

WHISTLEBLOWING POLICY

Cyprus Telecommunications Authority
Cyta

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1. INTRODUCTION

The Authority aims at ensuring lawful and ethical conduct at the highest level. To this end, we maintain a zero-tolerance policy with regard to misconduct that may be detrimental to the Authority`s reputation. We are committed to taking appropriate actions when any reprehensible or wrongful conduct is identified.

In order for us to take appropriate actions, any cases of misconduct should first come to our knowledge. Therefore, we promote a culture enabling anyone, whether inside or outside the Authority, to feel safe and encouraged to report any cases of misconduct or wrongful actions related to our activities. Our policy encourages everyone to raise any concerns or report any issues of violation of the Authority's policies and procedures or of the legislative and regulatory framework governing its activities. Such issues may include theft, corruption, bribery, actions involving serious environmental impact, intimidation, use of force, etc.

The Authority's Whistleblowing Policy ("the Policy") is an essential part of the above commitment. It ensures that any person working for or associated with the Authority can report any misconduct that comes to his/her attention. At the same time, the Policy offers protection to any person who makes a report, since all reports shall be treated as confidential and with due care. Thus, a reporting person can be secured against adverse reactions (retaliation) of any kind.

The Policy must not be misused for frivolous accusations or complaints of personal character.

The Policy describes how to make a Report, how it is investigated, how misconduct is dealt with and how the Authority supports and safeguards the whole reporting procedure.

2. DEFINITIONS

Affiliated Entities means Cyta's Funds (e.g. Pensions and Grants Fund of the Personnel of Cyta, etc.), Subsidiaries and companies where Cyta has a majority shareholding and/or a majority in their Board of Directors, including those based abroad which, however, may require adaptation in particular issues due to the local regulatory framework.

Associated Persons means employees, officers, members of the Board, persons acting as directors, retired employees, subcontractors, agents, partners and representatives of the Authority or Affiliated Entities or Partner Entities.

Authority or Cyta or Organization means the Cyprus Telecommunications Authority.

Board means the Board of Directors of the Authority as may be appointed from time to time.

Code of Conduct means the Code of Ethics and Conduct of the Authority.

Compliance Officer means the Compliance Officer of the Authority.

External Report means External Report as defined in Law 6(I)/2022, i.e. oral or written provision of information on the violations provided for in Law 6(I)/2022 to a competent authority through an external reporting channel.

IF, RC & CG Committee means the Institutional Framework, Regulatory Compliance and Corporate Governance Committee of the Board of Directors.

Internal Report means a report submitted through internal channels.

Internal Channel means the communication channels as defined in Paragraph 14 hereof.

Investigation Team means the team responsible for investigating Reports as provided for in Article 18.

Partner Entities means subcontractors, directors, agents, partners, representatives and suppliers of the Authority or Affiliated Entities.

Public Report means a Public Report as defined in Law 6(I)/2022 regarding only the violations provided for in Law 6(I)/2022.

Report means reporting a misconduct through the internal channels in accordance with this Policy.

Report Evaluation Committee or Committee means the Authority's Report Evaluation Committee as set out in Article 16 hereof.

Reported Person means a person about whom a Report has been made.

Reporting Person means a natural person who reports (discloses) a misconduct, in good faith, orally or in writing, or his/her representative.

Reprehensible Conduct includes any dangerous, unethical or illegal conduct, action or practice that occurs under the responsibility of the Authority or Associated Persons or in the course of their activities.

Personnel means all employees, monthly salaried personnel, hourly paid personnel and contract personnel of the Authority and Affiliated Entities.

3. PURPOSE

The purposes of the Policy are as follows:

3.1 To provide channels of communication and a mechanism for reporting genuine concerns about any Reprehensible Conduct that may concern the Authority and its Affiliated Entities, Associated Persons and Partner Entities, creating an environment that encourages responsible and safe Reporting of any cases of Reprehensible Conduct through the internal reporting channels; and

3.2 To express the Authority's policy for the protection of witnesses in the event of a Report being made of any Reprehensible Conduct provided for in Law 6(I)/2022 and only in cases where such witness is covered by the terms and conditions set out in the above Law.

