

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

1. INTRODUCTION

1.1. The company with the corporate name "INFORM LYKOS (HELLAS) S.A." and the distinctive title "INFORM LYKOS" with registered offices at Koropi, 5th km Varis-Koropiou Avenue, 19400, Attica (hereinafter "Company") operates in the business environment pursuing the maximum possible level of transparency and always based exclusively on the current legislative and regulatory framework and the rules of business ethics and professional conduct.

1.2. This Internal Whistleblowing Policy (hereinafter "Policy") aims, among other things, to create and clarify the operation of a system regarding the internal reporting of breaches of the legal rules of the European Union (hereinafter "EU" and/or "Union"), the organization of the process regarding the submission, receipt, investigation and follow-up of said reports and complaints, as well as the encouragement and protection of interested parties who proceed to report the breaches in question.

1.3. At the same time, with the adoption of this Policy, the Company fully complies with the requirements of Directive (EU) 2019/1937, regarding the protection of persons who report breaches of Union law, as well as of Law 4990/2022 (A' 210), which incorporated said Directive into the Greek legal order, legislative documents that both attempt to institutionalize an internal system for the early detection of harmful behavior and breaches of critical EU rules, in order to provide each business with the opportunity to, on the one hand, receive timely knowledge of the offending behavior and, on the other hand, to immediately take the appropriate preventive and/or remedial measures to restore the legality and protect its employees, as well as third parties having transactions with it in bona fide.

1.4. In any case, the effective protection of persons who decide to report illegal behaviors that have come to their attention, becomes of particular importance in the context of this Policy and is inextricably linked to the achievement of the goals of the relevant legislative and regulatory framework. This Policy is governed in its entirety by the principles of accountability, transparency, social responsibility and the protection of the public interest, frameworks within which the Company always seeks to operate.

2. DEFINITIONS

For the purposes of this Policy, the following Definitions apply (in the event that the definition of a concept is given by national or community legislation and covers the purposes of this or more generally the needs to comply with mandatory law provisions, the legislative definition prevails):

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

"Report": The provision, orally or in writing or via an electronic platform, of information regarding breaches of the present, to the Company's person designated as Responsible for Receipt and Monitoring of Reports (Recipient).

"Reporting Person": The natural person who reports information on breaches acquired in the context of his or her work-related activities.

"Person Concerned": The natural or legal person who is referred to in the report as the person to whom the breach is attributed or with whom that person is associated and falls within the scope of this Policy.

"Work-related Context": The current, past or anticipated work activities at the Company, through which, irrespective of the nature of such activities, persons acquire information on breaches and in the context of which such persons are likely to suffer retaliation if they reported such information.

"Breaches": Acts or omissions that are unlawful and relate to the Union acts and areas falling within the material scope of this Policy and/or defeat the object or the purpose of the rules in the Union acts and areas falling within the material scope of this Policy.

"Information on Breaches": Information, including reasonable suspicions, about actual or potential breaches which occurred or are very likely to occur at the Company, as well as information about attempts to conceal such breaches.

"Reasonable Grounds": The justified belief of a person, with similar knowledge, training and experience to the reporting person, that the information in his possession is true and constitutes a breach of Union law, falling within the scope of this.

"Retaliation": Any direct or indirect act or omission by the Company, which takes place in a work-related context, causes or is likely to cause unjustified detriment to the reporting person or puts him in a disadvantageous position and which is prompted by reporting a breach.

"Responsible for Receipt and Monitoring of Reports (Recipient)": The person responsible for receiving, managing, investigating and following up the submitted report.

"Reference Management Committee (RMC)": The committee which undertakes the management and investigation of the report each time.

"Follow-up": Any action taken by the Recipient of a report or any competent authority or institution, to which the report is referred for assessment, with the aim of evaluating the accuracy of the allegations included in the report and dealing with the reported breach.

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

"Feedback": The provision to the reporting person of information on the action envisaged or taken as follow-up and on the grounds for such follow-up.

