

P O L I C Y
on Whistleblowing
of “Antibiotic” Group*

I. Introduction

This Policy sets out the responsibilities and commitments of **“Antibiotic” Group** regarding the protection of whistleblowers and enables receipt and investigation in full confidentiality of whistleblower reports not only by employees of the group, but also, to the extent possible, by all representatives and suppliers of the group and by any person who acquires information through work-related activities with the group.

Whistleblowing provides warning and/or notification of risks affecting individuals, the Group, the society or the environment.

The Group warrants that all concerns raised about irregularities are treated seriously and appropriately.

The adoption of the Policy is bound by Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting on breaches of Union law and the need for its transposition into our national legislation.

II. Policy objectives

- *To comply with the current directive of the European Parliament and of the Council.*
- *To comply with Bulgarian legislation in the field of whistleblower protection, adopted in accordance with the current directive.*
- *Protection of individuals who report violations they have learned about in connection with their work.*

III. Reporting violations. Reporting person

1. Whistleblowing must be based on illegal or unlawful conduct, as well as serious irregularities related to the Group's activities and affecting substantial interests of the Group or the life or health of an individual/s. It may include, for example, but not limited to, the following:

- An unlawful act, whether civil or criminal;
- Violation of Group Rules and Policies;
- Knowingly violating local laws or regulations;
- Fraud, misappropriation or money laundering;
- Questionable accounting or auditing practices;

***Antibiotic Group (Antibiotic) involves:**

“Antibiotic – Razgrad” AD - parent company

“Balkanpharma – Razgrad” AD – subsidiary

- Health, safety or environmental hazards;
- Abuse of power or authority for an unauthorized or hidden purpose;
- Unfair discrimination in the work process;
- Conflict of interest;
- Manipulation of Group data/records/systems;
- Anti-competitive conduct;
- Breach of personal data protection/confidentiality laws and/or internal instructions regulating personal data processing;
- Retaliation directed at someone who has reported breaches in accordance with this Policy;
- Attempts to conceal any of the above.

2. For the purposes of this Policy, the Reporting Person may be a potential, current or former partner, employee, supplier, contractor, intern and any other person in the companies of the Group who has information about an unlawful act within the meaning of item 1, received during or in connection with the performance of work related to his/her activity.

3. Personal work-related complaints are handled through the internal rules and procedures in force in each company of the Group.

IV. Personal data and confidentiality

For the purposes of this Policy, the Group will process employees' personal data required for the purposes of this Policy to the extent permitted by applicable personal data protection laws.

The Group will treat all reports made under this Policy as confidential to the maximum extent permitted by law and in compliance with the applicable personal data protection laws, insofar this is consistent with conducting a full and fair investigation.

V. Responsibilities

Managers at all levels are responsible for informing and ensuring that Group employees are aware of this Policy.

The Group will not initiate or tolerate any form of retaliation against a whistleblower and/or individuals related to whistleblowers.

VI. Changes to the Whistleblowing Policy

This policy may be updated, amended or changed to meet the requirements of the law, good practices, our partners and stakeholders.

Adopted by Protocol dated 08.11.2022. from a meeting of the Board of Directors of “Antibiotic – Razgrad” AD.