

Whistleblowing policy

‘Speak Up’

ISSUED ON 03/04/2023

VERSION 1.0

1. This Policy

The purpose of this Policy is to bolster and confirm Globe Williams' commitment to an open reporting process in which employees and other eligible persons are encouraged to raise issues of misconduct they may encounter. In the current environment, whistleblowing remains Globe Williams' first and best line of defence against misconduct, which when identified and reported, allows Globe Williams to take immediate corrective measures to redress it.

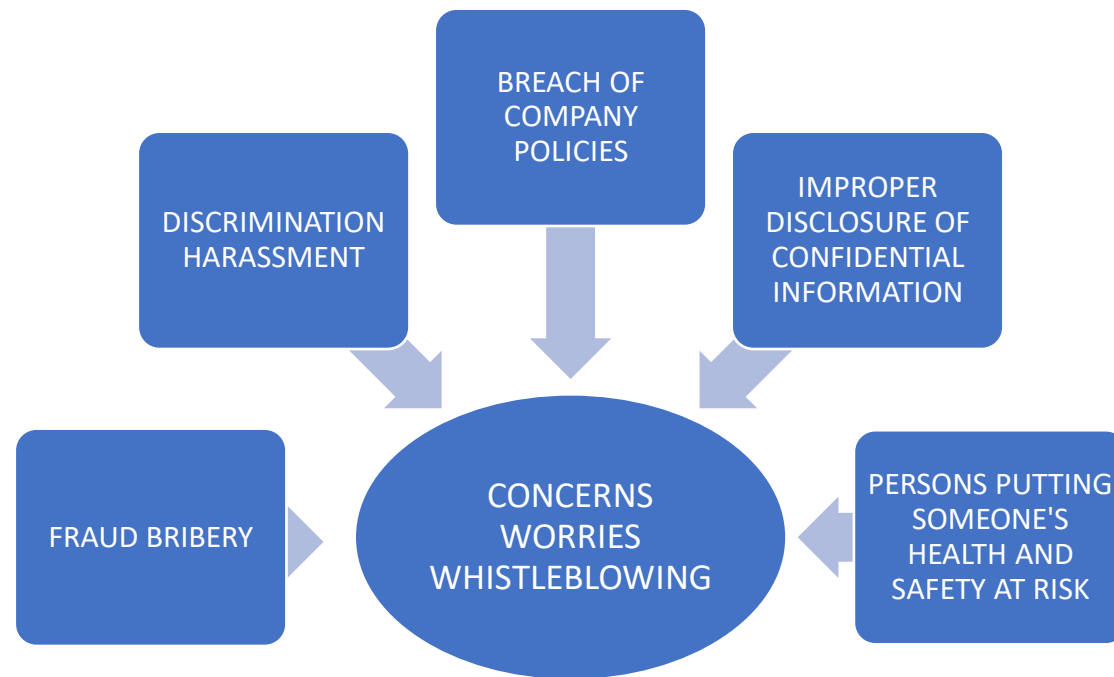
We acknowledge that timely identification and reporting of misconduct depends on maintaining a climate of trust and integrity in which all employees and other eligible persons:

- are encouraged to report potential misconduct as soon as possible, knowing that their concerns will be taken seriously and that appropriate measures will be taken;
- know and use the channels available to them to report concerns about misconduct;
- know the protection measures available and the steps we will take to investigate the reports;
- are confident that the whistleblowing process is confidential, and that we do not tolerate any attempts of victimisation, retaliation, revenge or unfavourable treatment of any kind.

Globe Williams is committed to fairness, integrity and respect for the law in all aspects of its business activities. It is very important for our company to ensure that employees can confidently present and discuss acts or possible acts of improper conduct (known as "Speaking Up"). In this way employees give our Company the opportunity to address any problem or issue using suitable tools and measures.

The Company acknowledges that employees under those conditions may not always feel comfortable raising the issue with their immediate manager or with anyone else within the Company. The purpose of this policy is to explain how you can express concerns about any improper conduct in a confidential manner without fear of retaliation. Consequently, the communication of incidents covers anyone who has or had some type of business relationship such as business partners, suppliers and agents who wish to express concerns about possible improper conduct within the Globe Williams Group.

2. What activities are covered by this Policy?



This Policy applies to individuals who wish to report unlawful conduct, inappropriate activities or inappropriate incidents involving Globe Williams, including any of the companies in the Globe Williams Group, and those activities include, inter alia:

- criminal activity, in accordance with all applicable laws;
- breach of duty or abuse of trust;
- bribery or corruption;

- violation of human rights;
- unethical conduct;
- violations affecting the protection of personal or confidential data or the security of Globe Williams' network and information systems;
- unauthorised disclosure of commercial secrets or exclusive or confidential information;
- any breach of the Code of Conduct or other Globe Williams policies or procedures;
- conduct which is likely to harm Globe Williams' reputation;
- attempts to victimise, retaliate or take revenge against the reporting of misconduct or provision of information to a legal professional outside the company for the purpose of seeking advice or legal representation in accordance with the applicable legislation on the protection of whistleblowers from time to time or to any competent regulatory authority performing its functions or duties in accordance with the applicable legislation;
- deliberate concealment of any of the above;
- infringements of competition laws and rules;
- improper use of company resources;
- confidential information transactions.

