

POLICY

Name	: Whistleblowing Policy
Responsible Unit	: Business & Regulatory Compliance, AML/CFT
Purpose	: The purpose of this document is to define the Framework for Reporting illegal or unethical conduct (Whistleblowing)
Version	: 2.0
Valid as of	:

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1. Introduction

doValue Greece (hereinafter "dVG" or "doValue Greece" or the "Company") aims to ensure the highest standards of ethical, moral and legal business conduct, while it expects all Board members, senior management, employees etc. to adhere to a high standard of personal and professional integrity and to avoid any behavior/conduct that may reflect unfavorably upon the Company and doValue Group's (hereafter the "Group ") operation and reputation.

In this context, Company recognizes the importance of establishing, implementing, and maintaining an effective system for preventing and reporting illegal or unethical conduct, as well as for protecting persons who disclose in good faith and on reasonable grounds wrongdoing / malpractice of whatever kind. Therefore, dVG has developed and implements this Policy for Reporting Illegal or Unethical Conduct (hereinafter "Policy").

The Policy describes the basic rules and principles that govern the reporting of illegal or unethical conduct (hereafter "whistleblowing" or "Reporting" or "Report") and the protection of the reporting persons (hereinafter "whistleblowers" or "reporting person") while guaranteeing the confidentiality of the personal data of the reporting person and of the person concerned (as defined further below), as approved by doValue Greece's Board of Directors.

It is noted that this Policy is complementary to related policies such as Company's Fraud Risk Management, Conflict of Interest Policies and Anti-harassment Policy as well as the Company's Code of Professional Conduct and Ethics, Group's Code of Ethics and Group's Anti – Corruption Policy.

1.1. Purpose

This Policy intends to encourage and facilitate staff members and any concerned third party to submit Reports on any suspected incident of misconduct/ serious irregularities/ violations/ wrongdoing/malpractice etc. that may come to their attention, ensuring that said information will be investigated based on objectivity and confidentiality, while setting out measures for their protection. In compliance with local and European regulatory framework for whistleblowing as amended and in force, indicatively:

- ✓ whistleblowing European Directive 2019/1937 on "the protection of persons who report breaches of Union law", and
- ✓ Law 4990/2022 on "Protection of persons reporting violations of EU law".

By creating an environment of trust and protection for its staff, the Company encourages the reporting of any actual, attempted, or suspected illegal or unethical conduct, ensuring that whenever it is necessary to report (in good faith) any misconduct/serious

irregularity/violation, it will provide the utmost protection and confidentiality without suffering any kind of retaliation and discrimination.

1.2. Scope

The Policy applies to all Company staff and inter alia, to all persons engaged by the Company permanently or temporarily, full-time or part time, including persons working remotely, Senior Management, members of the Board of Directors including non-executive members as well as paid or unpaid trainees ("staff members"). It also applies to any other person having access to information and/or premises of dVG, to ex-employees, volunteers and job applicants that have acquired information on breaches during the recruitment process or other pre-contractual negotiations, persons having self-employed status, or consultants, any persons working under the supervision and guidance of contractors, subcontractors and suppliers providing the Company with services, indicatively including, but not limited to, insurance agents, lawyers and law firms, management consultants, debt notification companies, suppliers of goods and services, associates etc. as well as shareholders, customers, debtors and any concerned third party submitting a report in good faith (hereinafter "concerned third parties").

For the purposes of this policy, all the above mentioned are grouped together under the term "reporting persons" or "whistleblowers".

1.3. Policy Updates & Approval

The Policy is updated on the earliest of:

- following applicable amendments to the legal and regulatory framework (when/if required);
- where significant deficiencies are identified in the reporting framework; or
- when changes to the Company's and/or Group's business require additional or different measures.

The Policy and any update and/or amendment thereof is approved by the Board of Directors (BoD) of the Company.

