

# Cepal Hellas

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## Whistleblowing Policy

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## 1. Policy Statement

Cepal Hellas Financial Services Single Member S.A. – Servicing of Receivables from Loans and Credits (hereinafter referred to as “the Company”) is committed to ethical business practices and operations across its entities and jurisdictions of operation. The Board of Directors and Senior Management of the Company apply a “zero-tolerance” approach to any incidents of misconduct or illegal activity, regardless of whether these incidents originate from employees of the Company or third parties that the Company cooperates with or is represented by. The Company is committed in maintaining the highest standards of integrity, transparency and responsibility across all its activities. It requires from all its employees to act with professionalism and due care, and expects them to safeguard its assets, brand and reputation. The Whistleblowing Policy (hereinafter referred to as the “Policy”) sets the framework for:

- The reception and management of Whistleblower Reports.
- The communication channels available to Whistleblowers to submit Whistleblower Reports.
- The protection of Whistleblowers that submit Whistleblower Reports in “good faith”.
- The responsibilities of employees and third parties with regards to this policy.
- The key contacts and provisions of the Whistleblowing Program.

This policy applies to concerns or incidents regarding misconduct or illegal activities as defined in article 2 of law 4990/2022, in article 20 of law 5095/2024 and the Common Ministerial Decision 47312/11.12.2023, which includes employees of the Company, its Board of Directors, Senior Management, and any third party with whom the Company may have a business relationship and serves in parallel with relevant applicable HR Policies on Employees Conduct, Violence and Harassment. Any employee or third party (that may have a business relationship) can submit a Whistleblower Report “in good faith”<sup>1</sup> raising concerns or reporting an incident about misconduct or illegal activities, without fear of retaliation.

The investigation process of the Whistleblower Reports will be conducted impartially and without considering any factors such as the tenure of the reported persons, their seniority, or their relationship with the Company. The management of these cases, as well as any decisions made for next steps (e.g., legal proceedings) shall be performed by the Board of Directors of the Company, with the contribution of the Company’s Corporate Legal department where this is deemed necessary.

This policy aims to ensure that the Company remains a healthy, safe, and just work environment, with all its stakeholders engaging in business practices and activities that are in line with its Corporate Code of Conduct and Ethics, its values, and the applicable legal framework.

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<sup>1</sup> Refer to chapter 2 for definition.



This policy applies to the entire Whistleblowing Management System (WBMS), as defined in the “ISO 37002:2021 Index” document. In this regard the Organization has adopted an Whistleblowing Management System comprising of the Whistleblowing Policy, Procedure and Platform to effectively manage the Whistleblowing risks. This system is attested in accordance with the ISO 37002:2021 standard and the relevant requirements.

## 2. Basic Concepts and Key Definitions

This section of the policy covers relevant definitions included within this document.

### 2.1 Policy Sponsor/Owner

The Sponsor/Owner of the policy is defined as the Whistleblowing Oversight Officer. The Sponsor/Owner is primarily responsible for the maintenance, update and communication of this policy across all employees of the Company and third parties (that may have a business relationship with the Company). The Sponsor/Owner is also primarily responsible for assessing the conformity of the Company employees to this policy and the escalation of matters that require the attention of the Board of Directors, in relation to this policy.

### 2.2 Whistleblowing Committee

The Whistleblowing Committee is responsible for advocating the Company’s Whistleblowing Program, provide oversight over its implementation and ensure that it remains effective. The Whistleblower Committee is also responsible for the periodic review of Whistleblower Reports submitted, making decisions on whether a Whistleblower Report will be investigated (e.g., based on merit of available information and the severity of the matter reported), monitor the investigation process, and advise the Board of Directors on mitigating actions and/or disciplinary actions required based on the results of the investigation. If a complaint refers to HR issues that are covered by relevant HR Policies and Committees (e.g., Employees Code of Conduct, Workplace Violence and Harassment) the relevant case is handed for investigation and decision to the applicable Committee which subsequently informs the Whistleblowing Committee concerning its findings and decision.

