# INTERNAL MANAGEMENT REPORT POLICY FOR CORPORATE VIOLATIONS
## (Law 4990/2022 - Whistleblowing")

a) The Company «**ALPHA BIOENERGY LIMITED LIABILITY COMPANY**» with the distinctive title «**alpha bio L.t.d**.», (hereinafter the «Company»), with main activity indicatively:

- the production of bio-oil and electricity from biomass, renewable sources (RES), other raw materials and waste,
- the production of organic and inorganic soil conditioners and fertilizers from biomass, biosolids, other raw materials and waste,
- the de-vulcanization of old tires of all kinds,

fully harmonized with the provisions of Law **N. 4990/2022** which incorporated Directive (EU) 2019/1937 for the protection of persons who report violations of EU law, is committed, through this Policy, to the establishment and implementation of an internal mechanism for the receipt and follow-up of reports.

b) The Company, **through the internal communication channel of reports**, on the one hand encourages and allows each employee and each associate, business partner of third party to disclose (denounce) any reprehensible or illegal behavior within the Company, in a confidential or anonymous manner, so as not to jeopardize his / her relationship (work, cooperative and personal) with the Company and from possible "retaliation" by the affected parties, and on the other hand, it may take note of and gather the necessary information and data in order to investigate and deal in a timely manner with the upcoming consequences of these acts (i.e. restoration of legality, protection of employees, rescue of the Company's commercial reputation and credibility).

c) The **Company hereby declares its zero tolerance** of illegal actions and reprehensible conduct, its **commitment** to protect persons who make complaints, ensuring, a high level of ethical and professional practices and conduct. In particular, through this Policy:

- Internal procedures are established to investigate internal named or anonymous reports, resulting in the prevention and deterrence of misconduct in the workplace.
- The integrity, transparency, accountability and detection of potential violations of the Company's Regulatory Framework are strengthened.
- Potential risks from incomplete and weak internal control procedures of submitted reports are assessed and addressed.
- Appropriate and necessary measures are adopted to prevent and / or deal with potential incidents of violations, with the aim of protecting the prestige and reputation of the Company.
- The possibility of penalties and sanctions due to non-compliance with the legislative framework is eliminated.

d) As part of Company's commitment to complying with this Policy, it provides the opportunity for any interested party to **submit a report** regarding violations of Law 4990/2022 (e.g. on public procurement, environmental protection, privacy protection, etc.). You can contact the Company's Monitoring and Reporting Officer, by completing the relevant report form which you will find here

e) The Company is committed to protecting the anonymity of individuals who submit such reports, if they so desire, and maintaining the confidentiality of the information included in all submitted reports.