4. SCOPE OF APPLICATION

4.1 This Policy is binding on the Authority and its Affiliated Entities, Associated Persons and Partner Entities.

4.2 Reprehensible Conduct of any Associated Person may be subject to Reporting.

4.3 Reports may be made of Reprehensible Conduct that has occurred since the date of adoption of the Policy, is occurring now or may occur in the future.

5. REPORTING PERSON

5.1 A Reporting Person is a natural person who reports or discloses Reprehensible Conduct. This term may include any person who wishes to make a Report.

5.2 The protection hereunder shall also extend to any Reporting Person who reports Reprehensible Conduct through an agent or legal adviser.

6. CONDUCT SUBJECT TO REPORTING

6.1 The term "Reprehensible Conduct" shall have the broadest possible meaning and shall include dangerous, unethical or unlawful conduct, actions or practices that take place under the responsibility or in the context of activities of the Authority or its Affiliated or Partner Entities.

6.2 By way of example and without limiting the generality of the foregoing, Reprehensible Conduct includes the following:

6.2.1 any violation of the Laws of the Republic,

6.2.2 any violation as defined in Law 6(I)/2022,

6.2.3 any action, practice or conduct that violates any policy, decision, regulation, procedure, statute, circular, directive or code of conduct of the Authority or its Affiliated Entities,

6.2.4 any action, practice or conduct that is contrary to or inconsistent with the principles, values and strategy of the Authority or its Affiliated Entities,

6.2.5 any concealment of, or inducement to commit, a reprehensible act,

6.2.6 any attempt to obstruct the submission or investigation of a Report.

6.3 The subject matter of a Report may include genuine concerns about any conduct, practices or actions that may potentially constitute Reprehensible Conduct.

6.4 Reports are made without any promise of payment or provision of any consideration and shall be based on a sincere and reasonable belief that Reprehensible Conduct has occurred or is likely to occur, or that there has been an attempt to commit a reprehensible act.

6.5 If it is not clear or proven that Reprehensible Conduct has occurred, potential Reporting Persons should judge the facts on their own and consider the conduct with reflection and critical thinking before making a Report. Nevertheless, when there is a suspicion that Reprehensible Conduct may have occurred, the Authority prefers that the reflection be reported in good faith rather than withheld.

7. REPORTS NOT SUBJECT TO CONSIDERATION

7.1 Reports related to Customer complaints regarding the quality of products and services provided by Cyta do not refer to Reprehensible Conduct for the purposes hereof and shall not be accepted for consideration unless they relate to a service provided by a specific person of the Authority and his/her conduct, practice or action in itself constituted Reprehensible Conduct. Such complaints shall be handled by the relevant Customer Service channels.

7.2 For the purposes hereof, the following types of reports shall not be considered:

7.2.1 Reports on matters pending before, or already examined and adjudicated by, the Cyprus Courts or other Supervisory Authorities such as the Commissioner for Administration and the Protection of Human Rights.

7.2.2 Reports of disagreements on issues concerning policies and decisions of competent bodies of the Authority.

7.2.3 Reports based only on hearsay.

7.2.4 Reports of complaints in relation to the terms and conditions of employment of a staff member and his/her career development.

7.2.5 Reports of day-to-day personal issues or personal disagreements with colleagues or managers of an employee and/or disagreements concerning the assignment of duties, performance evaluations or other administrative decisions.

7.2.6 Reports aimed at circumventing the expiry or limitation period of a right of action before the Court of Justice or of a justiciable right.

7.2.7 Reports aimed at avoiding the initiation or progress of disciplinary or other adverse proceedings against the Reporting Person.

7.2.8 Reports aimed at avoiding an unfavourable performance assessment, transfer to another position or any other lawful action by the Authority in relation to the Reporting Person.

