INTERAMERICAN
PART OF ACHMEA

23/11/2026

WHISTLEBLOWING SCHEME
Interamerican Hellenic Insurance Company S.A. Atena – Bucharest Branch

Article 1. Scope of Policy

Interamerican is committed to the highest ethical business standards and encourages all Employees to report potential violations of Interamerican policies, or any applicable laws and regulations to any appropriate and available internal channels without fear of Retaliation. Timely reporting of such potential violations is encouraged so Interamerican can identify and address the concerns as quickly as possible.

Details of the Reports received, including the underlying allegations, as well as the name of the Reporter and the accused, will be managed in an appropriately confidential manner and, to respect this confidentiality, shared only on a need-to-know basis, or when required by law or in response to a regulatory demand or obligation.

The purpose of this whistleblowing policy (the "**Policy**") is to ensure an integrated framework for the protection of persons who report violations of EU law, according to a) Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting violations of EU law (the "**Whistleblowing Directive**"); and b) Law no. 361/2022 on the protection of persons who report violations of the law ("**Law 361/2022**") which transposed the Whistleblowing Directive to the Romanian legal framework.

This Policy shall apply to Reporters reporting breaches ("**Breach of Law**") of EU and/or Romanian law that fall within the scope of the Law no. 361/2022 and which represent acts or omissions that are unlawful under Romanian and/or EU legislation regulating the following areas of law:

(a) public procurement;
(b) financial services, products and markets, and prevention of money laundering and terrorist financing;
(c) product safety and compliance;
(d) transport safety;
(e) protection of the environment;
(f) radiation protection and nuclear safety;
(g) food and feed safety, animal health and welfare;
(h) public health;
(i) consumer protection;
(j) protection of privacy and personal data, and security of network and information systems;
(k) breaches (such as fraud and other illegal activities) affecting the financial interests of the Union;
(l) breaches relating to the internal market (such as competition laws, state aid and corporate tax rules),

to the extent such Breaches of Law occur (or are suspected to have occurred or to occur in the future) within the context of the activities performed by the Interamerican Romanian Branch (as defined below).

This Policy applies to Interamerican Hellenic Insurance Company S.A. Atena – Bucharest Branch, a branch of Interamerican Hellenic Insurance Company SA ("**Interamerican**"), headquartered in Bucharest, 319G Splaiul Independentei, RiverView House building, 2nd floor, Bucharest, sector 6, 060044, registered with the Bucharest Trade Registry under no. J2025033442009, unique registration code 51767670 (the "**Romanian Branch**").

Art. 2 Definitions

Unless otherwise defined elsewhere herein, for the purposes of this Policy, the following definitions apply:

Board of Directors: The Board of Directors of Interamerican.

Employee: The natural person who, pursuant to the employment contract performs or has performed directly or indirectly work with/for the Romanian Branch and who reports an Incident, the suspicion of an Incident or Information about a Breach of Law of which the Employee has become aware in a Work-related Context in the course of his/her employment with the Romanian Branch, in accordance with this Policy.

Designated Officer: The official, employed by Interamerican, who has been appointed as such by the Board of Directors in the context of this Policy. Designated Officer is the person authorised to receive, address, monitor and resolve Reports, pursuant to according to art. 9 of Law no. 361/2022 with the status, authorities, tasks and responsibilities provided in said article. The Designated Officer shall be assisted by the Confidential Committee (as defined below) in the administration and management of Reports.

Confidential Committee: The consultative body that advises the Designated Officer in the decision-making process. In any case, the following are represented in this: the HR manager, the Legal Counsel, the Compliance Manager, the Internal Audit Manager of Interamerican.

Incident is an event or circumstance which does not rise to the level of a Breach of Law (as defined above), but which could still pose a financial, reputational, operational or other risk to Interamerican and/or the Romanian Branch:

a) an event as a result of inadequate or failing processes, people or systems, or due to external events that has resulted or could have resulted in financial loss (or accidental profit), reputational damage or other adverse effect for Interamerican and/or the Romanian Branch, and/or
b) an event that poses a serious risk to Interamerican's (and/or the Romanian Branch's) ethical business operations, caused by the conduct of a client, staff member, director, supervisor, statutory auditor, qualified shareholder or by a natural or legal person performing work on behalf of the institution, and/or
c) an event in which the social interest is at stake in the event of (danger of) violation of a legal regulation or internal rules, a danger to public health, a danger to the safety of persons, a danger to the damage to the environment, a danger to the proper functioning of Interamerican as a result of an improper manner of acting or failing to act, and/or
d) a deliberate act by one or more persons from the management, the bodies responsible for governance, staff or third parties, using deception and/or theft, and/or
e) an embezzlement to obtain an unlawful or unlawful advantage (fraud)..

