

**Code of Conduct Hotline – Whistleblowing System -  
(Whistleblowing)**

**of TRADES ESTATES REIC as a company of the FOURLIS Group**

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**Version:** Second (2nd)/ Date of approval by the Board of Directors of TRADE ESTATES REIC:  
**31/8/2023**

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**Purpose:** The Company as a member of the FOURLIS Group has access to the Whistleblowing System (Whistleblowing) of the Group. The Trade Estates complies with the Directive 2019/1937, issued by the European Parliament REIC and the Council on the protection of persons who report violations of the Union Law, as this Directive has been incorporated into the Greek laws, after its transcription by L.4990/2022 (the “Law”), which became valid and effective as of 11/11/2022.

Under article 10 of L.4990/2022, object of the present Policy shall be the establishment of a system for the internal and external report of violations of the Union law, the protection of the individuals reporting the said violations, the organization of the procedure for filing, receiving and monitoring of the reports and the sanctions imposed in case of violation of this Code.

With respect to the fundamental rights of the freedom of speech and information, the protection of the personal data, the business freedom and the sound administration, the protection of the consumers, the public health and the environment and with the purpose of guaranteeing a high protection standard of persons who report violations of the rights and the laws, the Company establishes the FOURLIS Group’s Whistleblowing System. It constitutes a system with internal reporting channels and reports monitoring processes in relation to violations of the following:

- Product Safety and Compliance;
- Anti-Money Laundering law provisions;
- Environmental Protection;
- Food Safety;
- Public Health Protection;
- Consumers’ Protection;
- Protection of privacy and personal data;
- Rules and provisions of corporate tax laws;
- Public Health Protection;
- Consumer Protection;
- Privacy and Personal Data Protection;
- Rules and provisions of corporate tax laws.

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**Whom it concerns:** According to an explicit provision of the Law, the private bodies employing at the same time fifty (50) or more employees, irrespective of the nature of their tasks and the duration of employment of each one of the employees within the year, shall appoint a Responsible Person for Receiving and Monitoring of Reports (R.R.M.R.) dealing with violations falling under the scope of application of this Code. The term of service of the R.R.M.R. shall last for at least one (1) calendar year, but it may be earlier terminated due to an important cause.

The R.R.M.R. may be either an employee of the private body or a third party, complying with the legislative requirements. In both cases, he/she shall account directly to the Company's Board of Directors.

The R.R.M.R shall be obliged to: a) exercise his/her duties with integrity, impartiality, objectivity, transparency and social responsibility; b) respect and apply the secrecy and confidentiality rules in relation to issues of which he/she became informed upon exercise of his/her duties; c) abstain from the management of specific cases, stating an impediment, provided there occurs a case of conflict of interests.

The R.R.M.R. shall diligently keep the reports archive (log book) and draft the "Information Report" once per year. The Report shall be submitted to the Audit Committee and to the Company's Chief Executive Officer.

The Whistleblowing System applies to reporting individuals who have acquired information regarding violations in respect of issues arising at work and at least to the following persons:

- Co-workers, that is anyone providing paid services, irrespective of whether their employment is full time or part time, permanent or seasonal or they are seconded by another body;
  - Shareholders and persons belonging to the administrative, managerial or supervisory body of an undertaking, including non-executive members, as well as volunteers and paid or non-paid trainees;
  - Any persons working under the supervision and the directions of contractors, subcontractors and suppliers;
  - Reporting individuals, when they report or disclose publicly information about violations, which (information) have been obtained in the framework of an employment relationship, that has thereafter been terminated;
  - Reporting individuals whose employment relationship has not yet commenced, in cases that information about violations have been obtained during the hiring process or at another negotiation stage prior to the conclusion of the employment agreement.

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The Whistleblowing System guarantees the availability of specific protection measures that shall apply to the following persons:

- Mediators;
- Third parties associated with the reporting individuals and who could suffer retaliation within the employment framework, such as colleagues or relatives of the reporting individuals;
- Clients or other third parties, having obtained information about violations from a transaction with a Group's Company.

The protection of the reporting individuals is conditional on their acting in good faith, on the fact that the information they are reporting, is integrated in the purpose of the Whistleblowing System of TRADE ESTATES REIC, and on the fact that they have founded reasons to consider the information that they report true at the time of the reporting. The Company reserves any legal right, in cases of defamation, fraud and acquisition of information by illegal means.

