



**WHISTLEBLOWING POLICY**  
**FREQUENTLY ASKED QUESTIONS**

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**1. What is whistleblowing?**

Whistleblowing is the act of exposing information by a person who has concerns, suspicions or is aware of activities within the company deemed illegal or unethical (wrongdoings).

**2. What is wrongdoing?**

Actions that may result in danger to the health and/or safety of people or damage to the environment, breach of a legal requirement, criminal activity, misuse of company assets, financial malpractice, impropriety or fraud, offering or accepting a bribe, conflicts of interest, breach of TOSOH Group Code of Conduct, inappropriate behavior (e.g. intimidation, harassment, abuse of power etc.), concealment of any of the above (these are not exclusive, other actions may also apply).

**3. Can I file a disclosure report?**

You can file a report in case you have concerns, suspicions or you are aware of a wrongdoing within the company and you are an employee of the company (full time or part-time, temporary or permanent, active or retired), a contractor or a sub-contractor, an external supplier or consultant, a job applicant.

**4. Is there any related document that I can use to report?**

Yes. There is the document titled "WHISTLEBLOWER REPORT FORM" which you can fill out in order to be facilitated in filing a report.

**5. To whom?**

To the disclosure manager Mr. Georgios Chatzigiannakis, an external legal advisor (lawyer).

**6. How?**

Reports should be conducted via e-mail at [Tosohreport@nomos.gr](mailto:Tosohreport@nomos.gr) or via phone at 6940914342. The possibility to lodge a written report by mail to the following address exists: Georgios Chatzigiannakis, Disclosure Manager, 1 Valaoritou Street, 54626 Thessaloniki, Greece. It is also possible to arrange an in-person reporting with the disclosure manager by arranging a personal meeting outside your working hours in a place agreed by the parties (please use the above contact details).

**7. What shall be the content of my report?**

In order to facilitate the investigation and proper assessment of the case disclosure may include the facts giving rise to suspicion/concern with reference to names, dates, documents and locations.



**8. Will my identity be protected**

Yes. Your anonymity will be protected and no actions, which may reveal your identity, will be taken. It is noted that the revelation of your identity may be required by a court or legal procedure in the framework of the investigation of the case. The maintenance and processing of personal data is carried out in accordance with the applicable legislation on the protection of personal data and TOSOH GDPR policy.

**9. Can I file an anonymous report?**

Yes. Anonymous reports will be taken seriously and investigated as fully as possible, however, anonymous reports cannot be dealt with as effectively as open disclosures since they are often more difficult to investigate.

**10. Am I safe from detrimental treatment by the company?**

Yes. Should you feel that you have been subjected to any retaliation by the company, your supervisors or co-workers as a result of raising a concern under the whistleblowing policy you should notify the disclosure manager immediately.

**11. What will happen once I file my report?**

The disclosure manager will acknowledge receipt of your report within seven days. Once report has been filed, the disclosure manager will check if the disclosure is substantiated and within the scope of the whistleblowing policy. If the report passes the above test the disclosure manager will inform the Whistleblowing Committee. The committee will investigate, assess the report and take all necessary steps.

**12. Will I be informed about the outcome of my report?**

The disclosure manager will inform you within 3 months from the receipt of your report as to the progress of the Investigation, as far as possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply.

**13. What if the committee decides that my report was unfounded?**

A disciplinary procedure may be invoked against you ONLY if you have intentionally misled the committee in respect of any matter or in case you have lodged a false allegation maliciously.

**14. What if I have any further questions?**

Please do not hesitate to contact the disclosure manager and ask for clarifications. Confidentiality applies.

**TOSOH HELLAS AIC encourages the reporting of genuine concerns or suspicions concerning wrongdoings!**