Competent Authority:

- the Romanian National Integrity Agency (the "**Agency**");
- Romanian public authorities and institutions which, under the specific legal provisions governing their scope of activity receive and resolve Reports regarding potential Breaches of Law within their domain of competence;
- other Romanian public authorities or institutions to which the Agency sends Reports for competent resolution.

Report: The provision of information, verbally or in writing or through any other platform, regarding potential Breaches of Law. For the purposes hereof a) "Internal Report": the Report made whether orally or in written or through any other platform providing information about Breaches of Law to the Designated Officer; b) "External Report": the Report made whether orally or in written or through any other platform providing information about a potential Breach of Law to a Competent Authority.

Reported person: A natural or legal person, who is named in an Internal or External Report or in the public disclosure as the person to whom the Breach of Law is allegedly attributed.

Reporting Person: A reporting person is defined as an individual who reports or publicly discloses information related to (potential) Breaches of Law acquired in the context of their work-related activities.
Any of the following can be a Reporting Person within the meaning of this Policy:
(a) Employees;
(b) self-employed persons carrying out an independent activity;
(c) shareholders and persons belonging to the administrative, management or supervisory body(including non-executive members);

(d) Volunteers and paid or unpaid trainees;
(e) any person working under the supervision and direction of contractors, subcontractors and suppliers of the Romanian Branch;
(f) individuals whose employment has not yet commencement (with respect to Breaches of Law of which they become aware during recruitment or other pre-contractual negotiation processes);
(g) former Employees/workers.

Retaliation: any direct or indirect act or omission, which occurs within the employment context, causes or is likely to cause unfair harm to the Reporting Person, or put him/her in a disadvantageous position, as a result of such Reporting Person making a report or participating in an investigation of a Report.

Reasonable grounds: the justified belief by a person, with similar knowledge, training and experience to the Reporting Person, that the information in his/her possession is true and is likely to constitute a Breach of Law, falling within the scope of this Policy.

Public disclosure: the direct offering of information through public channels, related to a Breach of Law.

Facilitator: a natural person who assists the Reporting Person in the reporting process within the work context, whose assistance must be confidential.

Follow-up Actions: Any action taken by the Designated Officer or any Competent Authority to which the Report is referred due to jurisdiction, with the purpose of evaluating the accuracy of the allegations contained in the Report and addressing the reported Breaches of Law, such as an internal investigation; investigation, prosecution, action for recovery of funds or termination of proceedings.

Information: the provision of information to the Reporting Person about the measures that are planned to be taken or have been taken in relation to a Report and the reasons for them.

Work-related Context: current, past or anticipated work activities, regardless of the nature of such activities, through which persons obtain information about Breaches of Law and in the context of which such persons are likely to suffer reprisals if they report them.

Information about Breaches of Law: Information, including reasonable suspicions, about Breaches of Law that have been committed or are likely to be committed and which the Reporting Person has become aware of in a Work-related Context in relation to the operations and activities of the Romanian Branch.

Article 3. Reporting Incidents and Breaches of Law

3.1 To the extent that you are aware of an Incident (or a potential Incident), as defined above, reporting should be made according to the IAG Incident Management Policy: An employee reports an Incident, a suspicion of an incident or Information about an incident in principle in accordance with the Incident Management Policy of IAG. Handling of the report will continue to take place in accordance with the Incident Management Policy which is available at https://interamericangr.sharepoint.com/sites/Human_Resources/SitePages/400_POLICIES_PROCEDURES.aspx.

3.2. To the extent that you are aware of an actual or potential Breach of Law (or have reasonable grounds to suspect, in good faith, that a Breach of Law has or will occur in relation to the operations and activities of the Romanian Branch), please report such Breach of Law in accordance with the provisions of this Whistleblowing Policy.

