

# Whistleblowing Policy

January 2022



# 1. Introduction to whistleblowing, what it is and why is it important.

Nera Kritis SA is continuously striving to achieve high level of business ethics and transparency. This whistleblower policy and process aims to alert the company regarding suspicions of misconduct in an anonymous and safe manner. This is an important method of detecting, reducing and preventing misconduct, malpractice and increasing trust and transparency among all stakeholders and partners. Primary aim is to proactively receive information, so all misconduct described below is addressed early and appropriately in a timely manner.

An additional goal of this whistleblowing process is to uncover flaws in processes or lack of procedures that could make Nera Kritis SA exposed to legal action, loss, criticism, environmental risk or misconduct.

Thus, the main purpose of this document “the policy” is to define the scope and operation procedure of the whistleblowing process to all stakeholders involved directly or indirectly to company activities. The Head of Quality is responsible for authoring, reviewing, updating at least annually or as necessitated by circumstances or needs and implementing this policy properly. In addition, this policy encourages all stakeholders to feel confident in raising concerns at the earliest opportunity in order to receive an appropriate response as early as possible, as well as the next steps in pursuing these concerns if a stakeholder is not satisfied.

## 2. When should this policy be used- When to blow the whistle?

According to the scope in 1, the whistleblowing process can be used to alert Nera Kritis SA of risks affecting the company, individuals, stakeholders, society or environment.

Misconduct, malpractices or suspicions in the scope of the whistleblowing policy that this policy can be used include:

1. Forms of serious or continuous discrimination or harassment of any nature (as stated in our Anti-harassment policy), including verbal or physical harassment of a person due to religion, origins, sexual orientation, special condition or anything pertaining to difference of any nature,
2. Acts that could constitute fraud or corruption,
3. Possible violation of financial or regulatory laws, banking and financial crime, anti-bribery laws,
4. Misappropriation of client's or company's resources or assets,
5. Violations of any applicable anti-money laundering legislation, or noncompliance with due diligence measures or reporting obligations
6. All full or partial infringements of Nera Kritis SA's code of conduct and the good ethics and conduct expected by all Nera Kritis SA's employees,
7. All improprieties that could endanger the life or health of individuals, either stakeholders or the public health,
8. All activities that could pose a threat to the environment,
9. Any actions that work against the company's, stakeholders' or affiliates interests.
10. Noncompliance to health and safety measures.

The list stated above should serve as a guideline to issues that can be raised via this process, but it is neither exhaustive nor intended to illustrate all issues that could be raised.

For the whistle to be blown, no evidence or evidence is required; An honest suspicion by the person blowing the whistle is sufficient to start the process. Nera Kritis SA is committed that any person, internal or external that submits a report will be protected against retaliation acts, as long as the report is made in good faith and the process is not abused. On the contrary abuse of this policy or deliberately reporting false information is forbidden and subject to disciplinary action as necessitated.

In any case, the whistleblower is encouraged to share any information or data known to him/her (for example details on an event, persons involved and documentation) that could assist in the investigation effort.

A report can be filled here.

### 3. Anonymous or named report?

It is encouraged that any person submitting a report is open with his/her identity as Nera Kritis SA is committed to both handling all reports discreetly. Specifically to maintaining identity confidentiality through the process and after its resolution. The exception to that is if it is deemed necessary and legal or judicial proceedings are required. Nera Kritis SA is also committed to shield against any and all forms of retaliation.

If a report needs to be filled anonymously, we offer this option of anonymously reporting and this anonymity is also secured through the entire process.

## 4. Investigation process

### A. The whistleblowing team

The whistleblowing team consists of three staff members that are appointed by upper management and require at least 3 years of previous employment in the company so that they are familiar with internal processes. Members of this team are also entered into a Confidentiality Agreement specifically in respect to the information and data they receive as members of the whistleblowing team. If required, individuals that add expertise may be provided with information (external lawyers) but they will also need provide written consent to the Confidentiality Agreement prior to that. According to the extent of the report, the whistleblowing team members may decide to de-escalate or escalate the investigation and thus additional persons within the company may be involved in the process.

In order to ensure integrity and objectivity, in case a person in the whistleblowing team coincides in a report, this report is flagged, and the team member is immediately removed from this incident and substituted with a member of upper management.

### B. Receipt of the report

When receiving a report, the whistleblowing team must decide if the message is accepted, and an investigation begins, or the message is declined.

The whistleblowing team may decline a message based on below:

1. There is insufficient information to allow for further investigation.
2. The reported incident has been already resolved.
3. Conduct is not a reportable conduct under the policies of Nera Kritis SA.
4. The report is not made in good faith or is malicious.

In case a report includes issues not covered by the scope of the Policy, the whistleblowing team may take the appropriate steps to resolve the issue and update the policy as required. If a different department or person is eligible to provide a solution, then it can be assigned elsewhere, provided that anonymity is maintained and retaliatory acts are prevented. Whistleblowing reports that could be made in bad faith or are unsubstantiated can be concluded without further acts. In case of non-anonymity the whistleblowing team will inform the whistleblower of whether the case was accepted or declined.

If a report is accepted, the investigation process is described below.

## C. Investigation

All reports are treated seriously and according to policy.

- The investigation of a case is initiated as soon as possible, normally within 5 working days of report receipt. The investigation is handled with objectivity, integrity and all stakeholders' interests.
- No one will try to identify the whistleblower in the case of an anonymous report or disclose his identity in case of a named report.
- The whistleblowing team may require further information and request it from the whistleblower in a discreet manner.

- The whistleblowing team must decide if and in which form the report can be escalated.
- A report will not be investigated by anyone mentioned in it, involved in a malpractice or if there is an affiliation to the person(s) in the scope of the investigation.
- All messages are handled confidentially by both members of the whistleblowing team as well as external or additional persons brought in the investigation process.

## 5. Personal Data Protection

The processing of Personal Data will be in compliance with no. 679/2016 European General Data Protection Regulation (“GDPR”), Law 4624/2019, as in force or as may be replaced and any other applicable Greek and European legislation for the protection of Personal Data (“Applicable Legislation”). The data controller within the meaning of GDPR is Nera Kritis SA, however the processing is performed solely by the whistleblowing team and/or any other person deemed necessary in accordance with the Policy.

## 6. Policy updates and amendments

The Head of Quality is responsible for authoring, reviewing, updating at least annually or as necessitated by circumstances.

## 7. Contact us

If there are any questions or concerns regarding the whistleblowing policy, please contact [arozos@nerakritis.gr](mailto:arozos@nerakritis.gr) .