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**Valid Term:** This Policy is valid as of its approval and for an indefinite period of time unless it is revised and / or amended earlier by a resolution of the Board of Directors of TRADE ESTATES REIC.

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**Policy Principles:**

**Clarity and accessibility**

The information provided during the induction training in any company and position within T, are clear and facilitate the parties concerned in the reporting of information via internal reporting channels. Further, in the webpage of TRADE ESTATES REIC [www.trade-estates.com](http://www.trade-estates.com) clear and easily accessible information are provided, such as the Code of Conduct which incorporates the aforementioned.

**Confidentiality**

The Whistleblowing System of TRADE ESTATES REIC ensures that the identity of the reporting individual and of the reported one is not disclosed to anyone else apart from the authorized members of the personnel, which are competent to receive and monitor the reports without the explicit consent of the said person. The same applies also as regards any other information from which the identity of the reporting individual can be assumed, directly or indirectly.

The identity of the reporting individual and of the reported one, as well as any other information mentioned in the previous paragraph may be disclosed only when it constitutes a required and analogous obligation imposed by the union or the national law, in the framework of investigations

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of national authorities or judicial proceedings, among other things, with the purpose of guaranteeing the defense rights of the reported person.

### **Personal Data Protection**

Personal data and any kind of information leading, directly or indirectly, to the identification of the reporting person, shall be disclosed to any other than the authorized members of the personnel, who are responsible to receive, or to monitor the reports, unless the reporting person grants his/her relevant consent. To this end, the company shall take the appropriate technical and organizational measures, such as pseudonymization techniques, during monitoring of the report and the communication with the competent authorities. The identity of the reporting person and any other information may be disclosed only in cases that this is required by the union or national law, in respect of investigations of competent authorities or in respect of judicial proceedings and provided this is necessary in order for the purposes of this Code be served or the defense rights of the reporting person be guaranteed.

Disclosures shall be made after a written information of the reporting person about the reasons for the disclosure of his/her identity and other confidential data, unless the disclosure of this information undermines the investigations or the judicial proceedings. After this information, the reporting person shall be entitled to submit in writing remarks to the authority pursuant to the terms and conditions of the Law. Exceptionally, in case that the presented reasons for the remarks are not considered as adequate, the disclosure of the identity and of the other confidential data of the reporting person shall not be impeded. No further guarantees of the identity of the reporting person and of information from which this identity may be concluded, which are provided by special clauses of the union or national law, shall be affected. The competent authorities, when receiving report of violations including trade secrets shall take care so that they shall not use nor shall they disclose the trade secrets except to the extent required for the proper monitoring.

Any processing of personal data in respect of management of reports, including the exchange or the transmission of personal data from/to the competent authorities, is made in accordance with the regulation (EU) 2016/679 (GDPR), the Directive (EU) 2016/680 and the L.4624/2019. Any exchange or transmission of information by the institutional and other organs or by the organisations of the Union is made in accordance with the regulation (EU) 2018/1725.

Personal Data which are obviously not associated with the handling of a specific report, are not collected or, if collected randomly, are erased without unreasonable delay.

### **Diligence in Record Keeping**

The Whistleblowing System keeps records about each report received, in accordance with the principle of confidentiality. The reports are saved for a period of time, that does not exceed the required and proportional period of time, so that the requirements imposed by the union or national law are met.

When for the submission of a report the call line with conversation recording is used, without prejudice to the consent of the reporting individual, the Company has the right to document the verbal submission of the report by one of the following means:

- by registration of the conversation in a fixed and retrievable form; or
- by a full and accurate transcription of the conversation drafted by the members of the personnel, which are responsible for the handling of the report.

The Company provides the reporting individual with the option to verify, correct and agree with the transcription of the conversation, by signing it.

When a person requests a meeting with R.R.M.R of the Group in order to submit a report, the Company ensures, without prejudice to the consent of the reporting person, that full and accurate minutes of the meeting in a fixed and retrievable form are kept.

The Company has the right to keep minutes of the meeting by one of the following ways:

- By recording of the conversation in a fixed and retrievable form; or
- By keeping accurate minutes of the meeting drafted by the members of the personnel, which are responsible for the handling of the report.

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The Company provides the reporting individual with the option to verify, correct and agree with the transcription of the conversation, by signing it.