3. SCOPE

3.1. In the context of this Policy, persons working in the Company are encouraged to report / disclose serious irregularities, breaches or criminal acts or serious indications that such acts are about to be committed, of which they become aware either because of, or on the occasion of their duties, concerning any person related to the Company or providing services to it, natural and/or legal. Also, the Company encourages and urges any third party associated with the Company to report such reprehensible behaviors and suspected incidents of illegal behavior. All reports / disclosures have the same importance and are treated equally by the Recipient and the Company's Management, regardless of their origin.

3.2. In particular, the provisions herein apply to those who are employed by the Company and have obtained, in the context of their work, information about breaches that fall under the subject of reports (see below), which they report in particular:

- a) to the employees, i.e. to those who provide the Company and under its instructions services for which they receive remuneration, regardless of whether their employment is full or partial, permanent or seasonal or if they are detached from another body, to the self-employed,
- b) the non-employee, self-employed or consultants or home workers,
- c) to the shareholders and the persons who belong to the administrative, management or supervisory body of a company, including non-executive members, as well as volunteers and paid or unpaid interns,
- d) to any persons working under the supervision and instructions of contractors, subcontractors and suppliers,
- e) to persons who report or publicly disclose information about breaches acquired in the context of an employment relationship that has ended for any reason, including retirement, as well as to reporters whose employment relationship has not yet begun, in cases where information about breaches has been obtained during the recruitment process or at another stage of negotiation before the conclusion of a contract and where appropriate,
- f) to intermediaries, to third parties connected to the reporting persons and who may suffer retaliation in a work context, such as colleagues or relatives of the reporting persons and to personal businesses or legal entities of interest of the reporting persons or for which they work or with which they are associated with another way with an employment relationship.

4. SUBJECT OF REPORTS

The cases that must be mentioned include in particular the cases of article 4 of Law 4990/2022 and Part I of its Annex (cases A to C) but also other cases that aim to protect

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

the rights of employees and third parties as well as of the Company's legitimate interests (cases D to IA):

(a) breaches of Union law in the areas of: aa) public contracts, ab) financial services, products and markets, ac) safety and compliance of products with Community and national provisions and directives of the regulatory authorities, ad) transport safety, ae) environmental protection, ae) radiation protection and nuclear safety, af) food and feed safety, as well as animal health and welfare, ag) public health, ah) the protection of consumers, ai) the protection of privacy and personal data, as well as the security of network and information systems,

(b) breaches that affect the financial interests of the Union of Article 325 of the Treaty on the Functioning of the European Union (TFEU) and those specifically defined in the relevant Union measures, i.e. acts involving fraud or any other illegal activity against the financial interests of the Union.

(c) infringements relating to the internal market as defined in the TFEU, including infringements of Union competition and State aid rules, as well as infringements relating to the internal market relating to acts in breach of rules on corporate taxation or arrangements, the purpose of which is to secure a tax advantage that defeats the object or purpose of the applicable corporate tax law.

5. CONDITIONS AND PROTECTION MEASURES

5.1. The Company undertakes to make every effort to protect those who submit reports that fall within the scope of the Policy and which have as their object the breaches identified herein, ensuring that there is no retaliation for submitting said reports.

5.2. In particular, any form of retaliation against the persons who submit reports is prohibited for this reason, including threats and retaliatory actions, and in particular, the following are prohibited on a case-by-case basis: a) suspension, dismissal or other equivalent measures, b) demotion, omission or deprivation of promotion, c) removal of duties, change of workplace, reduction of salary, change of working hours, d) deprivation of training, e) negative performance evaluation or negative professional recommendation, f) reprimand, the imposition of a disciplinary or other measure, including a monetary penalty, g) coercion, intimidation, harassment or marginalization, h) discrimination or unfair treatment, i) failure to convert a temporary employment contract into a permanent one, j) the non-renewal or early termination of a temporary employment contract, k) intentional damage, including damage to reputation, in particular on social media, or financial damage, including business damage and loss of income, l) entry on a list of undesirables ("black list"), based on a sectoral or sectoral formal or informal agreement, which may imply that the person is not going to find a job in the area or sector in the future, m) the early termination or cancellation of a contract for goods or services, n) the revocation or the cancellation of a diploma or license, o) the referral for psychiatric or

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

medical monitoring, p) the refusal or deprivation of providing reasonable accommodations to persons with disabilities.

