

SPEAK UP POLICY

Gr. Sarantis SA

Related Documents

Code of Conduct

Version Control

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1. Introduction

The company "GR. SARANTIS SA" (hereinafter the "Company"), the parent company of the SARANTIS Group (hereinafter the "Group") sets as a priority its activity within a framework governed by the highest level of ethics and professional conduct. For this reason, it ensures that the employees, the Board of Directors as well as the Managers comply with the requirements of the laws, regulations, policies and procedures established by the Company and that their actions are characterized by honesty, integrity and high moral values.

In this context and in order to ensure the integrity and effectiveness of the corporate culture, ethics and reliability promoted by the Company, this Report and Complaints Management Policy has been established (hereinafter the "Policy").

The Policy defines the principles and the mode of operation of the process adopted by the Company to receive, process and investigate eponymous and/or anonymous reports and complaints regarding unethical behaviours, irregularities, omissions or criminal acts.

The protection of anonymity and the guarantee of the confidentiality of the data of the persons who submit such reports/complaints is Company's commitment.

The Policy takes into account the provisions of Directive (EU) 2019/1937, as well as the best practices applied in the market.

Policy purpose

1.1 To serve the above pursuit of the Company, the purpose of this Policy is the internal management of reports and complaints concerning the violation of legal provisions, regulations, policies and procedures of the Company, and in particular non-compliance with the Code of Ethics, or with the performance of any act or omission which could damage the reputation, activities and assets, executives and staff of the Company. The mechanism for submitting, investigating and evaluating reports and complaints as well as all the individual elements described in the Policy have been established to effectively manage the submitted reports and complaints, providing adequate and appropriate guarantees to ensure the protection of personal data and privacy, on the other hand, the protection against malicious reports and complaints which are not based on facts.

1.2 In case of a personal complaint, the Company takes all necessary measures and assures that there will be no negative consequences, in the form of retaliation, to the detriment of the person filing the complaint. As a negative consequence, in the form of retaliation is defined any positive or negative action and/or omission which aims at the professional demotion and/or personal devaluation of the person who submitted the report/complaint.

2. Application scope

2.1 The Policy applies to all Group Companies.

2.2 If they come into the perception of the Group's employees, including the Managers, the members of the Board of Directors, the customers, the suppliers or associates of the Company, the shareholders of the Company or any other third parties information about behaviours that are contrary to legal or regulatory provisions or are in conflict with the regulations, policies and procedures of the Company and are related to it, the latter may submit, under the provisions of the Policy, a report or complaint addressed to the Company.

3. Content of Reports and Complaints

3.1 Indicative, and not restrictive, are mentioned some examples of cases of report and complaint that could be addressed to the Company:

- acts related to money laundering, terrorist financing (money laundering)
- acts involving evidence of gross negligence, suspected fraud or corruption
- bribing, offering or accepting
- theft, embezzlement, forgery, misuse of the Company's assets
- infringements of intellectual and industrial property rights
- violations of free and unfair competition law
- acts that violate the protection of personal data either employees of the Company, or customers, suppliers, partners, etc. and privacy and confidentiality issues
- acts that affect the purpose and reputation of the Company
- operations conflict with the interests of the Company
- acts that violate the rules of ethics that govern the activity and internal organization of the Company
- acts that violate the policies and procedures established by the Company, including inappropriate behaviour, harassment, intimidation, abuse of power, etc.
- operations that endanger the health and safety of employees and customers of the Company
- acts harmful to the environment

3.2 The subject matter of the reports and complaints does not cover:

- α. disputes over employment or personal matters between colleagues or employees and superiors or policies and decisions of the Company's Management.
- β. customer disputes with the Company in the context of their commercial cooperation.
- γ. Consumer reports and complaints regarding the quality of services and products provided by the Company, which are not subject to the Policy.

In these cases, interested parties should contact under (a). the Personnel Department, under (b). the Customer Service Department / Pricing Department and under (c). call center for customer

service and/or the relevant Marketing departments.

4. The anonymity of petitioner and complainant

4.1 The Company encourages branded reports and complaints. Anonymous reports and complaints render the task of their effective investigation extremely difficult and/or impossible since after the submission of the report/complaint it is impossible to communicate with the complainant/complainant to provide more clarifications, information and data. In addition, the submission of anonymous reports and complaints makes it difficult to assess the reliability of their content.

4.2 The submitted anonymous reports / complaints are investigated by the Company, and specifically by the Head of Regulatory Compliance, and are examined according to their degree of documentation and the possibility of substantiating the illegal or unethical action or omission they describe.

5. Reporting and Complaints channels

5.1 The reports/complaints, in order to facilitate their investigation and proper evaluation by the Company, may potentially include the following:

- (i) the facts (data, information) that gave rise to the suspicion/concern/knowledge of the reported/reported conduct, with as complete a reference as possible to the names of persons involved, dates, critical documents and locations; and
- (ii) the reason that led to the submission of the petition/complaint.

5.2 The petitioners/complainants should have good reason to believe, based on the circumstances and information available to them at the time of the petition/complaint, that the issues they are complaining about are true. This requirement is an important safeguard against malicious, frivolous or abusive reports, as it ensures that individuals, at the time of the report, who have deliberately and knowingly reported incorrect information to them do not enjoy protection.

5.3 The report/complaint is submitted either online or by phone or by mail or by filling in the relevant form as follows:

5.3.1 An online complaint report is submitted:

- By using the online platform <https://app.myethos.eu/>
- By sending an e-mail to Group's Compliance Officer : speakup@sarantisgroup.com

5.3.2 The telephone submission by telephoning to the contact phone of the Company: +30 210 6173000 asking directly the Group Compliance Officer Ms Maria Fotopoulou.