### 2.3 Whistleblower

A Whistleblower is any person that raises a concern or reports a misconduct or illegal activity in accordance with this policy. A Whistleblower can be a person that is an employee of the Company or any third party that may have a business relationship (e.g., supplier, competitor, etc.).

### 2.4 WOO – Whistleblowing Oversight Officer

The Whistleblowing Oversight Officer has the overall responsibility of receiving and handling the submitted Whistleblower Reports within the scope hereof. This person is responsible for the timely collection, processing, and escalation (where required) of Whistleblower Reports and provides to the Whistleblower the acknowledgment of Whistleblower Report reception

by the Company, in line with the provisions of Law 4990/2022 and 5095/2024 and the Common Ministerial Decision 47312/11.12.2023.

Moreover, the WOO:

- a) performs his/her duties with integrity, objectivity, impartiality, transparency, and social responsibility;
- b) respects and observes the rules of secrecy and confidentiality for the matters the WOO becomes aware during the exercise of the respective duties;
- c) abstains from the management of specific cases, declaring an obstacle, if there is a conflict of interest;
- d) provides appropriate information regarding the possibility of submitting a report within the Company;
- e) supports the Whistleblower throughout the process and where required after the process is concluded (e.g., protection from retaliation);
- f) maintains the contact with the Whistleblower and provides guidance where required about the process;
- g) evaluates the Whistleblower Reports in terms of risk and urgency;
- h) forwards the case to the respective business unit with no obligation of follow-up, if the incident reported is outside of the whistleblowing perimeter the WOO;
- i) monitors the Whistleblower Reports and maintains communication with the Whistleblowers and, if necessary, request further information from them;
- j) provides information to the Whistleblower about the actions taken within a reasonable period of time, which does not exceed three (3) months from the acknowledgment of receipt, or if no acknowledgment has been sent to the Whistleblower, three (3) months from the end of seven (7) working days from the submission of the Report;
- k) ensures the protection of the confidentiality of the identity of the Whistleblower and any third party that may have a business relationship (e.g., supplier, competitor, etc.) that may be mentioned in the Whistleblower Report, preventing access to it by unauthorized persons;
- l) opens any mail received in the presence of the Head of Risk Management Function;
- m) reports functionally to the Company's Board of Directors and administratively directly to the Head of Risk Management Function;

stores records (electronic or physical) of the cases received through the Whistleblowing Management System in accordance to the Personal Data Retention Policy.

Finally, in case the WOO identified during the examination of the report that it concerns an incident that took place a long time ago (e.g., 5 years ago) and the supporting documentation for the investigation is no longer available, the WOO has the ability to archive the case, indicating the aforementioned restriction.

## 2.5 IWR – Investigating Whistleblower Reports

The Whistleblowing Oversight Officer investigates the reports directly or delegates the investigation or parts of the investigation to the IWR. The IWR is the person with overall

responsibility over the investigation process of a Whistleblower Report. This person acts as a coordinator of the investigation team, as a single point of contact for the investigation, and as the person responsible for ensuring that the investigation process is concluded within the time limits described in the provisions of Law 4990/2022 and 5095/2024. Although the WOO is the person responsible for updating the Whistleblowing Committee on the results of the investigation, there may be cases (i.e., conflict of interest) where the IWR updates the Whistleblowing Committee, as well as provides feedback to the Whistleblower about the results of their Whistleblower Report, in line with the provisions of Law 4990/2022 and 5095/2024. There may be cases where the WOO and the IWR are the same person.

## 2.6 Whistleblower Reports in “good faith”

Submitting Whistleblower Reports in “good faith” means that the Whistleblower had reasonable grounds to believe that the information submitted in the Whistleblower Report was true, accurate and fair at the time of the submission, regardless if subsequently this information is proven untrue. Reports made in “good faith” are reports that aim to raise awareness of an issue to the Company, in order for the Company to take appropriate remedial actions. Any Whistleblower Reports made with the intent to misguide, misinform, or unjustly accuse any person or legal entity are considered as reports not performed in “good faith”. Any reports made that are not in “good faith” are considered an act of misconduct, and the person submitting such reports will be subject to disciplinary actions as per relevant HR Policies and Committees (e.g., Disciplinary, Employees Code of Conduct, Workplace Violence and Harassment). In case following the submission of the report, the Whistleblower realizes that the report submitted is not valid or no longer valid the former must inform in writing the WOO as soon as possible.

