

Gren Group

Whistleblowing Policy (GENERAL TERMS)

1. General provisions

The Whistleblowing policy (hereinafter **Policy**) is designed with the primary objective of establishing a secure and confidential structure, enabling all workers of Gren Group (hereinafter **Company**) to voice their concerns and disclose any information about misconducts that they become aware of.

This Policy is drafted in accordance with the regulatory obligations and recommendations established in the following laws:

- *Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998)*

2. Who can make a report?

This Policy applies to reports made on information acquired by all present and past employees, workers (including agency workers), trainees, interns, volunteers, shareholders, other stakeholders of the Company, individuals belonging to the Company's administrative, management or supervisory body, as well as any persons working under the supervision and direction of contractors, subcontractors, and suppliers (including information obtained in pre-contractual negotiations or the recruitment stage).

3. What can be reported?

Aiming to protect the public interest, information on wrongdoings can be provided in relation to any of the following (the list is non-exhaustive):

- Environmental protection;
- Public procurement;
- Illegal or non-transparent use of public funds or property;
- Violation of legal obligations established within local laws;

Fraudulence, financial impropriety, bribery, and corruption.

- Actions aimed at destroying evidence, hiding the repercussions, and obstructing the determination of the extent of the consequences of the committed wrongdoing;
- Other cases outlined in applicable laws or causing threat to the public interest.

This Policy does not cover concerns related to personal disputes such as bullying, harassment, discrimination, and similar cases, unless the specific concern holds public relevance.

4. Reporting channels

The responsible person for handling and investigating the reports is the Chief Legal Counsel of the Company.

If the whistleblower wishes to provide the information about the wrongdoing internally, it can be done through email at privacy@gren.com or in person to the Chief Legal Counsel.

The Whistleblower has the right to disclose the misconduct by submitting a free format report containing the following details:

- Specific factual circumstances;
- Suspected person of the wrongdoing;
- Whether the wrongdoing was already reported;
- Whistleblower's information (name, surname, personal code or date of birth, contact details).

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. You can contact them on 020 3117 2520 or using this link <https://protect-advice.org.uk/contact-protect-advice-line/>

5. Anonymous reporting

Information about the wrongdoing can also be provided anonymously, without identifying the whistleblower. However, anonymous whistleblowers cannot enjoy the rights and protection established under the whistleblowing laws.

6. Procedure

Upon receiving a report, the Company shall promptly begin an internal investigation to determine the credibility and validity of the raised issues. The investigation shall be performed impartially and may involve conducting interviews with relevant parties and gathering additional evidence.

The Company can conclude the examination in cases where the report is based on clearly false information or when the provided information has already been examined or is currently undergoing examination. The report shall be referred to responsible authorities no later than by fifth working day after receiving it if the Company lacks the authority to handle it. If the report is referred to the responsible authorities, the Company must inform the whistleblower of this.

7. Keeping the whistleblower informed

Upon submitting the report, the whistleblower shall receive confirmation of its receipt within 2 business days. The whistleblower shall receive information about the progress of the submission no later than 10 business days from the confirmation of receiving the report. The above can only be provided if the report was not anonymous or if the whistleblower has not expressly prohibited to send any information about the progress of the submission or unless there is a reason to believe that doing so would endanger the confidentiality of the whistleblower.

8. Guaranteed protection for whistleblower

The whistleblower shall be protected from discrimination or any other negative consequences due to the reports. Protection is guaranteed for whistleblowers who raise allegations of wrongdoing in good faith.

9. Maintaining confidentiality

Any information brought forward by the whistleblower or discovered during the investigation of the wrongdoing shall remain confidential and not disclosed to third parties until the investigation is concluded, except when whistleblowing laws provide otherwise.

10. Keeping record

All reports and associated documents shall be diligently stored by the Company for three years from the date of the last decision made regarding this information. The storage period can be extended upon a reasoned decision from the competent authority.

11. Validity and amendments of the Policy

This Whistleblower Policy shall be effective as of 1st of May 2024 and will be reviewed annually.