The Company has declared to the Greek Labor Inspectorate, as its PRRMR, the Group Head Human Resources and Administration.

**“Report”:** A complete, objective and accurate description of law or regulation breach incidents that have already occurred or are likely to occur.

**“Reporting person”:** A natural person who makes an internal or external report or public disclosure by providing information on breaches, acquired in the context of his or her work-related activities.

**“Reported Person”:** A natural or legal person who is referred to in the internal or external report or public disclosure as a person to whom the breach is attributed or who is associated with the person to whom the breach that falls within the scope of this Policy and relevant legislation is attributed.

**“Retaliation”:** Any direct or indirect act or omission which occurs in a work-related context, which causes or may cause unjustified detriment to the reporting party or which places the reporting party at a disadvantage, and which is linked to internal or external reporting or public disclosure.

**“Indicative misdemeanors” or “Incidents” or “Breach” or “Improper Practice”:** Any violation of law or regulation that may be the subject of a report include:

- fraud or theft
- bribery or corruption
- criminal activities
- human rights violations
- breaches of competition law
- discrimination / harassment
- acts, practices or threats thereof, which are intended to lead to, or may result in, physical, psychological, sexual or financial harm
- financial, accounting or control irregularities
- falsifications of documents or files
- conflicts of interest
- abuse of confidential information
- environmental issues, health and safety issues
- acts of Retaliation
- breaches of public procurement
- public health violations
- consumer protection violations
- violations regarding privacy and personal data protection, network and information systems security, etc.
- infringement of PharOS' Code of Conduct and Employee Handbook
- infringement of PharOS' Anti-corruption and Anti-bribery policy and generally any act that may constitute corruption
- infringement of PharOS' Anti-violence and Anti-harassment policy and generally any form of discrimination or harassment.

**“Information on breaches”:** Information, including reasonable suspicions, about actual or potential breaches, which occurred or are very likely to occur in the organisation in which the reporting person works or has worked or in another organisation with which the reporting person is or was in contact through his or her work, and about attempts to conceal such breaches.

**“Reasonable Suspicions”:** The reporting person shall consider, in the context of a justified belief, that the information relating to the reported breaches is true. He/she shall not necessarily be sure about the facts at the time of reporting nor assess whether the conduct he/she intends to report constitutes a particular criminal offence. “Justified belief” is considered as the belief that another person (e.g., a colleague) with similar knowledge, educational background and experience could agree with him/her.

**“Follow-up”:** Any action taken by the PRRMR and the Report Investigation Committee, to assess the accuracy of the allegations made in the report and, where relevant, to address the breach reported.

**“Employee”:** Directors, managers, and workers regardless of their contractual status, including staff on a project basis, independent service providers, remunerated mandate, persons working under the supervision and direction of third-party service providers, trainees including interns, former Employees, but also people seeking a position in the Company, trading or collaborating with the Company, any volunteer, shareholders and persons belonging to the administrative, management or supervisory body of an undertaking, including non-executive members, any

person in employment in the public administration, including as a member of a disciplined force, any person who is or was seconded to an employer

**“Public disclosure”:** The making of information on breaches available in the public domain.

**“Work-related context”:** Current or past work activities in the private sector through which, irrespective of the nature of those activities, persons acquire information on breaches and within which those persons could suffer Retaliation if they reported such information.

### **3. Report submission process**

#### **3.1 Filling of an internal report**

##### **a) Process description**

Any Employee who is aware of a law or regulation breach, either because he/she has been the victim of such an incident or because he/she has witnessed it or has Reasonable Suspicions that such an incident is about to occur, may submit an anonymous or signed report via the online process, via telephone, via letter or email to [speakup.pharos@gr.gt.com](mailto:speakup.pharos@gr.gt.com), or via in person meeting with PRRMR. All channels operate 24 hours a day, 7 days a week.

The internal reporting channels consist of the following :

##### **(A) Online process –The “SpeakUp” platform**

- Enter Company site (<https://www.pharosgr.gr/> )
- Go to “SpeakUp” tab
- Choose “Report a concern online”
- Select your primary location from the drop-down list
- Select the location to which your concern relates to from the drop-down list
- Select the business fields to which your report relates to from the drop-down list
- Select the issue type that best describes your concern from a proposed list
- Fill the form with all the necessary requested data
- Submit the form

##### **(B) Phone Line**

The content of the report submitted by phone is documented either by recording the conversation in a stable and retrievable form or by a complete and accurate transcription of the conversation into a protocol prepared by the PRRMR (provided that the reporting person has legally consented.) The reporting person must be in the position to verify, correct, and agree with the final transcription of the conversation by signing the relevant protocol.

