

Whistleblowing Policy – Policy on the Submission and Handling of Reports and Complaints

English translation. In case of any discrepancy, the Greek version prevails.

Document details

Title	Policy on the Submission and Handling of Reports & Complaints (Whistleblowing Policy)
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Approved by	Board of Directors
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Related documents	Internal Work Regulations; Policy on Violence and Harassment; Code of Ethics & Conduct; Data Protection Policy; Artificial Intelligence Policy
Next review	(at least annually, Article 5.3)

Revision history

Version	Date	Description of changes	Approval
1.0	21.05.2026	Initial version.	Yes
2.0	25.09.2026	Clarification of the material scope and of the definition of “Breaches”; job applicants and branches/subsidiaries; channel for reports outside the scope (violence and harassment); details of the National Transparency Authority; conditions for public disclosure; SALFO as data controller; artificial intelligence tools; sanctions (Article 23 of Law 4990/2022); corrections of cross-references, numbering and wording; standardised document format.	Yes

1. Introduction – Definitions – Scope

1.1. The company under the corporate name «ΣΑΛΦΟ ΚΑΙ ΣΥΝΕΡΓΑΤΕΣ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ – ΣΥΜΒΟΥΛΟΙ ΔΙΑΧΕΙΡΙΣΗΣ ΚΑΙ ΤΕΧΝΙΚΩΝ ΕΡΓΩΝ» (SALFO & Associates S.A. – Management and Technical Works Consultants), General Commercial Registry (G.E.M.I.) No. 117037201000, having its registered office in Athens, at 102 Vasilissis Sofias Avenue, 115 28, and duly represented (hereinafter “**SALFO**”), complies with all measures and obligations arising from Law 4990/2022 (transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019) and adopts this binding policy on the submission and handling of reports and complaints (whistleblowing policy), which is approved by its Board of Directors.

The purpose of this policy is to establish a system for the internal reporting of breaches of Union law, to protect persons who report such breaches, and to organise the procedures for submitting, receiving, handling, following up and assessing such reports, in full compliance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, as transposed into national law by Law 4990/2022 (Gov. Gazette A’ 210), and with Joint Ministerial Decision No. 47312/2023 of the Ministers of Interior, Labour and Social Security, and Justice (Gov. Gazette B’ 6994), issued under that law.

1.2. For the purposes of this policy, the following definitions apply:

- “**Policy**”: this Policy on the Submission and Handling of Reports & Complaints (whistleblowing policy);
- “**Report**”: the oral or written provision, or provision through an electronic platform, of information on Breaches;
- “**Internal Report**”: the oral or written provision, or provision through an electronic platform, of information on Breaches to SALFO’s RRFO;
- “**External Report**”: the oral or written provision, or provision through an electronic platform, of information on Breaches to the National Transparency Authority (N.T.A.);
- “**Reporting Person**”: a natural person who reports or discloses information acquired in the context of their work-related activities;
- “**Person Concerned**”: a natural or legal person who is named in the Internal or External Report or in the Public Disclosure as a person to whom the Breach is attributed or with whom that person is associated, where the Breach falls within the scope of the Policy;
- “**Retaliation**”: any direct or indirect act or omission which occurs in the Work-related Context, causes or may cause unjustified detriment to the Reporting Person or places them at a disadvantage, and is linked to an Internal or External Report or a Public Disclosure;

- **“Reasonable Grounds”**: the justified belief of a person with knowledge, training and experience similar to those of the Reporting Person that the information they hold is true and constitutes a Breach;
- **“Public Disclosure”**: making information on Breaches directly available in the public domain;
- **“Facilitator”**: a natural person who assists the Reporting Person in the reporting process in the Work-related Context and whose assistance should be confidential;
- **“Work-related Context”**: current, past or prospective work activities within SALFO, irrespective of their nature, through which persons acquire information on Breaches and within which such persons could suffer Retaliation if they reported it;
- **“Breaches”**: acts or omissions that are unlawful or that defeat the object or purpose of the rules falling within the material scope of the Policy, as defined in Article 2.1;
- **“Information on breaches”**: information, including reasonable suspicions, about Breaches which have occurred or are very likely to occur at SALFO or at other bodies with which the Reporting Person has been in contact through or on the occasion of their work, as well as information about attempts to conceal Breaches;
- **“RRFO”**: SALFO’s Reports Receipt and Follow-up Officer (Y.II.II.A.).

