

## Whistle Blowing Policy & Procedure

The Cyprus Asset Management Company Ltd (KEDIPE) applies the “Whistle-Blowing Policy & Procedure” (“Policy”) in compliance with the following requirements of the regulatory framework, as these are reflected:

- in The Governance and Management Arrangements of Credit Acquiring Companies and Credit Servicers Directives of 2020 and 2022 of Central Bank of Cyprus, and in the Directive (EU) 2019/1937 of the European Parliament and of the Council "on the protection of persons who report violations of Union law" and
- in the Law on the Protection of Persons Reporting Violations of Union and National Law, no. 6(I)/2022

The purpose of the Policy is:

- the establishment of an objective and impartial framework for the management of whistle-blowing reports/complaints which are submitted to KEDIPE,
- the encouraging of the submission of whistle-blowing reports/complaints by all interested parties, which raise suspicion of serious irregularities and violations of laws, regulations, internal policies and procedures or other criminal acts that came to their attention in the context of their work or relationship with KEDIPE.

Whistle-blowing reports/complaints are made without any promise of payment or the existence of any compensation, and their main objective is to protect the image and property of KEDIPE, its shareholders and customers, from irregular actions of staff members and executives which harm its prestige and reputation.

The Policy applies to all staff and members of the Board of Directors of KEDIPE. The Policy also applies to customers/debtors, persons working under the supervision and instructions of contractors, subcontractors and suppliers, who provide services to the Company or on behalf of the Company.

In particular, the Law establishes a framework for the protection of whistle-blowers who disclose information concerning:

A. Violations of EU law in the following areas:

- public contracts;
- financial services, products and markets and prevention of money laundering and terrorist financing;
- product safety and compliance
- transport safety;
- environmental protection;
- radiation protection and nuclear safety;

- food and feed safety, animal health and welfare;
- public health;
- consumer protection;
- protection of privacy and personal data and security of network and information systems

B. Violations of national law in the following areas:

- acts or omissions related to the commission or possible commission of a criminal offense and in particular corruption offences;
- acts or omissions relating to a person's failure to comply with any legal obligation imposed on him;
- violations that endanger or are likely to endanger the safety or health of any person;
- violations that cause or are likely to cause damage to the environment.

C. Violations affecting the financial interests of the EU.

D. Violations related to the internal market, including violations of EU competition and state aid rules, as well as violations of company tax rules.

The following cases must also be reported, including:

- Acts that harm the purpose and reputation of KEDIPES
- Actions which are in conflict with the interests of KEDIPES
- Violations of KEDIPES' Policies and Procedures that may negatively affect its operation and/or result in administrative or other fines
- Acts that unquestionably violate the rules of ethics and ethics of KEDIPES, as reflected in the Code of Ethics of KEDIPES
- Harassment of any kind (e.g. sexual, racial, religious, gender identity, etc.) as well as abuse of power

but **does not** apply to the following categories of complaints and/or requests:

- Complaints concerning labour relations which are handled in accordance with the provisions of the procedures of the Human Resources Department of KEDIPES.
- Customer Reports/Complaints that fall within the scope of the "Policy for the Management of Customer Reports/Complaints".
- Complaints concerning objections to restructurings and which are submitted to the Dispute Resolution Committee (E.EPI.DI).
- Requests/complaints of customers regarding the exercise of their rights foreseen by the General Data Protection Regulation and which are submitted to the Data Protection Officer (DPO) of KEDIPES for handling.

## Whistle-Blowing reports submission

Whistle-blowing reports/complaints can be submitted through the following channels:

- By sending them to the email address [whistle-blowing@kedipes.com.cy](mailto:whistle-blowing@kedipes.com.cy) by using the "[Whistle-Blowing Report Form](#)"
- By sending the completed "[Whistle-Blowing Report Form](#)" to the following postal address:  
*Cyprus Asset Management Company Limited*  
*8, Grigori Afxentiou, 1096 Nicosia*  
*To: The Whistle-Blowing Committee of KEDIPES*
- by calling the number: +357 22 743080
- at the request of the Reporting Person, the report may also be submitted through a personal meeting with the Secretary of the Committee and with a Member of the Committee.

#### **Notes:**

- In order to facilitate the proper investigation and evaluation of the reported irregularity/violation, whistleblowers are encouraged to provide all available information, including the events that gave rise to the suspicion / concern regarding the report, stating the date and nature of the event, the name(s) of the person(s) involved in the department(s), as well as possible witnesses or other evidence, including documents and locations.
- In the event that the report is submitted by phone, subject to obtaining the complainant consent, KEDIPES reserves the right to document the oral submission of a report in one of the following ways:
  - by recording the conversation in a stable and retrievable format or
  - with complete and accurate minutes in written form.

#### **Collection of Personal Data**

The personal data collected in the context of receiving reports is deleted within three (3) months from the date of completion of the procedure. It is further provided that, in the event that judicial or disciplinary proceedings have been initiated against any person involved in the violation/irregularity, the personal data shall be retained for the duration of said proceedings, including the case of an appeal or objection, and, after one (1) year from their processing, are deleted.

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**It is noted that the above Policy is not a communication channel for the submission of customer requests or complaints which are managed by KEDIPES Complaints Handling Department through the relevant process and based on the current regulatory framework.**