The report via phone can be also submitted via a voicemail system, if available in the Company, with the recording of the conversation, provided that the reporting person has legally consented. The content of the report submitted via voicemail is documented either by recording the conversation in a stable and retrievable form or by a complete and accurate transcription of the conversation into a protocol prepared by the PRRMR (provided that the reporting person has

legally consented.) The reporting person must be in the position to verify, correct, and agree with the final transcription of the conversation by signing the relevant protocol.

**(C) Written report**

1. Send a letter to PRRMR to the attention of “Person Responsible for the Receipt and Monitoring of Reports” of the Company, with the mention “Confidential” or an email to [speakup.pharos@gr.gt.com](mailto:speakup.pharos@gr.gt.com)
2. Provide the following details regarding your concern:
  - Date/Time of the situation
  - Names of the associates involved including those who may have knowledge or witnessed the situation you are describing
  - The location where the situation occurred
  - Have you reported your concern to anyone in the Company? If so, to whom and when?
3. Receive a confirmation e – mail with a unique code number for future reference

**(D) In person meeting with PRRMR**

Orally after a meeting with the PRRMR. The meeting is conducted within a reasonable time from the date of the relevant request by the reporting person, which can be submitted in writing, orally, or via email to the PRRMR. In this case, the PRRMR keeps complete and accurate minutes of the meeting in a stable and retrievable form, either by recording the conversation, provided the reporting person has legally consented, or in writing, which the reporting person can verify, correct, and agree with by signing.

**b) Information to be included in a report**

**Any person covered by the Scope of this policy may report incidents through the above channels. The report should be complete, objective and contain at least a brief description of the incident, the place where it took place, the time of occurrence and the parties involved.** The report should be made in good faith, based on true facts and unselfishly, without expectations for monetary satisfaction or profit. False and unfounded allegations will not be tolerated and may lead to disciplinary misconduct.

**c) Report anonymity**

**Reports can be anonymous or signed. PharOS takes every reasonable measure to ensure the confidentiality of report management to minimize the risk of revealing the identity of the reporting persons.**

If the reporting person wishes to submit an anonymous report, he / she should provide sufficient details to allow the proper investigation of the reported breach incident. PharOS takes every reasonable measure to ensure follow up questions for whistleblowers wishing to remain anonymous, to the extent technology allows. However, anonymous reports may cannot be supported by the follow up services In case the anonymous reporting person wishes to be updated on the status of his / her concern, he / she needs to provide at least some their contact details.

#### **d) How PharOS ensures the confidentiality of reports**

**The designated persons managing the reports are bound by the obligation to keep the identity of reporting and reported persons and third parties mentioned in the report strictly confidential.** More specifically, the identity of the reporting person and the reported person is not disclosed to anyone other than the authorized staff of PharOS who are responsible for receiving or monitoring the reports unless the reporting person gives his/her explicit consent. The same applies to any other piece of information from which the reporting person's identity could be deduced, directly or indirectly. Deviations from the above procedure apply only in accordance with the relevant provisions of the applicable legal framework.

Upon receipt of the report, regardless of the method of submission, the PRRMR ensures the confidentiality and protection of personal data of the reporting person as well as any third party named in the report, preventing access to it by unauthorized persons.

Information leading to the identification of the user of the reporting channels is not disclosed without his / her consent, except to the people who have undertaken the investigation of the report. The only exception would be if such disclosure is required by law or if a significant public interest is at stake.

Personal data that may be disclosed are processed in accordance with current Personal Data Protection legislation (GDPR) with which the Company is fully compliant. Personal data that are not explicitly related to the handling of a particular report are not collected or, if collected inadvertently, they are deleted without undue delay.

#### **e) Post report submission process**

**According to Applicable National and European legislation, the PRRMR is responsible for the receipt and monitoring of reports and, in particular, has the following duties:**

- Provides information regarding the possibility of reporting.
- Receipts reports regarding breaches and acknowledges the receipt to the reporting person **within seven (7) business days** from the day of receipt.
- Acts as appropriate, so that the Report Investigations Committee or the public authorities take charge of the report or terminates the procedure by archiving the report and communicating the relevant decision to the reporting person, in the event that the report is unintelligible or is submitted abusively or does not include incidents constituting a breach or indicating such a breach.
- Ensures the confidentiality of the identity of the reporting person and any third party mentioned in the report, by preventing access thereto by non-authorized persons.
- Follows-up the reports and communicates with the reporting person, if needed.
- Investigates the report, asks for further information, documentation or other evidence, meets the reporting person, witnesses and/or any other interested party along with the Report Investigation Committee.
- Submits the report and any supportive documents to the Report Investigation Committee.
- Provides feedback to the reporting person regarding the actions that will be taken or had already been taken within a reasonable timeframe, not exceeding three (3) months from the acknowledgement of the report's receipt, or, if no acknowledgement was sent

to the reporting person, within a timeframe not exceeding three (3) months from the expiry of the seven-day period after the report was made.

