

TECHNAVA S.A.

ANTI-RETALIATION POLICY

1. Purpose

Technava S.A. (“Technava” or the “Company”) is committed to a working environment that is free from harassment, intimidation, retaliation and discrimination. Maintaining such an environment depends on employees and others being able to raise questions, concerns and complaints in good faith, without any fear of retaliation.

This Policy is issued in implementation of Law 4990/2022, which transposes Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law. It is to be read together with the Company’s Code of Conduct and Anti-Bribery and Corruption Policy.

2. Scope

The Policy applies to all employees of Technava, to the members of its Board of Directors and senior management, and to all affiliates, contractors, consultants, agents, interns, volunteers, job applicants and other persons who acquire information on breaches in a work-related context with the Company (“Reporting Persons”).

The protections set out in this Policy apply irrespective of whether the Reporting Person’s working relationship with the Company has ended, has not yet begun, or is ongoing.

3. Definitions

Protected Activity

“Protected Activity” means any of the following acts carried out by a Reporting Person in good faith:

- making a report, whether internally within the Company or externally to a competent authority, concerning any conduct (or omission) that the Reporting Person reasonably believes to be a breach of applicable law, of the Company’s Code of Conduct, or of any Company policy;
- providing information or assistance in an investigation or proceeding relating to such conduct;
- making a public disclosure in the circumstances permitted by Law 4990/2022; and
- raising a concern in good faith with a manager, the Human Resources Department, the Legal and Compliance function, or through the Company’s reporting channels.

By way of illustration, Protected Activity may concern:

- discrimination, harassment or violence at work (Law 4808/2021, Law 3896/2010 and Law 4443/2016);
- fraud, embezzlement or misuse of Company assets;
- bribery or corruption (Articles 235–237 and 396 of the Greek Penal Code; Law 4557/2018);
- breaches of competition, tax, consumer protection, product safety, environmental or financial services law;

Reviewed : 8th March 2026

- breaches of data protection law, including Regulation (EU) 2016/679 and Law 4624/2019;
- unethical or unprofessional business conduct;
- non-compliance with Company policies or procedures, including the Code of Conduct;
- any actual or potential threat to the health or safety of workers or of the public;
- any other breach of Union or Greek law falling within the material scope of Law 4990/2022.

Retaliation

“Retaliation” means any direct or indirect act or omission taking place in a work-related context, prompted by a Protected Activity, that causes or may cause unjustified detriment to the Reporting Person or to a person connected to the Reporting Person (for example a colleague or relative).

Adverse Actions

“Adverse Actions” include, but are not limited to:

- dismissal, suspension or equivalent measures;
- demotion or the withholding of promotion;
- a change of duties, place of work or working hours, or a reduction in wages;
- negative performance appraisals or employment references;
- a failure to hire or to consider for hire;
- disciplinary measures, reprimands or other penalties;
- coercion, intimidation, harassment or ostracism;
- discrimination or other disadvantageous or unfair treatment;
- harm to the person’s reputation, including on social media;
- blacklisting on the basis of a sector or industry agreement, whether formal or informal;
- early termination or cancellation of a contract for goods or services;
- cancellation of a licence or permit; and
- psychiatric or medical referrals that are intended to discourage reporting.

4. Policy Statement

Technava does not tolerate Retaliation against any Reporting Person for engaging in a Protected Activity. The prohibition applies whether or not the concern that was raised is ultimately substantiated, provided that the Reporting Person had reasonable grounds to believe, at the time of the report, that the information reported was true.

Any act of Retaliation is a serious breach of Company policy. It may also constitute a criminal offence under Article 20 of Law 4990/2022. Engaging in a Protected Activity does not release the Reporting Person from the standards of performance and conduct that apply to their role.

5. Confidentiality

The identity of the Reporting Person, and any information from which the identity of the Reporting Person can be inferred (directly or indirectly), will be kept strictly confidential. It will not be disclosed to any person other than the staff members authorised to receive or follow up on reports, without the express consent of the Reporting Person. The same duty of confidentiality applies to any third party mentioned in a report.

Disclosure may be made only where it is a necessary and proportionate obligation imposed by applicable law, in the context of investigations by the competent authorities or of judicial

proceedings. In such cases, the Reporting Person will, where possible, be informed in advance, unless that information would jeopardise the investigation or the proceedings.

6. How to Report

Technava relies on its people and its business partners to raise concerns so that the Company can take appropriate action. Reports will be treated in confidence and may be submitted anonymously. Reporting Persons who choose to report anonymously are encouraged to provide sufficient detail (the subject matter of the concern, any potential witnesses, any supporting evidence) to allow the Company to investigate effectively.

A Reporting Person who believes that Retaliation has occurred, that a Protected Activity is being discouraged, or that this Policy has otherwise been breached, should raise the matter without delay through any of the following channels:

- the Reporting Person's manager;
- the Human Resources Department;
- the Company's Reporting Officer (Υπεύθυνος Παραλαβής και Παρακολούθησης Αναφορών), designated under Article 9 of Law 4990/2022;
- by email to compliance@technava.gr; or
- by telephone to the Company's dedicated compliance line at [+30 2104138768], including through the secure voicemail service outside business hours.

Reporting Persons may also, under Law 4990/2022, make an external report to the National Transparency Authority (Εθνική Αρχή Διαφάνειας) or to another competent authority, and may make a public disclosure in the limited circumstances permitted by that Law.

7. Handling of Reports

Receipt of a report will be acknowledged within seven (7) days, unless the Reporting Person has asked that no acknowledgement be sent or the Company reasonably believes that acknowledgement would prejudice the protection of the Reporting Person's identity.

The Company will follow up diligently on every report. Feedback will be provided to the Reporting Person within a reasonable period and in any event not later than three (3) months from the acknowledgement of receipt (or, if no acknowledgement is sent, from the expiry of the seven-day period). Follow-up may include internal investigation, disciplinary measures, reports to the competent authorities, and adjustments to the Company's procedures.

8. Personal Data

Any processing of personal data carried out under this Policy, including personal data relating to Reporting Persons, persons concerned and third parties, will be carried out in accordance with Regulation (EU) 2016/679 and Law 4624/2019. Personal data that is clearly not relevant to the handling of a specific report will not be collected or, if accidentally collected, will be deleted without undue delay.

9. Consequences of Violation

Any employee who retaliates against a Reporting Person, or otherwise breaches this Policy, will be subject to disciplinary action up to and including termination of employment, in accordance with

Reviewed : 8th March 2026

applicable labour law. Where the conduct may also amount to a criminal offence, the Company may refer the matter to the competent authorities.

At the same time, a person who knowingly makes a false or malicious report is not protected by this Policy and may be subject to disciplinary action and, where applicable, civil or criminal liability in accordance with Article 21 of Law 4990/2022.

10. Review

The Policy is approved by the Chief Executive Officer. It will be reviewed periodically, and in any event at least once every two (2) years, and updated as required to reflect changes in applicable law or in the Company's operations.