2. Roles and Responsibilities / Governance

2.1. Board of Directors

The Company's Board of Directors (BoD) is responsible for:

- Approving and promoting the continuous improvement/periodic review of this Policy, upon recommendation by Reporting Receiving and Monitoring Officer (RRMO) and Regulatory Compliance AML/CFT ;

- Ensuring the existence of a robust framework for reporting illegal or unethical conduct;
- Committing to, promoting and practicing a speak-up/listen-up culture;
- Ensuring, to the extent possible, that reporting persons and others involved will not suffer retaliation due to the reporting;
- Appointing the RRMO.

2.2. Ethics Committee

The Ethics Committee is responsible for reviewing/evaluating reports/cases proven to involve Code of Professional Conduct and Ethics violations and overseeing any required remedial measures, in line with applicable, at the time, relevant regulations, internal conduct provisions etc.

Additionally, Reports related to Regulatory Compliance AML/CFT or where a potential interest (of the RRMO) arises related to the Report, so as to compromise the impartiality and independence of the RRMO's judgment, will be also evaluated by the Ethics Committee. In this case, the participation of the RRMO and the secretary of Ethics Committee during the sessions of the Ethics Committee shall be assessed ad hoc for the purposes of potential conflict of interest.

2.3. Reporting Receiving and Monitoring Officer (RRMO)

RRMO is responsible for:

- The design, implementation, operation and improvement of the reporting system;
- Ensuring, to the extent possible, that investigation and protection functions are delivered independently;
- Providing advice and guidance on the reporting system and relevant issues;
- Receiving report and report related information; and
- Reporting on the performance of the reporting system to BoD.

The RRMO, supported by the Regulatory Compliance AML/CFT in its role as the authorised for this purpose reports office/supporting office under RRMO supervision and coordination, is further responsible for:

- Providing appropriate guidance as to how to submit a Report and ensuring that the relevant guidance information is displayed in a prominent place;
- Receiving the Reports;
- Ensuring that a confirmation of the receipt of the Report is provided to the reporting person within a period of seven (7) working days from the day of receipt;
- Performing an initial assessment of the report;
- Designating the competent unit or person to handle the report;

- Ensuring, to the extent possible, that the confidentiality of the reporting person's identity and of any third party named in the report, is protected, by involving only authorized persons;
- Monitoring the progress of the investigation and maintaining contact with the reporting person and asking for further information from the reporting person, where necessary;
- Ensuring that feedback is provided to the reporting person within a reasonable period of time, which shall not exceed three (3) months from the confirmation of receipt of the Report;
- Providing clear and easily accessible information for submitting Reports to competent authorities;
- Planning and coordinating training efforts related to ethics and integrity and participating in the development of relevant internal policies, procedures, guidelines etc.

The RRMO is appointed by the Company's BoD with reporting access to it (i.e. BoD). In case that he/she is a member of the Company's staff, it must be ensured that his/her other duties do not impair his/her independence and do not lead to conflicts of interest in relation to his/her role and specific responsibilities as RRMO (as outlined in this Policy).

Upon appointment, the Labour Inspectorate is informed within a period of two (2) months as from such appointment.

The RRMO must perform his/her duties with integrity, objectivity, impartiality, transparency and social responsibility. Furthermore, he/she must respect and comply with the rules of secrecy and confidentiality for matters brought to his/her attention during the exercise of his/her duties, as well as refrain from handling specific cases in the event of conflict of interest, by declaring an impediment.

3. Description

3.1. Types of Reporting

It should be noted that a reporting person may choose to report illegal or unethical conduct in any of the following ways:

- speak openly, without withholding their identity or asking for their identity not to be divulged;
- report in a confidential way, where the reporting person's identity is known to the person receiving the report, but it is not revealed to anyone beyond a need-to-know basis without his or her consent (unless required by law); or

- report anonymously, where the reporting person does not reveal his or her identity.