1.3. The Policy applies to persons who have acquired information on Breaches in a work-related context and report it, namely: employees of SALFO under any form of employment relationship, regardless of place of work, whether full-time or part-time, permanent or seasonal, or seconded from another body; non-salaried persons, self-employed persons and consultants working with SALFO; shareholders and members of SALFO’s Board of Directors, as well as volunteers and paid or unpaid trainees; SALFO’s contractors, subcontractors and suppliers, as well as any persons working under their supervision and direction; persons who are no longer employed by SALFO but report information acquired during their employment; and persons whose work-based relationship has not yet begun, where information on Breaches was acquired during the recruitment process or other pre-contractual negotiations.

The measures for the protection of Reporting Persons provided for in Article 4 of the Policy also apply, where relevant, to facilitators; to third persons who are connected with the Reporting Persons and who could suffer Retaliation in the Work-related Context, such as colleagues or relatives of the Reporting Persons; and to legal entities that the Reporting Persons own, work for or are otherwise connected with in a work-related context.

Reporting Persons qualify for protection provided that, at the time of reporting, they had Reasonable Grounds to believe that the Information on breaches was true and fell within the scope of the Policy.

The Policy applies to SALFO and its branches. It applies mutatis mutandis to the Group's branches and subsidiaries abroad, subject to the mandatory provisions of local law, and in any case the reporting channel under this Policy remains available.

2. Subject Matter of Reports – RRFO – Procedure for Submitting and Handling Reports

2.1. Reports may be submitted on: Breaches of Union law in the areas of public procurement; financial services, products and markets, and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; protection of the environment; radiation protection and nuclear safety; food and feed safety, and animal health and welfare; public health; consumer protection; and protection of privacy and personal data, and security of network and information systems; breaches affecting the financial interests of the European Union under Article 325 of the Treaty on the Functioning of the European Union (TFEU), as further specified in the relevant Union measures; breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law; breaches of national law concerning the offences of bribery and trading in influence, as defined in Articles 159, 159A, 235, 236, 237, 237A and 396 of the Criminal Code (Law 4619/2019, Gov. Gazette A' 95) and Article 134 of Law 5090/2024 (Gov. Gazette A' 30); and breaches of restrictive measures of the European Union adopted on the basis of Article 29 of the Treaty on European Union (TEU) or Article 215 TFEU.

The Policy does not apply to the protection of persons reporting Breaches relating to defence or security matters, without prejudice to the provisions concerning public procurement, transport safety, and radiation protection and nuclear safety set out above. Furthermore, the Policy does not affect the application of provisions concerning: the protection of classified information; the protection of legal and medical professional privilege; the secrecy of judicial deliberations or of other procedures designated as confidential by law; the rules on criminal procedure; and the exercise by workers of their rights to consult their representatives or trade unions, and the protection against any unjustified detrimental measure prompted by such consultations, as well as the autonomy of the social partners and their right to enter into collective agreements, without prejudice to the level of protection granted by the Policy.

The scope and exceptions apply as described in more detail in the applicable provisions of Law 4990/2022.

Reports or complaints concerning incidents of violence and harassment at work are submitted and examined in accordance with the Policy on the Prevention and Combating of Violence and Harassment at Work (Annex I to the Internal Work Regulations). If the RRFO receives such a report, the RRFO forwards it to the competent person under that policy, informing the Reporting Person and respecting confidentiality.

2.2. Reports Receipt and Follow-up Officer (RRFO)

2.2.1. Mr Konstantinos Efthymiou is appointed as the Reports Receipt and Follow-up Officer (RRFO) and reports directly to SALFO's Board of Directors. The RRFO's term of office is two years, but may be terminated earlier for good cause. Where the RRFO is prevented from acting due to a conflict of interest, the RRFO is replaced by Mr Antonis Matsouris.

