WHISTLEBLOWING POLICY

TERNA ENERGY ASSET MANAGEMENT S.A.

1. PURPOSE AND SCOPE

1.1 PURPOSE

The purpose of this Policy is to set forth the basic principles followed by the Company in handling reports on matters related to the Code of Conduct, such as incidents of fraud, corruption and bribery, violations of competition law, insider trading, violations of foreign trade controls, intentional breaches of information security, and discrimination and harassment in the workplace. This document has been developed to comply with Directive (EU) 2019/1937 and the applicable national legislation transposing it (e.g., Law 4990/2022), Law 4808/2021 on workplace violence and harassment issues, and the Company's applicable standards (ISO 37001 & ISO 37301).

1.2 SCOPE

The entire Company, as well as its subsidiaries.

2. PARTIES INVOLVED – RESPONSIBILITIES

The Compliance Officer:

- **Is designated as the Person Responsible for the Receipt and Follow-up the Reports (P.R.R.F.R.).**
- Adheres to the prescribed deadlines for communicating with the whistle-blower, as provided for in the relevant legislation.
- Evaluates and investigates all employee reports or concerns.
- Ensures the confidentiality of the whistle-blower and all individuals involved.
- Provides information on communication channels both within and outside the Company.
- In collaboration with the Board of Directors, takes appropriate corrective actions in response to reported incidents.
- Issues an annual report detailing the reports that were evaluated and addressed during the reporting year.
- Plans and coordinates staff awareness and training initiatives to foster a culture of compliance and transparency within the Company.
- Records the report in a special file that it keeps in digital format in accordance with the provisions of Chapter VI of Law 4990/2022 on the obligation of confidentiality, etc.
- Provides the whistle-blower, upon submission of the report and upon request, with all necessary information regarding their rights and the established procedure for handling reports.

3. DEFINITIONS – ABBREVIATIONS

Report: means the provision of information, verbally or in writing or via an electronic platform, regarding violations within the framework of this Policy and relevant legislation.

Whistle-blower: means a natural person who makes an internal or external report or a public disclosure, providing information regarding violations that he or she became aware of in the course of his or her work.

Reported Party: means the natural or legal person, who is named in an internal or external report or in a public disclosure as the person to whom the violation is attributed or who is associated with the person to whom the violation is attributed, and who falls within the scope of this Policy and the relevant legislation.

Retaliation: means any direct or indirect act or omission, which occurs within the work context, causes or is likely to cause undue harm to the whistle-blower, or to place him or her at a disadvantage, and is related to an internal or external report or public disclosure.

Pseudo-anonymisation: This is the process by which the whistle-blower's personal information (name, email, position, phone number, etc.) is removed or replaced, without losing the ability for the P.R.R.F.R. to re-identify the whistle-blower should it be necessary in the future.

4. REFERENCES

COCS-SOP 010 Reporting Procedure.

5. POLICY DEVELOPMENT

5.1 Basic principles

The Company undertakes:

- To encourage every employee, partner, supplier, or customer to report to TERNA ENERGY ASSET MANAGEMENT S.A. any suspicions or concerns regarding incidents of fraud, corruption, bribery, workplace harassment, and, more generally, violations of the Company's Code of Conduct and the relevant European and national legislation covered by the scope of this Policy, which come to their attention.
- To implement the relevant national and European legislation on the issue of petitions.
- To create a corporate culture where every employee, partner, supplier or customer feels free to express their concerns.
- To provide communication channels that are independent, impartial and protect the identity and personal data of the individuals involved.

- To enhance the transparency and reliability of the process used to receive, investigate, and evaluate reports.
- To entrust independent bodies, such as the Compliance Officer, with the task of receiving and evaluating reports.
- To protect the confidentiality of the identities of the individuals involved (whistle-blowers, those being reported, witnesses, etc.) and their personal data, by preventing access by unauthorised individuals.
- To protect the whistle-blower and all individuals involved from retaliation.
- To evaluate reports by taking into account all available evidence and information.
- To ensure that reporting is conducted in the public interest, in the interest of the Company and its shareholders, and in compliance with the applicable regulatory framework.
- Respond to reports as promptly as possible, in compliance with the deadlines set forth in applicable law.