3.2. Basic Principles

The basic principles of this Policy are as follows:

- a) All reporting persons are encouraged to report serious irregularities/regulatory breaches.
- b) Reporting persons may choose among a number of available reporting channels for submitting a Report.
- c) Reporting persons can choose to submit a report anonymously.
- d) The review of reports is carried out in such a way that objectivity and confidentiality are ensured, while at the same time care is taken to ensure that in the event of conflict of interest for the person reviewing the report, the information in the report shall be reviewed by another person.
- e) The reports and the handling/review thereof are subject to strict confidentiality and personal data protection rules.
- f) Reports of wrongdoing are dealt with in a proper and timely manner.
- g) The Company shall not hinder reporting, retaliate against reporting persons, victimise or discourage them in any way.
- h) Persons who report wrongdoing and have reasonable grounds to believe that the information they provide is true at the time of reporting, are protected against any form of retaliation, including threats and attempts of retaliation.
- i) Persons who submit Reports but are not acting in good faith are not protected. Such behavior is considered misconduct and shall be subject to appropriate measures.
- j) The reported irregularities shall be assessed, investigated, and if they are confirmed, the Company shall take all necessary actions to identify and implement appropriate remedies.
- k) Any person (physical or legal) that attempts to obstruct / threaten or deter persons that are willing to submit Reports are subject to penalties implemented by the legislation.
- l) No staff member or the Company's Management may use its position to prevent another member of staff from exercising their rights or complying with their obligations as indicated in this Policy.
- m) Malicious whistleblowing aiming at harming the integrity or reputation of another person is prohibited. In any case, the Company respects the right of defense of persons implicated/involved in any report.



3.2.1. Confidentiality and Anonymity

All Reports are treated as confidential. The Company takes measures so that all the communication channels for receiving the Reports are designed, established and operated in a secure manner that ensures that the confidentiality of the identity of the reporting person and any third party mentioned in the Report is protected.

The identity of the reporting person and any third party mentioned in the report is not disclosed to anyone beyond the authorized staff members competent to receive or monitor reports, without the explicit consent of that person(s).

The identity of the reporting person and any other relevant information may be disclosed only where this is required by law in the context of investigations by national authorities or judicial proceedings. In such cases the reporting person is informed in writing before such disclosure, unless such information would jeopardise the related investigations or judicial proceedings.

Anonymous Reporting is not preferred but it is acceptable, although it may impede the successful completion of the investigation or affect the findings of the investigation.

3.2.2. Protection of persons who report (whistleblowers protection)

The Company takes all reasonable measures (to the extent possible) to protect persons who submit a Report against any abuse or reprisals as a result of the Report, provided that reporting is done in good faith and in compliance with the provisions of this Policy. Reporting persons who consider that they have been the victim of such abuse or reasonably believe they are exposed to a risk of abuse or reprisal as a result of a report submitted, can report the case to any of the appropriate channels mentioned in this Policy.

In general, persons reporting violations are entitled to protection if, at the time of the report, they had reasonable grounds to believe that the information about the reported violations is true.

Reporting persons do not lose the protection merely because the concern expressed in good faith has been proved to be unfounded. Any report that is assessed as being unsubstantiated/non-feasible to investigate and/or cannot be investigated, may eventually be archived following the provisions of the present Policy. In any case, the Whistleblowers enjoy the protection and non-retaliation rights assigned by the Company.

The Company also ensures protection of whistleblowers who make a public disclosure.

3.2.3. Protection of Concerned Persons

Any person concerned, i.e. the person referred to in the Report or public disclosure as the one to whom the breach is attributed or with whom that person is associated, has presumption of innocence and the right of defense, including the right to be heard and the right to access their file.

The identity of persons concerned is protected for as long as investigations triggered by the Report or the public disclosure are ongoing.

All provisions of law and this Policy, as regards the protection of the identity of reporting persons shall also apply to the protection of the identity of persons concerned.

3.3. Nature of Violations to be Reported

All members of staff are encouraged to submit a report regarding any incident of actual, attempted or reasonably suspected illegal or unethical behavior which affects and/or may be harmful to dVG and/or Group and their mission, their staff or concerned third parties.

