



Whistleblower Procedure

December 2025

1. Purpose

Goldair Cargo S.A. is committed to operating with the highest standards of integrity, transparency and ethical conduct. This Whistleblower Procedure provides a clear, confidential and protected channel for employees, partners, suppliers, customers and other stakeholders to report any suspected wrongdoing, unethical behaviour or violation of laws, regulations or Company policies.

This Procedure has been established in compliance with Greek Law 4990/2022 on the protection of persons reporting breaches of Union law, and is aligned with the Company's Business Ethics Policy, the Suppliers Code of Conduct and the SEDEX/SMETA framework.

2. Scope

This Procedure applies to all employees, contractors, suppliers, customers, business partners and any other stakeholders of Goldair Cargo S.A. It covers any concern relating to:

- Bribery, corruption or any form of unethical financial conduct.
- Fraud, theft or misuse of Company assets.
- Breaches of anti-money laundering or tax compliance obligations.
- Violations of health & safety regulations or environmental laws.
- Discrimination, harassment, violence, child labour, forced labour or violation of human rights.
- Data protection breaches or information security incidents.
- Conflicts of interest not properly disclosed or managed.
- Any other conduct that may damage the reputation, integrity or interests of the Company or its stakeholders.

3. Principles

Goldair Cargo S.A. is committed to:

- Encouraging the disclosure of any suspected wrongdoing through clearly defined and accessible channels.
- Protecting the identity of whistleblowers to the fullest extent permitted by law.
- Treating all parties involved in an investigation in a fair, impartial and equitable manner.
- Maintaining strict confidentiality throughout the process.
- Prohibiting any form of retaliation, dismissal, demotion or adverse treatment against whistleblowers acting in good faith.
- Taking appropriate corrective, disciplinary and, where required, legal action upon confirmation of wrongdoing.

4. Reporting Channels

Whistleblower reports may be submitted through any of the following channels:

a. Receiving and Monitoring Officer (RMO)

The Company has formally appointed a Receiving and Monitoring Officer (RMO), independent of operational hierarchy, who is responsible for receiving and processing whistleblower reports in accordance with Law 4990/2022.

Contact details for the current RMO are communicated to all employees through internal channels and are available upon request.

b. Internal management contact

Reports may also be submitted to direct line management, the HR Department or the Compliance Officer, in cases where the matter does not concern those persons.

c. External channels

Where internal channels are not appropriate or have not produced adequate response, whistleblowers may use the external reporting channels provided by the National Transparency Authority (Εθνική Αρχή Διαφάνειας) under Law 4990/2022.

d. Anonymous reporting

Anonymous reports are accepted and will be investigated to the extent that the information provided is sufficient to enable a meaningful investigation.

5. Procedure

Upon receipt of a whistleblower report, the following procedure applies:

- a. The RMO (or designated reviewer) acknowledges receipt of the report to the whistleblower within seven (7) working days, where this is possible without compromising confidentiality.
- b. A preliminary assessment is conducted to determine the nature, scope and credibility of the report.
- c. Where appropriate, a formal investigation is initiated, involving relevant internal or external experts.
- d. The whistleblower receives feedback on the outcome of the investigation, typically within three (3) months of acknowledgement, in line with Law 4990/2022.
- e. Corrective actions, disciplinary measures and, where necessary, legal action are taken based on the findings.
- f. All reports, related communications and outcomes are recorded in a secure register maintained by the RMO, accessible only to authorized personnel.

6. Protection of Whistleblowers

Goldair Cargo S.A. strictly prohibits any form of retaliation against whistleblowers acting in good faith. Protected actions include reporting suspected wrongdoing, providing information during an investigation, and refusing to participate in unlawful or unethical activity.

Any retaliatory behaviour will be treated as a serious breach of Company policy and may result in disciplinary action up to and including termination of employment, as well as legal consequences under Law 4990/2022.

7. Confidentiality and Data Protection

All information related to whistleblower reports is treated with the strictest confidentiality and is processed in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Company's Information Security Policy and ISO 27001:2022 certification.

8. False Reporting

Reports submitted in good faith, even if subsequently shown to be unfounded, are fully protected. However, employees or other persons who knowingly submit false or malicious reports may be subject to disciplinary action and, where applicable, legal proceedings.

9. Communication and Training

This Procedure is communicated to all employees upon hiring and at regular intervals through awareness campaigns and training. Updates are communicated promptly to all relevant stakeholders. The Suppliers Code of Conduct also requires suppliers to maintain equivalent reporting mechanisms within their own operations.

10. Monitoring and Review

The effectiveness of this Procedure is monitored through:

- The number and nature of reports received (with target value: zero confirmed cases of corruption, fraud or human rights violations).
- The time taken to acknowledge, investigate and close reports.
- Annual internal audits and management review.

This Procedure shall be reviewed at least annually, or sooner where significant operational, organizational, legal or regulatory changes occur.

11. Approval

This Whistleblower Procedure is approved by Senior Management and communicated to all employees, suppliers, contractors and other relevant stakeholders. The Company is committed to providing the necessary resources to maintain a safe and trustworthy environment for reporting concerns.

Approved by:

Kallinikos Kallinikos



Vice President & Managing Director, Goldair Cargo S.A.

Date: December 2025