

## WHISTLEBLOWING POLICY

### Definitions

**“Company”** shall mean the company “SIDMA STEEL SA” and its controlled subsidiaries

**“Policy”** means the Policy for the Management of Reports and Complaints.

### Scope

This Policy applies to all companies, including those based abroad, but may require modification on individual issues due to local regulatory framework.

The report/complaint procedure concerns

- the Members of the Board of Directors (BoD) and the persons exercising managerial functions in the company,
- the personnel of the company,
- the customers, suppliers and anyone who provides services to the company; and
- any third party who possesses evidence and/or information about irregular or unlawful acts (that have already been committed or may be committed in the future) relating to the Company.

### Purpose and basic principles of the Policy

This Policy sets out the principles and the framework under which the company receives, processes, and investigates signed and anonymous reports/complaints of irregularities, misconduct or other offences brought to the attention of staff, customers or suppliers or other third parties. To serve the above fundamental purpose, the Policy aims to create a reliable mechanism:

- against malicious complaints by persons who, in good faith, report or complain about a matter which they consider to constitute a malpractice or misconduct and which relates to the operation of the company; and

- for the effective management of reports and complaints by providing assurances that potential reports or complaints are taken seriously and are confidential to the extent not contrary to applicable law.

In particular, and in relation to supporting these individuals, the Policy provides ways for them to raise concerns and receive information about the outcome of any investigation and also establishes a clear process for submitting and managing reports and complaints with quick reflexes and clear roles.

**The Policy is governed by the following fundamental principles:**

1. The company shall ensure the collection and investigation of all evidence and information related to each submitted report/complaint in order to provide a reasonably substantiated response.
2. The company ensures an environment of trust and security for its employees, customers and suppliers and in this way encourages the reporting in good faith of any illegal acts or serious offences that come to the attention of the aforementioned persons.
3. The anonymity and personal data of persons submitting reports/complaints are protected and, as long as these persons are employees of the company, their position or professional development is not compromised.
4. Reports/complaints are made on the basis of, on the one hand, compliance and observance of the respective institutional framework and, on the other hand, the need to safeguard the interests of the company, its shareholders and its customers, without the promise of payment or existence of any consideration to the person submitting the report/complaint.
5. Reports/complaints are treated with respect, in particular, respect for personality, trust, transparency, decency, honesty and professional integrity.

In this context, the company

- investigates reports/complaints diligently and without discrimination,
- responds with care to each report/complaint with courtesy and understanding,
- makes every effort and exhausts every possibility to settle the report/complaint promptly and not to take action against the person submitting the report/complaint.

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Approval: Chief Executive Officer

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### **Subject of reports/complaints**

Reports/complaints are submitted on the basis of a sincere and reasonable belief that an offence or misconduct has been committed or is likely to be committed. Employees, customers and suppliers of the Company are encouraged to submit reports of offences, suspected incidents of illegal conduct, serious irregularities-omissions in relation to the Company's regulations, policies and procedures.

The reports/complaints of omission or offences concern, indicatively:

- Acts involving elements of gross negligence, suspected fraud or corruption,
- Acts affecting the company's reputation and prestige
- Acts which conflict with the interests of the company,
- Serious breaches of policies and procedures, with a risk of financial loss,
- Acts that violate the company's ethical and conduct rules,
- Acts that endanger the health and safety of employees,
- Offering or accepting bribes,
- Theft, embezzlement, misappropriation, money laundering,
- Breach of confidentiality and personal data,
- Infringements of competition law, accounting and auditing infringements,
- Intimidation, discrimination, threats, use of violence, verbal abuse, defamation,
- Misconduct, harassment of any kind
- Abuse of authority, misuse of company assets and resources.

The subject of the reports/complaints does not cover:

- disagreements on matters concerning policies and decisions of the company's management
- personal issues and disagreements with colleagues or supervisors,
- rumors.

In the event that the above actions are subject to any legal procedure provided for by national legislation, the Company's Management will promptly send the complaint to the relevant department for further investigation.

### **Anonymity of the complaining party**

The company encourages signed reports/complaints. Anonymous reports/complaints make the task of detailed investigation extremely difficult or even impossible, due to the difficulty of providing information from an anonymous complaining party (e.g. conversation, meeting to provide clarifications during the investigation) and 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.

The anonymous reports/complaints submitted are examined according to their degree of substantiation and the possibility of identifying the unlawful action they describe.

Reference to sensitive personal data under the applicable legal framework (data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, health, sexual life and sexual orientation) is prohibited, unless it is directly related to the subject of the complaint. Otherwise, this information will be deleted.

