

**DETAILED INFORMATION ON REPORTS THAT MEET THE
REQUIREMENTS TO QUALIFY AS WHISTLEBLOWING.**

Pursuant to the decision **2/894/23.10.2020** of its Board of Directors on the subject of

- "a) Adaptation to Commission Implementing Directive (EU) 2015/2392 of 17 December 2015 on Regulation (EU) No. 596/2014 of the European Parliament and of the Council as regards reporting to the competent authorities of actual or potential infringements of that Regulation,*
b) Adaptation to Article 73 par. 1 of Directive 2014/65/EU - MiFid II and article 71 of Greek law 4514/2018,
c) Adaptation to Article 94B of Greek law 4099/2012 added by Article 14 of Greek law 4416/2016, Government Gazette A 160/6.9.2016 (Article 1 par. 7 of Directive 2014/91/EU) - amendment UCITS V,
d) Adaptation to par. 3 of Article 6 of Greek law 4557/2018, point (i), as amended by Greek law 4734/2020,
e) Adaptation to Articles 76 and 78 of Greek law 1969/1991 and par. 13 of Article 35 of Greek law 2324/1995, as replaced by Article 80 of Greek law 4706/2020, Government Gazette A 136/17.7.2020."

the Hellenic Capital Market Commission publishes on its website the following information regarding the receipt of reports of actual or potential infringements of the capital market legislation that meet the requirements to qualify as WHISTLEBLOWING.

Reports of actual or potential infringements of the capital market legislation that qualify for WHISTLEBLOWING and are submitted to the Hellenic Capital Market Commission are received by staff members qualified to handle reports of violations (**Qualified Staff Members**).

Such reports shall be submitted to the Hellenic Capital Market Commission, whether by name or anonymously, in the following ways:

- a) in writing, by e-mail to WHISTLEBLOWING@CMC.GOV.GR
- b) in writing, at the postal address "Hellenic Capital Market Commission, 3-5 Ippokratous Str., 106 79 Athens", marked '**Confidential - for the attention of the Qualified Members**',
- c) orally, **on the telephone lines [2103377159](tel:2103377159) and [2132071944](tel:2132071944) (these lines are recorded)**. In this case, a full and accurate transcript of the conversation shall be made. Once the reporting person has revealed his identity, he/she shall be given the opportunity to verify, correct and agree with the transcript of the conversation by signing it, and
- d) by a personal meeting of the reporting person with qualified members of the staff of the Hellenic Capital Market Commission. In this case, the Hellenic Capital Market Commission shall keep complete and accurate records of the meeting in a fixed and retrievable format and shall have the right to document the records of the face-to-face meeting in the format of:
- a recording of the conversation in a fixed and retrievable form, or

- accurate minutes of the meeting, drawn up by qualified members of its staff. In cases where the reporting person has disclosed his identity, the Hellenic Capital Market Commission shall provide the reporting person with the opportunity to verify, correct and agree with the record of the conversation by signing it.

The reporting person can be kept informed of the progress of his/her report through the **telephone lines [2103377159](tel:2103377159) and [2132071944](tel:2132071944) (on these telephone lines the conversations are recorded)**.

The Hellenic Capital Market Commission may require the reporting person, either in writing or orally, during a telephone conversation (via the **telephone lines [2103377159](tel:2103377159) and [2132071944](tel:2132071944) - on these telephone lines the conversations are recorded**) or a personal meeting with qualified members of its staff, to clarify the information disclosed or to provide any additional information.

The Hellenic Capital Market Commission shall promptly send an acknowledgment of receipt of written reports of infringements **to the postal or electronic address indicated by the reporting person**, unless otherwise expressly requested by the reporting person.

The Hellenic Capital Market Commission, after completing the examination of the report, sends a written notification to the reporting person on the result of its examination, **to the postal or electronic address indicated by the reporting person**, unless otherwise expressly requested by the reporting person.

Confidential information received, exchanged or transmitted upon receipt of reports of actual or potential infringements of the capital market legislation that qualify for WHISTLEBLOWING is subject to the provisions of professional secrecy set forth below:

(a) all information exchanged between the Hellenic Capital Market Commission and competent authorities of other Member States under the above institutional framework, that concerns business or operational conditions and other economic or personal affairs shall be considered confidential and shall be subject to the requirements of professional secrecy, except the Hellenic Capital Market Commission or the competent authority of the other Member State states at the time of communication that such information may be disclosed or such disclosure is necessary for legal proceedings,

(b) the obligation of professional secrecy applies to all persons who work or have worked for the Hellenic Capital Market Commission or for any authority or market undertaking to whom the Hellenic Capital Market Commission has delegated its powers, including auditors and experts contracted by the HCMC. Information covered by professional secrecy may not be disclosed to any other person or authority except by virtue of provisions laid down by Union or national law; and

(c) the Hellenic Capital Market Commission may transfer personal data to a third country provided that the requirements of **Regulation (EU) 2016/679** are fulfilled and only on a case-by-case basis. The Hellenic Capital Market Commission shall ensure that the transfer is necessary for the purpose of the above institutional framework and that the third country does not transfer the data to another third country unless it is given express written authorisation and complies with the conditions set out by the Hellenic Capital Market Commission.

The confidentiality of data may not be ensured in exceptional cases, including, where the disclosure of data is a necessary and proportionate obligation required under Union or national law in the context of investigations or subsequent judicial proceedings or to safeguard the freedoms of others including the right of defence of the reported person, and in each case subject to appropriate safeguards under such laws.

The Hellenic Capital Market Commission shall exchange information and cooperate effectively with the Ministry of Labor and any other relevant authority involved in the protection of persons working under a contract of employment, who report infringements that qualify for WHISTLEBLOWING to the Hellenic Capital Market Commission or are accused of such infringements, against retaliation, discrimination or other types of unfair treatment, arising due to or in connection with reporting of infringements that qualify for WHISTLEBLOWING.

Persons making information available to the Hellenic Capital Market Commission are not considered to be in infringing of any restriction on the disclosure of information imposed by contract or by any legislative, regulatory or administrative provision and are not to be involved in liability of any kind related to such disclosure.