

**VT DZU**

**VIDEOTON Bulgarian Holdings**

**VEAS Bulgaria**

**VT Bulplast**

**INTERNAL WHISTLEBLOWING POLICY**

**TECHNOLOGY**

**STABILITY**

**SUSTAINABILITY**

**DYNAMISM**

Posted by:

VIDEOTON Bulgaria

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Stara Zagora

## 1. GENERAL PROVISIONS

The scope of this Whistleblowing Policy covers all organizational units of the companies of the VIDEOTON Bulgaria: VT DZU AD; VEAS Bulgaria Ltd, VT Bulplast Ltd and VIDEOTON Bulgarian Holdings Ltd.

The purpose of the Whistleblowing Policy of the VIDEOTON Bulgaria is to establish a procedure and communication channels to enable the reporting and investigation of illegal or suspected illegal acts and omissions or other types of violations. In addition, the purpose of the Whistleblowing Policy is to establish those internal rules that, on the one hand, ensure compliance with the relevant laws and regulations and, on the other hand, can strengthen the ethical corporate culture, the control environment of VIDEOTON Bulgaria and the effectiveness of the functioning of the control mechanisms, and that can assist in the detection of irregularities and improve the external and internal image of VIDEOTON Bulgaria by demonstrating their commitment to ethical activity.

This Whistleblowing Policy applies to both the whistleblower and the person whose conduct or inaction gave rise to the whistleblower, the person who may have material information concerning the subject matter of the whistleblower, the person who may be identified by the information recorded in the whistleblower's report, the personnel receiving the report, the investigators, the employees who are absolutely necessary to conduct the investigation, and all persons who have accepted the provisions of this Whistleblowing Policy

Within the framework of the internal whistleblowing system, a whistleblower can be filed by any employee of the VIDEOTON Bulgaria companies, including those whose employment relationship with a group company has been terminated or those who wish to establish an employment relationship with a group company, provided that the procedure for establishing this relationship is ongoing. In addition, in the whistleblowing system, a report may be submitted by:

- ✓ a trading company or sole trader if employed under contract by a group company;
- ✓ any person who holds a shareholding in a group company and persons belonging to the administrative, management or supervisory body of a group company, including non-executive members;
- ✓ all persons working under the supervision and direction of contractors, subcontractors and suppliers, provided that the procedure for entering into a contract with a group company is ongoing or that they have previously been engaged under a contract with a group company;
- ✓ trainees and volunteers in a group company;
- ✓ any person who wishes to establish an employment or contractual relationship with a group company, provided that the procedure for establishing such employment or contractual relationship is ongoing;
- ✓ any person whose employment or contractual relationship with a group company under the preceding paragraphs has ended.

## 2. SIGNALING

### Channels for reporting

The report may be made in written or oral form.

The following communication channels are available for reporting:

#### ✓ **By post**

The written signal can be put in the form of a letter to be sent to the Ethics Committee of VDEOTON Bulgaria at the management address (VT DZU AD, 10 Nikola Petkov Blvd. № 10, 6009 Stara Zagora, Bulgaria). It is recommended that the envelope be marked "CONFIDENTIAL" or "SIGNAL OF IMPROPERITY".

#### ✓ **Electronically**

The written alert can be submitted in the form of an e-mail to be sent to the following address: law@dzu.bg. It is recommended that the subject of the e-mail be marked as "CONFIDENTIAL". The Ethics Committee also investigates reports received at other e-mail addresses, but in this case cannot guarantee that the content of the report will be seen only by the persons designated to investigate the report.

#### ✓ **In person**

The oral report can be made at the address of the management (VT DZU AD, 10 Nikola Petkov Blvd., 6009 Stara Zagora, Bulgaria), with the Head of Human Resources, after prior registration. Such an appointment can be arranged by calling the following telephone number: +359 42 697 105.