## 2.7 Non-Retaliation

The Company will never retaliate, nor permit retaliation, against a Whistleblower or members of the Whistleblowers family (who have an employment relationship with the Company), who in good faith reports a potential violation of the law or a Company’s policy. Any form of retaliation is prohibited, constitutes a serious disciplinary offense and may lead to disciplinary sanctions, including termination of employment. However, this prohibition is not intended to protect persons who knowingly file false complaints or Whistleblowing Reports. Employees who knowingly file a false complaint are subject to disciplinary action, including termination of employment. For further details and guidance please refer to HR Employee Regulation

## 3 Introduction

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### 3.1 Purpose of this Policy

The Company is committed to maintaining the highest standards of integrity in the way it is conducting its business and understands that an effective Whistleblowing Program is a significant contributor in this effort therefore the Company is committed to its continuous improvement. This Policy is an important element of an effective Whistleblowing Program and describes what concerns or incidents are reportable, how these concerns or incidents can be reported, and how Whistleblowers are protected against retaliation.

The Company strongly encourages everyone to raise a concern or report an incident regarding misconduct or illegal activities through the communication channels described in this policy.

### 3.2 About this Policy

The content of this Policy complies with the provisions of Greek Law 4990/2022 "Protection of persons who report violations of European Union law", the Law 5095/2024 and the Common Ministerial Decision 47312/11.12.2023, by which the EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 (L 305), on the protection of persons who report breaches of Union law, was incorporated into Greek law, the provisions of Greek Law 4808/2021 (Government Gazette A'101) "on the protection of employment", the provisions of Greek Law 4443/2016 (Government Gazette A'232) "on non-discrimination", the provisions of Greek Law 4557/2018 "on money laundering and terrorism financing", and the guidelines of the Banking & Credit Committee (Bank of Greece) 281/17.03.2009 "on the prevention of use of supervised credit and financial institution by the Bank of Greece for money laundering and terrorism financing".

The Whistleblower Reports Management Incident Response Procedure, acts as a supplement to this Policy and provides information on how the Company is applying this policy, including guidelines for the various roles involved with the management of Whistleblower Reports, including:

- The responsible person for Receiving the Whistleblower Reports (WOO),
- The responsible person for Investigating the Whistleblower Reports (IWR),
- The Company Whistleblowing Committee (CWC), and
- The sponsor / owner of this policy.

For detailed description for each of the above roles, please refer to section "Definitions" of this policy.

Please note that there may be cases where the WOO and the IWR are the same person.

### 3.3 Definition of the Whistleblower

Any person that reports misconduct or raises concerns about misconduct or illegal activities is considered a Whistleblower. This person can either be an employee of the Company (someone that maintains an employment relationship with the company – e.g., permanent or part time employees, employees under a freelance agreement, etc.) or a third party that may

have a business relationship with the Company (e.g., supplier, customer, etc.). Virtually any person can become a Whistleblower, regardless of their connection with the Company, if that person raises concerns or reports incidents of misconduct or illegal activities to the Company. All persons that have an employment relationship with the Company are required to abide by the Corporate Code of Conduct and Ethics of the Company, its policies and procedures, and applicable laws and regulations. Every person that has an employment relationship with the Company bears a responsibility to raise a concern or report an incident of misconduct or illegal activity to the Company, through the available whistleblowing communication channels. Conformity to the Third Party Code of Conduct of the Company is also expected by any third parties that have a business relationship with the Company (e.g., suppliers, customers, consultants, external auditors, etc.). These third parties are required to abide by the integrity principles of the Company and raise a concern or report an incident of misconduct or illegal activity to the Company, through the available whistleblowing communication channels.