The company undertakes to maintain the anonymity of the complaining party and not to take any action that may result in the disclosure of their identity. However, disclosure of the identity of the complaining party may be required by judicial or legal proceedings in the context of the investigation of the case.

### **Protection of complaining party and respondent party**

Reports/complaints must be made in good faith.

The company is committed to protecting its employees who have made a report/complaint in good faith from

- (i) any acts of retaliation in relation to their present position and future career development,
- (ii) any other kind of discrimination or any kind of unfavorable treatment,

If the complaining party participated in the event or act reported, they will not be exonerated, but their contribution to the detection and investigation of irregularities, omissions or offences will be taken into account.

Persons included in reports/complaints (respondent parties) have the right to be informed of the misconduct of which they are accused, of the persons who have access to the data contained in the report/complaint in the context of its examination or in the report and of the right to be called to account. However, where there is a serious risk that the above information could impede the investigation of the case and the collection of the necessary evidence, the information of the persons concerned by the report/complaint may be postponed until this risk no longer exists. If the report/complaint is ultimately found to be unfounded, the employee included in the report will not be informed that a report has been made against them, for reasons of protection of the working environment within the company, unless the employee exercises their right of access to their personal data or there is a legal obligation to do so.

### **Report/complaint submitting procedure**

In order to facilitate the investigation and their proper assessment, reports/complaints may include, by way of indication and not limitation, the following:

- (i) the events that gave rise to the suspicion/concern, with reference to names, dates, documents and locations; and
- (ii) the reason for submitting the report/complaint. In no case is the report/complaint expected to prove the complaining party's potential concerns/suspicious, but it is encouraged that all available information be reported to facilitate the investigation of the case.

Reports/complaints can:

- a. Be submitted directly to the Compliance Officer of the company; or
- b. Be sent to the e-mail address [compliance@sidma.gr](mailto:compliance@sidma.gr) or
- c. Be submitted through the complaint platform, which can be accessed at <https://app.reportall.eu/?ac=EBM62975> or
- d. Be sent by postal mail to the Compliance Officer marked "Confidential",  
SIDMA STEEL SA – 188 Megaridos Avenue, 193 00, Aspropyrgos, Attica – To the attention of the Compliance Officer, marked "CONFIDENTIAL"

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e. Be submitted in hard copy directly to the Compliance Department of the Company.

Any expression of protest, dissatisfaction, opinion and/or complaint, not submitted through this report/complaint procedure, will not be recognized and treated as a report/complaint by the company and the rules adopted by this Policy will not apply in such cases.

### **Anonymous/signed report/complaint platform**

The online complaint reporting application enables employees and third parties to report fraud incidents that have come to their attention within their workplace, confidentially or anonymously, while maintaining a channel of communication with the administrator without revealing their identity at all stages of the process. All information shall be managed and evaluated confidentially.

The complaint administrator may send messages to the person who submitted the complaint to ask for clarification or additional information and to inform them of the outcome of the investigation of the complaint.

### **Management of reports/complaints**

The Compliance Officer of the Company keeps a record, which for each report/complaint contains the subject, category and origin, information on the investigation of each report/complaint and the final result of the investigation and the actions that have been implemented.

The Compliance Officer shall immediately inform the complaining party of the receipt of their report/complaint, as well as of the results of the relevant investigation after its conclusion, if possible, and also during the investigation if requested by the complaining party.

They investigate within a reasonable period of time, which may not exceed 30 days, the report/complaint. Any delay should be duly justified. Where the report/complaint concerns a serious matter, in the opinion of the Compliance Officer, the assistance of Legal Counsel may be sought in the investigation of reports/complaints.

They keep a record of the results of the investigations they have conducted in relation to reports/complaints submitted and inform the CEO of the Company, through their annual reports and whenever necessary, of all reports/complaints received and handled during the year.

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The Directors and Heads of Departments and/or Divisions in the Company, must

- (i) inform their subordinates regarding this Policy and the relevant procedures,
- (ii) encourage their subordinates to adopt a positive, open work attitude so that they feel they can easily express their concerns; and

The employees of the company must

- (i) be aware of this Policy and the relevant procedures; and
- (ii) when submitting a report/complaint, make it in good faith and using evidence and declare whether they have a direct personal interest related to the matter.

### **Record keeping and data analysis**

The Company shall maintain at the Compliance Department, either in electronic or paper format, a file with the necessary security specifications, which includes all reports/complaints received, as well as the documents related to each of them, from the time of their submission and for a minimum period of five (5) years from the date each item came into its possession. This period of time is necessary for the effective management of complaints and the rational handling of issues that arise, including procedures for the assessment and analysis of incidents with a view to addressing malfunctions and preventing similar incidents in the future, in particular in cases characterized by frequent recurrence.

