



FLEXOPACK SOCIÉTÉ ANONYME COMMERCIAL AND INDUSTRIAL PLASTICS COMPANY

TZIMA LOCATION –194 00 KOROPHI, COUNTY OF ATTIKI, GREECE
G.E.MI. Number: 582101000

Whistleblowing Policy

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APPENDIX

1. Introduction

1.1 The Management of the societe anonyme company under the name “**FLEXOPACK SOCIÉTÉ ANONYME COMMERCIAL AND INDUSTRIAL PLASTICS COMPANY**” and the distinctive title “**FLEXOPACK S.A.**” (hereafter called as “**Company**” or “**FLEXOPACK S.A.**” for abbreviation purposes), in the context of the establishment of effective mechanisms for the timely detection and identification of irregularities and/or omissions and/or criminal acts across the broader operations of the Company and the Group, proceeded with the preparation of the present Whistleblowing Policy and Procedure (“Whistleblowing Policy” - thereafter called as “Policy” for abbreviation purposes), in cooperation with the Regulatory Compliance Officer, in order to ensure its uninterrupted, orderly, smooth and lawful operation.

1.2 The present Policy came into force by virtue of the decision of the Company's Board of Directors dated on 10.05.2023, following a relevant recommendation - proposal made by the Company's Regulatory Compliance Officer. Any subsequent changes and amendments to the Policy, if they are material, are submitted for approval to the Company's Board of Directors. Substantial means the changes and modifications which significantly change the content of the Policy, especially in terms of the applied principles and criteria as well as the applicable procedure.

In any case and with the aim to avoid any misunderstanding, it is pointed out that clarifications, recommendations and guidelines regarding the implementation of the present Policy do not constitute and cannot be considered as modifications of this Policy.

1.3 It is noted that a summary of the present Policy will be included in the applicable Internal Operating Regulations of the Company, in accordance with the concept and context of the provision of Article 14 of Law 4706/2020 regarding corporate governance.

2. Scope of the Policy

2.1 The present Policy applies to all Companies within the Group, including those entities whose headquarters are located abroad. However for such companies an adaptation to individual issues may be also required in accordance with the national / local regulatory framework which is effective every time.

2.2 This Policy applies to those who are employed by the Company and have obtained, in the context of their employment, information regarding violations (as presented in point 2.4) and in particular to the following parties:

(a) all members of the Board of Directors and its Committees, along with the persons who exercise

managerial and / or administrative duties in other Companies within the Group, as well as the Company's shareholders,

(b) the personnel of the Company and the Group in general, regardless of the contractual status which this personnel is subject to (including persons whose employment relationship has ended for any reason, as well as persons whose employment relationship has not yet commenced, as long as the information about any violations was obtained during the recruitment process or at another stage of negotiation before the conclusion of the contract), as well as any volunteers and paid or unpaid interns, and

(c) the suppliers in general and the persons who provide services towards the Company and the other Companies within the Group, as well as those who work under the supervision and instructions of the suppliers and / or consultants.

2.3 Reports-complaints are being performed under the condition of the honest and reasonable belief that a violation has been committed or is likely to be committed, defined as an act or omission, which is punishable under Union Law or contradicts the objective or purpose of the rules of Union Law which falls within the scope of Directive (EU) 2019/1937 of the European Parliament and the Council as of October 23, 2019 (L 305) and Law 4990/2022 for the protection of persons who report cases of violation of the Union law, as well as for reports regarding other serious misconduct or issues, as listed below.

The persons who fall, according to paragraph 2.2, within the scope of the Policy are encouraged to submit reports-complaints about criminal acts, suspected incidents of illegal behavior, incidents of violation of provisions of the Union Law in relation to the Company and/or the other companies of the Group.

2.4 The reports-complaints concern the following violations:

(a) acts involving evidence of gross negligence, suspicion of fraud or corruption.

(b) network and information system security breaches.

(c) serious irregularities, as well as material violations concerning the provision of services on behalf of the Company and the Group in general.

(d) offering or accepting a bribe.

(e) theft, embezzlement, abuse, money laundering, forgery, breach of confidentiality and personal data protection, breach of competition law, accounting and auditing offences.

