

POLICY ON PROTECTING PERSONS REPORTING BREACHES OF EU LAW

According to National Law 4990 and Directive (EU) 2019/1937

Version 01, 25/04/2024

1. PURPOSE

The purpose of this policy is to describe the measures taken by PETSIAVAS (henceforth the “Company”) to protect persons who submit reports regarding violations of EU and National law.

This policy is available to all Company personnel in suitable means and can be provided to external partners and public or private institutions if needed.

2. SCOPE

This policy concerns all of Company personnel, to protect those reporting violations of:

- EU law regarding public conventions, legalization of income from illegal activities and funding of terrorism, the safety and compliance of Company products, transport safety, protection of the environment and public health, protection of consumers and protection of the private life and data of Company employees and partners.
- Competition and state aid rules
- Tax legislation

Cases regarding defense issues, classified information, medical and legal confidentiality or advice from trade unions, are excluded.

3. ASSIGNMENT OF DESIGNATED PERSON FOR RECEIVING AND MONITORING REPORTS

The Company designates a Responsible for the Receipt and Monitoring of Reports and communicates the contact information to all personnel and external associates, as applicable.

Contact information of the Responsible for Receiving and Monitoring of Reports

Telephone: 210-6202301

Email: yppa@petsiavas.gr

To ensure the anonymity of the reports delivered by email, a dedicated email address is provided. Employees receiving calls, emails and handle the online Company presence (e.g. social media) have been trained accordingly to forward any reports to the Responsible.

Reports in written are sent in a closed envelope marked “For the Responsible for the Receipt and Monitoring of Reports, to the Company address:

PETSIAVAS SA
Ag. Anargyron 21
145 64
Kifisia

The recipient/ reporting person may submit an external report/ complaint directly to the National Transparency Authority (NTA), in written or by electronic contact form:

By email at kataggelies@aead.gr

Through the complaint form: <https://aead.gr/submit-complaint/>

By post, to the NTA address: 195 Lenorman & Amfiaraou st., 104 42, Athens, Greece

In person or by legal representative at the NTA premises at 195 Lenorman & Amfiaraou st., 104 42, Athens, Greece

4. MEASURES FOR WHISTLEBLOWER PROTECTION

- The Responsible does not disclose any information that could reveal the identity of the reporting person, but refers to them in a coded manner or simply by “the reporting person”, both verbally and in written.
- The identity of the reporting person can only be disclosed at the request of the Authorities and only to them (e.g. in the course of judicial proceedings). In this case, the reporting person should be previously informed.
- The email of the Responsible for Receiving and Monitoring of Reports is dedicated and secure.
- Reports in written are delivered exclusively to the Receiving and Monitoring of Reports, in a sealed envelope. The Responsible is obliged to notify the National Transparency Authority (NTA) if the envelope is delivered open.
- Communication by telephone can only be recorded with the explicit consent of the reporting person. Otherwise, an alternative means to submit the report is indicated and communication is terminated.
- Hardcopy records related to reports are kept in a specific drawer, accessible only to the Responsible.
- Digital records related to reports are kept in a specified path in the Company intranet, with access restricted to the Responsible.
- The Responsible communicates with the reporting person only through the means given in paragraph 3.
- Report handling and investigation is conducted in conformance with Regulation (EU) 2016/679.
- The reporting person does not suffer any change whatsoever in their relationship with the company due to the report.
- In case the Responsible has reason to believe that a conflict of interest will arise from him handling the report, he immediately notifies Top Management and if necessary, the National Transparency Authority.

5. REPORT HANDLING AND INVESTIGATION

The Responsible notifies the reporting person on the receipt of the report within 7 working days and initiates the investigation of the issue. For the investigation, the Responsible may

cooperate with any Company employee or partner, without restriction. Top Management ensures that unobstructed access to the premises and necessary records is provided.

Upon completion of the investigation, the Responsible notifies the reporting person on the findings and, provided the report is substantiated, on the actions to be taken by the Company to resolve the issue. In any case, either the report is substantiated or not, the Responsible is obliged to notify the reporting person within 3 months from the receipt of the report.

R. Anastasopoulos

General Manager and Responsible for Receiving and Monitoring of Reports