### 3.4 Definition of the Whistleblower Report

A Whistleblower Report is defined as any information submission (regardless of the way it is submitted) about a concern or an incident that regards one or more of the following:

- Violation of a person's fiduciary duties
- Abuse of the Company assets
- Embezzlement or stealing of the Company assets
- Activities that put in danger the safety and integrity of any person or the Company
- Stealing or embezzling cash or items of monetary value
- Harassment
- Intentional damage to property of the Company
- Any acts of fraud
- Any acts of money laundering
- Offering and/or receipt of bribes
- Abuse of privileges provided by the Company for personal benefit
- Violation of the Company policies and/or procedures
- Acts of retaliation
- Threatening or impairing the health and safety of the Company employees or any other person
- Conflicts of interest
- Market abuse/Insider Trading
- Environmental violations

A Whistleblower Report does not regard any of the following matters:

- General disagreements or arguments between two or more employees, unless they relate to any of the above areas.
- Decisions for job changes, transfers, or disciplinary actions, unless they relate to a form of retaliation for the submission of a Whistleblower Report performed in "good faith".

- Employee or third-party general complaints, unless they relate to any of the above areas.

Activities that are in direct violation of the applicable legal and regulatory framework (Law 5072/2023, Acts 225/30.01.2024 and 118/19.05.2017 of the Executive Committee of the Bank of Greece, Law 4224/2013 Code of Conduct in the relations with Borrowers) as well as complaints pertaining to the quality of services provided for by the Company are managed by the competent independent Unit of Complaints Handling in accordance to the provisions of Act no. 157/02.04.2019 of the Executive Committee of the Bank of Greece and are not under the scope of this Policy. For more details, please refer to the [Complaints Handling](#)

Activities that are in direct violation of the General Data Protection Regulation (GDPR) 2016/679 (EU) and the national data protection legislative framework are managed by the competent independent Unit of Data Protection and are not under the scope of this Policy. For more details please refer to the [Data Protection Policy](#)

### 3.5 Access to this Policy

This policy is available to all persons that have an employment relationship with the Company, through the dedicated [intranet site](#).

This policy is also available to any third party that may have a business relationship through the Third Parties Code of Conduct and the [official website](#) of the Company.

### 3.6 More Information about this Policy

Any person can request additional information about this policy, by placing requests in confidence towards the Whistleblowing Oversight Officer. Seeking advice or requesting additional information, does not necessitate that a Whistleblower Report has been priorly submitted.

If a person seeks to obtain a legal advice regarding their obligations towards this policy or the applicable legal framework on whistleblowing, it is highly recommended that this person contacts an external legal advisor and not the Company's Corporate Legal department.

### 3.7 Monitoring and Revision of the Policy

This Policy shall be reviewed periodically by its Sponsor/Owner, in order to perform any required updates based on the changes in the Company's environment or the applicable legal framework. The Policy shall be reviewed annually in order to ensure that it remains current and up to date. The Company's Board of Directors will provide oversight of this Policy.

## 4. How to Raise a Concern or Report an Incident

### 4.1 When to submit a Whistleblower Report

Before submitting a Whistleblower Report, the prospective Whistleblower must consider whether there are reasonable grounds to suspect a misconduct or an illegal activity. The Whistleblower is not anticipated to prove beyond doubt that the incident indeed occurred. However, the Whistleblower is anticipated to evaluate their concern or information about the incident intended for reporting in an objective manner, prior to submitting a Whistleblower Report. While every Whistleblower Report submitted “in good faith” will be protected against retaliation, even if the incident reported eventually turns out to not be a misconduct or illegal activity, the Whistleblower must show prudence in what they report as a potential misconduct or illegal activity and where able provide evidence to support the concern or incident. Any Whistleblower Reports that are submitted with a malicious or misleading intent are considered as misconduct and the Whistleblower in such cases may face disciplinary actions.

### 4.2 How to submit a Whistleblower Report

A Whistleblower Report can be submitted through the available communication channels of the Company. In detail, a Whistleblower Report can be submitted through:

- Cepal Whistleblowing Platform
- Email at [whistleblowing@cepal.gr](mailto:whistleblowing@cepal.gr).
- Mail at Whistleblowing Oversight Officer, Cepal Hellas Financial Services Single Member S.A., 209-211 Syggrou Avenue, 17121, Nea Smirni, Attiki, Greece.

