

WHISTLEBLOWER POLICY

I. Objective of this policy and the rules herein is protecting employees of **TREMOL SMD LTD**, who report information about activities, believed to be illegal, dishonest, unethical or otherwise improper, to the company or to a competent authority but related to the company. No rules in this policy should prevent employee from notifying a competent authority, where this is necessary.

II. Scope of this policy and the rules herein include receipt, retention and treatment of whistleblowing regarding company activities, believed to be illegal, dishonest, unethical or otherwise improper. They apply to all employees of **TREMOL SMD LTD**, who are protected under its rules insofar as the subject matter of complaint is not the result of conduct by the individual seeking protection, unless it as a conduct required by an order of the employer.

III. Whistleblower protection is provided in two important aspects: protection from retaliation and confidentiality, which shall be understood as follows:

- a) *protection from retaliation* shall be understood as the organization shall not retaliate against whistleblowers, which includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, terms, conditions, location and privileges of employment, poor work assignments and threats of physical harm.
- b) *confidentiality* shall mean that, insofar as possible, the identity and/or the nature of complaint of the whistleblower shall be maintained secret. Information pertaining identity of a whistleblower and/or nature of the complaint may be disclosed to parties authorized to carry out internal investigation, due to compliance with statutory requirements and in order to not deprive accused individuals of their rights of defense.

Note 1: The abovementioned protection does not include legal immunity for any personal illegal activity, alleged or proven in due process, perpetrated by the whistleblower.

IV. Reportable conduct shall be understood as the following (list not exhaustive):

- unlawful, unethical or corrupt actions;
- actions, which are in breach of any company policy;
- misuse of company funds and assets;
- abuse of authority;
- extending undue favor to a third party;
- misuse of position within the company to gain favor from a third party;
- criminal acts, including theft, the sale and use of drugs, money laundering, violence and threatened violence and damage against property;
- detrimental actions taken in reprisal against a whistleblower;
- any other action, which may result in injuries or loss of human life, financial or non-financial loss to the company and damage to its reputation.

V. Procedure under this policy mandates that if an employee has any knowledge about occurrence of any acts such as the ones described above, they must contact their respective Department Manager or the HR Manager, who report to the Executive Director.

Note 2: Regarding internal investigations, the whistleblower is not responsible to investigate the reported conduct, for determining fault or corrective measures. Appropriate management officials are charged with such duties by order of the Executive Director.

28.02.2025
Veliko Tarnovo

General Manager:.....

/Mr. Petar Kolev/

