AVAX S.A.

TASK AVAX SINGLE PERSON S.A.

E.T.E.TH SINGLE PERSON S.A.

ATHENS MARINA SA

AVAX IKTEO S.A.

AVAX DEVELOPMENT S.A.

IXION M.A.E.

KOINOPRAXIA ABAX A.E. - METKA A.T.E.

KOINOPRAXIA AVAX A.E. – ETETH MONOPROSOPI A.E.

WHISTLEBLOWING POLICY

Handling of reports and protection of persons alleging infringements of Union law

The Company, in accordance with Law 4990/2022, has established a framework for managing reports and protecting individuals who report infringements of Union law within the context of, or on the occasion of, an employment or professional relationship, with the procedure and means referred to herein, the use of a special reporting platform and the adoption of measures to protect individuals who report, mediate, or are connected with the report.

Reporting individuals / Individuals subject to the procedure

Reports as outlined above and detailed herein, can be submitted by employees and any persons employed and remunerated by the Company in any manner, collaborators or consultants, shareholders and individuals who are members of the Management and the bodies and committees, subcontractors, partners, suppliers and any other person who is or was employed by, and is or was working with, the Company and third parties, legal or natural persons associated with the above potential petitioners ("Public Interest Whistleblowers" or "Reporting Parties").

Events - infringements reported hereunder

This policy applies to the protection of persons who report or disclose:

(a) Infringements of Union law in the context of their work, even if within the Company, in the following areas:

(aa) public procurement, (ab) financial services, crypto-asset markets products and markets and the prevention of money laundering and terrorist financing, (ac) product safety and compliance, (ad) transport safety, (ae) environmental protection, (af) radiation protection and nuclear safety; (ag) food and feed safety and animal health and welfare; (ah) public health; (ai) consumer protection; (aj) protection of privacy and personal data, as well as network and information systems security;

(b) Infringements affecting the financial interests of the European Union (EU) under Article 325 of the TFEU, namely cases of fraud or any other illegal activity against the financial interests of the European Union;

(c) infringements related to the internal market (Article 26(2) of the TFEU), meaning the EU area within which the free movement of goods, persons, services and capital is ensured, including the Union rules on competition and State aid, as well as infringements related to the internal market concerning actions that infringe company tax rules or arrangements aimed at securing a tax advantage that defeats the object or purpose of the applicable tax legislation;

(d) Infringements of domestic law regarding the offences of bribery and trading in influence peddling under the Penal Code and Article 134 of Law 5090/2024, "Report/Reports".

(e) Violations of European Union restrictive measures, as established pursuant to Article 29 of the Treaty on European Union or Article 215 of the Treaty on the Functioning of the European Union.

Submission and receipt of internal report - Internal reporting channel: Internal Reporting Receiving and Monitoring Officer (RMO)

A report shall be submitted to the RMO (or their deputy, as the case may be), either verbally or in writing, or via an electronic platform ("Internal Report").

Specifically, an Internal Report shall be submitted:

a) via a special online platform, accessible from a prominent place on the Company's website, with clear instructions on how to use the platform and submit reports. The electronic platform is available in Greek and English.

b) by sending a postal letter to the RMO of the parent company AVAX S.A. (or their deputy, as applicable) at the following address: 16, Amarousiou - Chalandriou Avenue, 15125 Maroussi, Attica, with the indication “personal and confidential”, or

(c) via a voice messaging system with a recorded conversation, provided the reporting party has legally consented to the recording; or

(d) verbally, in a face-to-face meeting with the RMO (or their deputy, if applicable), which shall take place within a reasonable time of the Reporting parties request, in accordance herewith.

- The Internal Report may be submitted by name or anonymously.

- The submission of the Internal Report does not require adherence to a certain strict form or content, as long as it is clearly, sincerely and in good faith submitted. To facilitate the

Reporting Parties, a relevant Internal Report template has been posted on the online platform.

The Internal Report should include as much information as possible about the reported infringement incident, including but not limited to:

(a) a detailed description of the incident, (b) names of the parties involved, (c) date and time of the incident, (d) location of the incident, (e) names of any witnesses, and (f) any available supporting documents. In case of incomplete Internal Reports, the RMO may request additional information from the Reporting Party.

- The submission and receipt of an Internal Report is certified by the RMO with a receipt confirmation within seven (7) working days from its submission of the report.

Monitoring, review and transmission of Internal Report

- The examination of the Internal Report is carried out within a reasonable period of time, not exceeding three (3) months from the receipt confirmation.

- The RMO and the Reporting Management Committee of the parent company AVAX S.A., for the examination of Internal Reports, may seek assistance and advice from advisory bodies, namely internal and/or external (legal or other) advisors of the Company depending on the reported infringement of Union law, while always adhering to the principles of confidentiality and discretion, and corresponding personal data protection principles, in accordance with the applicable rules and the specific provisions of Law 4990/2022. During the examination of the Report, additional information may be requested.

- Each report is recorded in a special file kept by the RMO, either in paper or digital form.

- Upon receiving the report, the RMO shall take one of the following actions:

(a) forwards the report for investigation, pseudonymised, to the Reporting Management Committee, updating the special protocol book or file, accordingly;

(b) if the Report is evidently unreasonable, vague, incomprehensible, abusive or unfounded, or if there is no serious indications of an infringement, it is archived,

(c) if the report concerns an infringement in an area outside the scope of this policy, it is referred it to the appropriate body within the Company; and

In the event new information is provided for a report that has already been archived, the RMO shall retrieve the archived report and take the appropriate actions again.

