

WHISTLEBLOWING POLICY

The Whistleblowing Policy is a key component of the Compliance Management System (CMS).

It establishes a framework for reporting, investigating, and addressing misconduct while ensuring protection for whistleblowers.

The purpose is to define procedures for handling compliance incidents and safeguarding whistleblowers within Elevion Group.

Key insights:

- Governance, Risk & Compliance (GRC) department of EGBV is responsible for managing the Compliance Incident Investigation (CII)
- Whistleblowers are protected from retaliation and their identity is kept confidential. There is also a possibility of a completely anonymous report.
- Reports can be submitted through the FaceUp platform, which is part of the Whistleblowing System
- GRC department assess the reasonableness of reports and initiate investigations
- Confidentiality, impartiality, and non-discrimination are core principles of the investigation
- Corrective Measures are proposed and monitored to address confirmed misconduct