5.3. In any event, whistleblowers are entitled to protection if, at the time of reporting, they had reasonable grounds to believe that the information regarding the reported breaches was true and within the scope of this notice. And the persons who anonymously made a report regarding breaches that fall within the scope of the present and who were subsequently identified and retaliated against, are similarly entitled to protection under the provisions of the present and under the above conditions.

6. RESPONSIBLE FOR RECEIPT AND MONITORING OF REPORTS (Recipient)

6.1. The person designated as Responsible for Receipt and Monitoring of Reports (Recipient) can be an employee of the Company or a third party, who complies with the requirements of Law 4990/2022. If the Recipient simultaneously performs other duties or holds another position in the Company, the performance of these duties must not affect his independence and must not lead to a conflict of interest in relation to his duties as Recipient. A conflict of interest constitutes any situation in which the impartial performance of his duties is objectively affected.

6.2. The Recipient is appointed by a decision of the Company's Management with a term of at least one (1) calendar year, which may however be terminated earlier for an important reason. His term of office is automatically renewed, without the need for a new appointment decision, unless the Recipient resigns or there is an important reason for its termination. The details of the Recipient (in particular name, contact telephone number, postal address and e - mail) are announced to all employees via company e-mail and/or any other appropriate means (e.g. by printed information, by posting on the notice board, etc.) and are posted on the official website of the Company, together with this Policy, so that they can be accessed by anyone interested.

6.3. The Recipient carries out its duties with integrity, objectivity, impartiality, transparency and social responsibility, respecting the rules of secrecy and confidentiality for matters, which the Recipient becomes aware of in the course of his duties. He is obliged to refrain from the management of specific cases, declaring to the management of the Company his impediment, if there is a case of conflict of interests.

6.4. The Recipient has the following responsibilities:

- (a) provides appropriate information about the possibility to submit a report and communicates the relevant information in a prominent place;
- (b) receives reports that fall within the scope of this and Law 4990/2022,
- (c) acknowledges the receipt of the petition to the reporting person within a period of seven (7) working days from the day of receipt,
- (d) proceeds to necessary actions, in order for the competent bodies to deal with the report, or terminates the procedure, by filing the report, if it is incomprehensible and not

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

amenable to assessment or is submitted maliciously or abusively or does not contain incidents that demonstrate a breach of EU law or there are no serious indications of such a breach and notifies the relevant decision to the reporting person, who, if he considers that it was not dealt with effectively, may resubmit it to the National Transparency Authority ("NTA"),

(e) ensures the protection of the confidentiality of the identity of the reporting person and any third party named in the petition, preventing access to it by unauthorized persons;

(f) follows up on the report and maintains contact with the reporting person and, if necessary, requests further information from him;

(g) informs the reporting person of the actions taken within a reasonable time, which shall not exceed three (3) months from the receipt of the acknowledgment or if no acknowledgment has been sent to the reporting person, three (3) months from the end of seven (7) working days from the submission of the report,

(h) provides clear and easily accessible information on the procedures by which reports can be submitted to the NTA and, where appropriate, to public bodies or institutions and other bodies or organizations of the European Union, and

(i) plans and coordinates educational actions related to ethics and integrity, participates in drawing up internal policies to strengthen integrity and transparency in the Company.