When submitting an alert, the person making the alert must provide their name, address and contact information. In the case of a legal person, the registered office, name and contact details of the representative making the alert shall be provided. In both cases, a declaration shall also be made that the alert is made in good faith concerning circumstances known to the whistleblower or which the whistleblower has reasonable grounds to believe are true.

### Oral report

The oral signal may be made in person as defined above.

In the case of a report made in person, the designated officer shall put the oral report in writing. In addition to providing an opportunity for verification, correction and acceptance by signature, he/she shall transmit it to the sender in duplicate.

A complete and accurate recording shall be made during the recording of the oral signal.

In the case of an oral report, the whistleblower's attention is drawn to the consequences of reporting in bad faith, to the procedural rules governing the investigation of the report and to the fact that his or her identity will be treated as confidential at all stages of the investigation.

The consequences of poor reporting are as follows:

If it is established beyond reasonable doubt that the whistleblower has provided false data or information in bad faith, and

(a) it gives reason to believe that a criminal offence or infringement has been committed, the personal data of that person shall be transmitted to the authority or person entitled to conduct the proceedings;

(b) where the whistleblower is likely to have caused unlawful harm or other damage to the rights of others, his or her personal data shall be transmitted on request to the authority or person entitled to initiate or conduct proceedings.

## Written signal

The written alert may be sent by mail or by electronic message as defined above.

Within seven days of receipt of the written alert by post or electronic means, the sender of the alert will receive an acknowledgement of receipt of the report. As part of the acknowledgement, the whistleblower will be provided with general information on the applicable procedural and data management rules.

## Failure to investigate an alert

Alert investigators may consider investigating the report, which could result in the report being missed if:

(a) the alert has been submitted by a person who cannot be identified (e.g. anonymously or under an alias);  
(b) the whistleblowing is made by a person other than the person authorized under this Whistleblowing Policy;

(c) the alert made is identical to a previous alert made by the same person; and/or

(d) the harm to the public interest or to a compelling private interest would not be proportionate to the restriction of the rights of the natural or legal person involved in the report as a result of the investigation of the alert.

The persons investigating the alert will inform the person making the alert in writing of the omission to investigate the alert and the reason for the omission (if the alert is not anonymous).

## 3. INVESTIGATION OF ALERTS

### Ethics Committee

In order to ensure impartiality and independence, an Ethics Committee composed of: Human Resources Manager at VT DZU AD, the Legal Counsel at VT DZU AD and the Data Protection Officer of the companies of VIDEOTON Bulgaria shall be appointed to examine and investigate the given report.

The Human Resources Manager shall forward the report to the members of the Ethics Committee in such a way as to ensure the security of the data at the time of transmission.

### Whistleblowing investigation procedure, deadlines

The Ethics Committee conducts investigations related to the reports. The personal data of the whistleblower and of the person involved in the whistleblowing shall not be accessible to anyone other than those authorized to do so. At the beginning of the investigation, the person concerned by the report shall be informed in detail about the report, his or her rights in relation to the protection of his or her personal data and the applicable rules for handling his or her data. In exceptional and justified cases, the person concerned by the report may be informed at a later date if immediate information would frustrate the investigation of the report.

The members of the Ethics Committee are required to keep confidential information regarding the contents of the report and the individuals involved until the investigation is completed or until formal reporting begins as a result of the investigation and may not share it

- with the exception of informing the person involved in the report
- with any other organizational unit or employee of a company of Videoton Bulgaria, except in the cases specified by law.

During the investigation, the Ethics Committee may interview witnesses and request evidence (e.g. correspondence, contracts, other documents, etc.) from any employee of the VDEOTON Bulgaria companies.

The Ethics Committee shall study the contents of the report as soon as possible, but not more than thirty (30) days from the date of receipt of the report. This time limit may be extended on duly substantiated grounds, which shall be notified to the whistleblower at the same time. In this case, the whistleblower shall be informed of the expected duration of the investigation and the reasons for the extension. In either case, the time limit for investigating the alert and informing the whistleblower shall not exceed three months.