5.2 When is a report submitted?

An employee, partner, or customer should report an incident or raise a concern when:

- They act in the public interest or the interest of the Company
- They are acting with the intent to disclose past, present, or potential irregularities that fall, for example, into one of the following categories:
    - Criminal offenses including financial fraud, bribery, corruption, etc.
    - Failure to comply with obligations set forth in the Company's regulatory framework
    - Non-compliance related to the work environment
    - Non-compliance with information security and personal data protection requirements
    - Non-compliance with competition and state aid regulations
    - Noncompliance with tax laws
    - Money laundering
    - Non-compliance with financial penalties and during commercial or customs inspections
    - Non-compliance with the European Union's financial interests
    - Failure to fulfil contractual obligations
    - Judicial errors
    - Risk to the health and safety of a person
    - Negative impacts on public health
    - Negative impacts on the Company's resources and assets
    - Harassment and violence in the workplace
    - Negative impacts on the environment

- Negative impacts on the local community
- Acts of retaliation
- Covering up the above deviations

The Policy covers all cases as described in detail in the relevant European and applicable Greek legislation.

It should be noted that the scope of these reports does not include: (i) disagreements regarding matters related to the Group's management policies and decisions, (ii) personal matters and disagreements with colleagues or supervisors, (iii) rumours.

At the time the report is submitted, the whistle-blower must have "reasonable grounds", that is, a justified belief that the information regarding the alleged violations was true. They do not need to have assessed whether the conduct they wish to report constitutes a specific criminal offense. The decisive criterion should be whether, in their reasonable belief, the information at their disposal points to one or more violations.

5.3 Communication channels

Any employee, partner, supplier or customer may report or raise concerns regarding issues related to the implementation of the Code of Conduct and this Policy through the following communication channels:

- Send an anonymous or signed letter to the Person Responsible for the Receipt and Follow-up of Reports (P.R.R.F.R.) at the following address: "TERNA ENERGY ASSET MANAGEMENT S.A., 85 Mesogeion Avenue, 115 26, Athens, "marked 'Confidential'"
- Send an email to compliance@gekterna.com
- through the anonymised reporting platform https://gekterna.integrityline.com/frontpage.
- Verbally, following a meeting with the P.R.R.F.R.

The P.R.R.F.R. notifies the whistle-blower of the receipt of the complaint within seven (7) business days of the date of receipt and immediately begins its investigation.

The P.R.R.F.R. provides the necessary information regarding the options for submitting reports or clarifications both within and outside the Company.

In any case, the whistle-blower may contact the public authorities (e.g., the National Transparency Authority, the Labour Inspectorate, etc.) if they wish to report their concern.

5.4 Investigation of a Report

The investigation of the report should be conducted by an independent body to ensure transparency and avoid conflicts of interest.

The Company has designated the Compliance Officer as the competent body for evaluating reports and recommending to the Board of Directors any additional actions that may be required. The above bodies are independent, and both report directly to the Board of Directors.

In the case of a named report, the identity of the whistle-blower is concealed through pseudonymisation by the P.R.R.F.R. before the report is forwarded or disclosed to any other parties.

The results of the investigation, as well as the recommended actions, are presented directly to the Board of Directors.

If the evidence submitted indicates that a criminal offense subject to ex officio prosecution has been committed, the P.R.R.F.R. shall immediately forward a copy of the Report to the competent local prosecutor and notify the whistle-blower. If the report in question falls under the provisions of Article 5.2 of this document, the P.R.R.F.R. monitors the report.

Based on its assessment of the non-compliance, the Company takes all legal actions provided for by the applicable regulatory framework and the Work Regulations, such as termination of the business relationship, imposition of a fine or penalty clause, initiation of civil and criminal proceedings, etc.