7. REPORT SUBMISSION PROCEDURE

7.1. Any interested party may submit named or anonymous reports, that fall within the scope of the present, to the designated Recipient in the following ways:

a) In writing, by submitting a report through the Austriacard Group's whistleblowing channel ("AC Whistleblowing Channel"), which can be found in ACAG's website imprint (<https://www.austriacard.com/imprint/>), or by directly following the link <https://reportac-app.compliance2b.com/>,

b) in writing, by sending an e-mail message to the address: whistleblowing-gr@informlykos.com, with the subject of the message stating "Confidential Report to Recipient",

c) in writing, by sending a postal letter to the Company's Recipient, at the address of the company "INFORM LYKOS (HELLAS) S.A.", 5th km Varis-Koropiou Avenue, 19400, Koropi, Attica marked "Confidential Report to Recipient",

d) orally, either through telephone communication with the Company's Recipient on the phone 210 66 97627, or through a personal meeting with the Company's Recipient, within a reasonable period of time, following the request of the reporting person and indication of a relevant date, meeting time and place,

7.2. In cases where telephone communication is used to submit a report, recording of the conversation is permitted, provided the reporting person has legally consented. The

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

Recipient has the right to document the oral submission of a report, either by recording the conversation in a stable and retrievable format, or by a full and accurate transcript of the conversation, while providing the complainant with the opportunity to verify, correct and agree to the transcript document by signing it.

7.3. In cases where a telephone communication is used for the submission of a report without a recording of the conversation, the Recipient has the right to document the oral submission of a report in the form of precise minutes of the conversation, at the same time providing the reporter with the opportunity to verify, correct and agree with the minutes of the conversation, signing them.

7.4. In the cases where the reporting person chooses to request a meeting with the Recipient for the submission of a report, subject to the consent of the reporting person, complete and accurate minutes of the meeting are kept in a stable and retrievable format, either by recording the conversation in a stable and retrievable format, or with accurate minutes of the meeting, while giving the reporting person the opportunity to verify, correct and agree to the minutes of the meeting by signing them. In all the aforementioned cases, if the reporting person refuses to sign the prescribed minutes, a relevant note is made by the author of the minutes.

7.5. In any case, the submission of petitions should be governed by the principle of good faith on the part of the reporting person, who must exercise due diligence throughout the process. It is recommended that the reports to be submitted are clear, accurate, certain and provide all available information and details, i.e. it is recommended that they include at least the details of the person who is suspected by the reporter to have committed an offense or irregularity, the date or the time period and the place where the alleged incident took place, the type of misconduct and as detailed a description as possible. Despite the fact that reports can be anonymous, it is recalled that submitting a named report provides the opportunity to communicate and provide further information, if deemed necessary.

8. REPORT HANDLING PROCEDURE

8.1. Submitted reports are reviewed with due diligence, impartiality and objectivity. Upon receipt of the report by the Recipient, the latter a) dully informs ACAG's Legal and Compliance Department of said submitted report and b) confirms receipt of it to the reporting person within a period of seven (7) working days from the day of receipt and either files the report, if the Recipient judges that it is incomprehensible or that it is submitted abusively or that it does not contain incidents which constitute a breach of EU law or that there are no serious indications of such a breach, either he immediately informs the Company's Management and a three-member ad hoc Report Management Committee ("RMC"), preferably composed of a director, the Recipient and a member designated by the Recipient on a case-by-case basis. In the event that the petition submitted is directed against a member of the RMC or if a member of the RMC finds himself in a situation of conflict of interest, the member in question is replaced ad hoc regarding the examination of the specific report by another member appointed by the Recipient. The Recipient may

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

maintain communication with the reporting person throughout the investigation, request clarifications or additional information or his assistance. The RMC examines the reported incidents discreetly and confidentially, firstly investigating whether the report actually falls within the scope of the present. Following this, the RMC proceeds to further investigate the report, including conducting audits, assessing the accuracy of the allegations contained therein, deciding on the validity or otherwise of the allegations contained therein and recording the results of the investigation. It is noted that the access of third parties to the details of the report is limited, i.e. the report and the critical facts it presents are disclosed to the required extent and only to the persons deemed necessary for the conduct of the investigation, who are committed in advance and as part of their duties to abide by the rules of secrecy and confidentiality. ACAG's Legal and Compliance Department shall be updated periodically by the Recipient regarding the progress and/or the outcome of the aforementioned procedure.

