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Date of Certifying: **22.12.2025**

**The Certifying Legal Representative:**

**POLICY FOR THE PROTECTION OF WHISTLEBLOWERS OF EU LAW**

**VIOLATIONS**

**&**

**FOR THE SUBMISSION AND MANAGEMENT OF INTERNAL REPORTS**

## **I. Preamble**

At the company, we ensure that we act ethically with our business partners. We work with honesty, fairness, and dedication in our professional and commercial transactions. The partnerships we develop reflect our commitment to maintaining continuous contact with all stakeholders involved in medical research and progress, in order to support the development of innovation. We ensure that our suppliers provide and have improvement plans for social responsibility and corruption prevention. Additionally, we recognize competition as a factor for innovation and, broadly, for corporate development. We ensure that conditions of lawful and fair competition are maintained.

The purpose of this policy is to define the general principles and the operational framework under which the company receives, processes, and investigates named and anonymous reports of violations of Union law, harmful to the public interest, which came to the attention of its staff, and/or its customers, and/or its suppliers, and/or other third parties. This policy encompasses reports concerning the public interest, particularly in the areas of safety and public health protection, consumer rights, combating corruption and economic and tax crime, as well as personal data protection, etc.

This policy is adopted in accordance with the provisions of Law 4990/2022 "on the Protection of Persons Reporting Violations of Union Law," which incorporates Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 and the implementing Joint Ministerial Decision 47312/18.11.2023.

## **II. Incident Reporting**

The report can be submitted either to individuals within the company, and/or through the company's internal electronic channels (internal report), or directly to the National Transparency Authority (external report) in accordance with the terms of Law 4990/2022.

The company and individuals exercising managerial rights or representing the company, to the extent and degree of their own responsibility, are obliged to initiate the prescribed procedure for managing and addressing internal reports of incidents that fall within the scope of this Policy.

## **III. Appointment of R.R.M.R.**

The company has designated the **Compliance Specialist** as the **Responsible for Receiving and Monitoring Reports (R.R.M.R.)**.

The internal report is submitted in writing or orally via telephone or other voice messaging systems, and/or through a personal meeting with the company's R.R.M.R.

The R.R.M.R. facilitates the reporter in submitting their report by providing them, upon request, with all necessary information regarding their rights and the prescribed procedure for submitting and managing reports.

Access to the R.R.M.R. for employees, customers, suppliers, and any third party will be easy and immediate, specifically allowing them to communicate and submit their reports, either named or anonymously, in writing or orally, via the telephone line: 6936-789204.

Additionally, the company has established an internal notification system (ETHICS LINE) for all its employees and third parties. This internal notification system is accessible to everyone and allows them to report/complain in good faith, either named or anonymously, about any concerns regarding behaviors or practices that may violate this Policy. Reports/complaints can be sent through the specially designed electronic platform: <https://servier.whispli.com/ethicsline>, which operates on the company's website: [www.servier.gr](http://www.servier.gr).

#### **IV. Submission of the Internal Report**

Specifically regarding the submission of an internal report, the following apply:

1. **The written report** is submitted in person or by mail to the aforementioned company headquarters in an envelope marked "Attention R.R.M.R." or "Report under Law 4990/2022" or another indication suggesting that the report falls under the provisions of Law 4990/2022.
2. The oral report is submitted in one of the following ways:
  - a) **Via telephone** with recorded conversation, provided the reporter has legally consented. The content of the report submitted by telephone is documented either by recording the conversation in a stable and retrievable form or by a full and accurate transcription of the conversation into minutes prepared by the R.R.M.R., allowing the reporter to verify, correct, and agree with the final transcription of the conversation by signing the relevant minutes.
  - b) **Via a voice messaging system**, if available at the company, with recorded conversation, provided the reporter has legally consented. The content of the report submitted via voice messaging system is documented either by recording the voice message in a stable and retrievable form or by a full and accurate transcription of the voice message into minutes prepared by the R.R.M.R., allowing the reporter to verify, correct, and agree with the final transcription of the voice message by signing the relevant minutes. In the case of an oral report where the conversation is not recorded, the content of the report is documented in the form of accurate minutes prepared by the R.R.M.R., allowing the reporter to verify, correct, and agree with them by signing the minutes.

c) **Via a personal meeting** between the reporter and the R.R.M.R., which takes place within a reasonable timeframe from the date of the reporter's request, which can be submitted in writing, orally, to the R.R.M.R. In this case, the R.R.M.R. keeps full and accurate minutes of the meeting in a stable and retrievable form either by recording the conversation, provided the reporter has legally consented, or in writing, which the reporter can verify, correct, and agree with by signing them.