(f) intimidation, discrimination, threat, extortion, use of force, verbal abuse, defamation, sexual harassment.

(g) misuse of assets and resources of the Company and the Group in general.

(h) breaches of Union Law in general in the areas of public procurement, product safety and conformity, transport safety, environmental protection, radiation protection, public health and consumer protection.

(i) violations related to the internal market (indicative of rules on competition and state aid, rules on

business taxation, etc.).

2.5 The following cannot be the subject of a report-complaint:

- (a)** any disagreement on matters concerning policies and decisions of the Company's Management and the Group in general,
- (b)** personal matters and disagreements with colleagues or superiors;
- (c)** rumors.

3. Objective and basic principles of the Policy

3.1 The enactment of the present Policy aims to define the principles and the framework on the basis of which the Company receives, processes and investigates named or anonymous reports-complaints about irregularities, omissions or other criminal acts that have come to the attention of the persons included in the subjective scope of this Policy as mentioned in the previous section.

In addition, the purpose of the present Policy is to ensure an integrated framework for the protection of persons who report violations such as those listed in the previous section.

3.2 In order to serve the above fundamental purpose, the Policy aims to create a reliable mechanism for:

- (a)** the support and protection from malicious acts of the persons mentioned in paragraph 2.2 who in good faith make a report-complaint about an issue that they consider to be a violation and affects the operation of the Company or the other Companies of the Group,
- (b)** the effective management of reports-complaints, providing guarantees that such reports-complaints about potential violations are taken seriously into consideration and are confidential to the extent that they do not conflict with applicable law, and
- (c)** ensuring the exclusion of any form of retaliation against persons who submit any report or complaint.

The present Policy provides ways for such persons to express their concerns and receive information about the outcome of each investigation. It also formulates a clear process for submitting and managing reports-complaints with quick responses and transparent roles.

3.3 The Policy is governed by the following fundamental principles:

- (a)** making a certain effort to collect and investigate all evidence and information related to each submitted report-complaint for the purpose of providing a reasonably substantiated response;
- (b)** ensuring an environment of security and trust, so as to encourage the submission of reports-complaints made in "good faith" about illegal acts or irregularities that come to the attention of the

persons under paragraph 2.2.

(c) ensuring the anonymity and protection of the personal data of the persons who submit reports-complaints, without jeopardizing the current position they hold or their future professional development (prohibition of acts of retaliation);

(d) dealing with reports-complaints with impartiality, respect for general and specific principles and values, such as respect for personality, human dignity, trust, transparency, decency, honesty and professional conscientiousness.

In this context the Company: **(i)** investigates reports-complaints diligently, within a reasonable timetable and without discrimination, **(ii)** responds carefully to each report-complaint, showing courtesy and understanding, **(iii)** makes every effort and exhausts every possibility of immediate settlement of the case relating to the report-complaint, **(iv)** does not enter into an opposition state versus the submitter of the report-complaint and **(v)** provides guidance on the existing communication mechanisms of the relevant issues.

4. Anonymity of petitioner - complainant

4.1 The Company encourages named reports-complaints, while anonymous complaints are also accepted. It is noted however, that the anonymous reports-complaints make the process of the analytical investigation extremely difficult and / or impossible, due to the difficulty of having an anonymous complainant providing information and because of the difficulty of assessing the credibility of the reports. Anonymous reports-complaints are investigated by the Company taking into account, among other things, the seriousness of the issue and the possibility of confirmation of the report-complaint by independent and reliable sources.

4.2 Submitted anonymous reports-complaints are examined depending on their degree of documentation and the possibility of rightfully identifying the illegal action they describe.

4.3 Any reference to sensitive personal data based on the current regulatory framework (e.g. data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, membership in a trade union, genetic and biometric data, health, sex life, sexual orientation) should be avoided, unless directly related to the subject of the complaint. Otherwise, the specific information will be deleted.

4.4 The Company is committed to maintaining the anonymity of the complainant and to reject actions that may result in the disclosure of his/her identity.