### **Protection of reporting and reported persons**

The Whistleblowing System takes the appropriate measures in order to prohibit retaliation of any kind against the reporting persons, including the threats and the attempts of counter-revenge, among other things, retaliation in the following form:

- Termination of employment, dismissal or equivalent measures;
- Degradation or deprivation of promotion;
- Transfer of duties, change of workplace, remuneration reduction, change of the working hours;
- Deprivation of training;
- Negative assessment of performance or negative professional recommendation;
- Imposition or application of discipline, reproach or other disciplinary measure, including monetary penalty;
- Forced labor, intimidation, harassment or marginalization;
- Discrimination, drawback or unfair treatment;
- Non-conversion of a preliminary employment contract into a permanent employment contract, whereas the co-worker has reasonably trusted the offering of a permanent employment;
- Non-renewal or early termination of the preliminary employment contract; damage, including the damage to the reputation, in particular via the social media networks, or financial damage, including professional damage and loss of revenue;

registration in a black-list based on an agreement between departments or on a sectoral official or unofficial agreement, which may mean that the person is not going to find a job position in the department or in the sector in the future;

- early termination or annulment of a contract for goods or services;
- cancellation of license or approval;
- reference for psychiatric or medical checkup;
- rejection or deprivation of provision of reasonable adjustments to individuals with disabilities.

The Whistleblowing System ensures that all aforementioned principles shall apply both for the reporting as well as for the reported persons, who are enjoying the presumption of innocence.

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- The reported persons shall have access to all remedies and appeals and shall enjoy the rights to a fair trial, and especially the right to file an action before an impartial court, as well as the presumption of innocence and the rights to defense, including the right to a fair hearing and the right to access to their file.
- The identity of the reported persons shall be protected throughout the investigations ordered following the report or the public disclosure. Whatever is by law applicable for the protection of the identity of the reported persons shall also apply for the protection of the identity of the reported persons.
- The persons proceeding to the submission of a report shall bear no responsibility:
  - a) in relation to the acquisition of information or to the access to the information reported or disclosed in public, provided that the said acquisition or access does not constitute a criminal offence in its own right. In judicial proceedings, inter alia, in cases of libelous defamation, infringement of intellectual property rights, violation of the confidentiality obligation, violation of the rules for the protection of personal data, disclosure of trade secrets, or in cases of petitions for damages under the civil, public or collective labor law, the reporting persons shall bear absolutely no responsibility arising from reports or public disclosures in accordance with the above provisions, provided they had justified reasons to believe that the report or the public disclosure was required in order for the violation be disclosed;
  - b) in case of a report or a public disclosure of information including trade secrets, in relation to violations falling within the scope of the Law, provided that the report or the publication is considered lawful under the terms and conditions provided in article 1 of L.4605/2019 (A' 52);
  - c) any other possible liability of the reporting persons arising from acts or omissions not related to the report or to the public disclosure, or not required for the disclosure of the violation, shall be governed by the applicable law provisions;
  - d) if the report or the public disclosure constitutes for the reporting person a criminal, disciplinary, administrative violation or tort, any criminal, disciplinary, administrative or civil proceedings initiated against the reporting person in relation to the reported violation shall be suspended until completion of investigation of the reported data. For as long as this suspension lasts, the limitation or

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**Process:**

The Whistleblowing System, keeping the criteria of objectivity and independence, shall appoint as Responsible for Receiving and Monitoring of Reports (R.R.M.R.) the persons mentioned below:

For the company “Trade Estates REIC” c/o Vicky Kastanioti – Group’s Compliance, Internal Controls and ERM Manager.

The reports may be submitted and received via three alternative channels:

- By a written report through dispatch of an e-mail to the e-mail account [codeofconduct@fourlis.com](mailto:codeofconduct@fourlis.com), [compliance@fourlis.gr](mailto:compliance@fourlis.gr); or
  - By a phone report to the telephone number +30 210 6293010; or
  - Via a request for a personal meeting within a reasonable period of time.
  - The request shall be submitted in writing or by a phone call.
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The R.R.M.R shall have the following **responsibilities**:

- a) provide the appropriate information in relation to the option of report submission within the body/organization and communicate the relevant information in a visible place of the body's / organisation's premises;
- b) receive reports in relation to violations falling within the scope of this Code;
- c) confirm the delivery of the report to the reporting person within a deadline of seven (7) business days as of the day of the delivery;
- d) proceed to the required actions, so that the competent organs of the body/organization or the competent agencies in the specific case undertake the responsibility to deal with the specific case or terminate the procedure by archiving the report, provided it is incomprehensible or is abusively submitted or does not contain facts which constitute a violation of the union law or no serious indications of such violation occur and the service of the relevant decision to the reporting person, who, in case he/she considers that his/her case was not effectively dealt with, may resubmit the report to the National Authority for Transparency (NAT), which acts as an external channel;
- e) guarantee the protection of confidentiality of the identity of the reporting person and any third party named in the report, preventing non-authorized persons from obtaining access to it;
- f) monitor the reports and keep contact with the reporting person, and, if required, ask him/her for further information;
- g) provide information to the reporting person about actions undertaken within a reasonable period of time, which exceeds three (3) months from the receipt confirmation note, or in case no confirmation note has been sent to the reporting person, the three (3) months from the end of the seven (7) business days as of the submission of the report;
- h) provide clear and easily accessible information about the procedures under which the reports may be submitted to the National Authority for Transparency, and, on a case-by-case basis, to public bodies, organisations or institutional and other organs or organisations of the European Union; and
- i) prepare and coordinate training actions in relation to the ethics and the integrity, participate in the drawing of internal policies for the enhancement of the integrity and transparency in the body / organization.

In case the R.R.M.R executes other duties as well, it shall be ensured that the exercise of these duties does not affect his/her independence and does not lead to a conflict of interests in relation to his/her duties.

The latter may guarantee the assistance of other persons or services within the Group for the purpose of the most effective management of the reports. The other persons or services shall be bound in any cases by the principles of the Information Reporting System.

The appointment of a R.R.M.R. shall not exclude the direct reporting to the N.A.T., when the reporting person reasonably considers that his/her report cannot be effectively dealt with by the R.R.M.R or there is a retaliation risk.

The R.R.M.R. shall diligently keep the reports archive (log book), and shall draft the "Information Report" once per year. The Report shall be submitted to the Audit Committee and to the Company's Board of Directors.

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**Definitions/ General:**

For the purposes of the Whistleblowing System, the following definitions shall apply:  
«Report»: the verbal or written or electronic provision of information, in relation to violations of this Code.

a)«Internal Report»: the verbal or written or electronic provision of information in relation to violations to the Responsible Person for Receiving and Monitoring of Reports (R.R.M.R.).

b)«External Report»: the verbal or written or electronic provision of information in relation to violations to the National Authority for Transparency (NAT);

«Reported person»: natural person or legal entity which is named in the internal or external report or in the public disclosure as a person to whom the violation is attributed or with whom the person to whom the violation falling within the scope of this Code is attributed, is associated;

«Reporting person»: natural person who proceeds to an internal or external report or to a public disclosure, providing information in relation to violations, which this person has obtained in respect of his/her working activities;

«Retaliation»: any direct or indirect act or omission, which takes place within the working environment, causes or may cause an unreasonable damage to the reporting person, or to place him/her in a disadvantageous position, and is linked to an internal or external report or public disclosure;

«Legitimate Reasons»: the justified belief of a person with similar knowledge, training and experience to the reporting person, that the information available to him/her are true and constitute a violation of the union law, falling within the scope of this Code;

«Public Disclosure»: the direct disposal of information to the public in relation to violations;

«Mediator»: natural person who helps the reporting person in the process of the report within the working framework, the assistance of whom must remain confidential;

«Monitoring measure»: any act executed by the recipient of the report or any competent authority or body, to whom the report is referred on the grounds of competency, with the purpose of evaluation of the accuracy of the arguments that are included in the report, and, possibly, the fighting of the mentioned violation, also via measures such as the internal investigation, enquiry, prosecution, action for the recovery of funds or for termination of proceedings;

«Information»: the provision of information to the reporting persons about the prospected measure to be taken or to have been taken in the framework of the monitoring and for the reasons of the said monitoring;

«Labor framework»: current, past or expected labor activities in the public or private sector, regardless of the nature of the said activities, through which the persons acquire information in relation to violations and in respect of which the said persons could suffer retaliation in case they reported this information;

«Violations»: acts or omissions that are illegal according to the Union Law or are contrary to the object or to the purpose of the Union law provisions falling within the objective scope of this Code;

«Information about violations»: information, including reasonable suspicions, in relation to actual or potential violations, which have been committed or is highly likely to be committed in the organization in which the reporting person works or has worked, or is going to work or is negotiating his/her hiring or in other bodies and organizations to which the reporting person had contact via his/her work or on the occasion of his/her work, as well as information about attempts for concealment of violations.

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