

Olympic Brewery, a member of the Carlsberg Group, aims at a transparent professional environment and in this context encourages employees, partners, customers, or other persons to report any case of misconduct. Following the principles set out in Law 4990/2022, we have appointed a local Person in charge of “Receipt and Monitoring of Reports Officer” (RMO), who will confirm within seven (7) working days that he/she has received your report and will inform you of the progress of your complaint within a reasonable period of time, which may not exceed three (3) months. This policy informs you of the process for submitting and managing your report, which has been submitted directly to the RMO. If you are submitting your report through the Group's communication channels please refer to the Speak up manual posted here.

[WHO WE ARE » AT A GLANCE » SPEAK UP « OLYMPIC Brewery](#)

## **WHEN CAN A REPORT BE SUBMITTED?**

A person making a report does not need to have a high degree of proof as long as he or she has reasonable grounds to suspect that a particular practice is irregular and may constitute a risk to the public interest. However, we would like to make it clear that the deliberate reporting of false or malicious information is prohibited and any misuse of the system may result in legal penalties as provided for in Article 23 of the Act. 4990/2022.

Examples of irregular practices are:

- Suspected fraud, bribery, corruption, misappropriation of assets or inadequate financial or non-financial record keeping
- Breach of data protection regulations
- Environmental, health and safety issues, health and safety problems
- Concerns about alcohol or drug abuse
- Human rights violations
- Retaliation against any person who speaks in good faith
- Violations of competition law
- Money laundering or violations of trade laws sanctions
- Suspicions of improper use of confidential information
- Disclosure of confidential business information
- (Sexual) harassment, intimidation or discrimination

## **REPORTING: NAME OR ANONYMOUS?**

The report can be submitted named or anonymously to the “Receiving and Monitoring Officer” of Olympic Brewery in one of the following ways:

- By sending an email to: [whistleblowing@olympicbrewery.gr](mailto:whistleblowing@olympicbrewery.gr)
- By phone calling 2106675300
- By post sending your report to:

Olympic Brewery 59 Elaion, 14564, Nea Kifissia "Attention R.M.O"

Alternatively, you can follow the complaint procedure through the group's speak up platform [information is available here [WHO WE ARE » AT A GLANCE » SPEAK UP « OLYMPIC Brewery](#)]

## **INVESTIGATION PROCEDURE OF REPORT**

### **A. TEAM OF INVESTIGATION**

As mentioned above, the company has appointed a Report Receiving and Monitoring Officer to whom your report will be submitted. Access to such reports will be limited - beyond that - to authorized individuals of the Company, if necessary to investigate the report. These persons shall act in absolute confidentiality and have signed a confidentiality agreement for this purpose. In the event that the person named in the complaint coincides with the person designated as responsible in the investigation process then that person will be automatically excluded from the investigation process.

### **B. REPORT MESSAGE**

The message submitted will be examined by the RMO [or by the RMO and the team of investigation] but may be rejected if the following reasons apply:

- The report falls outside the scope of this policy
- The report has been submitted in bad faith and/or there is insufficient evidence to investigate

The report that is unfounded and has been made improperly will be filed without further action being taken.

### **C. INVESTIGATION OF REPORT**

All reports will be treated in confidence and no person (RMO or designees) will seek to identify the complainant. Confidentiality also covers the person for whom the complaint may have been made. If the complaint has been made anonymously, the RMO may ask some additional questions if necessary.

### **D. PROTECTION OF THE COMPLAINANT AND PERSON COMPLAINT OF**

The complainant is protected from any retaliation for making a report as long as it was not made in bad faith. The identity of the complainant, even if he or she has submitted the report by name, shall be treated in strict confidence, unless he or she has submitted false statements, in which case malicious reports shall not be protected and kept confidential. Protection and confidentiality shall also apply to the person about whom the report has been made in the complaint.

The identity of the reporting party and any other information may be disclosed only in cases where required by Union or national law, in the context of investigations by competent authorities or in the context of judicial proceedings,

and where this is necessary to serve the purposes of the investigation of the report or to safeguard the rights of defence of the reporting party.

Disclosures pursuant to the above paragraph shall be made after informing the reporting person in writing of the reasons for the disclosure of his or her identity and other confidential information, unless such information would undermine the investigations or judicial proceedings.

## **E. PROTECTION OF PERSONAL DATA**

If the report is made by name or anonymously but a specific person is named in the report, personal data is processed. When processing personal data, the provisions of the applicable European and national legislation on personal data and any other applicable legal provision [2016/679 General Data Protection Regulation, Greek law 4624/2019 with any subsequent amendments] are complied with.