3.3. If you are unsure whether specific circumstances or events qualify as an Incident or a Breach of Law as defined herein, on the side of caution report it in accordance with this Whistleblowing Policy. The Designated Officer will refer the matter for resolution under the IAG Incident Management Policy to the extent the matter refers to an Incident which does not qualify as a Breach of Law hereunder. Please be aware that certain Incidents may trigger reporting or notification obligations (e.g. in the event of a personal data breach) subject to short and strict deadlines (e.g. 72 hours, in the event of a personal data breach). Timely reporting of any Incident or Breach

of Law (or even suspicion thereof, where reasonable and in good faith) is crucial for Interamerican's ability to comply with such statutory obligations.

3.4 Where to report Breaches of Law – Designated Officer

If the Reporting Person has Reasonable Grounds to believe that a Breach of Law has occurred or may occur, or has Reasonable Grounds to suspect that an (actual or potential) Breach of Law should be reported, it is recommended that the Reporting Person use the Internal Reporting channels in the first instance. A Report should preferably be made directly to the Designated Officer via the email address avertizori@anytime.ro.

It is noted that in order to safeguard confidentiality and segregation of duties, the above email line is directed only to the Designated Officer, the Head of the Interamerican Compliance Function, and the Head of the Interamerican Internal Audit Function.

The Designated Officer has the following responsibilities:

(a) Acknowledgment of receipt of the Report to the Reporting Person within seven days of that receipt;
(b) Will maintain communication with the Reporting Person and, where necessary, ask for further information from and provide feedback to that Reporting Person;
(c) Diligent follow-up of the case: The Designated Officer follows up on Reports, maintains contact with the Reporting Person and, if necessary, requests further information. In addition, they take the necessary actions, in order for the Report to be taken up by the competent bodies of the organization or the competent bodies as the case may be.
(d) Provide feedback within a reasonable timeframe, not exceeding three months from the acknowledgment of receipt of the Report or, if no acknowledgement was sent to the Reporting Person, three months from the expiry of the seven-day period after the Report was made;

3.5 Processing of Reports made via the Internal Reporting channels

3.5.1 A written acknowledgement of receipt of the Report will be provided to the Reporting Person within a maximum of seven days following receipt thereof.
3.5.2 The Reporting Person will be informed of the status of the investigation of their Report within three months of (i) the confirmation of receipt of the Report; or (ii) as of the expiry of the aforementioned seven-day term, as well as afterwards whenever there are developments in the investigation process (to the extent this would not endanger the investigation).
3.5.3 The contents of a Report, the name of the Reporting Person (including any information that may directly or indirectly reveal the identity of the Reporting Person), and of the Reported Person, will be kept confidential, as will the details of any third party mentioned in the Report.
3.5.4 The Reporting Person will be informed of the manner in which the Breaches of Law included in the Report are to be addressed.
3.5.5 Reports submitted under this Policy must contain at least the following information:
(a) Name, surname, contact details and signature of the Reporting Person;
(b) Description of the Work-related Context where the information regarding the reported Breaches of Law were obtained;
(c) Details on the Reported Person, if known;
(d) A description of the Breaches of Law being reported;
(e) Any proof the Reporting Person may have in relation to the reported Breaches of Law; and
(f) The date of the Report and the signature, as the case may be.
3.5.6 Reports will be dismissed if they fail to contain the information provided in section 3.2.5 above, except for information under item (a), and, if following the request from the Designated Officer, additional information is not provided within 15 days of the request. Further Reports on the same Breach of Law with no additional information will also be dismissed.
3.5.7 A Report of an Breach of Law may be dismissed if, following investigation, the Report is found to refer to a Breach of Law that is clearly a minor breach and no additional subsequent measures are necessary.
3.5.8 When a Report is dismissed, at the end of the investigation, the Reporting Person will be informed of the closure and the result of the investigation, with the mentioning of the legal basis for dismissing the Report.
3.5.9 Protection from Retaliation (where applicable) will be extended to Reporting Persons and Facilitators, as defined herein, as well as to anonymous Reporting Persons or Reporting Persons reporting to European Union competent bodies, institutions, offices, or agencies.

3.5.10 Anonymous Reports are permitted under Romanian law and will benefit from the same treatment as any other Reports, whether made anonymously or not. However, any applicable time periods set out above for acknowledging receipt and providing feedback to the Reporting Person are not applicable to such anonymous Reports.

3.5.11 Anonymous Reports which fail to contain sufficient Information regarding the Breach of Law reported will be dismissed if, following a request from the Designated Officer, the Reporting Person fails to provide additional information within 15 days.

3.5.12 Reports are registered and kept in a dedicated internal registry for five years, subject to observance of all confidentiality requirements. After the expiry of this five-year term, Reports are destroyed, regardless of how they are stored.

