Whistleblowing Channels of ATHEXGROUP

ATHEX Group is in full compliance with the legal and regulatory framework which governs its operations implementing standards of corporate governance, transparency, professional and ethical conduct. In this context, ATHEX Group encourages employees or third parties to freely disclose information related to illegal acts or omissions which has come to their attention and is or may be harmful to the Group's proper functioning, reputation, standing, moral and/or financial interests.

Our Whistleblowing Channels:

- comply with the terms of the current legislation,
- are strictly confidential and safe,
- ensure Personal Data and privacy protection, and
- are designed to avoid any adverse actions.

It is noted that Whistleblowing processes/ complaints should follow the principles of good faith and not be used for unsubstantiated allegations or personal grievances. In case of unfounded reports and claims, penalties may be imposed.

What should be reported

Includes all the violation incidents of Group Policies, Internal Procedures and Regulations or applicable law contraventions (e.g. theft, embezzlement, fraud, bribery/accepting bribes, negligence, forgery, damage/loss to foreign property, money laundering, falsification of accounting and financial documents, violations of legislation of personal data protection, human rights violations and any act or omission which can cause material or moral damage to the Group), including violations of EU law, as described in article 4 of Greek Law 4990/2022.

Whistleblowing Channels

ATHEX Group (ATHEX, ATHEXClear & ATHECSCD) established channels are the following:

- 1. email: whistleblowing@athexgroup.gr
- 2. postal letter: 110 Athens Avenue, 104 42 Athens | attention of the Chief Internal Audit Executive
- 3. telephone contact: tel. 210 3366634 | Monday to Friday 10am to 5pm
- 4. in person with the Chief Internal Audit Executive

Through communication channels 1, 2 and 3 the whistleblower has the option to retain his/her anonymity.

Within seven (7) working days from the date of submission, the whistleblower receives a receipt of acknowledgment. Within three (3) months from receiving the proof of acknowledgment, the whistleblower is informed about the actions taken or planned by the responsible Group Bodies.

Individuals can submit their reports direct to the National Transparency Authority (N.T.A.) in accordance with the provisions of the current legislation. Detailed instructions for submission are available on the Authority's <u>website</u>.