## **V. Receipt of the Internal Report**

1. The R.R.M.R. receives reports that fall within the scope of Article 4 of Law 4990/2022.
2. The acknowledgment of receipt of the report to the reporting person takes place within seven (7) working days from the receipt and regardless of the method of submission. The notification of the reporting person about the receipt of the report can be made by any appropriate means, provided that it is proven while always maintaining the confidentiality and protection of personal data requirements of Chapter VI of Law 4990/2022. The R.R.M.R. is not obliged to notify the receipt of the report of subparagraph c' of paragraph 2 of Article 10 of Law 4990/2022, where, in the absence of necessary contact details of the reporting person, such notification becomes impossible.
3. When there is an oral report, as described in paragraph 2 of the "Submission of Internal Report" section of the present document, the record prepared by the R.R.M.R., once signed by the reporting person, serves as an acknowledgment of receipt of the report of subparagraph c' of paragraph 2 of Article 10 of Law 4990/2022. In case the reporting person refuses to sign the record, a note to that effect is made by the drafter.
4. Upon receipt of the report, regardless of the method of submission, the R.R.M.R. ensures the confidentiality and protection of personal data of the reporting person as well as any third party named in the report, preventing access to it by unauthorized persons, in accordance with the provisions of Chapter VI of Law 4990/2022.
5. The report, regardless of the method of submission, is recorded in a special file maintained by the R.R.M.R. in either printed or digital form, in accordance with the provisions of Chapter VI of Law 4990/2022.
6. In the event that the report is received by an unauthorized person, they are obliged to forward it immediately to the R.R.M.R. of the company, without any modification of its content or disclosure of information that may lead to the identification of the reporting person or any third party named in the report, in compliance with the provisions of Chapter VI of Law 4990/2022.

## **VI. Management of the Report**

1. Upon receipt of the report, the R.R.M.R. takes one of the following actions:

- a) forwards the report for investigation, pseudonymized and in accordance with the provisions of Chapter VI of Law 4990/2022 regarding confidentiality and protection of personal data;
- b) to the Legal Representative of the Company and the Human Resources Director of the company, updating the special file maintained, who, after the investigation, prepare an investigation report detailing the inquiries, testimonies, and findings, along with the conclusion of the investigation.
- c) to the competent authorities as appropriate, updating the special file maintained. Indicatively, such authorities include the Economic Crime Prosecutor and generally the Prosecutorial Authorities, the National Transparency Authority, the Competition Commission, the Bank of Greece, the Personal Data Protection Authority, the Unified Public Procurement Authority, the Hellenic Atomic Energy Commission, the Unified Food Control Agency, the Consumer Ombudsman, the National Cybersecurity Authority, the Anti-Money Laundering Authority and the Financing of Terrorism and Control of Asset Declarations, the Independent Authority for Public Revenue, and the General Directorate for Economic Crime Prosecution.
- d) archives the report with a decision communicated to the reporting person, if feasible, when:
- e) The report is evidently unreasonable, vague, incomprehensible, or repeated in an abusive manner, such as in the case of resubmission of the same content without the provision of new evidence.
- f) The content of the report does not fall within the scope of Article 4 of Law 4990/2022. If the aforementioned report includes information regarding violations for which another company body or public authority is competent, the R.R.M.R. is obliged, based on Article 4 of the Administrative Procedure Code, to forward it to the competent body. In this case, there is no longer an obligation to monitor the report as per subparagraph f' of paragraph 2 of Article 10 of Law 4990/2022.
- g) There are no serious indications of violations falling within the scope of Article 4 of Law 4990/2022.

In case new evidence is provided for a report that has already been archived, the R.R.M.R. retrieves the archived report and proceeds with actions either subparagraph a' or subparagraph b' of this section.