7.3 Reports of harassment may be made through the procedure set out herein but such reports will be handled in accordance with the provisions of the Harassment and Sexual Harassment Prevention and Combating Policy.

7.4 Anonymous Reports will be accepted through the Internal Communication Channels but will be considered only if there is sufficient objective evidence to investigate and if it is deemed necessary by the Report Evaluation Committee.

7.5 Reports concerning disciplinary offences for which disciplinary proceedings are already pending within the Organization shall not be considered.

8. PROTECTION

8.1 The Authority will not permit or tolerate any threat, retaliation, unfair treatment or disciplinary action of any kind against the Reporting Person or the Reported Person or any person involved in the investigation of any Report.

8.2 The protection referred to in paragraph 8.1 above and in paragraphs 9, 11 and 12 below shall also extend to the cases of External Reports and Public Reports but only for the Violations provided for in Law 6(I)/2022 and strictly only if the Reporting Person has followed the procedures and has complied with the terms and conditions provided for in Law 6(I)/2022.

8.3 In the event of an External Report or Public Report of any issues not included in the Violations provided for in Law 6(I)/2022, the Authority cannot ensure protection of the Reporting Person, and the Reporting Person may face disciplinary or other offences.

9. PROTECTION OF THE REPORTING PERSON

9.1 The Authority will provide protection to Personnel and all individuals, who submit a Report of Reprehensible Conduct through the Internal Channels in good faith and within the framework of this Policy, from the following:

9.1.1 any form of harassment, bullying or victimisation, including threats or intimidation or other improper practices and retaliation,

9.1.2 retaliation in the working environment, such as bullying, removal of duties without reasonable justification or replacement of duties with the new ones, transfer to another position, impact on performance assessments,

9.1.3 any other kind of discrimination or unfavourable treatment,

9.1.4 early termination or cancellation of the contract,

9.1.5 disciplinary or other adverse proceedings,

9.1.6 disclosure of identity except where it is necessary before a competent authority as provided for in Paragraph 12.

9.2 In the event that the Reporting Person is retaliated against, the Authority encourages him/her to notify the incident in writing in the form of a Report, submitting any information substantiating the complaint, through the communication channels provided for herein.

9.3 If an investigation under this Policy does not substantiate the allegations, the Reporting Person will not face any consequences from the Authority.

9.4 If the Reporting Person participated in the event or action complained of, he/she will not be exonerated from responsibility, but his/her contribution to the detection and investigation of irregularities, omissions or criminal offences will be taken into account.

10. PROTECTION OF THE REPORTED PERSON FROM RETALIATION

10.1 The Authority shall ensure that the person about whom a Report has been made is protected and that no action will be taken against him/her if the infringement is not proven.

10.2 The Reported Persons, subject to the provisions of paragraph 10.3, shall have the right:

10.2.1 To be informed of the infringement for which the Report has been submitted against them,

10.2.2 to receive a copy of the Report, while maintaining the confidentiality of any personal data of third parties contained therein,

10.2.3 to be represented by a lawyer,

10.2.4 to appear before the Report Evaluation Committee.

10.3 The Reported Person shall be informed of the existence of the Report and of the content of the relevant allegations after the completion of the investigation and prior to the adoption of a decision by the Report Evaluation Committee, provided that the findings of the Investigation Team include elements that concern him/her personally and may adversely affect him/her.

10.4 In case the Report is found to be groundless, the Reported Person will not be informed that a Report has been made against him/her, for the reason of maintaining a favourable working environment within the Authority, unless the Reported Person exercises the right of access to his/her personal data or unless a relevant legal obligation exists.

11. CONFIDENTIALITY

11.1 All Reports are treated confidentially and the parties involved are bound by a duty of confidentiality.

11.2 All Personal Data will be handled on the basis of the provisions of the General Data Protection Regulation EU 2016/679 and the Law on the Protection of Natural Persons with regard to the Processing of Personal Data No.125(I)/2018. Any complaint of a personal data breach, or a request for the exercise of rights granted under the above data protection legislation, shall be considered by the Data Protection Officer of the Authority.