4.5 In the event that the disclosure of the identity of the petitioner is necessary in the context of any investigations held by the competent authorities or due to judicial proceedings, then this disclosure will

be carried out after the petitioner has been informed in writing about the reasons for the disclosure of his/her identity and other confidential information, unless this information undermines investigations or legal proceedings. After the notification, the petitioner is entitled to submit written observations, which are not disclosed. Unjustified omission of the above provision of information constitutes a disciplinary offense, while the petitioner is entitled to submit written comments to the competent authority regarding this disclosure. In the event that the stated reasons for the comments are not considered sufficient, then the disclosure of the identity and other confidential information of the petitioner is not prevented.

5. Protection of petitioner - complainant

5.1 Reports-complaints must always be made "in good faith". The Company's Management is committed towards protecting the petitioner from:

- (a)** any acts of "retaliation", as defined in detail below in point 5.3, regarding the position he/she holds and/or his/her future professional development,
- (b)** any other kind of discrimination or any kind of threat or adverse treatment, and
- (c)** acts or behaviors of targeting/victimization of the authority -as mentioned below- which is responsible for the collection and examination of the report-complaint.

5.2 Personal data and any kind of information that leads directly or indirectly to the identification of the petitioner is not disclosed to anyone other than the authorized members of the Company's personnel who are competent to receive or monitor the petitions, unless the petitioner initially consents.

For this purpose, the Company takes the appropriate technical and organizational measures, such as techniques of using nicknames when monitoring the report and communicating with the competent authorities.

5.3 "Retaliation" is defined as the negative consequences that the petitioner may experience, due to the submission of a report-complaint or his/her participation in an investigation concerning a submitted report-complaint. Indicatively, possible acts of retaliation may relate to the following: **(i)** suspension, dismissal or other equivalent measures, **(ii)** workplace harassment (bullying), **(iii)** unfavorable treatment, **(iv)** assignment of excessive duties, **(v)** removal of duties without justification and replacement with new tasks, omission or deprivation of promotion, change of workplace, change of working hours, **(vi)** obstruction of the exercise of labor rights (participation in training, obtaining leave, development of trade union related activities, etc.), **(vii)** reprimand, imposition of disciplinary or other measures, **(viii)** entry on a spam list ("blacklist"). In the event of retaliation in the working environment, the victim reports the incident to the Human Resources Department, which immediately proceeds to investigate the issue, informing the victim of the progress of the investigation in order to normalize the

employee's working environment. Along this procedure, the presumption of innocence of both the complainant and the accused is taken into account in order to protect all involved parties and ensure the necessary objectivity and impartiality. In this context, if any of the aforementioned situations or conditions appear, as long as it constitutes a vengeance related behavior as a countermeasure to any report-complaint, then it is invalid and has no legal effect.

5.4 In any case, the petitioners enjoy the measures and protection provided in detail in the current regulatory framework (indicatively in articles 18 to 22 of Law 4990/2022).

5.5 If the petitioner deliberately submits a false report or a report not in good faith, then the petitioner is not protected against retaliation and may suffer consequences in terms of his/her employment relationship, including, but not limited to, immediate termination of the employment contract as well as being punished with fine and imprisonment of at least two (2) years depending on the case.

6. Procedure for submitting reports - complaints

6.1 Reports-complaints, in order to facilitate the investigation and the proper evaluation, must include indicatively and not restrictively the following:

- (a)** the events giving rise to the concern/suspicion with reference to names of persons involved, dates, documents and locations, and
- (b)** the reason that led to the filing of the report-complaint.

In no way is a complaint expected to prove the complainant's potential concerns / suspicions regarding the reported violation, however all available information is encouraged to be made available in order to facilitate the investigation of the case.

6.2 Reports-complaints are submitted in writing or verbally or through an electronic platform also accessible from people with disabilities, which is available at the following link:

<https://www.flexopack.com/whistleblowing-policy/> .

The verbal report can also be submitted via telephone or other voice message systems, as well as through a personal meeting directly to the Company's Personnel Manager who is the Company's Report Receiving and Monitoring Officer (hereinafter called as **R.R.M.O.**).

The written report can be submitted to the following email address:

whistleblowingpolicy@flexopack.com

6.3 The person submitting the report-complaint may use for assistance the "Incident Reporting Form" which is also attached to this Policy as APPENDIX.

6.4 Any expression of protest, dissatisfaction and / or complaint which is not submitted through the formal procedure, is not recognized and not treated by the Company as a report-complaint and is not covered by the provisions and regulations of the present Policy.