- Provides clear and easily accessible information regarding the procedures for THE external reporting , public authorities or EU institutional and other bodies or organisations, as the case may be. →
- Designs and coordinates educational trainings related to ethics and integrity, participates in the formation of internal policies for the strengthening of integrity and transparency in the Company. →
- Keeps records of the reports received, according to the confidentiality requirements provided by the applicable legislation.
- In the event that the PRRMR finds indications of a criminal act that is prosecuted ex officio from the submitted evidence, he/she must immediately forward a copy of the report to the locally competent Prosecutor, informing the reporting person.

Once submitted by the reporting person and received by the PRRMR the report is forwarded to the designated PharOS staff, the Report Investigation Committee, who shall produce a transcript of the report so it can be properly investigated. Members of the Report Investigation Committee are the Group Directors and Group Heads of the following departments: Quality Assurance, Human Resources, Operations and Accounting & Finance.

During the investigation and evaluation of the report and for the collection of information and detailed data, the members of the Report Investigation Committee may have access to the records of the Company, to audiovisual material and to other appropriate means for the verification of the report.

The members of the Report Investigation Committee must look into the reports without any delay and examine the information contained in the reports demonstrating objectivity and impartiality, without prejudice against involved parties and taking all measures necessary for the protection of confidentiality and personal data of those involved unless otherwise provided by applicable law. The members of the Report Investigation Committee need to conclude whether the reported case constitutes a law or regulation violation and then to judge the reliability of the information provided. The people involved in the report are informed by the PRRMR on the nature of the reporting person's allegations, when deemed necessary, for them to be able to respond to those allegations accordingly.

The members of the Report Investigation Committee treat any person involved in reports with professionalism, dignity and respect. No one is presumed to have been involved in a breach of law or regulation before the relevant report investigation has been completed.

If the report involves an Employee or a person participating in the investigation or if one of these persons has a conflict of interest, then that person shall abstain from the investigation and be replaced. More specifically, when a report is directed at a member of the Report Investigation Committee, this member must abstain from the investigation and the report shall be forwarded from the PRRMR to the other members of the Report Investigation Committee. When a report is directed at PRRMR, PRRMR shall record the report and forward the report to the NTA (as external channel) informing the reporting person. Specifically for Malta, an internal disclosure may be made to the director, who is hereby deemed to be the PRRMR if: the whistleblower believes on reasonable grounds that PRRMR is or may be involved in the alleged improper practice; or the whistleblower believes on reasonable grounds that the PRRMR is, by reason

of any relationship or association with a person who is or may be involved in the improper practice alleged in the disclosure, not a person to whom it is appropriate to make the disclosure.

The Company will make every effort to inform the reporting person, who has made a signed report, about the progress of the report's status, the progress of the investigation and the expected time of completion in accordance with law provisions regarding time deadlines. Sometimes, however, to ensure the adherence to the principle of confidentiality, may prevent the disclosure of information related to the investigation until the latter has been concluded.

Following the completion of the investigation, the Report Investigation Committee shall draft an investigation report. The report will include the Committee's proposal for the application of measures aimed at the protection of those affected as well as for disciplinary penalties, if appropriate. The Report Investigation Committee reports directly to the Management of the Company (Director & Managing Directors). False reports or reports that turn out to be malicious may constitute a serious disciplinary offense.

The report, regardless of the method of submission, is recorded in a special file maintained by the PRRMR in either printed or digital form. The Company keeps a record of every report it receives, in accordance with the confidentiality requirements set out in the relevant legal framework. Reports shall be kept for a period not exceeding that which is necessary and proportionate to comply with the provision of EU or national law.

In case the report is received by an unauthorized person, they are obliged to forward it immediately to the PRRMR, without any modification of its content or disclosure of information that may lead to the identification of the reporting or any third party named in the report.

#### **f) Prohibition of Retaliation**

No reporting person may be retaliated against for making a signed report or for allegedly making an anonymous report or participating in its management.