12. PROTECTION OF ANONYMITY

12.1 Any person who is involved in the report examination or who knows the identity of the Reporting Person is prohibited from revealing his/her identity or disclosing details that could lead to the identification of the Reporting Person, unless they have obtained his/her express consent.

12.2 The Authority will take all measures to reduce the risk of identification of the Reporting Person without his/her consent.

12.3 Disclosure of the identity of the Reporting Person may be required by judicial or legal proceedings at a later stage.

13. TERMINATION OF REPORTING PROCEDURE

If the Reporting Person makes an External Report or Public Report while the procedure hereunder is pending, the procedure hereunder will be terminated.

14. INTERNAL COMMUNICATION CHANNELS

14.1 Reports can be made using the following internal communication channels:

14.1.1 **By e-mail**: whistleblowing@cyta.com.cy

14.1.2 **In writing** by mail: c/o: Cyta Compliance Officer (Cyta, Tilepikoinonion Str. (Telecommunications Str.), P.O. Box 24929, Nicosia, CYPRUS), indicating the word "CONFIDENTIAL" on the sealed envelope containing the Report.

14.1.3 **In writing** by internal correspondence. A Report may be sent in a sealed envelope clearly marked with the word “CONFIDENTIAL” for the attention of the Cyta Compliance Officer.

14.1.4 **By telephone**: +357 22 701010 (ext. 1010).

14.1.5 **At a personal meeting** after consultation with the Compliance Officer.

14.1.6 **Through the electronic platform** for the submission of Reports available on Cyta's website.

14.2 The above communication channels function exclusively as Internal Reporting Communication Channels and are designed to protect the anonymity of the Reporting Person.

14.3 Any Reports using Social Media and/or Public Disclosure, without prior use of the Internal Communication Channels and until the procedures hereunder have been exhausted, will not be covered by the provisions hereof.

15. COMPLIANCE OFFICER

15.1 The Compliance Officer has the authority and responsibility for overseeing the investigation of Reports and for the implementation and proper execution of this Policy.

15.2 The responsibilities of the Compliance Officer, inter alia, with respect to this Policy, are detailed in Annex A.

16. REPORT EVALUATION COMMITTEE

16.1 The examination of Reports falling within the scope of this Policy shall be carried out by the Report Evaluation Committee.

16.2 The Report Evaluation Committee shall consist of four (4) members. It shall comprise the Compliance Officer of Cyta ex officio, the Senior Director/Chief Operations Officer (Committee Chairperson), the Internal Audit Director and the Legal Services Director.

16.3 In order to ensure a fair and impartial outcome during the investigation of a Report, the Report Evaluation Committee may adjust its composition in cases where a conflict of interest exists.

16.4 For the purposes of this Policy, the Compliance Officer of the Authority, in addition to being an ex officio member, shall also act as the Secretary of the Report Evaluation Committee.

16.5 In the event of resignation, retirement or prolonged absence of any member of the Report Evaluation Committee:

16.5.1 The member shall be replaced by the person designated by the Organization as his/her substitute in the position previously held.

16.5.2 Such designation shall automatically apply to participation in the composition of the Report Evaluation Committee.

16.5.3 If the designated person is already a member of the Committee, another person shall be appointed for the purpose of replacing the member until the appointment of a new member or the return of the original member, in order to maintain the full and functional composition of the Committee.

16.6 For the adoption of decisions, a quorum of three (3) members shall be required, including the Compliance Officer. Decisions shall be taken by majority vote. In the event of a tie, the Chairperson of the Committee shall have the casting vote.

16.7 Meetings of the Committee may also be held remotely, by means of teleconference, provided that the principles of the applicable legislation (Law 159(I)/1999, as amended) and confidentiality are observed. The deliberations and decisions of the Committee shall be recorded in the minutes.