2. In case the R.R.M.R. finds indications of a criminal act that is prosecuted *ex officio* from the provided evidence, they must immediately forward a copy of the report to the competent local Prosecutor, notifying the reporting person. If the violation falls within the scope of Law 4990/2022, the forwarding is done in accordance with the provisions of Chapter VI of Law 4990/2022 regarding confidentiality and protection of personal data and there remains an obligation to monitor the report as per subparagraph f' of paragraph 2 of Article 10. If the violation does not fall within the scope of Law 4990/2022, a copy of the report is forwarded without the obligation to monitor subparagraph f' of paragraph 2 of Article 10.
3. In case the R.R.M.R receives a report containing allegations against themselves or against bodies responsible for investigating reports within the company, they are limited to recording

it in the relevant file maintained and forwarding it to the National Transparency Authority as an external reporting channel, notifying the reporting person.

4. The company maintains a confidential file of all actions taken in handling each case, assures the involved parties that all records related to the matter are kept confidential, and ensures that the process is completed as quickly as possible. Reports, minutes, and minutes of oral report transcription are stored for a reasonable and necessary period to be retrievable and to meet the requirements imposed by Law 4990/2022, Union or national law, and in any case until the completion of any investigation or judicial process initiated as a result of the report.

## **VII. Monitoring the Report**

1. The R.R.M.R maintains communication with the reporting person and, if required and feasible, requests further information or/and evidence from them.
2. The R.R.M.R monitors the case of the report by communicating with the competent bodies of the company that have taken up the report or with the competent authorities to whom the report has been forwarded in accordance with the provisions of Chapter VI of Law 4990/2022.
3. The competent bodies of the company or the competent authority that has taken up the report shall timely inform the R.R.M.R. of the actions undertaken, so that the latter can inform the reporting person within a reasonable time, which does not exceed three (3) months from the acknowledgment of receipt or if no acknowledgment has been sent to the reporting person, three (3) months from the end of the seven (7) working days from the submission of the report. In cases where no acknowledgment has been sent to the reporting person, the notification referred to in the previous sentence is made at the initiative of the reporting person and by referencing the relevant number of the special file maintained by the company or by referring to the content of the report.
4. The reporting person is entitled, if not satisfied with the handling of the report by the company's R.R.M.R, to contact the National Transparency Authority (<https://aead.gr/en/kataggelies/ti-eidos-kataggelias>), in accordance with the provisions of Law 4990/2020.

## **VIII. Protection of Reporters**

1. Personal data and any kind of information that directly or indirectly lead to the identification of the reporting person are not disclosed to anyone other than the authorized members of the company's staff who are responsible for receiving or monitoring the reports, unless the reporting person consents to such disclosure. For this purpose, the company takes appropriate technical and organizational measures, such as pseudonymization techniques, during the monitoring of the report and communication with the competent authorities.
2. Notwithstanding the above, the identity of the reporting person and any other information may be disclosed only when required by Union or national law, within the context of investigations

by competent authorities or within the context of judicial proceedings, and provided that it is necessary for the purposes of Law 4990/2020 or for ensuring the defense rights of the reported person.

3. Disclosures pursuant to the above paragraph are made after prior written notification to the reporting person about the reasons for disclosing their identity and other confidential information, unless such notification would undermine the investigations or judicial proceedings. After the notification, the reporting person is entitled to submit their written observations, which are not disclosed to anyone. Exceptionally, if the reasons for the observations are deemed insufficient, the disclosure of the identity and other confidential information of the reporting person is not hindered. Further safeguards of the identity of the reporting person and the information from which it can be inferred, provided by specific provisions of Union or national law, are not affected.