2.2.2. The RRFO has the following duties, which are further specified in Article 2.3 of the Policy: provides appropriate information on the possibility of submitting an Internal Report and displays such information in a prominent place at SALFO's offices or on its website; receives Internal Reports on Breaches; acknowledges receipt of the Internal Report to the Reporting Person within seven (7) working days of receipt; takes up the Internal Report, or forwards it for investigation to the competent bodies as appropriate, or closes the procedure by archiving the Internal Report if it is incomprehensible or submitted abusively, or does not contain facts constituting a Breach within the meaning of the Policy, or there are no serious indications of such a Breach, and notifies the relevant decision to the Reporting Person, who, if they consider that the report was not handled effectively, may resubmit it to the N.T.A., which, as the external channel, exercises powers under Article 12 of Law 4990/2022; ensures the confidentiality of the identity of the Reporting Person and of any third party named in the Internal Report, preventing access to it by unauthorised persons; follows up reports and maintains communication with the Reporting Person and, where necessary, requests further information from them; provides feedback to the Reporting Person on the action taken within a reasonable timeframe, not exceeding three (3) months from the acknowledgement of receipt or, if no acknowledgement was sent, three (3) months from the expiry of seven (7) working days after the Internal Report was submitted; provides clear and easily accessible information on the procedures for making External Reports to the N.T.A. and, where relevant, to public bodies or to institutions, bodies, offices or agencies of the European Union; and designs and coordinates training on ethics and integrity, and contributes to internal policies aimed at strengthening integrity and transparency at SALFO.

2.2.3. The RRFO must perform their duties with integrity, objectivity, impartiality, transparency and social responsibility; respect and observe the rules of discretion and confidentiality on matters that come to their knowledge in the performance of their duties; and

abstain from handling specific cases, declaring an impediment, where there is a conflict of interest.

Where the RRFO or their deputy also perform other duties, it is ensured that such duties do not affect their independence or give rise to a conflict of interest.

2.3. Procedure for Submitting and Handling Reports

2.3.1. Any person to whom the Policy applies and who has acquired information on Breaches is entitled to submit an Internal Report, which may be made by name or anonymously. Internal Reports may be submitted in writing through the following channels:

- in person or by post to the address of SALFO’s registered office (102 Vasilissis Sofias Avenue, 115 28 Athens), in an envelope marked “For the attention of the RRFO” or “Internal Report under Law 4990/2022”, or with any other marking indicating that it falls under the Policy and Law 4990/2022;
- by email to kefthimiou@salfogr.gr, to which only the RRFO has access, or, in case of a declared conflict of interest, to amatsouris@salfogr.gr, to which only the deputy RRFO has access.

Internal Reports may be submitted orally:

- by telephone at +30 210 92 100 80 on working days and during working hours, with the conversation recorded where the Reporting Person has lawfully consented. The content of a report made by telephone is documented either by recording the conversation in a durable and retrievable form or by a complete and accurate transcript of the conversation prepared by the RRFO, which the Reporting Person has the opportunity to check, rectify and finally agree with by co-signing the transcript;
- at a physical meeting between the Reporting Person and the RRFO, held within a reasonable time from the Reporting Person’s request, which may be made in writing, orally or by email to the RRFO. In that case, the RRFO keeps complete and accurate minutes of the meeting in a durable and retrievable form, either by recording the conversation, where the Reporting Person has lawfully consented, or in writing; the Reporting Person may check, rectify and agree with the minutes by signing them.

The RRFO assists the Reporting Person in submitting the Internal Report by providing, upon request, all necessary information on their rights and on the procedure for handling Internal Reports, and displays the relevant information in a prominent place at SALFO’s offices or on its website.

2.3.2. The appointment of an RRFO by SALFO does not preclude the possibility of an External Report to the National Transparency Authority, in accordance with Article 11 of Law 4990/2022 (website: www.aead.gr), where the Reporting Person reasonably considers that their Report cannot be handled effectively by the RRFO or there is a risk of Retaliation.