17. REPORT HANDLING PROCEDURE

17.1 Each person submitting a Report through the internal communication channels is expected to provide all available information supporting and substantiating the case, including, but not limited to, the following:

17.1.1 the facts that gave rise to the suspicion/concern, with reference to names, dates, documents and locations;

17.1.2 the reason for the Report submission.

17.2 A report form, as shown in Annex C hereto, shall be completed for all Reports. If a Report is made by telephone or at a personal meeting, the Reporting Person shall have the opportunity to check, correct and confirm the record of the conversation contents by signing the Report.

17.3 Once a Report is submitted, the following procedure will be carried out:

17.3.1 The Compliance Officer will confirm receipt of the Report to the Reporting Person within seven (7) days, given that his/her contact details and means of communication are available.

17.3.2 The Compliance Officer will check whether the Report is substantiated with evidence and, if necessary, will contact the Reporting Person for more information. The Compliance Officer has the authority to maintain contact with the Reporting Person to request further information.

17.3.3 The Compliance Officer shall decide whether the Report falls within the scope of this Policy.

17.3.4 If the Report does not fall within the scope of this Policy, it will be rejected by the Compliance Officer and the Reporting Person will be notified accordingly.

17.3.5 If the Report falls within the scope of this Policy, then the Compliance Officer shall consider whether the Report falls within the competence of the Report Evaluation Committee.

17.3.6 If the Report does not fall within the competence of the Report Evaluation Committee, the Compliance Officer shall refer the Report to the competent Directorate or Service for internal administrative investigation and shall inform the Reporting Person accordingly, as well as that the protection provided under Sections 8, 9 and 10 shall not apply.

17.3.7 If the Report falls within the scope of this Policy and the competence of the Report Evaluation Committee, then the Compliance Officer shall refer the Report to the Report Evaluation Committee for further action.

17.4 Having evaluated the Report, the Report Evaluation Committee shall decide whether it falls within the scope of this Policy and whether it requires further investigation. If it does fall within the scope hereof and does require investigation, the Committee shall appoint an Investigation Team and forward the Report for handling by the Team.

17.5 If, in the judgment of the Report Evaluation Committee, the Report does

not fall within the scope hereof, it shall be:

17.5.1 either transferred to the competent Directorate for further handling, as provided for in Section 17.3.6 above, or

17.5.2 rejected, and the Reporting Person shall be notified accordingly.

17.6 The Report Evaluation Committee may give a summary decision on any Report submitted to it. If it reasonably and justifiably considers that no further investigation is required, the Compliance Officer shall inform the Reporting Person accordingly. Otherwise, where the Committee determines that the Report needs further investigation, the procedures set out in Sections 18 and 19 below shall be followed.

17.7 The Reporting Person shall be informed within three (3) months from the receipt of his/her Report regarding the progress of the investigation, to the extent possible and in an appropriate manner, taking into particular consideration any applicable confidentiality obligations.

18. INVESTIGATION TEAM

18.1 The Investigation Team shall make every effort to complete the investigation and to provide the Committee with relevant information within thirty (30) business days after the Report has been submitted to it. If the investigation cannot be completed within thirty (30) business days, the Investigation Team may request additional thirty (30) business days on the basis of a written reasoned notice to the Committee.

18.2 The Investigation Team shall inform the Committee of the conclusion of its investigation with a report including findings on the allegations and a summary of the revised evidence.

18.3 The Compliance Officer is responsible for the diligent monitoring of the progress of the Report investigation and the timely issuance of a final report.

18.4 The Investigation Team shall consist of at least two (2) impartial members assigned with the responsibility of investigating Reports, appointed by the Report Evaluation Committee depending on the nature and subject matter of the case. At least one (1) of the members shall have prior experience in internal investigations, such as internal audit

investigations, disciplinary investigations or investigations conducted within the framework of this Policy.

18.5 The participation of the members appointed to the Investigation Team shall be mandatory, unless there is a documented impediment or a conflict of interest, which shall be immediately notified to the Compliance Officer.

18.6 The members shall be bound by a duty of confidentiality and shall cooperate for the completion of the investigation within the prescribed timeframes.

