EYDAP

# WHISTLEBLOWING POLICY

March 2023

TABLE OF CONTENTS

# 1. INTRODUCTION

EYDAP is committed to operating in accordance with ethical rules and the applicable legal and regulatory framework throughout its activities, seeking to maintain high standards of corporate governance, transparency and professional and ethical conduct.

The cultivation and establishment of a stable, modern and healthy corporate environment that promotes EYDAP's mission and is characterized by the principles of integrity, honesty and regulatory compliance, is an obligation for all and a basic prerequisite for healthy business activity and social cohesion and progress. EYDAP is committed to conducting its business activities with honesty and integrity in full compliance with national and EU law, corporate policies and procedures.

EYDAP's officers, including its Board members, the Chairman of the Board and the CEO, and its staff are committed to act with professionalism, legality and integrity in all their business dealings, and to demonstrate zero tolerance for illegal or irregular acts or omissions that damage its prestige and reputation, or that could give rise to the mere suspicion of corruption and/or generally improper activity. Therefore, EYDAP encourages reports from employees or third parties to be freely submitted in order to enhance confidence in its proper functioning and efficiency and to limit the occurrence of corruption. Cultivating a climate of open communication with the Company is crucial to address incidents of illegal or irregular behavior. In this context, this document constitutes a Policy and Procedure aimed at preventing, combating and managing illegal acts or omissions, in order to ensure the above principles, including the fight against corruption.

"Whistleblowing" refers to the voluntary disclosure of information related to illegal acts or omissions, including - not limited to - corruption and fraud, and to violations of EU law as defined in article 4 of Law 4990/2022, which have already been committed or there is an indication and intention of their possible commission within the Company and which have come to the attention of the Reporting Party. The "Reporting Person" is defined as the person who makes the report by providing information about the violations, which he obtained in the performance of his duties, to persons or units within the Company that are in charge of managing such reports.

The purpose of the Company's Report-Complaint Management Policy (named and unnamed) is to establish a framework for the timely identification and management of any violations that are conducted or for which it is identified or determined that they are intended to occur in the performance of the Company's personnel and officers' duties and that may be detrimental to employees and to the Company's credibility and reputation. This Policy is part of the internal audit system and is intended to improve the Company's operation and organization, as the disclosure and identification of violations that have been identified or are likely to be caused will result in corrective action being taken.

Within the framework of the Policy, the persons named in the scope of this Policy are encouraged and urged to report, eponymously or anonymously, any violations that have come to their attention, as well as to express any concerns, reservations or complaints regarding any violations of the Company's policies or the legislative-regulatory framework governing its operation. In this way, this policy and the procedure set out in it constitute, in a confidential manner for all employees and third parties who raise concerns about unfair practices, the means for the Company to investigate and take corrective action in accordance with its policies and procedures.

The implementation of this Policy as part of the Company's internal audit system is periodically evaluated as to its effectiveness by the Internal Audit Division. The Policy is updated by decision of the Board of Directors upon recommendation of the Compliance Committee and proposal of the Compliance Division.

The entire Staff and Executives of the Company should provide all possible cooperation in the investigation of reports and actively support the mechanism for raising concerns. The Company's Executive Divisions and Directorates should promptly and accurately provide all information and assistance necessary for the effective investigation of reports.

The following have been taken into account in the preparation of this Policy:

- Directive (EU) 2019/1937 of the European Parliament and of the European Commission.
- Public Interest Whistleblower Protection Guidelines for Companies in Greece OECD.
- A Best Practice Guide for Whistleblowing Legislation, Transparency International.
- The United Nations Convention against Corruption Resource Guide on Best Practices in the Protection of Reporting Persons.

## 2. DEFINITIONS

**Whistleblowing:** the reporting in good faith of an incident or incidents that the whistleblower has observed or become aware of in the course of or in relation to the performance of his or her duties and which indicate the existence of "serious irregularities". The report should be made in writing and without delay. A report may be made by a third party (i.e. a person who is not a member of the Company's staff).