2.3.3. The RRFO receives Internal Reports and acknowledges receipt to the Reporting Person within seven (7) working days of receipt, regardless of the means of submission. The Reporting Person is informed of the receipt of the Internal Report by any appropriate means, provided it can be evidenced, always subject to the confidentiality and data protection requirements of Articles 3.1 and 3.2 of the Policy.

Upon receipt of the Internal Report, regardless of the means of submission, the RRFO ensures the confidentiality and protection of the personal data of the Reporting Person and of any third party named in the Internal Report, preventing access to it by unauthorised persons, in accordance with Article 3.2 of the Policy.

The Internal Report, regardless of how it is submitted, is recorded in a special register kept by the RRFO in hard copy or digital form, in accordance with Chapter VI of Law 4990/2022 and Article 3.3 of the Policy. The records are kept for at least five (5) years from the date of receipt of the Internal Report, unless other lawful grounds extend the retention period, such as an ongoing investigation.

Where an Internal Report is received by a person who is not competent, that person must forward it without delay to the RRFO, without any modification of its content or disclosure of information that could lead to the identification of the Reporting Person or of any third party named in the Report.

2.3.4. Upon receipt and acknowledgement of the Internal Report, the RRFO takes one of the following actions:

- (a) takes up the Internal Report or forwards it, in pseudonymised form, for investigation to the competent bodies as appropriate, in accordance with Law 4990/2022 and the provisions of the Policy on confidentiality and personal data protection, updating the special register kept under Article 3.3 of the Policy, so that those bodies may deal with the Report. Such bodies include, by way of example, the Financial Crime Prosecutor and the public prosecution authorities in general, the National Transparency Authority (N.T.A.), the Hellenic Competition Commission, the Bank of Greece, the Hellenic Data Protection Authority, the Hellenic Single Public Procurement Authority, the Greek Atomic Energy Commission, the Hellenic Food Authority, the Consumer Ombudsman, the National Cybersecurity Authority, the Anti-Money Laundering, Counter-Terrorist

Financing and Source of Funds Investigation Authority, the Independent Authority for Public Revenue and the Financial Crime Prosecution Directorate;

- (b) archives the Internal Report by a decision notified to the Reporting Person, where feasible, when:
 - (ba) the Internal Report is manifestly unreasonable, vague or incomprehensible, or is repeated abusively, such as where the same content is resubmitted without new evidence;
 - (bb) the content of the Internal Report does not fall within the scope of Article 4 of Law 4990/2022 and Article 1.3 of the Policy. However, where the Internal Report contains information on Breaches for which another SALFO body and/or a public body is competent, the RRFO must forward it to the competent body. In that case, there is no further obligation to follow up the Internal Report;
 - (bc) there are no serious indications of Breaches.

Where new evidence is provided in respect of a report that has already been archived, the RRFO retrieves the archived report and takes either the actions under point (a) or the actions under point (b).

Where the RRFO identifies, from the evidence provided, indications that a criminal offence prosecuted ex officio has been committed, the RRFO must forward a copy of the Internal Report without delay to the locally competent Public Prosecutor, informing the Reporting Person. Where the breach falls within the scope of the Policy, the transmission is made in accordance with Chapter VI of Law 4990/2022 and Articles 3.1 and 3.2 of the Policy on confidentiality and personal data protection, and the obligation to follow up the report under Article 10(2)(f) of Law 4990/2022 continues to apply. Where the breach does not fall within the scope of Law 4990/2022, a copy of the report is forwarded and the follow-up obligation under Article 10(2)(f) no longer applies.

Where the RRFO receives an Internal Report containing allegations against the RRFO personally, the RRFO limits their action to recording it in the register kept under Article 3.3 of the Policy and forwarding it to the National Transparency Authority as the external reporting channel, informing the Reporting Person.

2.3.5. The RRFO maintains communication with the Reporting Person and, where necessary and feasible, requests further information and/or evidence from them.