3.5.13. When Reports are made by phone or other vocal messages system, the reporting shall be documented either by recording by way of durable and accessible means, subject to the Reporting Person's consent, or by complete and accurate transcription of the conversation. The Reporting Person will be given the opportunity to check, rectify and express consent by signing the minutes of the conversation or confirming electronically. If the Reporting Person refuses to consent to the form of the minutes, they will be directed to the process for making a written report via other Internal Reporting channels.

3.5.14 Reporting Persons may request an in-person meeting to make their Report. In such case, the Designated Officer will prepare minutes of the conversation by way of durable and accessible means. The Reporting Person will be given the opportunity to check, rectify and express consent by signing the minutes of the conversation or confirming electronically. If the Reporting Person refuses to consent to the form of the minutes, they will be directed to the process for making a written report via the Internal Reporting channels.

3.6 Anonymous notifications

In principle, it is possible to report a Breach of Law, suspicion of a Breach of Law or information about a Breach of Law anonymously to the Designated Officer. In that case, if additional information or explanation is required in the interest of the investigation, the Reporting Person may be requested to cooperate, without being obligated.

3.7 Confidentiality-Data Protection

3.7.1 The Designated Officer and members of the Confidentiality Committee will treat the Report of Reporting Person confidentially. Personal data and any information leading, directly or indirectly, to the identification of the Reporting Person shall not be disclosed to anyone other than the authorised staff members competent to receive and/or follow up on Reports, unless the Reporting Person consents to this. To this end, an anonymised 'case number' is used. Disclosures of the identity of the Reporting Person and of any other information shall be made after the Reporting Person has been informed in writing of the reasons for the disclosure of his or her identity and other confidential information, unless such disclosure undermines investigations or judicial proceedings. Communication about the Breach of Law, suspicion of a Breach of Law or Information about a Breach of Law is objectified in such a way that the identity of the Reporting Person cannot be inferred from the information.

3.7.2 Interamerican takes appropriate technical and organizational measures so that, during the submission and follow-up of Reports, personal data are collected which are necessary and appropriate to achieve the purposes of the law. Personal data, which are obviously not relevant to the handling of a specific Report, or are excessive, are not collected, or if they have been collected accidentally are deleted without delay.

3.7.3 Interamerican does not provide relevant information on the processing of personal data to the Reported Person and to any third person in his capacity as a subject of the data named in the Report or the personal data resulting from surveillance measures and in particular about the source of origin for as long as necessary and necessary for the purpose of preventing and responding to attempts to obstruct reporting, obstruct, frustrate or delay Follow-up Measures, in particular with regard to investigations, or attempts to identify Reporting Persons, and to protect them against retaliation.

3.7.4 Interamerican may not satisfy the rights (Articles 15 to 22 of the GDPR) exercised by the Reported Person and third parties named in the Report. Interamerican may refuse to enforce the rights without informing the reason for the restriction. However, the data subject is entitled to lodge a complaint with the Personal Data Protection Authority (DPA), which may investigate whether the conditions for the restriction of rights are met

and inform the subject accordingly, provided that such information is not detrimental to the fulfillment of these purposes.

3.7.5 In case of data leakage of the Reporting Person, of the Reported Person, of the Facilitator or third parties named in the Report, Interamerican shall not make a communication in accordance with para. 1 of Article 34 of the GDPR to the data subject, if such communication may be detrimental to the intended purposes hereof, but informs accordingly the relevant DPA, which may, after investigating the existence of the reasons invoked, request that the communication be carried out, if it considers that the conditions for the omission of the communication are not met.

3.8 Providing information
The Reporting Person shall provide all information known to him/her necessary to assess the Report and, if necessary, to enable an investigation into the reported Breach of Law, suspicion of a Breach of Law or information about a Breach of Law.

3.9 Registration and filing
Reports of Breaches of Law, or information about potential a Breach of Law are recorded by the Designated Officer. He/She creates an anonymized file in which all steps are documented. All registrations and files are stored in a secure environment. Data will be destroyed when it is no longer necessary to comply with the requirements of this Policy, the Directive or other requirements imposed by or pursuant to Law no. 361/2022 and EU law. Reports are stored for a reasonable and necessary period in order to be retrievable and to comply with the requirements imposed by this Policy, Union or national law and in any case until the completion of any investigation or judicial process which has been initiated as a consequence of the report to the detriment of the respondent, the complainant or third parties.