**Dysfunction/ Serious irregularity:** Irregular activity or dysfunction or omission related to a breach of internal Policies and Procedures. Indicatively, the non-compliance may be related to: Accounting and auditing practices and financial reporting (i.e. financial misconduct, internal audit, expense reporting); professional integrity (i.e. bribery, document falsification, fraud, conflict of interest, customer issues); human resources, and respect in the workplace (i.e. discrimination, diversity, retaliation); environment, health and safety; misuse/misappropriation of corporate assets; and harm to public interest.

**Reasonable belief:** The person disclosing does not necessarily need to be certain of the facts at the time of disclosure. The crucial factor should be whether, in the reasonable belief of the reporting person, the information available to him contributes to a finding of one or more objectionable practices relating to the operation of the company.

**Good faith:** A belief in the validity of the reported incidents, i.e. the fact that the reporting party reasonably and in good faith believes that the information conveyed is true. Good faith is presumed to exist unless (and until) proven otherwise.

**Retaliation:** Any direct or indirect action or threat of action or omission against the reporting party that occurs because of the report and takes place in a work-related context that causes or may cause undue harm to the reporting party, including harassment, discrimination, negative evaluations and retaliation (detailed in the relevant section 10 of this document).

**Confidentiality of identity:** In cases where the report is anonymous, the identity of the reporting party shall be kept confidential by the recipient of the information vis-à-vis the person(s) who may be involved in the serious irregularity reported and shall only be used in cases where absolutely necessary.

**Anonymity:** The state where the identity of the source of the information is not known to the recipient.

## 3. OBJECTIVES – BASIC PRINCIPLES

The objectives of the Policy are:

- encouraging the reporting of any illegal, irregular or inappropriate conduct,
- providing clear procedures for reporting and dealing with them,
- preventing and deterring misconduct that could affect financial performance and damage the Company's reputation,
- providing assurances that all disclosures will be treated as confidential, with seriousness and diligence, without fear of retaliation of any kind,
- contributing to the promotion and development of a culture of accountability, compliance and integrity,
- ensuring support for employees who report when they observe or suspect improper, unethical or inappropriate conduct in the Company.

The basic and inalienable principles of the Report-Complaint Management Policy are the protection of the anonymity and confidentiality of the data of the persons submitting such Reports-Complaints as detailed in paragraph 7, and ensuring, in addition, that no retaliation is imposed, i.e., indicatively the jeopardization of their current position and their future professional development and other negative consequences for the person making the complaint.

## 4. FIELD OF APPLICATION

The Policy applies to all organizational units of the Group and is addressed to and concerns any person working, providing services, cooperating with EYDAP and any third party related to the Company and in particular:

- Employees (permanent, seasonal, fixed-term, trainees)
- The members of the Board of Directors
- All officers
- Contractors and subcontractors
- Suppliers
- Consultants, Specialist Partners and anyone providing services to the Company
- Candidates for employment or other forms of cooperation
- Customers
- Shareholders
- third parties who have relevant information about any illegal activities involving the Company.

## 5. REPORTING SYSTEM

### 5.1. Categories of cases concerning the reporting system

The internal reporting mechanism concerns illegal, irregular, dangerous or unethical practices taking place in the context of the Company's activities. Such conduct may include, but is not limited to, the following situations:

- Violation of EU and national law (laws, European Directives and Regulations, etc.)
- Damage or threat to the public interest (public health and safety, environment, money laundering, fraud and corruption in public procurement, use of public funds, etc.)
- Damage or threat to corporate interests
- Theft, embezzlement
- Fraud
- Corruption
- Bribery
- Abuse of Power
- Exercise of Influence
- Misappropriation of resources
- Misuse of assets
- Breach of corporate/professional confidentiality
- Violation of Company policies
- Violation of the legislative/regulatory framework governing the operation of the Company
- Related party transactions that are not disclosed or declared in accordance with applicable legislation.
- Falsification of financial statements, provision of falsified financial or non-financial information
- Bypassing safeguards, Internal Audit System and accounting system safeguards.
- Risk to public health or safety or the environment.
- Violation of issues in procurement and public contracts procedures (e.g. competition distortion, conflict of interest, unequal treatment of tender candidates, etc.).
- Consumer protection issues.
- Any violation of the Code of Conduct and Ethics.
- Tolerance to reprehensible behaviors or ineffective management of them.
- Cover-up or concealment of any of the above.

