



DEEPSEA TECHNOLOGIES

Whistleblowing Policy

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Contents

1. Overview	2
2. Scope	2
3. Definitions	2
4. Confidentiality	3
5. Report Submission	3
6. Investigation	3
7. External Reporting	3
8. Protection of Personal Data	4



1. Overview

DeepSea Technologies (hereinafter referred to as "the Company") is committed to upholding the highest standards of ethics, transparency, and integrity in all its business activities. We recognize the importance of fostering an environment where employees, contractors, partners, and stakeholders can report misconduct, malfunctions, irregularities, or criminal activities without fear of retaliation. This Whistleblower Policy outlines the framework for the timely detection and management of such concerns to safeguard the Company's interests and reputation.

This policy is established in accordance with the European Union legislation on whistleblowing (Law 4990/2022 and Directive 2019/1937 EU) and its incorporation into the Company's Policy. It also aligns with international best practices for internal reporting.

2. Scope

This policy applies to all individuals associated with the Company, including but not limited to:

- Employees (full-time, part-time, permanent and non-permanent)
- Contractors
- Advisors
- Trainees and interns

3. Definitions

For the purpose of this policy, violations refer to serious irregularities or misconduct related to:

- Violations of laws and regulations, including financial services, banking, financial crimes, and anti-money laundering.
- Violations of public contracts, European Union competition directives, and corporate tax regulations.
- Actions that pose threats to public health or the environment.
- Misappropriation of Company assets.
- Financial malfeasance, irregularities, or fraud.
- Any form of bribery, both active and passive.
- Violations of personal data protection legislation.
- Concealing or covering up any of the aforementioned violations.



- Individuals uncertain about whether a matter falls within this policy should seek guidance from the designated authority.

4. Confidentiality

The Company encourages individuals to report concerns through existing reporting channels. It is committed to safeguarding the identities of both the whistleblower and individuals mentioned in reports. During investigations, the whistleblower's identity will not be disclosed to anyone except authorised personnel responsible for receiving and investigating reports, except with the whistleblower's express consent or in cases where a report is found to be malicious.

We maintain confidentiality through appropriate organisational measures, primarily through our online reporting platform.

5. Report Submission

Reports can be submitted via the online platform at [link](#).

6. Investigation

Upon receiving a report, the following investigation process will be followed:

1. The Reporting and Monitoring Officer (RMO) designated by the company (currently, the People Operations Director) will acknowledge receipt of the report within seven (7) working days.
2. The RMO will assess whether the report is substantiated and falls within the scope of this policy. Reasons for rejection will be communicated in writing, which may include cases where the reported acts do not constitute a violation, insufficient information is provided, the report is malicious, or the issue has been resolved.
3. The whistleblower will be informed of the investigation's progress within three (3) months of report receipt, taking into account any applicable confidentiality obligations.

7. External Reporting

Whistleblowers have the option to directly submit reports to the National Transparency Authority (*Εθνική Αρχή Διαφάνειας (Ε.Α.Δ.)*), which can be done in writing or electronically through designated channels accessible to all individuals.



8. Protection of Personal Data

Throughout the reporting and investigation process, personal data will be processed in accordance with applicable privacy and data protection laws and regulations. The Company encourages whistleblowers to avoid including specific categories of personal data unless necessary to substantiate the report. Unnecessary or irrelevant personal data will not be processed.

Data processing will comply with the European General Data Protection Regulation (GDPR), Greece's Data Protection Law, and any other applicable legislation. The Company serves as the data controller, and processing is carried out by authorised personnel following this policy.