3.10 Investigation decision
The Designated Officer shall decide, on the basis of the information provided to them, whether or not to conduct an investigation in response to the Report. The Designated Officer respectively is advised by the Confidential Committee on this decision and its implementation. If it is established that the Report does not relate to a Breach of Law, suspicion of a Breach of Law or information about a Breach of Law, the reported Breach of Law, suspicion of a Breach of Law or information about a Breach of Law is not sufficiently serious to initiate an investigation or that insufficient information has been provided to be able to form an opinion on the Report, the Designated Officer advised by the Confidential Committee may decide not to conduct an investigation. The decision whether or not to proceed with an investigation and the grounds on which this decision is based will be communicated to the Reporting Person immediately. Upon request, the communication will be confirmed in writing to the Reporting Person.

3.11 Informing the Board of Directors
The Designated Officer may, if there is reason to do so and after consultation with the Reporting Person, inform the Chairman of the Board of Directors of the Report. If the Report relates to a member of the Board of Directors, the Chairman of the Board of Directors shall be informed of the Report. This notification shall take into account confidential treatment in accordance with Article 3.

Article 4 Investigation procedure

4.1 Conduct of research
If the Designated Officer decides to investigate the reported Breach of Law, suspicion of a Breach of Law or information about a Breach of Law, he/she shall ensure that an investigation is carried out immediately into the Report.
Such an investigation will often be carried out by the Designated Person, with assistance and/or cooperation (as the case may be) from the Compliance, Internal Audit (IA) department or HR and, where relevant, of the legal department. The investigation will - if possible - be completed within six weeks. The Designated Person shall immediately inform the Reporting Person of the completion of the investigation.

4.2 Decision
The Designated Officer may request advice from the Confidential Committee on the basis of the results of the investigation. The Designated Officer shall decide, within a period of two weeks from the date on which the

results of the investigation are available, on the basis of those results, whether further action should be taken to eliminate the causes of the Breach of Law. The Reporting Person will be informed of the decision. No later than three months after sending the acknowledgement of receipt of the initial notification, it must be clear to the Reporting Person whether the Report has been conclusively investigated or further Follow-up Actions are required.

4.3. Decision on further action
If it is decided that further action is desirable as a result of investigating a Report, advice to this effect will be given to the person or body of Interamerican and/or the Romanian Branch to which the Report relates or which has competence/jurisdiction to take remedial action in relation to the Breach of Law disclosed in a Report. In this opinion, the identity of the Reporting person is not disclosed.

4.4. Monitoring compliance advice
The Designated Officer, together with the Confidential Committee, supervises compliance with the advice. The person or body to which the advice has been provided must, on request, provide the Designated Officer with all the information necessary to determine whether and how the advice has been followed. If the advice of the Designated Officer is not or insufficiently followed, it may decide to report this to the Chairman of the Executive Board.

4.5 Annual reporting
The Designated Officer shall report to the Audit &Risk Committee (ARC) and the Board of Directors of Interamerican on their activities in the relevant calendar year within six months of the end of the calendar year. The reports of the Designated Officer are general in nature and do not contain any information on the basis of which the identity of the Reporting Person can be traced.

Article 5. Secrecy

Anyone who obtains information about (the reporting of) a (suspicion of) a Breach of Law under this Policy shall maintain confidentiality with third parties, unless he/she is authorized or obliged to provide that information to a third party on the basis of this regulation or by or under the law.

Article 6. Protection

6.1 Legal protection of the Reporting Person
Interamerican and the Romanian Branch shall ensure that, as a result of a Report under this Policy, the Reporting Person will not be subject to any form of Retaliation, insofar as he/she acts in good faith.

Law no. 361/2022 provides that all legal entities that are subject to the provisions of the law are prohibited from taking any form of Retaliation against the Reporting Person(s) and/or any Facilitator, including threats of retaliation and attempts of retaliation including in particular in the form of:

(a) suspension, lay-off, dismissal or equivalent measures;
(b) demotion or withholding of promotion;
(c) transfer of duties, change of location of place of work, reduction in wages, change in working hours;
(d) withholding of training;
(e) a negative performance assessment or employment reference;
(f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty;
(g) coercion, intimidation, harassment or ostracism;
(h) discrimination, disadvantageous or unfair treatment;
(i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment;
(j) failure to renew, or early termination of, a temporary employment contract;
(k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
(l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;

(m) early termination or cancellation of a contract for goods or services;
(n) cancellation of a license or permit;
(o) psychiatric or medical referrals;
(p) unilateral adverse change in working conditions.