18.7 The Investigation Team shall be granted temporary authorization for the purposes of carrying out the specific investigation assigned to it.

Subject to the provisions of Section 11, the access of the Investigation Team to documents, information or personal data shall be strictly limited:

18.7.1 to the purpose of the investigation,
18.7.2 to its duration,
18.7.3 to the strictly necessary data related to the case,

The granting and termination of such access shall be carried out under the supervision of the Compliance Officer. The authorization shall be automatically revoked upon completion of the investigation and submission of the findings to the Report Evaluation Committee.

18.8 The Investigation Team may collect and evaluate information, request the necessary evidence, documents or clarifications, conduct interviews and document findings. Such powers shall be exercised exclusively for the specific investigation and shall automatically cease upon its completion.

18.9 The Investigation Team shall not take decisions on the findings. The final evaluation and decision shall rest with the Report Evaluation Committee.

19. DECISIONS OF THE REPORT EVALUATION COMMITTEE

19.1 Having considered the final conclusion of the Investigation Team or in cases where it decides to do so summarily, the Committee may refer cases, where appropriate, with its proposals to the competent Directorates of the Authority for any further action as may be required.

19.2 The Committee shall have the right, and may invite, where feasible and subject to his/her consent, the Reporting Person to participate in a meeting of the Committee in the context of the relevant investigation of the Report submitted.

19.3 In addition, during the conduct of an investigation, the following principles shall apply:

19.3.1 The presumption of innocence for both the Reported Person and the Reporting Person.
19.3.2 Timely action and transparent communication in relation to the investigation and the subsequent decisions.
19.3.3 Supporting the Reported Persons, should they choose to respond in person to the allegations.
19.3.4 Allowing the Reporting Person to check, correct and confirm the minutes of the call, conversation or meeting by signing the same.

The process flowchart is shown in Annex B hereto.

20. MONITORING AND REPORTING

20.1 The Compliance Officer shall keep record of all reports received with details including at least the date of receipt and how they were handled.

20.2 The Compliance Officer shall periodically inform the Committee of all cases rejected and referred to other departments by him/her, specifying the reason for their rejection.

20.3 The Compliance Officer, in cooperation with the Committee, shall submit to the IF, RC & CG Committee a semi-annual report on all reports received, including information on how they were handled and the minutes of the Committee's meetings. The IF, RC & CG Committee shall inform the Board of Directors accordingly. In cases where no Reports have been submitted during the relevant semester under review, the submission of the report may be omitted, subject to a relevant notification to the IF, RC & CG Committee.

20.4 In cases where any Report is of such a form and scale that if true, it may be detrimental to the Authority`s reputation, the Committee must

immediately inform the Chief Executive Officer (CEO) and the Chairperson of the Board for further action. It is understood that:

20.4.1 if the Report concerns the CEO, the Committee must immediately inform the Chairperson of the Board to decide on further handling accordingly,

20.4.2 if the Report concerns the Chairperson of the Board, the Committee must immediately inform the CEO and the Vice-Chairperson to decide on further handling accordingly,

20.4.3 if the Report concerns the CEO and the Chairperson of the Board, the Committee must immediately inform the Vice-Chairperson of the Board to decide on further handling accordingly.

21. INFORMATION AND TRAINING ON THE POLICY

21.1 The Authority shall ensure that its Personnel and Associated Persons are regularly informed about the Policy in order to ensure the best possible knowledge and effective implementation hereof. Information on the Policy shall be published in a prominent place on the Authority's intranet and on the Authority's website.

21.2 The Personnel shall be properly informed in order to be fully aware of their rights and obligations hereunder. All relevant information and materials shall be provided by email or other appropriate means depending on the category of employee.

21.3 Personnel training (face-to-face or online) shall be carried out at regular intervals using various tools to monitor the knowledge of the Organization`s employees who should receive an adequate training: (i) on this Policy and (ii) on the operation of the Authority`s channels and tools for reporting and the access thereto.