We would like to encourage you not to submit sensitive data in your report unless such reporting is absolutely necessary for your report. In keeping with the principles set out in the Data Protection law, we must process only the data necessary for the purpose for which it is required. Additional data, especially sensitive data that is not relevant and not necessary for your report will not be taken into account and will not be processed by the RMO and other authorized persons.

## **DEFINITIONS**

**“Personal data”**: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**“Processing”**: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**“Special categories of personal data” or “sensitive personal data”**: the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of positive identification of a person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**“Data controller”:** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**“Recipient”:** the natural or legal person, public authority, agency or other body to whom the personal data are disclosed.

## LEGAL BASIS OF DATA PROCESSING

When you submit the report by name or anonymously, but the report mentions a specific person, the data will be processed solely for the specific purpose of investigating the report. The legal basis for the data processing is:

- A) The legal obligation arising from Law 4990/2022.
- B) The legitimate interest of the company in relation to the prevention of unlawful conduct.

## DATA SUBJECTS’ RIGHTS

Under current legislation, the data subject has certain rights:

- A) the right of access to the data which have been processed by the controller
- B) the right of rectification of data which are incorrect, inaccurate or incomplete
- C) the right to restrict the processing of the data
- D) the right to erasure
- E) the right to object

In any case, the data subject has the right to complain to the DPA  
Address 1-3 Kifissias Street, P.C. 115 23, Athens, Greece, Telephone: 210 6475600,  
E-mail: [contact@dpa.gr](mailto:contact@dpa.gr).

However, it should be made clear that the fulfilment of these rights is subject to limitations, as provided for in the applicable legislation, in particular when it is necessary to ensure the proper investigation of the report or to protect the fundamental rights and freedoms of persons involved in the report.

The controller shall not provide relevant information on the processing of personal data to the data subject and any third person in his or her capacity as data subject of the data identified in the report or the personal data resulting from monitoring measures and in particular shall not provide information on the source of the data for as long as necessary and where necessary for the purpose of preventing and responding to attempts to obstruct the report, obstruct, frustrate or delay the processing of personal data.

The controller shall, in the event of a personal data breach, not give notice thereof in accordance with par. 1 of Article 34 of the General Data Protection

Regulation to the data subject, if such communication may be detrimental to the purposes pursued herein and shall inform the DPA, which may, after having investigated the grounds invoked, request that the communication be carried out, if it considers that the conditions for not making the communication are not met.

## **DATA RECIPIENTS**

Personal information obtained through the reporting system will not be transferred to persons other than authorized persons, unless such a transfer is considered strictly necessary for the purpose of the investigation.

In addition, the information may be transmitted to the competent supervisory, investigative or other competent authorities where there is a legal obligation to do so. To ensure your concerns are handled in the best way possible with adequate quality, your report can be assigned to Group or to your legal entity, in full confidence for the protection of your rights. For example, it is considered necessary to contact the Group if there is a complaint of misconduct towards a colleague by his/her supervisor or another manager. In the event of information being exchanged within the group, confidentiality will be respected and the necessary and necessary knowledge of the information will be provided.

## **COMPLIANCE WITH MEASURES AND DELETION OF DATA**

The company shall take all necessary measures pursuant to Article 32 of the GDPR to protect personal data that may be processed during the reporting and investigation process. In addition, the necessary data retention periods are respected as required by the applicable legislation.

The RMO shall keep records of each report received, in accordance with the confidentiality requirements laid down by law. Reports shall be stored for a reasonable period of time in order to be retrievable and to comply with the requirements imposed by Law 4990/2022, Union or national law and in any case until the conclusion of any investigation or judicial proceedings initiated as a consequence of the report against the reporting party, the party being included in the report or third parties.

## **CONTACT**

If you have questions about the section on the processing of personal data, you can contact "Olympic Brewery SA", Elaion 59, Nea Kifisia 14564, Attiki, tel. +30 210 6675200, fax +30 210 210 6675297 or via email at [privacy@olympicbrewery.gr](mailto:privacy@olympicbrewery.gr)

If you have questions about the handling or report, you can communicate with RMO via email at [whistleblowing@olympicbrewery.gr](mailto:whistleblowing@olympicbrewery.gr) or calling at 2106675300.

## **SUBMISSION OF EXTERNAL REPORT TO THE NATIONAL TRANSPARENCY AUTHORITY [E.A.D]**

You can submit an external report to the National Transparency Authority.

Complaints are submitted in writing and in particular:

Electronically: by email to the address: [kataggelies@aead.gr](mailto:kataggelies@aead.gr) or by filling in the corresponding complaint form: **SUBMIT A COMPLAINT**.

By post: by sending to the postal address of E.A.D. 195 Lenorman & Amfiaraou, TK 104 42 – Athens.

In person (or through a legally authorized representative) at the premises of E.A.D.