The RRFO follows up the Internal Report by communicating with the competent bodies to which the report has been forwarded, in accordance with Chapter VI of Law 4990/2022.

The competent body that has taken up the Internal Report informs the RRFO in good time of the actions taken, so that the RRFO can provide feedback to the Reporting Person within a reasonable timeframe not exceeding three (3) months from the acknowledgement of receipt or, if no acknowledgement was sent, three (3) months from the expiry of seven (7) working days after the Internal Report was submitted. Where no acknowledgement was sent to the Reporting Person, the feedback under the previous sentence is provided at the Reporting Person's initiative.

2.3.6. A person who makes a Public Disclosure qualifies for protection under the Policy if: (a) they first reported internally and externally, or directly externally, and no appropriate action was taken within the time limits of Law 4990/2022; or (b) they have Reasonable Grounds to believe that the Breach may constitute an imminent or manifest danger to the public interest or that, in the case of an External Report, there is a risk of Retaliation or a low prospect of the Breach being effectively addressed, in accordance with Law 4990/2022.

3. Confidentiality – Personal Data – Record-keeping

3.1. Duty of Confidentiality

- (a) Personal data and any information leading, directly or indirectly, to the identification of the Reporting Person are not disclosed to anyone other than the RRFO, unless the Reporting Person consents. To that end, the RRFO takes appropriate technical and organisational measures, such as pseudonymisation techniques, when following up the Report and communicating with the competent authorities.
- (b) By way of derogation from point (a), the identity of the Reporting Person and any other information may be disclosed only where required by Union or national law, in the context of investigations by competent authorities or judicial proceedings, and where necessary to serve the purposes of this Policy or to safeguard the rights of defence of the Person Concerned.
- (c) Disclosures under point (b) are made after the Reporting Person has been informed in writing of the reasons for the disclosure of their identity and other confidential information, unless such information would jeopardise the investigations or judicial proceedings. Unjustified failure to inform constitutes a disciplinary offence for persons subject to disciplinary rules. Following such information, the Reporting Person is entitled to submit written observations to the authority making the disclosure under point (b), which are not communicated to anyone. Exceptionally, where the reasons given in the observations are not considered sufficient, the disclosure of the identity and other confidential information of the Reporting Person is not prevented. Further

safeguards of the identity of the Reporting Person and of the information from which it may be inferred, provided for by specific provisions of Union or national law, remain unaffected.

- (d) Competent authorities that receive reports on breaches involving trade secrets ensure that they do not use or disclose those trade secrets beyond what is necessary for proper follow-up.

3.2. Personal Data

3.2.1. Any processing of personal data under the Policy, including the exchange or transmission of personal data by the competent authorities, is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR, OJ L 119), and Law 4624/2019 (Gov. Gazette A' 137), subject to the specific provisions of Law 4990/2022, this Policy, the Data Protection Policy and any specific rules governing the processing of personal data by the competent authorities.

3.2.2. Any processing of personal data under the Policy is carried out for the performance of the RRFO's duties and for taking the measures necessary to follow up Internal Reports under Article 2 of the Policy. Such processing includes, in particular, any information on Breaches in the context of Internal and External Reports, including its exchange or transmission. The information contained in Reports may be transmitted to the competent supervisory and investigating authorities and may be used as evidence in administrative, civil and criminal investigations and proceedings.

3.2.3. SALFO, as data controller, through the RRFO, takes appropriate technical and organisational measures to ensure that, when Internal Reports are submitted and followed up, only the personal data that are strictly necessary and appropriate for the purposes of the Policy are collected. Personal data which are manifestly not relevant to the handling of a specific Internal Report, or are excessive, are not collected or, if accidentally collected, are deleted without delay. Entering the content of Reports or data concerning Reporting Persons, Persons Concerned or third parties into artificial intelligence tools that have not been expressly approved by SALFO for that purpose is prohibited.