8.2. Depending on the results of the RMC's investigation regarding the submitted report, the latter may recommend to the Company's Management the taking of appropriate measures to deal with the reported breach, such as, but not limited to, the additional training of employees, the creation of new internal control procedures, the modification of existing procedures, initiation of disciplinary and/or judicial actions, etc. The proposals and decisions in general of the RMC are taken by majority vote and must be justified. The Recipient must inform the reporting person of the actions taken within a reasonable period of time, which must not exceed three (3) months from the confirmation of receipt, or if no confirmation has been sent to the reporting person as stated above, the three (3) months from the end of seven (7) working days from the submission of the report. In the case of rejection of the petition by the RMC, the procedure is terminated and the Recipient files the petition, at the same time notifying the reporting person in writing of the decision of the RMC, which also includes the reasons for rejection. If the reporting person considers that his report was not dealt with effectively, he may re-submit it to the National Transparency Authority ("NTA"), following the instructions that the latter has posted on its website.

9. RECORD KEEPING

9.1. The Company, through the Recipient, keeps a record of every report it receives, in accordance with the confidentiality requirements provided for in this Policy (see below). Reports are stored for a reasonable and necessary period of time, in order to be recoverable and to comply with the requirements imposed by the present, Union and national law and, in any case, until the completion of any investigation or judicial process that has been initiated as a consequence of the report against the reported, the reporting person or third parties.

9.2. In particular, the Recipient maintains a confidential file with the submitted petitions and the corresponding relevant documents, which he hands over to the next appointed Recipient. No other persons have access to the register, except, as the case may be, the competent administrative and/or judicial authorities, unless there is a serious reason to

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

declassify a case and only for the information that is necessary and sufficient for the treatment of the specific reason. The register and the related file are kept for three (3) years, as long as there are no other legitimate reasons for keeping them for a longer period of time, in accordance with the relevant legislation and with the other policies of the Company.

10. OBLIGATION OF CONFIDENTIALITY

10.1. Personal data and any information that leads, directly or indirectly, to the identification of the reporting person, is not disclosed to anyone other than the authorized staff members who are competent to receive, or monitor the petitions, unless the reporting person consents. To this end, the Company takes appropriate technical and organizational measures, such as pseudonymization techniques, when monitoring the report.

10.2. By way of derogation from the above, the identity of the reporting person and any other information may only be disclosed in the cases required by Union or national law, in the context of investigations by competent authorities or in the context of civil, criminal or administrative proceedings and if this is necessary for the service of the purposes herein or to ensure the defense rights of the said.

10.3. Disclosures, as stated above, are made after the reporting person has been informed in writing about the reasons for disclosing his identity and other confidential information, unless this information undermines investigations or legal proceedings. After being informed, the reporting person is entitled to submit written comments to the Company making the disclosure in accordance with the above, which will not be disclosed to anyone. Exceptionally, in the event that the stated reasons for the observations are not considered sufficient, the disclosure of the identity and other confidential information of the reporting person is not prevented. This is without prejudice to further safeguards of the identity of the reporting person and the information from which it can be deduced, provided for by specific provisions of Union or national law.

11. PROCESSING OF PERSONAL DATA

11.1. Any processing of personal data pursuant to this is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, for the protection of natural persons against the processing of personal data and for the free circulation of this data and the repeal of Directive 95/46/EC (General Data Protection Regulation, "GDPR") and Law 4624/2019 (A' 137), subject to the more specific provisions of Law 4990/2022 and more specific regulations concerning the processing of personal data by the competent authorities.

11.2. Any processing of personal data that takes place in the context of this, is carried out to fulfill the obligation to establish reporting channels and take the necessary measures for their monitoring as set out above. The concept of the above processing of personal

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

data includes, in particular, any information related to breaches in the context of reports. It is permitted to transmit to the competent supervisory and investigative authorities the information obtained in the reports, which can be used as evidence in administrative, civil and criminal investigations and proceedings.