6.5 The R.R.M.O. treats all written reports-complaints as confidential and undertakes, both when receiving and also when monitoring the progress of the reports, the obligation to maintain the confidentiality of the information contained in each report.

7. Management of reports - complaints

7.1 For the management of reports-complaints as well as of any other issue that falls under the present Policy, the R.R.M.O. functions as a reference person to whom complaints - reports are being addressed.

7.2 The R.R.M.O. maintains a file which contains the following information pertaining to each report-complaint:

(a) number, subject, category and origin,

(b) information regarding the investigation of each report-complaint and

(c) the final outcome of the investigation and the actions implemented in this context. The file is kept either in electronic or printed format, with the necessary security specifications, and includes all the reports-complaints received by the R.R.M.O., as well as the documents related to each complaint from the time of their submission.

When a hotline or other telephone messaging system is used to compile a report-complaint, recording of the conversation is permitted if the reporting party has lawfully provided consent. If a hotline or other telephone messaging system is utilized without a recording of the conversation, the Company may document such verbal report in the form of accurate minutes of conversation, which are prepared by the R.R.M.O., providing the reporting party with the opportunity to verify, correct and agree to the minutes of this conversation.

7.3 The file is kept for a minimum period of five (5) years from the date that each item came into the possession of the R.R.M.O.; otherwise it is kept for a reasonable period of time and in any case for the entire period of time required for the completion of the investigation or any legal proceedings. All reports - complaints will be properly stored and only authorized persons will have access to them.

7.4 The R.R.M.O. of the company:

(a) must perform his/her duties with integrity, objectivity, impartiality, transparency and social responsibility. The R.R.M.O. must also respect and observe the rules of secrecy and confidentiality for matters he/she became aware of during the exercise of his/her duties,

- (b)** receives reports - complaints, monitors their progress and maintains communication with the complainant – reporting party,
- (c)** informs the complainant immediately, within seven (7) working days, about the collection of the report - complaint, providing a relevant confirmation of receipt (in paper or electronic form),
- (d)** evaluates in principle the seriousness and credibility of the report-complaint and informs within five (5) days the Director of the Internal Control Unit (ICU) who in turn informs the Board of Directors, if the Director of ICU deems that the issues relating to the complaint are serious,
- (e)** investigates within a reasonable period of time, which may not exceed thirty (30) days, the subject of the report-complaint and formulates proposals to address and resolve the issue. Any delay should be adequately justified. If the report-complaint concerns a serious matter, in the opinion of the R.R.M.O., the assistance of the Company's Internal Control Unit (ICU) may be requested. The Units, Departments and Directorates of the Company must provide all possible and necessary assistance and support during the investigation of reports-complaints.
- (f)** terminates the procedure by archiving the report-complaint, if it is incomprehensible or is submitted abusively or if it does not contain incidents that constitute a violation of Union Law or there are no serious indications of such a violation and notifies the relevant decision to the complainant – reporting party. If the complainant – reporting party considers that the report-complaint was not dealt with effectively, then he/she may resubmit it to the National Transparency Authority (hereafter called as NTA).
- (g)** keeps minutes regarding the results of the investigations that he/she has carried out in relation to the reports-complaints submitted and informs the Board of Directors of the Company, through annual reports. Furthermore whenever this is deemed appropriate or imperative, the R.R.M.O. briefs the Board of Directors about all reports-complaints that he/she received and handled during the year.
- (h)** ensures the protection of the confidentiality of the identity of the complainant and of any third party named in the report-complaint, preventing access to such report by unauthorized persons.
- (i)** monitors the reports-complaints and maintains contact with the complainant – reporting party and, if necessary, requests further information from that party,
- (j)** provides notice to the complainant – reporting party of the actions taken within a reasonable period of time, which shall not exceed three (3) months from the acknowledgment of receipt of the report-complaint. If no acknowledgment has been sent to the complainant – reporting party, then the above reasonable period should not exceed three (3) months from the end of a period of seven (7) working days from the submission of the report-complaint,
- (k)** provides clear and easily accessible information on the procedures by which reports-complaints can be submitted to the National Transparency Authority (NTA) and, as the case may be, to public bodies or institutions and other bodies or organizations of the European Union.