3.2.4. SALFO, as data controller, through the RRFO, by way of derogation from Article 5(1)(a), Articles 12 and 13, Article 14(1) to (4) and Article 34 GDPR, does not provide information on the processing of personal data to the Person Concerned or to any third party, in their capacity as data subjects named in the Report, or on personal data arising from follow-up measures, and

in particular on the source of the data under Article 14(2)(f) GDPR, pursuant to Article 14(5) GDPR in conjunction with Article 23 GDPR, for as long as required and where deemed necessary for the purpose of preventing and addressing attempts to hinder the Internal Report, to obstruct, frustrate or delay follow-up measures, in particular investigations, or attempts to identify Reporting Persons, and to protect them against Retaliation.

3.2.5. SALFO, as data controller, through the RRFO, may decline to satisfy the rights under Articles 15 to 22 GDPR when exercised by Persons Concerned and third parties named in the Internal Report or identified through follow-up measures, in accordance with Article 3.2.4 above.

3.2.6. In cases of restriction of the rights of data subjects under Articles 3.2.4 and 3.2.5 above, SALFO, as data controller, through the RRFO, takes all necessary technical and organisational measures to protect the rights and freedoms of the persons concerned. Where SALFO, as data controller, refuses to satisfy the rights without stating the reason for the restriction, the data subject is entitled to lodge a complaint with the Hellenic Data Protection Authority (HDPa), which may investigate whether the conditions for restricting the rights are met and inform the data subject accordingly, provided that such information is not detrimental to the fulfilment of those purposes.

3.2.7. SALFO, as data controller, through the RRFO, in the event of a personal data breach, does not communicate it to the data subject under Article 34(1) GDPR where such communication may be detrimental to the purposes of this Policy, and informs the HDPa accordingly; the HDPa may, after examining the reasons invoked, request that the communication be made if it considers that the conditions for omitting it are not met.

3.3. Record-keeping

The RRFO keeps a record of every Internal Report received, in accordance with the confidentiality requirements of Article 3.1. Internal Reports are stored for at least five (5) years from the date of receipt and for as long as is reasonable and necessary to ensure that they are retrievable and that the requirements of the Policy and of Union or national law are met, and in any case until the completion of any investigation or judicial proceedings initiated as a result of the Report against the Person Concerned, the Reporting Person or third parties.

4. Prohibition of Retaliation – Protection Measures – Remedial Measures

4.1. Prohibition of Retaliation

Any form of Retaliation against the persons referred to in Article 1.3 of the Policy is prohibited, including threats and attempts of retaliation. The following forms of Retaliation, in particular, are prohibited:

- suspension, dismissal or equivalent measures;
- demotion or withholding or denial of promotion;
- transfer of duties, change of location of place of work, reduction in wages, change in working hours;
- withholding of training;
- a negative performance assessment or employment reference;
- reprimand or imposition of any disciplinary or other measure, including a financial penalty;
- coercion, intimidation, harassment or ostracism;
- discrimination, disadvantageous or unfair treatment;
- failure to convert a temporary employment contract into a permanent one;
- failure to renew, or early termination of, a temporary employment contract;
- harm, including to the person's reputation, particularly on social media, or financial loss, including loss of business and loss of income;
- blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not find employment in the sector or industry in the future;
- early termination or cancellation of a contract for goods or services;
- cancellation of a licence or permit;
- psychiatric or medical referrals;
- refusal or denial of reasonable accommodation for persons with disabilities.

4.2. Measures for Protection against Retaliation

4.2.1. Without prejudice to the exceptions of Article 2.1, the persons referred to in Article 1.3 incur no liability:

- in respect of the acquisition of, or access to, the information which is reported or publicly disclosed, provided that such acquisition or access did not constitute a self-

standing criminal offence. In legal proceedings, including for defamation, breach of intellectual property rights, breach of secrecy, breach of data protection rules, disclosure of trade secrets, or for compensation claims based on private, public or collective labour law, the persons referred to in Article 1.3 incur no liability whatsoever as a result of reports or public disclosures in accordance with the Policy, provided that they had Reasonable Grounds to believe that the report or public disclosure was necessary for revealing a breach;

- in the case of a Report or Public Disclosure of information that includes trade secrets, concerning breaches falling within the scope of this Policy and of applicable law, provided that such reporting or disclosure is considered lawful under the conditions of Article 1 of Law 4605/2019.

