



**WHISTLEBLOWING
PROCEDURE
AT ROMANIAN LEVEL**

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CHAPTER I. GENERAL PROVISIONS

1. PURPOSE AND SCOPE

- 1.1. By raising questions and concerns, Whistleblowers help create an ethical and socially responsible work environment. Speaking up also promotes a culture of free exchange where ideas are shared and deficiencies are quickly identified and addressed.
- 1.2. The following Globalworth whistleblowing procedure (the “**Procedure**”):
 - (a) sets out the process and means by which Workers, business partners and other stakeholders can alert the Company about an issue of serious concern;
 - (b) defines the rules and the eligibility criteria for using the whistleblowing mechanism and explain the process for reporting, investigating and taking follow-up actions/measures; and
 - (c) provides reassurance that genuine concerns may be raised in good faith without fear of reprisals and always with observing the confidentiality legal requirements.
- 1.3. This Procedure does not form part of any Worker’s contract (no matter the form of agreement) and we may amend it at any time.
- 1.4. The directors of the Company have overall responsibility for this Procedure. Management at all levels are responsible for ensuring that Workers under their coordination understand and comply with this Procedure and are given adequate and regular training on it.
- 1.5. The Compliance Officer shall ensure that:
 - (a) each Worker is made aware of the contents of this Procedure;
 - (b) each applicant for employment with the Company, regardless of the basis of employment, is informed at the recruitment or pre-contractual negotiation stage of the opportunity and rules to make Reports; this applies also for terminated (no matter the grounds) employment status.
- 1.6. All Workers must ensure that they read, understand and comply with this Procedure.

2. DEFINITIONS

The following terms shall have the following meanings:

- (a) **Breach** – any act or omission contrary to or intended to circumvent the applicable EU or Romanian law, as provided in the national Whistleblowing Law or Globalworth group’s values and principles as set out in its group policies and local procedures (including this Procedure and the Code of Conduct);
- (b) **Compliance Officer** – a person/department with responsibility for compliance risk management at the Company;
- (c) **Workers** – any person who is employed by or works or acts for the Company, at all levels and grades, including employees, agency staff, trainees, volunteers, representatives, seconded staff, casual workers etc.;
- (d) **Company** – the Romanian company, controlled directly or indirectly by Globalworth Real Estate Investments Limited; Where Globalworth group is mentioned, this Procedure shall refer to Globalworth Real Estate Investments Limited and/or, where appropriate, any and all of its subsidiaries and/or affiliated entities;
- (e) **Head of Human Resources** – means the head of human resources of the Company;
- (f) **Head of Legal** – means the head of the legal department of the Company;
- (g) **Whistleblower** – the eligible person (Workers, business partners and other stakeholders as mentioned in this Procedure) making the Report;
- (h) **Whistleblowing Law** – the Law no.361/2022 on the protection of whistleblowers;
- (i) **Report** – oral or written information of a Breach or suspected Breach that has occurred or is likely to occur at the Company, including attempts to conceal such a Breach.

CHAPTER II. REPORTING RULES

3. WHO CAN FILE A REPORT?

- 3.1. A Report may be submitted by:
- (a) any Worker;
 - (b) a business partner of the Company;
 - (c) a candidate for employment with the Company, only to the extent to which any reported information was obtained as part of pre-relationship negotiations, e.g. during the recruitment and selection of potential employees;
 - (d) a former Worker of the Company;
 - (e) any other person entitled to submit a Report in accordance with the applicable law who acquired information about a Breach in their professional-related interactions with the Company.