### 5 .2. Cases not related to the reporting system within the scope of this Policy

No further investigation will be carried out into reports relating to:

- information that has already been published (e.g. newspaper or website articles, publications, etc.),

- matters where it is not well established that the violation constitutes a risk to the public interest, or where sufficient and specific information is not provided to substantiate the allegation
- matters that do not relate to irregular, unethical, illegal or criminal conduct in connection with the Company's operations, i.e. do not fall within the scope of this document, i.e. non-bona fide or abusive reports, (e.g. when repeated with the aim of disrupting the service or defaming the reported person, etc.)
- false reports,
- cases for which preliminary investigation or judicial proceedings or proceedings before the authorities have been initiated
- ases of handling customer complaints that are part of the normal operation of the Company (water supply, sewerage, damage issues, customer issues, etc.), which are handled by the Executive Directorate for Customer Services in cooperation with the competent General Directorates of the Company. Such issues will, at the discretion of the Head of the Committee, be forwarded directly to the relevant organizational units of the Company for their management.
- cases of filing reports to satisfy requests or requirements arising from the Personnel Regulations, which are managed by the Executive Directorate of Human Resources. For these cases, the procedures already established shall continue to apply.
- issues that have already been resolved or conduct that has been rectified.

## 6. REPORTING MALFUNCTIONS, IRREGULARITIES, ILLEGAL OR CRIMINAL ACTS - **PROCEDURE**

### 6.1. How to report

The Company makes available to the Petitioners communication channels that enable them to submit reports on incidents falling under the provisions of this Policy. Incident reporting must be submitted within a reasonable period of time after the facts came to the attention of the Reporting Party, be clear, definite and substantiated, and be made either by e-mail or by mail to the Compliance Directorate. The relevant channels of communication are listed at the end of this document and are posted on the Company's website.

If a report that falls within the scope of this policy is sent to another service unit of the Company, the latter must forward it to the Compliance Directorate.

### 6.2. Procedure for the receipt of reports

The Compliance Directorate is responsible for the management of the internal reporting system. Its role is to ensure the implementation of the policy and the operation of the Company's Reporting Mechanism. The Compliance Directorate handles reports-complaints with due diligence, confidentially, impartially and objectively. Upon receipt of the report, the Compliance Directorate shall file it in both hard copy and electronic form in a separate register and shall be maintained in a manner that ensures confidentiality. It will also immediately, and in any case no later than three working days, contact the person who submitted the report to inform him/her that the report has been received, provided that it was submitted by name and signed. The Compliance Directorate will then forward the reports to the Reports Evaluation Committee.

### 6.3. Evaluation of reports - Committee for the Evaluation of Reports:

The Reporting Evaluation Committee consists of the Director of Compliance, who is the head of the Committee and responsible for the entire process, the Director of Internal Audit and a manager employed in the Company's human resources department, appointed by decision of the Executive Director of Human Resources.

The Commission, if necessary, is assisted by a lawyer from the Legal Services Directorate, who is appointed by the Director of Legal Services depending on the matter (e.g. labor, public works, financial, etc.), within the framework of the Legal Services Directorate's advisory role.

The Committee shall meet when the need arises, taking summary minutes. The keeping of summary minutes and the overall secretarial support of the Committee shall be entrusted to a person appointed on a case-by-case basis under the authority of the Compliance Director. If the report relates to a Member of the Reporting Evaluation Committee or a Member of the Committee has a conflict of interest, that Member shall abstain from the meeting and shall be replaced by his/her alternate.