4.2.2. Any other possible liability of Reporting Persons arising from acts or omissions which are unrelated to the Report or Public Disclosure, or which are not necessary for revealing a Breach, is governed by the applicable provisions.

4.2.3. Where the Report or Public Disclosure constitutes, for the Reporting Person, a criminal, disciplinary or administrative offence or a tort, any criminal, disciplinary, administrative or civil proceedings brought against the Reporting Person in respect of the reported Breach are suspended until the investigation of the Report is completed. For the duration of such suspension, the limitation or preclusion periods of the corresponding rights of the persons affected by the Report are also suspended. The second sentence of Article 113(2) of the Criminal Code applies accordingly to the criminal, disciplinary and administrative liability of the Reporting Person.

4.2.4. A Reporting Person who participated in a breach constituting a criminal offence under Articles 235 to 260, 390 and 396 of the Criminal Code is exempted from any disciplinary and administrative sanction if the conditions of Article 263A(2) and (3) of the Criminal Code are met in their person.

4.3. Remedial Measures

4.3.1. In the event of Retaliation, the persons referred to in Article 1.3 are entitled to full compensation for the damage suffered. In proceedings before a court or other authority relating to a detriment suffered by them, and provided that they establish that they made a Report or Public Disclosure, it is presumed that the detriment was made in retaliation for the Report or Public Disclosure. Evidence to the contrary may be adduced that the detrimental measure was objectively justified and was not taken against the person because of the Report or Public Disclosure.

4.3.2. Measures taken in breach of Article 4.1 of the Policy are null and void. The persons referred to in Article 1.3 against whom Retaliation was taken may request the restoration of the situation that existed before the Retaliation, where this is objectively possible and not disproportionately burdensome for the obligated party.

4.3.3. Termination of an employment contract that takes the form of Retaliation is in any case null and void.

4.4. Measures for the Protection of Persons Concerned

4.4.1. Persons Concerned have access to all legal remedies and fully enjoy the right to a fair trial, in particular the right to an effective remedy before an impartial tribunal, as well as the presumption of innocence and the rights of defence, including the right to be heard and the right to access their file.

4.4.2. The identity of Persons Concerned is protected for as long as investigations triggered by the Report or the Public Disclosure are ongoing. Articles 3.1 and 3.2 of the Policy on the protection of the identity of Reporting Persons also apply to the protection of the identity of Persons Concerned.

4.5. No Waiver of Rights and Remedies

Any clause or agreement by which rights and remedies provided for in the Policy and in Law 4990/2022 are waived or limited, including an arbitration clause or agreement, is null and void to the extent of such limiting effect.

4.6. Sanctions

Any person who hinders or attempts to hinder reporting, takes or threatens Retaliation, brings vexatious proceedings against the persons referred to in Article 1.3, or breaches the duty of confidentiality under Article 3.1 is subject to disciplinary sanctions in accordance with the Internal Work Regulations, without prejudice to the sanctions under Article 23 of Law 4990/2022. Knowingly making a false Report or Public Disclosure does not enjoy protection under the Policy and entails disciplinary and other legal consequences, in accordance with the same Article.

5. Approval – Amendments – Supervision of Implementation of the Policy

5.1. The Policy was approved by decision of SALFO's Board of Directors dated 21.05.2026; it is amended by subsequent decision of SALFO's Board of Directors and consolidated accordingly.

5.2. The Policy is communicated to SALFO's staff by any appropriate means, under the responsibility of the RRFO, and is published on SALFO's website www.salfo.gr.

5.3. The RRFO is responsible for supervising the implementation of the Policy and for its assessment and annual review, and may propose amendments to reflect any changes in the relevant regulatory framework.

5.4. SALFO notifies the appointment of the RRFO to the Labour Inspectorate and to any other competent authority in accordance with Law 4990/2022.