If you have reasonable grounds to suspect that any misconduct has occurred or could occur, you should report it in accordance with this Policy.

3. Who can submit reports / complaints in the context of this Policy

This Policy and the procedures outlined in this Policy are available to all current and former employees, workers and partners of Globe Williams and to all contracting parties with whom Globe Williams has or had a business relationship. This policy and the procedures outlined in this policy also cover any relatives or dependents of the above, including spouses, dependent family members of spouses, parents or other direct ancestors, children, grandchildren or siblings or other persons as required by the relevant legislation.

4. How to report an issue

We hope that all employees will feel comfortable and free to raise issues about actual or potential misconduct and where they feel comfortable they can report them orally or in writing. Globe Williams urges that all reports of misconduct be made to Globe Williams' **Speak Up** reporting line which includes multiple reporting channels.

- Any member of the Globe Williams internal audit team.
- **Although Globe Williams encourages individuals who submit a report to disclose their identity, they can submit it anonymously using the Speak Up reporting line via QR, the Safetyculture application which has been posted at your work place, and via email at speakup@globewilliams.com**
- Notifying the Head of Department about the issue.
- The company's HR Manager.

Irrespective of the channel used, employees must report suspected misconduct as soon as possible. Reporting misconduct as soon as possible allows Globe Williams to carry out investigations and to address or eliminate the offence and to minimise any negative consequences that may arise from it.

The objective of this Policy is to provide an internal mechanism for reporting, investigating and addressing any workplace misconduct. Sometimes individuals may have concerns about the actions of a third party, such as a client, supplier or service provider. We strongly recommend that you report these issues in-house before reporting them to any third party. You should use one of the reporting channels listed above for guidance.

5. What is not covered by this policy

While we encourage everyone to speak up and report concerns to Globe Williams, not all manner of concerns fall within this policy.

For example, this policy is not intended to cover:

- Immediate threats to life and property;
- Disagreements about the interpretation of policy or management decisions;
- Unfounded rumours and rumours in general;

- Information already known to the public;
- Issues where you have a personal interest in the outcome; Personal complaints relating to work.

6. Maintaining confidentiality

If you report misconduct for well-founded reasons, your identity and any information which may lead to you being identified will remain confidential and will only be disclosed on a need-to-know basis to those responsible for investigating or resolving the issue.

Where you provide your name and personal contact details, your identity will remain strictly confidential and will not be disclosed to the person or persons referred to in the report unless you provide your consent for that.

The only exceptions to this confidential approach exist when the Company or the Speak up service provider is legally obliged to disclose further information to public authorities to protect or defend human rights or our employees, clients, suppliers, business partners or where the Company has ascertained that the allegations were malicious and were made in bad faith.

No one will be deemed to have been involved in misconduct or inappropriate conduct until the investigation, if conducted, has been completed and they have had the opportunity to respond to the allegations. All investigators will treat witnesses professionally and with dignity and respect. Depending on the outcome of an investigation, in addition to possible disciplinary measures, investigators can make recommendations for changes so that Globe Williams can minimise the risk of future misconduct.

Globe Williams will seek to keep any person who raises an issue of misconduct informed about the progress of any investigation and the possible timeframe for its completion. However, sometimes the need for confidentiality and legal assessments can prevent us from giving the person who raises the issue of misconduct specific details about the investigation or any disciplinary measures taken as a result.

7. Prohibition of attempted victimisation

We understand that individuals are sometimes concerned about the potential ramifications associated with complaints of misconduct. Please note that we encourage transparency and will support any person with substantial grounds to report any suspicion of wrongdoing under this Policy, even if they are proven to be wrong.

We will not tolerate any direct or indirect attempt to victimise, retaliate or take revenge of any kind against any person making a report in accordance with this Policy or conducting, assisting or participating in an investigation of a report submitted in accordance with this Policy. Any employee who is found to have engaged in similar conduct against a person because he/she believes that that person has submitted, may submit, intends to submit or could submit a report in accordance with this Policy or because he/she has assisted, may assist, intends to assist or could assist in a report in accordance with this Policy will be subject to suitable disciplinary measures, including possible termination of employment. Persons holding relevant records supporting such complaints(e.g. memos, emails, direct messages, files, notes, photographs and recordings, etc.) must keep such records and provide them to Globe Williams. Any employee who knowingly destroys or alters potentially relevant records or information will be subject to disciplinary sanctions.