The report may, indicatively and not exhaustively, refer to incidents:

- a) Of serious misconduct or violations of policies, procedures, guidelines and applicable legislation (National and European legal and regulatory framework).
- b) Violations of the Company's Code of Professional Conduct and Ethics and / or the Group's Code of Ethics.
- c) Violations referring to financial reporting such as falsification or destruction of business and financial reports; misrepresentation or suppression of financial information and non-adherence to internal financial reporting policy and controls.
- d) Other forms of criminal behavior, integrity violations, unfair and/or unethical behavior including but not limited to theft, embezzlement, corruption, bribery, money laundering, conflicts of interest, fraud, breach of Data Protection regulation, abuse or improper use of Company's and others' information, abuse or improper use of Company's or/and Group's property and/or powers, ethical/ psychological/ physical/ sexual harassment.
- e) Anything that could damage the reputation of the Company and/or the Group,
- f) Retaliation against an individual who reported an illegal or unethical behavior or concern.
- g) As well as any attempt to cover up the above etc.

Such incidents may concern (indicatively not exhaustively) members of staff, ex-staff customers, debtors, contractors, subcontractors, suppliers, beneficiaries or other persons or entities that participate or seek to participate in activities that involve dVG and/or Group.

It is noted that customer and debtors complaints regarding the quality of services provided, the products as well as any queries/questions about the operation of a service, do not fall within the scope of this Policy.

3.4. Reporting Procedures

Reporting persons may choose among a number of available reporting channels for whistleblowing, bypassing if they wish in any case their hierarchy entirely.

The whistleblowing channels are designed, set up and operate in a manner that ensures the confidentiality of the identity of the whistleblower and prevents access to unauthorised staff members.

In general, Reports may be submitted in writing or orally/verbally, or both. It is noted that, upon request by the reporting person, Reports can also be made by means of a meeting in person.

3.4.1. Reporting channels

Reporting persons can submit a Report through one or more of the channels listed below:

- a) Contact the RRMO i.e. the Chief of Business & Regulatory Compliance AML/CFT Officer
- b) Send an email to: EthicsHotline@dovaluegreece.gr
- c) Call the telephone line: +30 210 4847620 (ext. 47620) and either talk directly to the RRMO or leave a message on the answering machine (to the attention of the RRMO), which is available 24/7, all year round
- d) Send a letter to the attention of the RRMO, to the mail address:
doValue Greece
27 Kyprou and Archimidous Street, Moschato
- e) Through the dedicated online whistleblowing reporting platform, which the Company has in place (installation date H1 2024).

It should be noted that other internal parties that may receive reports of that nature, are obliged to inform and forward the Report to the RRMO immediately, without amending its content or disclosing information mentioned therein that may lead to the identification of the reporting person or any third party named in the Report.

3.4.2. External Reporting

It is noted that reporting persons may choose to submit a Report through external reporting channels either directly or after having first reported through internal reporting channels. Depending on the matter, there are authorities competent to receive, give feedback and follow up on reports (e.g. NTA etc.).

3.5. Content of the Reports

Reports should be as specific as possible and violations should be described in sufficient detail to facilitate the investigation.

To assist the Company in the response or investigation of a suspicion, the suspicion should be factual rather than speculative, containing as much specific information as possible to allow the appropriate assessment of the nature, extent and urgency of the suspicion. It is less likely that the Company will be able to conduct a successful investigation based on a suspicion that contains unspecified wrongdoing or broad allegations without supporting evidence.

In general, the Report should, where possible, contain the following information:

- a) The alleged event, matter or issue that is the subject of the Report and that has led to a reasonable suspicion of misconduct,
- b) The name(s) of the person(s) involved,
- c) If the Report involves a specific event(s), the approximate time and location of each event,
- d) Any additional information, documentation, or other evidence available to support the Report, and
- e) Specific reference to amounts involved is usually helpful in better understanding a Report.

It should be noted that the person reporting on unethical conduct events should not perform an investigation of any sort on their own.

3.6. Receiving the Report

RRMO assisted by Regulatory Compliance AML/CFT is responsible for receiving Reports through the communication channels mentioned above. In case a Report is filed through an alternative channel, the receiving party shall provide RRMO and authorized staff (i.e. Regulatory Compliance AML/CFT) with all necessary information relating to the Report without undue delay.