Additionally, where a Reporting Person reports information on Breaches of Law or makes a public disclosure on Breaches of Law in accordance with Law no. 361/2022, they shall not be considered to have breached any company rules on information protection and shall not incur liability of any kind in respect of such a report or public disclosure, provided that they had reasonable grounds to believe that the reporting or public disclosure of such information was necessary for revealing a Breach of Law.

6.2 Legal protection of the Designated Officer and the Confidential Committee
The Designated Officer and the members of the Confidential Committee shall in no way be disadvantaged in their position because of the performance of their duties under this Policy. They act independently and impartially in the processing and resolution of Reports

6.3 Reporting Person's involvement in the reported Breach of Law
The Reporting Person who knowingly participated in or is the cause of a Breach of Law will not be entitled to benefit from any rights or protections under Article 6.1, as it applies to an Reporting Person acting in good faith, when reporting a Breach of Law.

6.4 Data subject to a Breach of Law
Interamerican/the Romanian Branch shall ensure that the Reported Person who is or appears to be involved in a reported Breach of Law is treated fairly and objectively, and receives at least the protection to which he/she is entitled by or under the law.

6.5 Legal Assistance to Reporting Person
Upon request from the Reporting Person, within a maximum of 1 (one) year from the Report date, the Reporting Person shall be entitled to benefit from legal assistance from the Bar Association in which the activity of the Reporting Person is carried out, with respect to any disciplinary investigation carried out in relation to such Reporting Person.

6.6 Ability to challenge Retaliation
A Reporting Person may challenge any measures taken against him/her, which he/she believes to be a form of Retaliation, through a claim made before the competent court within the jurisdiction of which the Reporting Person is domiciled.
In court claims referred to in the preceding precedent, it is the employer (or such other entity which is alleged to have instituted the Retaliation measures) that has the burden of proving that the contested measure is justified by reasons other than reasons related to the Report or public disclosure of a Breach of Law.
The competent court of law may take interim measures (even in the absence of a judgment on the merits of the case) to suspend the contested measures.
Upon request from the Reporting Person, the Bar Association in which the Reporting Person is domiciled must provide free of charge legal assistance.
If the competent court of law determines that the contested measure amounts to Retaliation, it may instruct, as the case may be: the cancellation of such measure, returning the parties to the *status quo ante*, indemnification for damages caused, cessation of the measure and its prohibition for the future, as well as any other measures to cease any form of Retaliation.

Article 7. External reporting channels

7.1 Any Breach of Law, suspicion of a Breach of Law or information about a Breach of Law can be reported directly to the Agency, in accordance with the reporting procedure provided on the Agency's website at: https://avertizori.integritate.eu/?_gl=1%2Alqt2rc%2A_ga%2AMjM2MTkyNTEuMTc1NTYx-ODE2OA..%2A_ga_4GQ9YTR59X%2AczE3NTU2MTgxNjgkbzEkZzAkdDE3NTU2MTgxNjgkajYwJGwwJGgw.

7.2 State Support measures:The Agency provides advice and information with respect to any potential protection measures, rights, procedures and applicable reparatory measures available under the law. The Agency also provides Reporting Persons assistance for the protection thereof against Retaliation before any public authority.

Art. 8 Public disclosures

8.1 Subject to the provisions hereof, the Reporting Person may also make a public disclosure with respect to a Breach of Law. Such public disclosure may be made to the press, a professional organization, a trade union or employers' association, non-governmental organisations, Parliamentary commissions, or by making available in any other manner in the public sphere of information regarding a Breach of Law.

8.2 Protection in case of public disclosure

8.2.1 Reporting Persons who make public disclosure benefit from the protections granted to Reporting Persons under this Policy if at least one of the following conditions is met:

(a) the Reporting Person has first reported internally and externally, or only externally, but considers that no adequate measures were taken within the legal deadlines;

(b) the Reporting Person has good reasons to consider that:

(i) the Breach of Law can constitute an imminent or obvious danger to public interest or may pose a risk for a damage that cannot be mitigated; or

(ii) in case of external reporting, there is a risk of Retaliation, or a low probability of the Breach of Law being effectively mitigated considering the specific circumstances of the reporting.