8. Cooperation

All employees are obliged to fully cooperate with any investigation conducted in accordance with this Policy by providing full and true information. Any employee who does not collaborate with a manager or reports falsehoods or misleads Globe Williams will be subject to disciplinary measures, including termination of employment.

Employees who have been informed about or become aware of ongoing investigations about which they may have relevant records (e.g. memos, emails, direct messages, files, notes, photographs and recordings, etc.) must keep such records and provide them to Globe Williams. Any employee who knowingly destroys or alters potentially relevant records or information will be subject to disciplinary sanctions.

9. Responsibility for the success of this policy

All employees are responsible for the success of this Policy and must ensure that they use it to disclose any suspicion of misconduct. Employees are invited to submit comments about this Policy and propose ways in which it could be improved.

Comments, proposals and questions should be addressed to the Director of the Legal Department.

Speaking Up is encouraged and this policy has been designed to offer protection to employees who reveal such concerns, provided that the disclosure is done in

- (i) good faith and
- (ii) is based on the reasonable belief of the person making the disclosure that he or she is revealing misconduct.

The Globe Williams Group takes the well-being of its staff seriously and is responsible for communicating this Policy and ensuring compliance with it across all of Globe Williams.

10. Revision and compliance with this Policy

In cooperation with the Board of Directors, the Legal Department will examine this Policy from a legal and operational viewpoint at least once a year.



Τι να κάνω;

ΜΠΟΡΕΙΣ ΝΑ ΜΙΛΗΣΕΙΣ!

Στο άτομο που εμπλέκεται

ή

Στον Προϊστάμενό σου

ή

Στο τμήμα HR



Δεν είναι πάντα εύκολο να εκφράσεις τους ενδοιασμούς ή αυτό που σε προβληματίζει. Στη Globe Williams ενθαρρύνουμε την επικοινωνία, χωρίς να φοβάσαι οποιαδήποτε επίπτωση. Οποιαδήποτε αναφορά θα διερευνηθεί με την απαραίτητη αντικειμενικότητα, επαγγελματισμό και εχεμύθεια. Είμαστε εδώ για εσένα.





Ειδικά για τις παραπάνω περιπτώσεις μπορείς ακόμα να επικοινωνήσεις στο

speakup@globewilliams.com

| Νιώθεις άβολα; | Do you feel uncomfortable? |
|---------------------------------------|--|
| Νιώθω ότι δεν έχω ισότιμη μεταχείριση | I feel that I am not being treated equally |
| Αντιμετωπίζω απάτη; | Am I the subject of fraud? |
| Γίνεται εκμετάλλευση της εταιρείας; | Is the company being exploited? |
| Είναι δωροδοκία; | Is bribery taking place? |
| Νιώθω ότι υφίσταμαι κακοποίηση | I feel that I am being abused |

| | |
|-------------|----------------|
| Τι να κάνω; | What can I do? |
|-------------|----------------|

| | |
|--------------------------|-------------------------|
| ΜΠΟΡΕΙΣ ΝΑ ΜΙΛΗΣΕΙΣ! | YOU CAN SPEAK UP! |
| Στο άτομο που εμπλέκεται | To the person concerned |
| Ή Στον Προϊστάμενό σου | Or to your supervisor |
| Ή στο τμήμα HR | Or to the HR Department |

| | |
|---|---|
| <p>Δεν είναι πάντα εύκολο να εκφράσεις του ενδιαρισμούς ή αυτό που σε προβληματίζει. Στη Globe Williams ενθαρρύνουμε την επικοινωνία, χωρίς να φοβάσαι οποιαδήποτε επίπτωση. Οποιαδήποτε αναφορά θα διερευνηθεί με την απαραίτητη αντικειμενικότητα, επαγγελματισμό και εχεμύθεια. Είμαστε εδώ για εσένα.</p> | <p>It is not always easy to express reservations or say what is concerning you. At Globe Williams we encourage communication without fear of any repercussions. Any report will be investigated with the necessary objectivity, professionalism and confidentiality. We are here for you.</p> |
|  |  |
| <p>Ειδικά για τις παραπάνω περιπτώσεις μπορείς ακόμα να επικοινωνήσεις στο speakup@globewilliams.com</p> | <p>Especially in the above cases you can also contact speakup@globewilliams.com</p> |

INTERNAL AUDIT TEAM

1. PANAGIOTIS SOUVATZIS
2. IOANNIS KALAITZOPOULOS
3. ANTONIS FOUTOUCHOS
4. MICHALIS KERAMEIDAS
5. CHRYSILIA VAKI

WHISTLEBLOWING OFFICER

MICHALIS KERAMEIDAS