A Whistleblower Report may also be submitted to the National Transparency Authority (NTA) – Εθνική Αρχή Διαφάνειας (ΕΑΔ), which serves as an external reporting channel. The submission of a Whistleblower Report to the NTA can be performed in writing, verbally or through its electronic platform. Details on how to submit a report to the NTA can be found in <https://aead.gr/en/>. <sup>i</sup> Before a Whistleblower selects to submit a Whistleblower Report to the NTA, it is considered prudent to receive legal advice, from an independent legal advisor (not the Company’s Corporate Legal department), to understand the conditions for such a submission.

### 4.3 What to Include in a Whistleblower Report

A Whistleblower Report must contain as much information as possible about the concern or the incident, for its investigation to be effective. Indicative information that is useful in a Whistleblower Report is the following:

- date, time, and location of the incident;
- names of people involved in the incident, the job titles, and departments;
- the general nature of the incident or concern;
- how it was identified;
- potential witnesses to the incident;

- supporting documents for the incident (i.e., emails, photos, etc.). Any supporting documents must not be products of theft or illegal recording.

#### 4.4 Whistleblower Identity Disclosure

The Whistleblower can select whether to remain anonymous or report in confidence when submitting a Whistleblower Report. If the Whistleblower selects to remain anonymous, then the Company may not be able to communicate with the Whistleblower to provide feedback or request for additional information regarding the raised concern or reported incident. The Whistleblower must exercise caution if they desire to remain anonymous with respect to the selected reporting communication channel, as certain channels (e.g., email) may unintentionally disclose the identity of the Whistleblower.

If the Whistleblower selects to report in confidence, then their identity will be disclosed to the WOO of the Company. In such a case, the identity of the Whistleblower shall be used only for the purposes that the Whistleblower will provide their consent for or otherwise required by the applicable legal framework. The Whistleblower must remain mindful that the WOO on occasions may disclose information about the Whistleblower Report, without the Whistleblower consent, when:

- the respective information does not contain the identity of the Whistleblower;
- the Company has performed all reasonable steps to reduce the risk that the Whistleblower's identity will be disclosed from the respective information;
- it is required for the investigation of the raised concern or reported incident.

#### 4.5 Whistleblower Protection

For a Whistleblower to be protected against retaliation, the Whistleblower Report must be submitted to an authorized recipient based on the provisions of this policy. The protection of the Whistleblower extends to:

- identity protection;
- protection from detriment;
- compensation and remedies;
- civil, criminal, and administrative liability protection.

The Company is committed to taking all reasonable steps to protect the Whistleblower from detriment, as a result of submitting a Whistleblower Report "in good faith" under the provisions of this policy and applicable legal framework.

The WOO will take all reasonable steps to protect the interests of the Whistleblower who submits a Whistleblower Report "in good faith" under the provisions of this policy. The WOO will usually act as a liaison between the Whistleblower and the Company in all matters related to the submitted Whistleblower Report in line with the provisions of Law 4990/2022 and 5095/2024

## 4.6 Non-Retaliation

The Company applies a zero-tolerance approach to any forms of retaliation applied against Whistleblowers that submitted a Whistleblower Report “in good faith” or any other person that is involved in the investigation process of the concern or incident reported through the Whistleblower Report.

Indicative examples of retaliation forms include but are not limited to the following:

- Dismissal of an employee or negative changes to their job role / duties, or negative comments on an employee’s appraisal that do not reflect actual performance.
- Harassment or bullying.
- Threat of retaliation.

The Company places great importance to all reports submitted for acts of retaliation. In case a person is the recipient of a retaliation act, this should be disclosed to the Company through the available communication channels, and the Company will take appropriate corrective measures on this act based on the act reported and the provisions of this policy. For further details and guidance please refer to HR Employee Regulation. The Company uses a dedicated confidential Whistleblowing platform for the storage of the whistleblowing reports.