The P.R.R.F.R. maintains contact with the whistle-blower and, if necessary, requests further information and/or details from that person.

In addition, the P.R.R.F.R. shall inform the whistle-blower of the progress of the investigation within a reasonable period of time, and in any case no later than three (3) months after the expiration of the seven (7) business days following the date the complaint was filed.

If the evidence submitted shows that the report is completely unreasonable or vague, or does not fall under the cases specified in Article 5. 2 of this Act, or if there is no substantial evidence of violations falling within the scope of Article 5.2 of this Act, the P.R.R.F.R. shall close the case by means of a decision that is communicated to the whistle-blower, if possible.

5.5 Protection of Personal Data and Anonymity

In any case, the Company is committed to respecting the personal data and anonymity of both the whistle-blower and the person being reported. For this reason, it implements appropriate measures to ensure that no information is disclosed that could lead to the identification of the whistle-blower to anyone other than those authorised by the Company. The identity of the whistle-blower may be disclosed only with that person's consent, or if required by applicable law, or for the purposes of an investigation by public or judicial authorities. If disclosure of the whistle-blower's identity is required, the whistle-blower must first be notified in writing of the reasons for disclosing his or her identity and other confidential information, unless such notification would undermine investigations or judicial proceedings.

With regard to the processing of personal data, the Company follows the policies and procedures it has established regarding personal data and information security, subject to the restrictions provided for in applicable data protection laws.

To protect personal data, the Company implements all necessary organisational and technical measures.

Access to the personal information of the reported individual, the reporting individual, and any witnesses is restricted exclusively to the Company's Compliance Officer and the Group's Compliance Unit.

5.6 Protection Against Retaliation

The Company ensures that the identity of the whistle-blower is protected, in accordance with the provisions set forth above, and that the whistle-blower is not subject to retaliation, such as suspension, termination, intimidation, marginalisation, harassment, etc.

In addition, the same level of protection against retaliation applies to other interested parties, such as:

- Colleagues and relatives of the whistle-blower
- The whistle-blower's clients or service recipients
- Staff involved in investigating reports

5.7 Training and awareness-raising for staff

In an effort to raise awareness among its staff and emphasise the importance of the reporting channel, the Company has incorporated relevant training for all employees into its training program.

In addition, it makes all relevant policies and procedures available on a shared website so that all employees can access them remotely.

5.8 Informing other Agencies/Organisations

If the complainant is not justifiably satisfied with the scope of the investigation or the measures taken based on the investigation's findings, they are free to submit a report to the chair of the independent members of the Board of Directors or to the public authorities. The P.R.R.F.R. is responsible for informing them about alternative means of communication outside the Company. The following are examples of contact information for external agencies/ organisations:

National Transparency Authority:

- By email to kataggelies@aead.gr
- By submitting an online report on the platform: https://aead.gr/submit-complaint/

- By sending a letter to the following address: 195 Lenorman & Amfiaraou, 104 42 Athens

For more information, please visit the following link: https://aead.gr/contact

Specifically, when a complaint is received that includes allegations against the P.R.R.F.R., the P.R.R.F.R. enters the complaint into the special digital database it maintains and forwards the complaint to the National Transparency Authority, while notifying the complainant.

Labour Inspectorate:

- Through the 1555 single citizen service hotline.
- Through the online service for submitting anonymous complaints
- By visiting or calling the relevant Inspection Department.
- By sending an email to the Workplace Inspection Department.

For more information, please visit the following link: https://www.hli.gov.gr/ergasiakes-scheseis/ergazomenoi-ergasiakes-scheseis/katangelia2/katangelia-2/

Ombudsman:

By submitting an online report on the platform https://www.synigoros.gr/el/anafora/ipovoli-anaforas

For more information, please visit the following link:
https://www.synigoros.gr/el/anafora/ipovoli-anaforas

6. RECORD KEEPING

The Company maintains the relevant complaint records in accordance with the provisions of the applicable legal framework and at least until a final decision is issued by the judicial authorities in the event that legal proceedings are initiated.