21.4 Information should be spread and awareness-raising activities should be promoted within the Organization, to Associated Persons and to the general public for consolidation and support of the principles of integrity, honesty and transparency within and outside the Authority.

22. DATA RETENTION/RECORDING

22.1 The Committee shall maintain a record of all reports submitted and keep all relevant documents, including minutes of meetings or investigations.

22.2 Personal data shall be deleted within three (3) months from the date of completion of the procedure. In cases where legal or disciplinary proceedings have been initiated, it shall be retained for the duration of such proceedings (including in the event of an appeal or objection) and shall be deleted in one (1) year after the completion of such proceedings.

22.3 The Reporting Persons have the right to access, update, delete, object and rectify their personal data based on the provisions of the General Data Protection Regulation (EU 679/2016).

23. CONTINUOUS MANAGEMENT AND IMPROVEMENT OF POLICIES AND PROCEDURES

The Report Evaluation Committee shall review and revise the provisions of the Policy in accordance with the Policy Review Framework.

ANNEX A: Roles and Responsibilities of the Compliance Officer

The roles and responsibilities of the Compliance Officer include, inter alia:

- Overseeing the investigation of Reports and the proper implementation of the Policy. Monitoring the implementation and effectiveness of the procedure as described in Section 17 of the Policy.

- Keeping a record of all reports received, with details including at least the date of receipt and information on further handling.

- The Compliance Officer shall inform the Report Evaluation Committee on a regular basis of all cases he/she has rejected and referred to other departments, specifying the reason for their rejection.

- Submission (in cooperation with the Report Evaluation Committee) to the IF, RC & CG Committee of a semi-annual report on all reports received, along with the minutes of the Committee's meetings.

- Conducting periodic risk assessments in relation to Reprehensible Conduct Reports, with support from the Corporate Risk Management unit.

- Ensuring that all records are kept in a safe place and protected by adequate and effective physical and logical security measures.

- Ensuring the Authority's Personnel is informed and trained on this Policy.

- Communicating the Authority's principles: integrity, honesty and transparency, both within and outside the Organization.