Decisions of the three-member committee shall be taken by majority vote, but members of the committee should make every effort to reach a unanimous decision. Where decisions are not taken unanimously, any dissenting views must be documented in the minutes of the relevant meeting. **If a majority consensus cannot be reached due to the formation of three different views, the matter shall be referred to the Compliance Committee**.

The purpose of the Committee is to carry out an initial investigation of the issues involved and then, where appropriate, forward the case to the relevant Company Units for further action. It is noted that the Reporting Evaluation Committee has the authority to review the reports, without discrimination, regardless of who they refer to, even if they relate to the Chairman of the Board, Chief Executive Officer, members of the Board of Directors.

The minutes of the Report Evaluation Committee and the results of the investigations of the cases are disclosed to the Compliance Committee of the Board of Directors when the annual report is submitted. In processing the reports, the accuracy and significance of the information received is assessed in order to weigh whether there are significant grounds for further investigation and corrective action.

In the investigation, the seriousness of the matter disclosed and the possibility of confirming the complaint are taken into account. In the course of investigating the complaint and in order to verify the reported fact, the Reports Evaluation Committee may request information and clarification from the person who made the report, from the parties involved or from any other source it considers will contribute effectively to the investigation of the case. It should be noted that anyone who receives a request to provide information must make it available to the Commission without exception, irrespective of their role and the organisational unit in which they work. It is at the discretion of the Reports Evaluation Committee to decide whether to use external auditors, consultants or experts at any stage of the process. If external contractors are used, a confidentiality and data protection agreement will be signed and the project will be supervised by the Reports Evaluation Committee.

The Evaluation Committee conducts an initial investigation in order to decide whether or not to investigate the case further and records its decision with the corresponding justification in the minutes of the

Commission's meeting. If the evaluation and investigation of the report does not reveal or prove the validity of the report, the report is simply recorded and archived under the supervision of the Compliance Directorate for up to 5 years.

If the Evaluation Committee decides that the report requires further investigation, it will take one or more of the following actions, depending on the case:

- refers the report to the Audit Committee, which may a) give a written mandate to the Internal Audit Directorate, forwarding to it the relevant material with the report (except in cases of established fraud, which according to the Company's Internal Operating Regulations are carried out by an external, certified consultant), b) refer the report to the external auditor, c) refer the report to an external partner for the purpose of an independent investigation,
- refers the report to the DPO,
- refers the report to the Legal Services Directorate for specific legal action
- refers the report to the Compliance Directorate,
- refers the report to an external law enforcement authority
- refers the report to the competent bodies within the framework of the Company's disciplinary procedure, in accordance with the provisions of the Personnel Regulations.
- Refer the report to an organizational unit of the Company to manage the matter, if possible.
- Refer the report to the CEO

The Report Evaluation Committee informs in writing within a reasonable period of time and not later than three months the reporting party of the progress of the investigation and of its outcome, if the report has been submitted anonymously.

The Report Evaluation Committee submits an annual report to the Board of Directors on all cases that have been reported and the findings of the relevant investigations.

Reports/complaints should not include data that constitute sensitive personal data not related to the conduct described in the report (in particular, for example, data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, data concerning health or data concerning sexual life or sexual orientation) and in any case such data will not be further processed. Reports containing such data shall not be searched in accordance with Article 9 paragraph 1 of the General Data Protection Regulation (EU 679/2016).

Personal data which are manifestly not related to the handling of a specific report shall not be collected or, if collected accidentally, shall be deleted without undue delay.

The Reporting Parties of the incidents of misconduct as well as any persons included in the above reports have the right to access, inform, object and correct their personal data as well as to request at any time and without charge the deletion of the data they provided, as defined in Law 4624/2019, regarding the implementation measures of the General Data Protection Regulation (EU 679/2016) and the relevant policies of the Company.

