



PJ CONDELLIS SA

## INTERNAL REPORTS & COMPLAINTS POLICY

The company PAUL J. CONDELLIS SA (hereinafter referred to as the 'Company'), for complying with Law 4990/2022, implements this Internal Reports & Complaints Management Policy (hereinafter referred to as the 'Policy'), which applies to the following categories of persons (hereinafter referred to as 'Reporting Persons'):

- a) the Company's employees, regardless of whether their employment is full or part-time, permanent or seasonal;
- b) independent contractors, self-employed persons, or consultants, or persons working remotely;
- c) shareholders and persons who are members of the Company's administrative, management or supervisory bodies, including non-executive members, as well as volunteers and paid or unpaid interns;
- d) any persons working under the supervision and instructions of contractors, subcontractors and suppliers of the Company;
- e) exiting employees with regard to information obtained in the context of an employment relationship which has ended for any reason, (potential) future employees with regard to information obtained during the recruitment procedure or another stage of negotiations prior to conclusion of a contract;
- f) third persons associated with reporting persons who may be subject to retaliation in a work context, such as colleagues or relatives of reporting persons; and
- g) personal businesses or legal entities in which the reporting persons have an interest, or for which they work, or with which they are otherwise connected by an employment relationship.

The internal report may concern violations on one of the following issues:

Public procurement contracts, financial services, products and markets, prevention of money laundering and the financing of terrorism, product safety, safety of transport, environmental protection, protection from radiation and nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection, protection of privacy and personal data, as well as network and information systems security, breaches affecting the financial interests of the European Union, as well as breaches related to the internal market.

Any person indicated above acting as a reporting person has the right to submit an internal report by name or anonymously to the Company's Report Receiving and Monitoring Officer (hereinafter referred to as the 'RRO') by sending an email to [yppa@pjc.gr](mailto:yppa@pjc.gr)

On receipt of a report, the RRO will notify the management of the Company and immediately convene the Reports Investigation Committee, which consists of the RRO, the Company's Legal Advisor and the Director of Human Resources.

The Company in its capacity as Data Controller will process the required, necessary, and personal data of the persons involved, in accordance with the GDPR and Law 4624/2019, as currently in force. The legal basis for processing is compliance by the Company with Law 4990/2022. Access to the information is only available to the RRO and the competent EDA. The information in question may be transmitted to the competent supervisory and investigative authorities where deemed necessary. All subjects have the rights provided for in the GDPR, in accordance with the provisions of the Company's respective Privacy Policy.

**December 2023**