4. WHAT MAY BE REPORTED?

- 4.1. The subject matter of the Report may be any Breach relating to:
- (a) a criminal offence or misdemeanours;
 - (b) a serious threat or harm to the public interest;
 - (c) bribery and corruption;
 - (d) money laundering and financing of terrorism;
 - (e) bullying, harassment, discrimination or substance abuse;
 - (f) danger to health and safety;
 - (g) breach of human rights or acts of modern slavery;
 - (h) conflicts of interest;
 - (i) unauthorised disclosure of confidential information;
 - (j) violation of privacy and data protection;
 - (k) damage to the environment;
 - (l) conduct likely to damage our reputation or financial wellbeing;
 - (m) financial fraud;
 - (n) attempts to conceal, or assist others, in any of the above;
 - (o) violations of other legal obligations.
- 4.2. The whistleblowing mechanism is not the appropriate service through which to raise an individual grievance by a Worker, which should be directed to the Whistleblower's direct manager or the Head of Human Resources.
- 4.3. A concern will not be eligible if it is untruthful and was filed fraudulently or in bad faith or for a frivolous or malicious purpose. Moreover, if the whistleblowing mechanism has been used in this way, a disciplinary process and legal proceedings may be initiated against the individual raising a concern.
- 4.4. Any matters relating to occupational health and safety should be reported in accordance with the procedures defined in the Company's internal regulations, unless the issue in question is serious and there exists reasonable doubt as to the advisability of reporting it through the standard channels.
- 4.5. This document also does not apply to any product or service-related complaints or complaints about unsatisfactory quality.
- 4.6. If there is doubt as to whether a suspicion should be reported, it is advisable to discuss the matter with a superior or another person in a management position who can be trusted and is not involved in the matter in any way.
- 4.7. It is important not to share any information about possible suspicions with anyone involved in the matter or any third party other than the person from whom confidential advice is sought.

5. REPORTING CHANNELS

- 5.1. A Whistleblower may make a Report:
 - (a) by sending an e-mail to:
whistleblowing@globalworth.com, or
 - (b) by contacting the Compliance Officer directly.
- 5.2. If the Report concerns the Compliance Officer or the directors of the Company, the Report should be made to the General Counsel & Company Secretary of Globalworth group (nicola.marrin@globalworth.com).

6. ANONYMOUS REPORTS

- 6.1. In submitting a Report, the Whistleblower does not have to disclose his or her identity.
- 6.2. If an anonymous Report is made, the Company will not take any action that will seek to establish the identity of the Whistleblower, unless the Whistleblower decides to disclose their identity themselves, or it is required under the law.
- 6.3. Unidentified or anonymous allegations may be disregarded as may allegations where insufficient information is provided to allow proper investigation to be undertaken. This is because a proper investigation may be more difficult or impossible if we cannot obtain further information from the Whistleblower. It is also more difficult to establish whether any allegations are credible. We will also be unable to provide the Whistleblower with any feedback. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Compliance Officer and appropriate measures can then be taken to preserve confidentiality.

7. RECEIPT OF REPORT

- 7.1. The person authorized by the Company to receive and review Reports and to take follow-up action is the Compliance Officer.
- 7.2. Regardless of which reporting channel has been selected, within 7 (seven) days from the date of the submission of the Report, the Compliance Officer will confirm to the Whistleblower the acceptance of the Report.
- 7.3. The Compliance Officer may contact the Whistleblower for further information about the Breach.
- 7.4. Regardless of the manner and form in which the Report was made, the Whistleblower should include as much information as possible in the Report, in particular:
 - (a) full name and contact information of the person raising a concern;
 - (b) full name of the individual(s) and/or organization about whom a concern is raised, if known;
 - (c) the professional context in which the information was obtained;
 - (d) a description of the facts which the whistleblower believes constitute a breach or potential breach;
 - (e) any relevant documents/proof related to the concern being raised;
 - (f) other mandatory details according to the national whistleblowing legislation.

CHAPTER III. HANDLING OF THE REPORT

8. FOLLOW-UP ACTIONS

- 8.1. Once a Report has been accepted, the Compliance Officer takes follow-up action. The purpose of these actions is to assess the information contained in the Report in an unbiased, fair and objective manner and to prevent the Breach that is the subject of the Report.
- 8.2. Follow-up actions may include in particular:
 - (a) carrying out an internal investigation;
 - (b) taking measures to recover funds;
 - (c) taking measures to prevent further breaches.
- 8.3. The follow-up actions shall be documented.