The Report Evaluation Committee shall process only the data that are necessary in accordance with the principle of proportionality, which shall be retained for a period of five (5) years, unless there are serious reasons requiring their retention for a longer period (e.g. ongoing investigation, pending judicial proceedings), in which case the retention period shall be extended to twenty (20) years. The Report Evaluation Committee shall protect personal data against loss, misuse, unauthorized access or disclosure and generally ensure that appropriate technical and organizational measures are in place to protect personal data.

All reports shall be treated equally, with absolute confidentiality and discretion, in accordance with the provisions of Chapter 7 of this policy.

## 7. ANONYMITY - CONFIDENTIALITY

The Company, through the communication channels it establishes, gives the opportunity to the reporting parties to submit their report either eponymously or anonymously. However, the Company encourages anonymous reports as this better achieves an assessment of the credibility of the report-complaint and the reporting party's intentions, and facilitates communication both for further clarification and to keep the reporting party informed of the progress of the report.

In the case of anonymous reports falling within the scope of paragraph 5.2, the Company undertakes to maintain the anonymity of the Complainant and not to take any action that may result in the disclosure of the identity of the Complainant. In the event that a report by name does not fall within the scope of paragraph 5.2 (e.g. routine management of customer complaints), then the report will be forwarded as such to the competent services of the Company for further processing, in which case the anonymity of the complainant will not be preserved, given that for the examination of the customer's request, the Company's services will need to know the complainant's personal data. Therefore, the attention is drawn to the complainants not to submit reports, if their complaint concerns routine water supply, sewerage, damage, illegal water intakes, debts and other related issues, but to contact the Company's Customer Service Units (1022, Regional Centers, etc.) for their support. It is noted that the disclosure of the identity of the complainant may be required in the context of any judicial investigation of the case or other legal proceedings. In this case, the anonymity of any other persons involved in the report will be respected, subject to the above restrictions.

## 8. RETALIATION – PROTECTION AGAINST RETALIATORY ACTS

### 8.1. Definition and forms of retaliation

Retaliation is defined as any action by anyone (management or superior of the person raising the concern, colleagues, associates, external consultants, suppliers, customers) related to the report that causes or may cause, directly or indirectly, during or after the report, adverse effects or significant business changes that place the person covered by this Policy at a disadvantage or discriminate unfavourably against the person covered by this Policy.

The definition of retaliation includes, but is not limited to, the following forms:

- Suspension or dismissal
- Non-renewal or early termination of a temporary employment contract
- Preventing the reporting person or his/her colleagues from investigating or discussing the matter
- Discontinuation of services
- Exclusion from tenders and procurement procedures
- Early termination or cancellation of a contract for goods or services
- Not providing a letter of recommendation
- Damage to reputation
- Unjustified performance rating as low
- Excessive limitation or extension of the reporting person's obligations (except at the reporting person's own request) or of the terms of the employment contract
- Mobbing - Verbal or written harassment that intimidates the reporting person
- Unfavourable treatment - Unilateral detrimental changes to the terms of the employment contract (e.g. compulsory placement of the reporting person in another position, excessive limitation or extension of the reporting person's duties (except at the reporting person's own request) or working conditions, change of working hours, exclusion from training, promotion opportunities, corporate social opportunities, hindrance to career development, demotion to a lower position, withholding of salary increase, salary reduction, withholding of bonuses or allowances, etc.).
- Obstruction of the exercise of employment rights (denial of leave, training, etc.)

In case of retaliation or breach of confidentiality, persons subject to retaliation have the option of filing a formal report to the Reporting Evaluation Committee, which must inform the Board of Directors, in order to request the Company's protection in any way (practical, legal protection, advice, payment of expenses, protection from adverse service changes, transfer to another service) in order to protect themselves from possible adverse reactions in their work environment.

Any act of discrimination that takes place against an employee who raises concerns or against an employee who assists in an investigation, or any act that may discourage other employees from raising concerns, will not be tolerated and will result in disciplinary action in accordance with the provisions of the Company's Personnel Rules.