The Regulatory Compliance AML/CFT assisting the RRMO shall acknowledge the receipt of the Report to the reporting person within seven days (7) of that receipt. However, it is noted that in some cases the acknowledgement of the receipt may not be possible (e.g. in cases of anonymous reporting where the reporting person does not provide any contact details).

Additionally, the RRMO should update the person who reported the case on its progress within three months as from the acknowledgement of the Report's receipt.

3.7. Treatment/ Assessing/ Review the Report

All Reports made under this Policy are handled by the RRMO with the assistance of Regulatory Compliance AML/CFT.

The RRMO, if deemed necessary, may designate an impartial person or department to initially assess the reports and handle them accordingly (e.g Internal Audit, People etc.)

Reports shall be assessed, including aspects such as urgency, completeness and relevance of the information and, to the extent possible, the risk of detriment to and the level of protection and support required for the reporting person and others involved.

Reports that are out of the scope of this Policy shall be forwarded to the competent units as per the provisions of relevant policies/procedures etc. Relevant records are maintained for reporting issues and future reference.

Reports are carefully investigated in a spirit of absolute discretion and confidentiality and ensuring impartiality. Specifically, the RRMO with the assistance of Regulatory Reporting AML/CFT:

- considers whether the issue falls within the scope of this Policy, taking into account its seriousness and whether the Report includes enough information to enable further investigation;
- may assign the case to the Company's unit/department which is responsible for the specific subject of the report/complaint, or to any other unit/department, in order to conduct the investigation;
- may decide to conduct their own investigation;
- maintain communication with the reporting person (where possible) and, where necessary;
- may assess, with a Designated Person or Department (where necessary), the accuracy of the allegations made in the Report, take protective measures and, where relevant, to address the breach reported, including through actions such as an internal enquiry, an investigation or the closure of the procedure.

The actions to be taken depend on the nature and gravity of the concern. In any case, the actions shall be taken in an independent, as well as timely manner and shall be documented. In all cases, when an investigation takes place, it shall aim to establish facts and evaluate them objectively in order to determine if the wrongdoing is occurring, has occurred or is likely to occur, as well as its extent.

It should be noted that reports concerning the RRMO will be recorded in the special file kept by RRMO and will be forwarded to the National Authority Transparency for evaluation as an external reporting channel, informing the whistleblower accordingly.

Additionally, Reports related to Regulatory Compliance AML/CFT or where a potential interest (of the RRMO) arises related to the Report, so as to compromise the impartiality and independence of the RRMO's judgment, will be referred to the Ethics Committee for evaluation.

RRMO may close the review process of the Report by archiving it, if it is concluded that:

- it is unintelligible, or
- it is submitted abusively, or
- it does not refer to incidents that constitute a violation of the regulatory framework or policies and internal regulations of the Company and/or the Group, or
- no serious indications of such violation are apparent.

3.8. Record Keeping and Privacy

Records of any Reports received shall be registered in a special file kept by RRMO ensuring confidentiality. Reports shall be stored for a period not exceeding ones necessary and proportionate in order to comply with the requirements of any relevant legislation and the Company's policies, procedures, and guidelines.

In case the reporting of irregularities involves dealing with personal data, such data shall be managed/conducted in full compliance with the provisions of the applicable privacy legislation / regulations, as well as the Company's and/or the Group's relevant policies, procedures and guidelines.

As regards filing of Reports that do not take place in writing, the following apply:

- (a) Where a recorded telephone line or another recorded voice messaging system is used for reporting, subject to the consent of the reporting person, the RRMO or the person receiving the Report shall have the right to document the oral reporting in one of the following ways: (a) by making a recording of the conversation in a durable and retrievable form; or (b) through a complete and accurate transcript of the conversation prepared by the RRMO or the person receiving the Report. The reporting person shall be offered the opportunity to check, rectify and agree the transcript of the call by signing it.
- (b) Where an unrecorded telephone line or another unrecorded voice messaging system is used for reporting, the RRMO or the person receiving the Report shall have the right to document the oral reporting in the form of accurate

minutes of the conversation written by the RRMO or the person receiveing the Report. The reporting person shall be offered the opportunity to check, rectify and agree the transcript of the call by signing it.