## 4.7 Malicious or Misleading Whistleblower Reports

When a person selects to submit a Whistleblower Report, it is expected that this is submitted based on reasonable grounds that the information contained is true at the time of the submission. This means that the Whistleblower submitted a Whistleblower Report “in good faith” and believed that the information reported was true at the time of the submission, regardless if the incident is later proven to be untrue. Whistleblowers submitting reports “in good faith” will be protected against retaliation, regardless if the concern raised or incident reported may later be proven to be untrue.

On the contrary to the above, if a person submits a Whistleblower Report containing information that are intentionally or knowingly untrue or misleading at the time of the submission, this is considered as an act of misconduct and in direct violation of the Code of Conduct. Any person that submits intentionally or knowingly misleading information in a Whistleblower Report, may be subject to disciplinary actions or even be subject to legal proceedings depending on the severity of the case.

# 5 Whistleblower Report Investigation

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## 5.1 Who will Assess or Investigate a Whistleblower Report

All Whistleblower Reports will be received by the WOO who is responsible for the timely collection, processing, as well as escalation (where required) to the Whistleblowing Committee (CWC) for cases that need special investigation, who will in turn appoint the person responsible for performing and coordinating the investigation process (IWR) of the reported concern or incident.

Moreover, in case the Whistleblower Report concerns:

- a person that is a member of the senior management team, the WOO escalates without any notification to the Whistleblowing Committee, the Whistleblower Report to the Board of Directors.
- a person that is a member of the Whistleblowing Committee (WC), the WOO escalates the Whistleblower Report to the Board of Directors.
- a person that is a member of the Board of Directors (BoD), the WOO escalates the Whistleblower Report to the Chairman of the Audit Committee (AC).
- a person that is a member of the Audit Committee (AC), the WOO escalates the Whistleblower Report to the remaining members of the Board of Directors.
- the WOO or the responsible person for investigations, the Chairman of the Whistleblowing Committee (WC), informs the Board of Directors and forwards the report to the National Transparency Authority upon notification to the Whistleblower. In this case the WOO is excluded from the content and the handling of the case.

Finally, in case the WOO identifies a conflict of interest (Col) in a Whistleblower Report, the WOO informs the Chairman of the BoD by declaring an obstacle. The BoD must promptly substitute the WOO for the handling of the specific case.

## 5.2 How Will the Whistleblower Report be Assessed

The Company treats every Whistleblower Report seriously and ensures that every report is examined thoroughly to assess if the reported concern or incident warrants an investigation process. The results of the investigation process are communicated to the Whistleblowing Committee, who is responsible for assessing the results of the investigation and determine appropriate corrective actions.

## 5.3 How the Investigation Process is Performed

All Whistleblower Reports are not the same and the concerns or incidents reported may vary significantly from one another. This means that the investigation process may also vary on how it is conducted based on the nature of the concern or incident reported. As a general approach, the investigation process is performed:

- following a fair and objective procedure;
- as quickly and effectively possible considering the circumstances and nature of the incident;
- by determining if there is sufficient evidence to prove or disprove the reported incident or concern;
- by not considering the seniority, job title or tenure of the person the Whistleblower Report relates to.

The Company is committed to provide feedback to the Whistleblower, where this is possible, with the progression of their Whistleblower Report investigation and the expected timeline of its completion.

## 5.4 Fair Treatment of Persons Included in a Whistleblower Report

The process is designed in a manner that provides a fair treatment of every person that is included in a Whistleblower Report, which includes:

- confidential treatment of Whistleblower Reports;
- assessment of Whistleblower Reports and determination if they require an investigation process;
- assumption that a person is innocent until the investigation process is concluded;
- that the goal of the investigation is to determine if there is sufficient evidence to prove or disprove the reported concern or incident.

## 5.5 What Happens after the Investigation Process is Concluded

The Company will provide, where possible, feedback to the Whistleblower on the investigation results of their Whistleblower Report, upon conclusion of the investigation process, in accordance to the relevant provisions of laws 4990/2022 and 5095/2024. However, the Company may not be able to disclose certain information on the results of the investigation due to their sensitive nature.

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