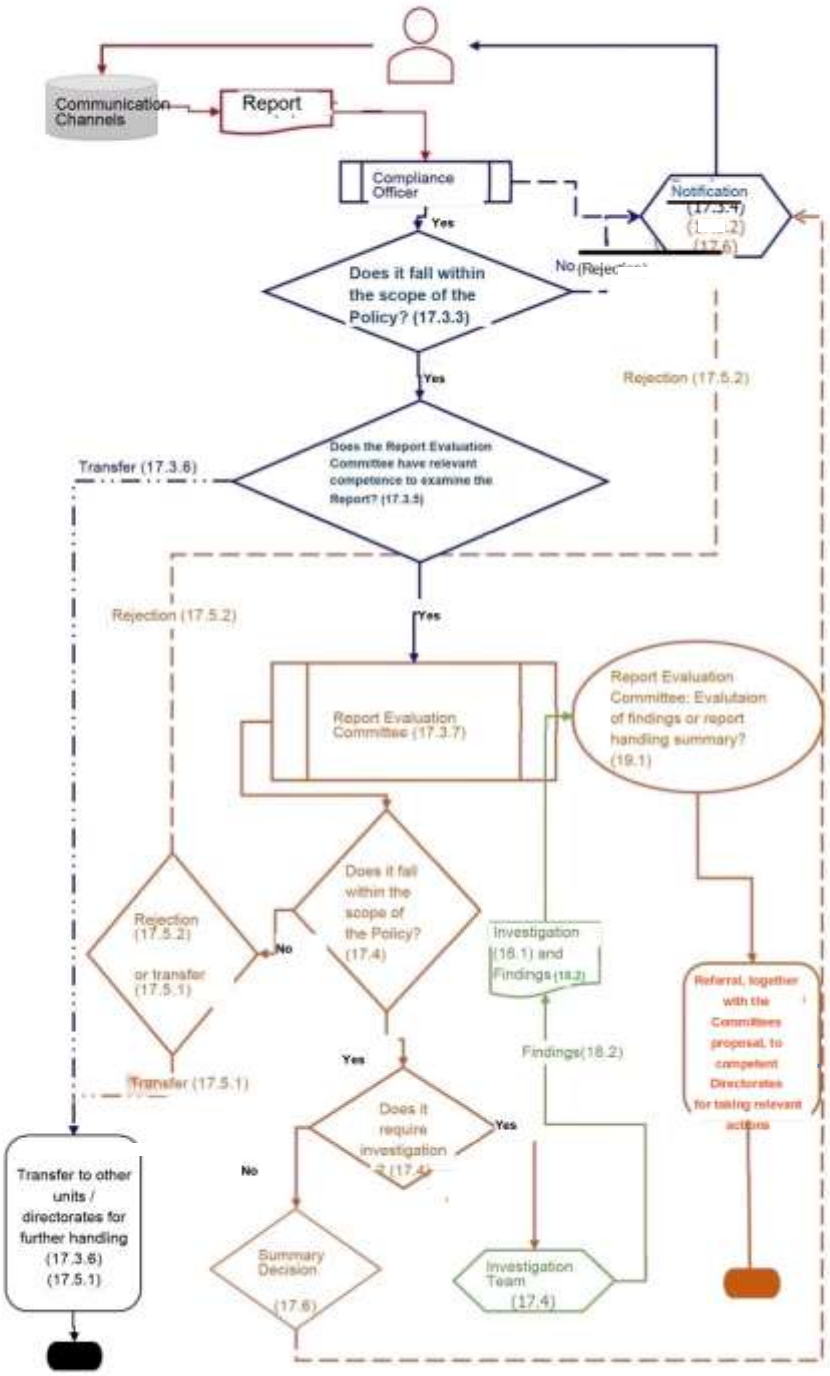
- Ensuring the proper functioning of the Report Management procedure, which he/she shall periodically review and update, subject to relevant approvals.

- Ensuring regular communication between him-/herself, the Board of Directors and the Report Evaluation Committee.

- The Compliance Officer shall be easily accessible to a Reporting Person.

- The Compliance Officer shall report directly to the Board of Directors for his/her duties, while at the same time he/she may belong to any Directorate to which he/she shall report for his/her other duties.

ANNEX B: Flowchart - Report Handling Process



ANNEX C: Report Form

Do you want to reveal your identity or to provide your contact number/email*? (required field)

○ Yes ○ No

* Anonymous Reports will be accepted through the Internal Communication Channels but will be considered only if there is sufficient objective evidence to investigate and if it is deemed necessary by the Report Evaluation Committee.

Full name of the reporting person:

Department/Directorate of the reporting person:

Contact details of the reporting person (including email (optionally)

Give a title for the subject matter you are contacting us about

Please provide a detailed description of the incident. Where possible, include names, location(s), date(s), time(s), etc. Please note that this field is limited to 5.000 characters.

Try to give as much accurate information as possible (if you wish to remain anonymous, do not give any information that may lead to your identification). (required field)

When did the incident take place? Please specify the date(s) and time(s) as accurately as possible (required field)

Are there any witnesses to this incident?

- No
- Yes

How did you find out about this incident?

Do you have any evidence to support your claim?

- Yes
- No

Is anyone else aware of this incident?

- Yes
- No

Is there any additional information that would facilitate the investigation of this issue?

- Yes
- No

Have you reported this incident to anyone else inside or outside Cyta?

- Yes. If yes, to whom? No

Additional comments/ observations:



You can attach a file to support your claim. Maximum file size: 5MB.
Accepted file types:

Microsoft Word (.doc & .docx)
Microsoft PowerPoint (.ppt &
.pptx) OpenOffice Text (.odt)
OpenOffice Presentation (.odp)
Adobe PDF (.pdf)

☐ I declare that this report has been made in good faith and that I have read and taken note of the content of the Whistleblowing Policy. (required field)

Date of completion/sending of the report