The period of five (5) years is considered entirely proportionate to the above purposes and coincides with the statutory limitation period for tort claims.

The Company's Compliance Department conducts qualitative and quantitative analysis, on an ongoing basis and in an anonymized format, of data related to the handling of reports/complaints, in order to ensure that any recurring or systemic problems and potential legal and operational risks are identified and addressed, for instance:

- (i) identifying the company units most frequently affected by reports/complaints,
- (ii) analyzing the causes of individual reports/complaints to identify common root causes,
- (iii) examining whether the above-mentioned root causes may also affect other processes or functions of the company

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- (iv) making recommendations for corrective action and taking corrective action where appropriate.

### **Personal data**

Any processing of personal data based on this Policy is carried out in accordance with the relevant national and European legislation. The data of all parties involved are protected and processed for the sole purpose of verifying the validity or otherwise of the specific report/complaint and investigating the specific incident.

In the event that those involved in the report/complaint are not immediately informed of its content in order to avoid obstructing the investigation, the reasons for the delay should be recorded in writing and the document should be included in the case file.

Access to the data contained in the reports/complaints for the purposes of examining or managing the reports/complaints can only be accessed by those involved in the management and investigation of the incident in question.

### **Final provisions - adoption and revision of the Policy**

The Compliance Officer shall ensure that the policy is communicated to employees and posted on the intranet and the company's website [www.sidma.gr](http://www.sidma.gr)

The Reporting and Complaints Management Policy is approved by the Company's Chief Executive Officer, reviewed annually and revised whenever the need arises. The Company's Compliance Officer is responsible for preparing and proposing revisions to the Policy.

## Compliance Incident Report

GENERAL INFORMATION			
Report by:		Report Date:	
Subsidiary/Country		Incident Date:	
PARTIES INVOLVED			
Name of the person/associate who committed the alleged infringement:			
Position of the person or relationship to the associate who committed the alleged infringement:			
Others involved in the infringement incident:			
INCIDENT INFORMATION			
Source (How the incident was identified; e.g. reports/complaints from employees, during an audit by the responsible management)			
Category of Incident: (Ethics or Compliance)		Subcategory of incident: (Bribery, non-compliance with laws, etc.)	
Relevant project or procedure:			
Brief description of the incident:			

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### **Framework for protection against retaliatory acts in a report/complaint**

Recognizing that there are employees who are reluctant to submit any form of report/complaint for fear of possible retaliation, this framework ensures that the company is a safe environment that protects and encourages reports/complaints of irregularities, misconduct or other offences brought to the attention of its employees.

The company opposes to the imposition of retaliation against any employee who reports or participates in the investigation of an actual or suspected violation of the relevant institutional framework and/or internal regulations governing its operation.

In this framework, each employee is encouraged, without fear of any form of retaliation, to speak openly and provide honest and complete information when they observe or suspect illegal or unethical conduct or conduct contrary to the relevant institutional framework and/or internal regulations governing the operation of the Company.

### **Definition of Retaliation**

Retaliation is defined as the negative consequences that an employee may experience in the work context as a result of their involvement in a report/complaint and/or an investigation into reports/complaints made.

Indicatively, possible retaliatory acts include

- (i) workplace bullying,
- (ii) unfavorable treatment,
- (iii) assigning excessive tasks outside the hierarchical level and development plan,
- (iv) removal of tasks without reasonable justification and replacement with new tasks,

### **Complaint procedure for retaliation and remedial actions**

In the event that an employee is subjected to retaliation in their work environment, the company encourages the employee to report the incident in writing to the Human Resources Department, including any information that substantiates the complaint.

This Directorate assesses the credibility of the complaint, investigates the incident and proceeds to an appropriate resolution. The complaining party shall be informed at the closure of the procedure of the outcome of the report. Finally, the Human Resources Directorate informs the Company's Compliance Department of the reporting of an act of retaliation in a complaint.

The Company shall take the necessary steps to restore the working environment of the employee found to have been subjected to retaliation, even considering the transfer of the employee to another department or company of the Group, if this is feasible and if the employee's request has been made beforehand.

**Basic principles of operation of the “Framework for protection against retaliatory acts in a report/complaint”**

The company upholds the presumption of innocence for both the complaining party and the respondent party.

The company is committed to adhering to the framework of protection of the complaining party and the respondent party (isonomy) from retaliation, even if the complaints made cannot be confirmed after an investigation.

Appropriate consequences will be attached if it is proven that the employee knowingly made a false allegation, provided false or misleading information by obstructing work during an investigation or acted in bad faith in any way.