7.5 In case the report-complaint is related to a person involved in the investigation process, the latter must refrain from examining the report-complaint and shall be replaced by another person.

7.6 The term of office of the R.R.M.O. lasts at least one (1) calendar year, but may be terminated earlier for good cause. If the R.R.M.O. performs other duties, it is ensured that the exercise of these duties does not affect the principle of independence and does not lead to a conflict of interest in relation to the above duties.

8. Obligations

8.1 The Heads and Directors of the individual Units, Departments and Directorates of the Company and of the other Companies within the Group are obliged to:

- (a)** inform their subordinates,
- (b)** encourage their subordinates to adopt a positive and open mind-set so they feel free to express their concerns without hesitation and fear; and
- (c)** apply the provisions and regulations of the present Policy, as well as the decisions of the competent corporate bodies for dealing with and managing reports-complaints.

8.2 The persons who, according to paragraph 2.2, fall within the scope of the Policy must act as follows:

- (a)** be aware of the existence of this Policy and the relevant procedures the Policy establishes and
- (b)** submit a report-complaint in good faith and in substantiated manner, and also declare the existence of any direct personal interest related to the matter.
- (c)** ask the R.R.M.O. of any information or clarification regarding the application of this Policy as well as the broader set of their rights and their protection measures.

9. Personal Data

9.1 Any processing of personal data that takes place under the present Policy is carried out in accordance with the applicable national and European legislation in order to fulfill the obligation to establish the appropriate reporting channels and take the necessary measures each time. The personal data of all parties involved are safeguarded and are subject to processing with the sole objective of verifying the validity of a specific report-complaint and facilitate its investigation.

9.2 Access to the data included in the respective reports-complaints can only be provided to the parties involved i.e. the petitioner-complainant and the accused person, and also to the persons responsible for the management and investigation of each incident, the witnesses and anyone who has a legitimate interest in the cases investigated. The Company takes all the necessary technical and organizational measures to safeguard the relevant personal data.

The level of access that is being granted to the petitioner is decided on a case-by-case basis by the

R.R.M.O. and varies according to the status of the petitioner and the seriousness of case. When access is granted, the details of the petitioner and the witnesses are withheld, unless they have provided their outright consent for the opposite or unless the report-complaint has been proven to be malicious.

9.3 In any case, the Company takes all necessary technical and organizational measures as well as actions in order to safeguard personal data.

10. Monitoring - review of the Policy

10.1 The provisions of Directive (EU) 2019/1937 of the European Parliament and of the Council as of 23 October 2019 (L 305) and of Law 4990/2022 on the protection of persons reporting breaches of EU law, are the ones that determine the outcome of issues and procedures not governed by the present Policy.

10.2 The Regulatory Compliance Officer evaluates the adequacy, appropriateness, completeness and effectiveness of the present Policy, monitors its adoption and implementation, records any weaknesses and deficiencies identified, and finally makes the necessary proposals as well as recommendations for improvement.

10.3 The Policy is reviewed and assessed on annual basis whereas its context and implementation is modified and revised whenever it is deemed appropriate, necessary or imperative, following a relevant recommendation from the Regulatory Compliance Officer.

10.4 Under the responsibility of the R.R.M.O., the present Policy is communicated to the employees and is also being posted on the Company's website.

11. Validity of the Policy

This procedure is a new one and does not supersede any previous procedure. It is effective as of 10 May 2023.

Issue	Date	Description	Approval
1	10/05/2023	Initial Issue	10/05/2023

APPENDIX

EVENTS REPORTING FORM			
GENERAL INFORMATION			
Full name of the party reporting the complaint		Reporting date	
E-mail			
Company Name / R.R.M.O.		Date of alleged violation	
PARTIES INVOLVED			
Full name of person who committed the alleged violation			
Position of person who committed the alleged violation			
Other persons involved in the violation incident			
INFORMATION ABOUT THE EVENT			
Source (how the event of the alleged violation was identified - indicatively through reports – complaints made by employees / during an audit by the relevant administrative officers, etc.)			
Category of alleged violation (e.g. bribery, fraud, embezzlement, non-compliance with laws etc.)			
Related work or process			

Brief description of alleged violation	
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