## **IX. Prohibition of Retaliation**

Any form of retaliation against whistleblowers is prohibited, including threats and acts of retribution. The following forms of retaliation are particularly prohibited:

- a) termination, dismissal, or other equivalent measures,
- b) demotion, omission, or deprivation of promotion,
- c) removal of duties, change of workplace, salary reduction, change in working hours,
- d) denial of training,
- e) negative performance evaluation or negative professional recommendation,
- f) reprimand, imposition of disciplinary or other measures, including financial penalties,
- g) coercion, intimidation, harassment, or marginalization,
- h) discrimination or unfair treatment, i) non-conversion of temporary employment contract to permanent,
- j) non-renewal or premature termination of temporary employment contract,
- k) deliberate harm, including damage to reputation, especially on social media, or financial damage, including business loss and loss of income,
- l) blacklisting, based on sectoral or industry official or unofficial agreements, which may result in the person not finding employment in the sector or industry in the future,
- m) premature termination or cancellation of a contract for goods or services, n) revocation or cancellation of a diploma or license,
- o) referral for psychiatric or medical monitoring,
- p) refusal or denial of reasonable accommodations for persons with disabilities.

## **X. Protection of Whistleblowers**

1. Whistleblowers have access to all legal remedies and enjoy the rights of a fair trial, including the right to an effective remedy before an impartial court, the presumption of innocence, and the rights of defense, including the right to be heard and the right to access their file.
2. The identity of whistleblowers is protected throughout the duration of investigations initiated by the report or public disclosure.

## **XI. Processing of Personal Data**

1. Any processing of personal data under this policy, including the exchange or transfer of personal data by the competent authorities, shall be carried out 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 movement of such data, and the repeal of Directive 95/46/EC, subject to the specific provisions of Law 4990/2020.
2. Any processing of personal data carried out under this policy is conducted to fulfill the obligation to establish reporting channels and take necessary measures to monitor them in accordance with the provisions of Law 4990/2020. This includes any information related to violations within the context of internal and external reports, including their exchange or transfer. The transmission of information contained in the reports to the competent supervisory and investigative authorities is permitted, and such information may be used as evidence in administrative, civil, and criminal investigations and proceedings.
3. The company, as the data controller, takes appropriate technical and organizational measures to collect only the necessary and relevant personal data during the submission and monitoring of reports to achieve the purposes of this policy. Personal data that is clearly unrelated to the handling of a specific report, or is excessive, is not collected, or if collected accidentally, is promptly deleted.
4. The company, as the data controller, by way of derogation from point A of paragraph 1 of Article 5, Articles 12 and 13, paragraphs 1 to 4 of Article 14, and Article 34 of the GDPR, does not provide relevant information about the processing of personal data to the reported person or any third party identified in the report or personal data arising from monitoring measures, especially regarding the source of origin under point f of paragraph 2 of Article 14 of the GDPR, pursuant to paragraph 5 of Article 14 of the GDPR, in conjunction with Article 23 of the GDPR, for as long as necessary and if deemed essential for the purpose of preventing and addressing attempts to obstruct the report, impede, thwart, or delay monitoring measures, particularly concerning investigations, or attempts to identify whistleblowers, as well as for their protection against retaliation.

5. The company, as the data controller, may not fulfill the rights provided by Articles 15 to 22 of the GDPR when exercised by the reported persons and third parties identified in the report or arising from monitoring measures as specified in the above paragraph.
6. In cases of restriction of the rights of data subjects as provided in the above two paragraphs, the company, as the data controller, takes all necessary technical and organizational measures to protect the rights and freedoms of individuals. When the company denies the fulfillment of rights without informing about the reason for the restriction, the data subject is entitled to lodge a complaint with the Data Protection Authority (DPA), which may investigate the conditions of the restriction of rights and inform the data subject if the notification does not harm the achievement of these purposes.
7. The company, as the data controller, in case of a personal data breach, does not make an announcement under paragraph 1 of Article 34 of the GDPR to the data subject if such an announcement could harm the purposes of this policy and informs the DPA, which may, after investigating the reasons cited, request the announcement if it finds that the conditions for omitting the announcement are not met.

## **XII. Formulation and Implementation of this Policy**

This policy is formulated to enhance transparency and promote the company's zero tolerance for illegal or irregular actions that may harm or affect its reputation and reliability. The company is committed to ensuring that its employees and any collaborators are appropriately informed about this policy, which is publicly posted on the company's website, so that all interested parties can be aware of it.

The company will evaluate the effectiveness of this policy and make necessary amendments. For this purpose, it may collect anonymous statistical data and information on its implementation to determine its effectiveness. This policy may also be revised if required for the company's compliance with legal and regulatory requirements.

For the company

The Legal Representative



Estève Sylvain Speranza