- 8.4. In taking follow-up action, the Compliance Officer may use:
- (a) the knowledge of other Workers, in particular on the procedures and practices in force;
 - (b) the assistance of external consultants.
- 8.5. Before proceeding, unless already bound by a duty of confidentiality, each of the persons indicated in paragraph 8.4 is required to sign a declaration of confidentiality of any information related to the Whistleblower and the Report.

9. FEEDBACK

- 9.1. Within 3 months of the date of confirmation of acceptance of the Report, the Compliance Officer will provide feedback to the Whistleblower.
- 9.2. Feedback shall include, inter alia, the following information:
- (a) whether or not a Breach has been established;
 - (b) the follow-up action(s) planned or taken and the reasons for such action(s);
 - (c) the measures, if any, that have been or will be taken in response to the Breach identified.
- 9.3. Feedback shall observe the personal data protection and confidentiality requirements in accordance with the applicable legislation.

10. REGISTER OF REPORTS

- 10.1. The Compliance Officer maintains a register of Reports. The data in the register is confidential and only the Compliance Officer has access to the register.
- 10.2. Personal data and other information in the register shall be kept for a period of 3 years after the end of the calendar year in which the follow-up action was completed or the proceedings initiated by that action are completed.
- 10.3. Compliance Officer for each calendar year submits a report to the General Counsel & Company Secretary of Globalworth group containing statistical data on Reports received and managed by the Company. The report shall be anonymized.

11. EXTERNAL REPORTS

- 11.1. The Company encourages a person with information about a Breach to first make a Report through the internal reporting channels provided. However, regardless of the possibility to make an internal report, a person with knowledge of a Breach may make a Report to the National Agency of Integrity.
- 11.2. The Company protects all Whistleblowers, regardless of whether they have made an internal or external notification.

12. FALSE REPORTS

- 12.1. Status as a Whistleblower shall not be granted to a person who intentionally and knowingly provides false information to the Company, which in particular has the characteristics of intentional defamation.
- 12.2. The Company reserves the right to assert liability, including disciplinary liability, against any person who has made a false report.

CHAPTER IV. PROTECTION OF THE WHISTLEBLOWER, CONFIDENTIALITY, PERSONAL DATA

13. PROTECTION OF THE WHISTLEBLOWER

- 13.1. The Company will not tolerate any form of reprisal or retaliation against the Whistleblower who reports, in good faith, a potential or actual Breach.
- 13.2. Individuals who do not respect these provisions of non-retaliation or reveal the identity of the individual raising a concern will be subject to disciplinary action and, where appropriate, information passed to the relevant law enforcement authorities.

14. CONFIDENTIALITY

- 14.1. The identity of the Whistleblower shall be kept confidential, and the Company shall protect any information that could indirectly or directly reveal this identity. Disclosure of the Whistleblower's identity may take place only with the Whistleblower's express consent, expressed in writing or by e-mail (electronic) or if required under the law.

15. PERSONAL DATA

- 15.1. The Company is a controller of the personal data it received in connection with the Report. the Company processes personal data 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 flow of such data and repealing Directive 95/46/EC.
- 15.2. The Company shall process only those personal data that are relevant to the processing of the Report. Any personal data that is clearly not relevant to the processing of a Report shall not be processed and, if accidentally collected, shall be deleted without any delay.

CHAPTER V. FINAL PROVISIONS

16. GOVERNANCE AND ENTRY INTO FORCE

- 16.1. The content of this Procedure is based on the provisions of the Whistleblowing Law and the provisions of Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers of European Union law and is supplemented accordingly by the national legislation, including the Whistleblowing Law. In case of any discrepancy between the provisions of this procedure and the mandatory provisions of any applicable law, the later will prevail.
- 16.2. The Procedure shall enter into force as of 19.12.2024.
- 16.3. This Procedure replaces all documents governing the Company's acceptance and verification of Reports and taking follow-up actions.