If the RMO finds indications of a criminal act prosecuted ex officio, they immediately forward a copy of the report to the competent Public Prosecutor, informing the reporting party. If the infringement does not fall within the scope of this policy, a copy of the report shall be forwarded without any further obligation to further monitoring.

If the RMO receives a report that includes accusations against themselves or the body responsible for investigating reports within the Company, they are limited to recording it in the special book or relevant file and forwarding it to the National Transparency Authority as an external channel, informing the reporting party.

- The Reporting Management Committee consists of an independent Member of the Board of Directors (BoD) of the parent company AVAX S.A., the Chair of the Audit Committee of the parent company AVAX. S.A. and the Human Resources Director of the parent company AVAX S.A. In the event that the Internal Report is directed against a member of the Reporting Management Committee or a member of the Reporting Management Committee is found to have a conflict of interest, they are removed from the recipient list for the case, do not participate in its investigation and are replaced ad hoc by a person appointed by the CEO. Decisions of the Reporting Management Committee shall be reasoned and taken by majority vote.

The Reporting Management Committee investigates the Internal Report, conducts audits, evaluates the allegations contained therein, decides on the validity or otherwise of the Internal Report, records the results of the investigation and recommends to the Board of Directors a) the closure of the procedure and the filing of the Report or b) the appropriate measures to address the infringement. Measures to address the reported infringement may include, but are not limited to: (i) additional training of employees and associates, (ii) establishment of new internal controls, (iii) modifications to existing policies and procedures, (iv) disciplinary sanctions, (v) legal action, etc.

At the end of each six-month period, a table containing statistical data relating to the reports submitted through the reporting platform concerning:

i)bribery
ii)corruption
iii)whistleblowing in general

shall be submitted to the Board of Directors.

More specifically, the information submitted shall include: (a) the total number of Internal Reports, (b) the number of Internal Reports specifically concerning bribery, (c) the number of Internal Reports specifically concerning corruption, and (d) the number of Internal Reports that have been archived and those that have been substantiated, together with an update on their progress or the stage at which they currently stand.

- If the Reporting Party considers that their Internal Report has not been dealt with effectively, they may resubmit it to the National Transparency Authority.

Confidentiality - Personal data protection

Any element, piece of information, as well as personal data related to or associated with a Report are strictly confidential and shall be transmitted to the persons authorised by this document and the law for the purpose of managing the Report only. With regard to the personal data included in Reports and processed in the context thereof, the specific provisions for the protection of personal data apply, in particular Regulation (EU) 2016/679 (General Data Protection Regulation / GDPR) and Law 4624/2019, subject to the special provisions of Law 4990/2022 in this regard.

The Company, in its capacity as Data Controller, informs the data subjects about the processing of their personal data within the framework of this Policy, in accordance with the specific Notification for this purpose within the Reporting platform, and takes the

appropriate technical and organizational measures to protect the personal data processed within the framework of Reports.

- The Company, in its capacity as Data Controller, notwithstanding the General Data Protection Regulation (Articles 5, paragraph 1, point A, 12, 13, 14 paragraphs 1 to 4, and 34), does not provide relevant information on the processing of personal data to:

(a) the Reported Party; and

(b) any third party named in the Internal Report or the personal data obtained from monitoring measures (particularly regarding the source of origin), for as long as needed and if deemed necessary for the purposes of preventing and countering attempts to obstruct the Internal Report, obstructing or cancelling or delaying monitoring measures, or attempts to identify the Reporting Party, as well as for the protection against retaliation.

Furthermore, the Company, in the same aforementioned capacity, may refuse to satisfy the rights provided by the General Data Protection Regulation (Articles 15 to 22), when these rights are exercised by the Reported Party or by third parties named in the Internal Report or whose personal data was obtained from monitoring measures.

In the above cases of restricting the rights of the Reported Parties and third parties, if the Company, as the Data Controller, does not inform these individuals, as data subjects under the personal data protection provisions, of the reasons why their rights are not being satisfied, these individuals/data subjects are entitled to file a complaint with the Hellenic Data Protection Authority (HDPA).

External Reports - External Reports Reporting Channel

Any person who makes a report in accordance with this policy reserves the right to also submit an external report/complaint regarding any infringement hereunder before the National Transparency Authority, if they reasonably believe that their Internal Report cannot be effectively addressed by the RMO, or if there is a risk of retaliation.

Instructions regarding the process for External Reporting to the National Transparency Authority can be found on their website (https://intwhistle.aead.gr/#/).

Specifically, for infringements of Articles 101 and 102 of the TFEU (protection of free competition in the EU), the Competition Commission is designated as the external reporting channel .

Protection of Reporting Parties

The Reporting Parties shall be protected hereunder if, when they submit a Report or make a Public Disclosure, they had reasonable grounds to believe that the information regarding the reported infringements of Union law within the Company were true and falls within the scope of this policy.

The same protection applies to Reporting Parties who initially submitted a Report or made a Public Disclosure anonymously and were subsequently identified.

Similarly, third parties connected to the Reporting Parties who may be subject to retaliation in a work-related context, such as colleagues or relatives of the Reporting Parties, personal businesses or legal entities in which the Reporting Parties have an interest, or for which they work, or with which they are otherwise connected in an employment relationship, are also protected as appropriate.

Consequences of a breach of this policy

The Company shall take all appropriate measures against any of its employees, contractors or associates of any kind, if it is found or determined that they: a) obstructed or attempted to obstruct the submission of a Report in cases of infringements hereunder, b) retaliated or initiated malicious proceedings against a Reporting Party, c) breached the duty of confidentiality.

Final Provision

This Policy does not supersede any other Company policies, is regularly evaluated, and serves as a model for Group's companies.