### 8.2. Protection of the complainant from acts of negative consequences (retaliation) and persons who assist in any way in the investigation

Those who selflessly and "in good faith" made a report - complaint, are entitled to protection if at the time of reporting they had reasonable grounds to believe that the information regarding the reported violations is true and falls within the scope of this Policy. Therefore, they are not protected in the case of a malicious complaint, i.e. where it is proven that the employee knowingly made a false allegation, or provided false or misleading information, obstructed work during an investigation, or acted in bad faith in any way.

The Company also protects individuals who, through error or ignorance, are believed to have made a report and are subject to retaliation as a result. Protection is even afforded to persons who assisted in the investigation of the disclosure because they were required to do so by virtue of their authority and position or in the performance of their duties.

Protection applies to individuals of any status who are covered by the scope of this Policy (Section 4) and who may make reports as defined herein.

Protection is also afforded to persons whose employment relationship has ended and to candidates for employment or other forms of employment who have obtained information about violations during their employment or during the recruitment process, and who could be subject to retaliation, for example in the form of negative professional references, blacklisting or boycotting of businesses.

Protection is also extended to family members of the petitioners who may have an employment or professional relationship with the company.

### 8.3. Duration of protection

Protection against retaliation is not limited to a specific period of time, because retaliation may be imposed at a much later stage after the report has been made (e.g. during the investigation of the report or the public announcement of the imposition of sanctions) or even before the report has been made, for example when it becomes known that the employee discovers or establishes an incident and suffers negative consequences as a result (retaliation).

## 9. PROMOTING A CULTURE OF FREE EXPRESSION AND ETHICAL BEHAVIOR, REGULAR TRAINING AND AWARENESS RAISING OF STAFF ON THE INTERNAL MECHANISM FOR RAISING CONCERNS

The Company takes all necessary measures to encourage employees to express themselves freely, to react to objectionable conduct, to report without fear of retaliation and to comply with company policies... To this end, newsletters, e-mail, intranet, training, website posting, meetings of the manager of the system for raising concerns with staff are used. The Training Directorate will organise systematic training of staff on the internal mechanism for raising concerns, while making it clear that no employee is subject to retaliation, discrimination or disciplinary action for reporting reprehensible conduct.

Periodic surveys will also be carried out by the Internal Audit Directorate to assess employees' perception of the 'ethical climate' and their knowledge of the framework of the operation of the whistle-blowing mechanism.

## 10. COMMUNICATION CHANNELS FOR REPORTING INCIDENTS OF MISCONDUCT

This Policy is posted on the Company's official website "www.eydap.gr".

You may report incidents involving violations of Company policies and procedures and applicable laws and incidents of alleged misconduct using the communication channels below:

- by e-mail (whistleblowing@eydap.gr). Reports can be submitted via either the corporate or personal email address.
- By post, E.YD.A.P. S.A. - Regulatory Compliance Service

The system for raising concerns is also accessible to persons outside the company (suppliers, customers) and any third party associated with the company.

Reports of irregularities by members of the Board of Directors or Senior Management should be brought immediately to the attention of the Chairman of the Audit Committee by email.

Please note that in order to avoid conflicts of interest, any reports involving a member of the Compliance Directorate staff are forwarded directly to the Audit Committee. In the context of this policy, by decision of the Compliance Committee and upon proposal of the Compliance Directorate, EYDAP may consider cooperation with external bodies in the framework of its technical reporting arrangements, e.g. possibility of anonymous, confidential reporting, taking into account in each case the regulatory framework for the protection and management of personal data.

In all the above cases, the exact communication details for reporting are available on the company's website (Home/Corporate Governance/Communication).

As an indication, the following are essential elements in a report:

- Description of the objectionable conduct.
- Date of disclosure.
- Contact information, if the individual chooses to identify himself.
- Any document or information that contributes to the identification and disclosure of the objectionable conduct.

## 11. UPDATE AND REVISION OF POLICY

This Policy is approved and revised periodically by the Board of Directors of the Company upon the recommendation of the Compliance Committee and upon the proposal of the Compliance Directorate.