- (c) Where a person requests a meeting for reporting purposes, the RRMO or the person receiveing the Report shall have the right to document the meeting in one of the following ways: (a) by making a recording of the conversation in a durable and retrievable form; or (b) through accurate minutes of the meeting prepared by the RRMO or the person receiveing the Report. The reporting person shall be then offered the opportunity to check, rectify and agree the minutes of the meeting by signing them.

In case the reporting person denies the signing of the aforementioned minutes, such denial shall be mentioned in the minutes.

3.9. Training & Awareness

The Company provides information and training on the present Policy and the reporting system. Appropriate training is provided in order to encourage reporting of wrongdoing, as well as to ensure that staff members are aware and understand the principles that govern the reporting of illegal or unethical conduct.

3.10. Penalties / Sanctions

It is noted that the Company shall apply penalties to persons that:

- a) Hinder or attempt to hinder reporting;
- b) Retaliate against reporting persons or referred to in the Report;
- c) Bring vexatious proceedings against reporting persons or referred to in the Report;
- d) Breach the duty of maintaining the confidentiality of the identity of reporting persons and the person concerned.

3.11. Access of the Policy

The Policy is accessible by all members of staff through the Policies Master list, while the contact details of the RRMO are always available of the Company's website.

3.12. Information Flow

RRMO, assisted by the Regulatory Compliance AML/CFT, prepares on an annual basis a report containing anonymous and aggregate information regarding the reports eventually received during the year, including discarded ones, and relevant action plan implemented, which shall be submitted to the Company's BoD for information purposes, and then to the Group, in order to be consolidated in the whistleblowing Group Compliance annual report.

RRMO may decide to bring to the attention of the BoD a specific report (ad hoc reporting) in case that such report is well is well founded and exposes the Company to compliance risks. If the BoD confirms such compliance risks, the relevant information shall be provided towards the Group.

4. Definitions

- **doValue Greece or dVG or Company** means doValue Greece Loans and Credits Claim Management Société Anonyme.
- **Group means doValue S.P.A.**, and the Companies controlled by doValue S.P.A
- **Report or Whistleblowing:** Oral or written or submitted online communication of information on breaches, or a concern submitted about an actual or potential breach.
- **Who can file a report:**
 - ✓ Company's and Group's employees providing to the Company or the Group services for which they receive remuneration, regardless of whether their employment is full time or part time or whether they are seconded from/to another body;
 - ✓ Volunteers and paid or unpaid trainees;
 - ✓ individuals whose employment relationship has been terminated for any reason whatsoever, including retirement, as well as individuals whose employment relationship has not yet begun (in cases where information about violations has been obtained during the recruitment process or at another stage of negotiation before the conclusion of an agreement);
 - ✓ Shareholders
 - ✓ the Company's suppliers and any individual working under its supervision and direction.
 - ✓ Company's customers and/or debtors under management, as well as any interested third party (regardless of whether they have or had an employment relationship with the Company).
- **Staff members:** All persons engaged by doValue Greece permanently or temporarily, full-time or part-time, including persons working remotely, Senior Management, members of the Board of Directors including non- executive members as well as paid or unpaid trainees.
- **Reporting Person or Whistleblower:** the natural person who reports or discloses information on actual, attempted or suspected wrongdoing/breaches, and has reasonable belief that the information is true at the time of reporting.
- **Good faith** means that the reporting person reasonably and honestly believes (at the time of the reporting) the transmitted information to be true. Furthermore, good faith also means that reporting person does not do so with the intention to benefit personally.
- **Person concerned or Reported person:** A natural or legal person who is referred to in the report or public disclosure as a person to whom the breach/ irregularity is attributed or with whom that person is associated.