11.3. The Company, as data controller, takes the appropriate technical and organizational measures, so that, when submitting and monitoring the reports, the absolutely necessary and appropriate personal data to achieve the purposes of this are collected. Personal data, which are obviously not related to the handling of a specific report or are excessive, are not collected, or if they have been collected accidentally, they are deleted without delay.

11.4. The Company, as data controller, by way of derogation from paragraph A of paragraph 1 of article 5, articles 12 and 13, paragraphs 1 to 4 of article 14 and article 34 of the GDPR does not provide relevant information about the processing of the personal data to the reporting person and to any third party in their capacity as the subject of the data named in the report or the personal data resulting from monitoring measures and in particular for the source of origin according to paragraph f of paragraph 2 of article 14 of the GDPR, pursuant to paragraph 5 of article 14 of the GDPR, in conjunction with article 23 of the GDPR, for as long as necessary and as long as it is deemed important for the purpose of preventing and dealing with attempts to hinder reporting, to obstruct, thwart or delay follow-up measures, in particular with regard to investigations, or attempts to identify the reporting persons, as well as to protect them against retaliation.

11.5. The Company, as data controller, may not satisfy the rights provided by articles 15 to 22 of the GDPR, when exercised by the mentioned and third parties named in the report, or resulting from monitoring measures. In the cases of limiting the rights of the data subjects provided for in paragraphs 5 and 6, the data controller takes all the necessary technical and organizational measures to protect the rights and freedoms of the persons. When the data controller refuses the satisfaction of the rights, without informing of the reason for the restriction, the data subject is entitled to submit a complaint to the Personal Data Protection Authority ("PDPA"), which can investigate the compliance of the conditions restriction of rights and to inform the subject about it, as long as this information is not detrimental to the fulfillment of these purposes.

11.6. The Company, as a data controller, in the event of a personal data breach, does not make a notification in accordance with paragraph 1 of Article 34 of the GDPR to the data subject, since this notification may be detrimental to the intended purposes of this Policy and informs the PDPA about this, which may, after investigating the validity of the reasons cited, request that the announcement be made, if it considers that the conditions for the omission of the announcement are not met.

12. IMPOSITION OF SANCTIONS

12.1. The Company reserves the right to take any measure it deems appropriate, in case

INTERNAL WHISTLEBLOWING POLICY OF INFORM LYKOS

of breach of the terms herein. In particular, the company may impose any type of sanctions it deems appropriate, against persons who, among other things, have been proven and in any way a) prevented or attempted to prevent the submission of a report in cases of breaches that fall within the scope of this Policy, b) exposed any person who submitted a report pursuant to this, to any form of adverse treatment, c) proceeded to impose reprisals or initiated similar procedures against any person who submitted a report pursuant to this, d) violated the obligation of confidentiality as stated above, etc.

12.2. At the same time, it is mentioned that Law 4990/2022 provides for a prison sentence and a fine for persons who: (a) obstruct or attempt to obstruct the submission of a report, (b) retaliate or initiate malicious proceedings against the reporting persons and (c) violate the obligation to maintain the confidentiality of the identity of the reporting persons. Also, persons who knowingly made false reports or false public disclosures are punished with a prison sentence of at least two years and a fine. If any of the breaches were committed, for the benefit or on behalf of a legal entity, an administrative fine is imposed on the entity, the amount of which cannot be less than ten thousand (10,000) euros and more than five hundred thousand (500,000) euros.

13. INFORMATION

The Recipient ensures that all employees of the Company are informed about the content of this Policy. This information may be provided by sending information material, e-mails, newsletters, or by any other suitable means and method. At the same time, this Policy is accessible to any third party, on the official website of the Company, as long as it is in operation.

14. MODIFICATIONS

This Policy is subject to continuous evaluation and may be adapted to the requirements of new conditions, modified, updated and revised, in order to continuously improve its efficiency and effectiveness.