Retaliation including threats of Retaliation and attempts of Retaliation may take the form of:

- (a) suspension, lay-off, dismissal or equivalent measures;
- (b) demotion or withholding of promotion;
- (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours;
- (d) withholding of training;
- (e) a negative performance assessment or employment reference;
- (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty;
- (g) coercion, intimidation, harassment or ostracism;
- (h) discrimination, disadvantageous or unfair treatment;
- (i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment;
- (j) failure to renew, or early termination of, a temporary employment contract;
- (k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
- (l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
- (m) early termination or cancellation of a contract for goods or services;

- (n) cancellation of a license or permit;
- (o) psychiatric or medical referrals.

Anyone found retaliating against a reporting person who has submitted, may submit, intends to submit, or has assisted, may assist, intends to assist or could assist in an investigation of a submitted report, may be considered to commit a disciplinary offense.

The members of the Report Investigation Committee are ambassadors against violence and harassment and must ensure that Retaliation against victims is prohibited, directly or indirectly.

Especially regarding the reporting person, PharOS prohibits any form of Retaliation. Any type of adverse behaviour towards a reporting person is prohibited, even if his/her report cannot be confirmed after investigation. The same level of protection shall also apply to third parties connected with the reporting persons, Facilitators and in general persons potentially subject to Retaliation, such as colleagues or relatives of the reporting persons, legal entities and legal aid in criminal and cross-border civil proceedings.

#### **h) Cooperation with competent authorities and provision of information as needed**

All Employees must cooperate fully with the Company-appointed Report Investigation Committee, providing complete and true information but also with any competent public, administrative or judicial authority which, either ex officio or at the request of the person concerned, within its competence, requests the provision of data or information, providing necessary assistance and facilitating access to data. Making false or malicious allegations during the investigation may constitute disciplinary misconduct. The reporting process should not be misused for reckless accusations or personal complaints.

### **3.2 Filling an external report**

#### **For Greece:**

The submission of an internal report does not prevent a person from submitting an external report to the NTA, according to law 4099/2022 and the respective applicable legislation.

External reports to the NTA are submitted at present orally or in writing or through an electronic platform and in particular:

- Electronically, by sending e-mail to [kataggelies@aead.gr](mailto:kataggelies@aead.gr) or by filling in the corresponding complaint form <https://aead.gr/submit-complaint/>
- By post, by sending letter to the postal address of NTA: Lenorman 195 & Amfiaraou Str., Athens 10442, Attiki.
- In person (or by a duly authorized representative) at the premises of the NTA (Lenorman 195 & Amfiaraou Str., Athens 10442, Attiki).

This information is available at the following link: <https://aead.gr/contact>

#### **For Malta:**

- Prior to an external disclosure, an internal disclosure must already have been made or attempted to be made. However, an external disclosure may be made to the whistleblowing reports unit directly if the reporting person believes on reasonable grounds –
- (a) that the head of the organisation is or may be involved in the improper practice alleged in the disclosure; or
- (b) that immediate reference to the authority, is justified by the urgency of the matter to which the disclosure relates, or some other exceptional circumstances; or
- (c) at the time he makes the external disclosure, that he will be subjected to an occupational detriment by his employer if he makes an internal disclosure; or
- (d) that it is likely that evidence relating to the improper practice will be concealed or destroyed if he makes an internal disclosure; or
- (e) that although an internal disclosure has previously been made, the whistleblower has not been informed on the status of the matter disclosed or it is reasonably evident to the whistleblower that there has been no action or recommended action on the matter to which the disclosure relates within a reasonable time from the making of the disclosure.

### **3.3 Public Disclosure**

A person who makes a public disclosure shall qualify for protection under this policy and the national and European legislation if any of the following conditions is fulfilled:

- (a) the person first reported internally and externally, or directly externally in accordance with, but no appropriate action was taken in response to the report within the timeframe defined in this policy, or
- (b) the person has Reasonable Suspicions/grounds to believe that: (i) the breach may constitute an imminent or manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage; or (ii) in the case of external reporting, there is a risk of Retaliation or there is a low prospect of the breach being effectively addressed, due to the particular circumstances of the case, such as those where evidence may be concealed or destroyed or where an authority may be in collusion with the perpetrator of the breach or involved in the breach.

### **3.4 Related Policies**

Pharos' Code of Conduct and Employee Handbook

Pharos' Anti-corruption and Anti-bribery policy

Pharos' Anti-violence and Anti-harassment policy

GDPR Privacy notice for Employees, workers and contractors