5.3.3 The postal submission is done by sending a letter to the registered office of the Company: Maroussi - Chalandri no. 26, 151 25 Maroussi, with a marking to the Group Compliance Officer Ms Maria Fotopoulou.

5.3.4 The paper submission is made by completing a relevant form and submitting it to the Group Compliance Officer.

6. Investigation and Evaluation of the submitted Reports and Complaints

6.1 For the evaluation and further addressing of the reports/complaints, the person in charge of Regulatory Compliance is responsible.

6.2 Upon receipt of the report / complaint, the Regulatory Officer will confirm its receipt, within seven days of submission. The report / complaint is evaluated and checked by investigating the issues raised and further investigation, depending on the nature and severity of the case being judged. Indicatively are mentioned:

- (i) in the case of a report concerning the operation of the Group, those responsible for investigating the matter are, the Audit Committee, the Chief Executive Officer and, as the case may be, the Heads of Departments to whom the matter relates, namely Group CFO & deputy CEO, Group CCO & deputy CEO, Group COO, Group HR Director, General Manager Selective Division,
- (ii) for labour matters responsible for investigating the issues are the Audit Committee, the CEO and Group HR Director,
- (iii) for health and safety issues at work issues responsible for investigating the matter are the Audit Committee, the Chief Executive Officer and Group HR Director
- (iv) for information systems safety issues the Audit Committee, the CEO and Group CFO & Deputy CEO.

The Speak-up Policy does not apply to:

- a. on issues of consumer complaints and grievances and
- b. on privacy issues.

6.3 In cases where a member of the Board of Directors of the Company or a person participating in the investigation process is involved in the report/complaint, this person is excluded from the procedure and is replaced.

6.4 Regulatory Compliance Officer keeps a record of the results of the case investigation and informs on an annual basis the Board of Directors of the Company, for the results of the management of the submitted reports/complaints during the year or more often if reports/complaints are submitted that need immediate attention and decision-making by the Board of Directors.

6.5 If the Company or other competent authority chooses to pursue legal or other legal proceedings, the petitioner / complainant may be required to disclose his or her identity.

7. Protection of personal data

7.1 The Company is fully compliant with the legal provisions for the processing of personal data and in this context takes all the necessary technical and organizational measures for the protection of personal data, observing high standards in its systems and the procedures it follows regarding the Policy. The processing of personal data of both the complainants/complainants (if they submit a personal report/complaint) and of the natural persons whose personal data are mentioned within the content of the reports/complaints is carried out in accordance with the provisions of EU and national legislation and best practices and in particular in accordance with Regulation (EU) 2016/679 and Directive (EU) 2016/680.

For the issues of personal data protection, the Group has developed

- i. Privacy Policy
- ii. Cookies Policy
- iii. Privacy notice for employees
- iv. Privacy notice for sole proprietorships
- v. Privacy notice for consumers or generally for natural persons
- vi. Procedure for managing data subject requests
- vii. Procedure for assessing potential violations
- viii. Control procedure of third parties performing the processing
- ix. Register of data subject requests
- x. Data Processing Impact Assessment procedure.

It is clarified that for matters of personal data protection the means of communication referred to in term 5.3.1 is not competent.

8. Protection of confidential information

- 1.1 The internal procedure for submitting reports and complaints, which is observed by the Company, allows the receipt and investigation in complete confidentiality of the reports and complaints by the employees of the Company and its subsidiaries and affiliates (of the Group), but also, to the extent which is possible, from representatives and suppliers of the Group and from any persons obtain information through their work activities within the entity and the Group.
- 1.2 In order to enable effective communication with the staff members responsible for handling reports, the Company has and uses user-friendly channels, which are secure, ensuring confidentiality in the receipt and handling of information concerning violations provided by the petitioner or complainant and allowing the information to be retained and stored so that further investigations can be carried out by the Company.

9. Keeping a file of statistical data

- 9.1 The Company keeps in electronic and/or on paper form with the necessary safety specifications, a file for which the Head of Regulatory Compliance is responsible and which includes the content of all reports and complaints submitted, the course of their investigation, the history, etc. ., for a minimum period of five (5) years from the date of their submission. This period is considered reasonable and necessary for the effective management of reports and complaints and the effective treatment of issues that arise, with the ultimate goal of preventing the occurrence of related incidents in the future and can be extended or shortened if required by law.
- 9.2 Regulatory Compliance Officer periodically performs qualitative and quantitative analysis of data related to reports and complaints in an anonymized form, to ensure that any recurring or systemic problems and potential legal and operational risks are adequately identified and addressed.

10. Update and Training

- 10.1 The Policy may be amended and/or supplemented periodically, if necessary, to reflect any changes to the reporting and grievance mechanism as well as existing legislation and best practices. In this case, the most up-to-date version of the Policy is published on the Company's website: [Corporate Governance \(sarantisgroup.com\)](http://Corporate Governance (sarantisgroup.com)).
- 10.2 After the approval by the Board of Directors, the Policy is communicated to the employees and all the executives of the Company, who are extensively informed and receive training to understand the Policy and the procedures provided in it.
- 10.3 The Head of Regulatory Compliance is responsible for preparing and proposing policy revisions.

11. Communication

- 11.1 If you have any questions regarding the processing or protection of your Personal Data or in case you need more information about your rights and how to exercise them, contact the relevant department of the Company at the following e-mail address: DPO@sarantisgroup.com or at the following postal address: 26, Amaroussiou-Chalandriou str., 151 25 Maroussi in view of the DPO.
- 11.2 In case you need any clarification regarding the process of submitting a report or complaint, or any other request, you can contact the Company at the Group Compliance Officer's e-mail address: speakup@sarantisgroup.com