- **Concerned third parties:** Include, inter alia, ex-employees, volunteers and job applicants that have acquired information on breaches during the recruitment process or other pre-contractual negotiations, persons having self-employed status, or consultants, any persons working under the supervision and direction of contractors, subcontractors and suppliers, as well as shareholders and board members, including non-executive members.
- **Designated Person or Department:** An impartial person or department which is designated by the RRMO and which is competent for assessing and handling a report.
- **Report Receiving and Monitoring Officer (RRMO):** An appointed individual, responsible for the receipt and monitoring of reports of wrongdoing through the designated communication channels.
- **Reasonable belief:** A belief held by an individual based on observation, experience or information known to that individual, which would also be held by another person in the same circumstances.
- **Retaliation:** Any direct or indirect act or omission which occurs in a work-related context, prompted by reporting, which causes or may cause unjustified detriment to the whistleblower or put them at an undue disadvantage (i.e. aimed against the whistleblower). Retaliatory actions may include, but are not necessarily limited to, harassment, discriminatory treatment, negative evaluation, salary freeze or adjustment, work assignments, demotion, termination of employment, or the withholding of an entitlement.

Retaliation includes, indicatively, the following: suspension, lay-off, dismissal or equivalent measures, demotion or withholding of promotion, transfer of duties, change of location of place of work, reduction in wages, change in working hours, withholding of training, a negative performance assessment or employment reference, imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty, coercion, intimidation, harassment or ostracism, discrimination, disadvantageous or unfair treatment, failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment, failure to renew, or early termination of, a temporary employment contract, harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income, blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry, early termination or cancellation of a contract for goods or services, cancellation of a licence or permit,

psychiatric or medical referrals, physical or medical referrals, denial or withdrawal of reasonable accommodations to persons with disabilities.

- **NTA:** National Transparency Authority
- **Client or Customer:** Credit or financial institutions or loan and credit claim management companies under Law 4354/2015 as amended and in force or special purpose vehicles under Law 3156/2003 which assign to the Company the task of managing their claims from loans or credit facilities which will be or have been granted.
- **Debtor:** Debtors from loans and credit facilities already granted or to be granted by credit or financial institutions, the management of which has been assigned to the Company. They include:
 1. Natural persons,
 2. Legal persons, or
 3. groupings of associated natural or legal persons (Trusts, Funds, Joint Ventures, etc.).
- **BoD:** Board of Directors
- **Public disclosure:** The direct disclosure of information to the public relating to breaches of law.
- **Anonymity:** When the identity of the information source is not known to the recipient
- **Secrecy/Confidentiality of identity:** When the report is not anonymous, the whistleblower's identity shall be kept secret by the recipient of the information from the person(s) implicated in the misconduct/breach/serious irregularity that has been reported, and shall be used only as absolutely necessary
- **Misconduct/Serious irregularity/Violation of Legislation:** Irregular activity or omission relating to breaches with regard to internal policies and procedures, Codes of Conduct or breaches of the national and European legal and regulatory framework.

Such breaches may relate to (indicatively):

 - ✓ accounting, auditing and financial reporting (i.e., financial misconduct, internal controls, reporting of expenses)
 - ✓ business integrity (i.e., bribery, forgery/falsification of documents, fraud, corruption, conflicts of interest, customer issues)
 - ✓ the Group's Anti-Bribery Policy, Company's Code of professional Conduct and Ethics, Group's Code of Ethics, Group's Policy for Prevention of Market Abuse,

Policy on Conflict of Interest, as well as other policies and regulations governing the Company's operation

- ✓ financial services, products and markets, as well as the prevention of money laundering and financing of terrorism;
- ✓ protection of consumers;
- ✓ the protection of confidentiality, privacy and personal data, as well as the security of network and information systems;
- ✓ environmental protection;
- ✓ breaches of public procurements, European Union competition rules and acts that breach rules on corporate tax, environment, health and safety;
- ✓ misuse/misappropriation of corporate assets;

5. Related Documents

1. Conflict of Interest Policy
2. Fraud Risk Management Policy
3. doValue Greece's Code of Professional Conduct and Ethics
4. doValue Group's Code of Ethics
5. doValue Group's Anti - Corruption Policy
6. AML/CFT Policy
7. doValue Group Whistleblowing Policy