During the investigation of a whistleblowing case, the Ethics Committee shall liaise with the whistleblower and may, in this context, request further details and clarifications of the whistleblowing case in order to establish the relevant facts of the case, as well as request additional information.

Upon completion of the investigation, the Ethics Committee shall prepare a report summarising its findings and, if it considers that the whistleblowing is justified, shall determine a plan of action to avoid similar violations or abuses of the rules in the future and, if necessary, taking into account the relevant provisions of the Labour Code, formulate a proposal for the imposition of sanctions on the abusive employees. The proposal may be to impose a disciplinary penalty, including termination of employment by dismissal, depending on the seriousness of the violation.

During the investigation of the whistleblowing, the relevance of the circumstances contained in the whistleblowing must be assessed and measures taken to remedy the abuse. If, during the investigation, the Ethics Committee finds grounds to initiate criminal proceedings, it is obliged to report the matter to the Public Prosecutor's Office of the Republic of Bulgaria. If, on the basis of the contents of the report, administrative criminal proceedings are necessary, the Ethics Committee shall notify the competent public authority.

The Ethics Committee shall inform the whistleblower in writing of the results of the investigation of the whistleblowing and of the measures taken or planned. This notification will be sent by mail if the whistleblower has provided his or her mailing address in his or her report. (If the whistleblower requests feedback by e-mail regarding his or her report, the written notification will be sent accordingly.)

In accordance with the above, during the investigation of the alert, the companies of Videoton Bulgaria provided information on the following:

- on the lack of investigation of the alert and the reason for it,
- at the start of the investigation,
- for the person concerned in the report on the start of the investigation,
- the extension of the investigation, the expected date and the reason for the extension,
- the outcome of the investigation of the report, the measures taken or planned.

## 4. PROTECTION OF WHISTLEBLOWERS

VIDEOTON Bulgaria protects the whistleblower if the whistleblowing is lawful and not anonymous, and guarantees that the whistleblower will not suffer any retaliation, adverse or other negative consequences in connection with the whistleblowing (this does not include cases where, during the whistleblowing, the whistleblower provides false information or misrepresents actual facts in bad faith and intentionally).

The report is considered to have been lawfully prepared if the following three conditions are met:

- (a) the Reporting Person has submitted his or her report through the Whistleblowing System set out in this Whistleblowing Policy in accordance with the provisions set out in this Whistleblowing Policy,
- (b) the reporting person has received the reported information relating to the circumstances covered by the report in connection with his or her employment, and
- (c) the reporting person had reasonable grounds to believe that the information reported relating to the circumstances covered by the report was correct at the time of reporting.

The whistleblower's protection is also guaranteed if, during the course of an investigation initiated following a report made in good faith by the whistleblower, the investigators conclude that the report is unfounded.

After submitting the alert, the sender of the alert has the right to notify VIDEOTON Bulgaria if, in his/her opinion, any omission has been made in connection with the alert. The Ethics Committee is obliged to investigate the notification properly (in which case the rules for investigating a report apply accordingly) and to issue a duly substantiated report on the outcome of the investigation.

The Whistleblower Protection Act provides further details on whistleblower protection, lawful whistleblowing, legal aid for whistleblowers, measures adversely affecting whistleblowers and administrative or judicial proceedings in relation to acts with an adverse effect.

## 5. FINAL PROVISIONS

### Provisions for implementing the policy

The Whistleblower Policy is communicated to all employees of the companies of the Videoton Bulgaria business group.

The Whistleblower Policy is uploaded to the internal servers of the VIDEOTON Bulgaria companies and is made available on paper in the Human Resources Department to ensure its permanent availability. Information on the functioning of the internal whistleblowing system and the whistleblowing procedure should be made available on the VIDEOTON Bulgaria website.

## 6. APPLICABLE LAWS

VIDEOTON Bulgaria's whistleblowing principles are in accordance with applicable laws, in particular the following:

- ✓ Labour Code of 01.01.1987;
- ✓ Whistleblower Protection Act of 04.05.2023;
- ✓ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR).