



МУЛТИФОРС А.С. ЕООД

ПРОЕКТИ ЗА СИГУРНОСТ, ФИЗИЧЕСКА ОХРАНА И ОХРАНИТЕЛНА ТЕХНИКА

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WHISTLEBLOWER PROTECTION POLICY

1. Introduction

This Whistleblower Protection Policy governs the manner in which MULTIFORMS A.S. Ltd., regulates the conditions, procedures and measures for the protection of persons, in accordance with the requirements of the Whistleblower Protection Act (the "WIPPA" or the "Act") of the Republic of Bulgaria and Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers.

The protection of whistleblowers or whistleblowers who have publicly disclosed information about infringements is a top priority for MULTIFORMS A.S. Ltd. As a legal entity and in accordance with legislation and good practice, MULTIFORMS A.S. Ltd. applies the required technical and organisational measures to protect whistleblowers.

This policy provides information on the terms and conditions for the submission and handling of such reports or publicly disclosed information. The purpose of this policy is to ensure the protection of persons at MULTIFORMS A.S. Ltd. who have reported or publicly disclosed information about violations of Bulgarian law or European Union acts that have come to their attention in the course of or in connection with the performance of their employment or duties or in any other work context. Please contact us if you have any questions about this policy, and if you disagree with any of the terms contained in the Whistleblower or Whistleblower Protection Policy, we encourage you to contact us at the contact details provided.

2. Information about MULTIFORS A.S. Ltd. as a private legal entity.

In connection with reporting violations of Bulgarian legislation or European Union acts that threaten or harm the public interest and European Union law, you can contact us at the following address:

MULTIFORS A.S. Ltd.

Address: "Druzha 2, bl. 2. A, Str. 1

E-mail: multiforce@multiforce.bg

Tel: +359 2 8000000

If you believe that there are violations of Bulgarian law or European Union acts that threaten or harm the public interest and European Union law, and in accordance with the requirements of the Whistleblower Protection and Public Disclosure Act (the "Whistleblower Protection Act" or the "Act") of the Republic of Bulgaria and Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers, you have the right to file a

2.1 Right of appeal to a supervisory authority.

If you wish to make a complaint about our handling of your whistleblowing or about the way we have handled your complaint, you have the right to complain to the Data Protection Commission and the Whistleblower Protection Officer (DPO).

You can complain in person, by letter, fax or email to the DPO at:

. 1592 Sofia Blvd. "1595, Proff. 02 9153525, email: kzld@cpdp.bg), via the CPPD website in the manner described on the relevant page.

In each of these cases, the complaint should contain:

- details of the complainant - name, address, contact telephone number, e-mail address;
- nature of the complaint;
- information and documents you consider relevant to the complaint;
- date and signature (for electronic and paper documents)

The CPVO provides a complaint form which can be downloaded from the Commission's website.

3. Legal basis

This Whistleblower Protection Policy (the "Policy") is issued on the basis of the Whistleblower Protection Act (the "Whistleblower Protection Act" or the "Act") of the Republic of Bulgaria and Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers.



Bulgarian law and Directive (EU) 2019/1937 provide rules on what actions MULTIFORMS A.S. Ltd. must take in order to protect whistleblowers or publicly disclose information about violations of Bulgarian law or European Union acts that threaten or harm the public interest and European Union law.

The protection of whistleblowers or persons who have made public information about infringements of Bulgarian legislation or European Union acts which threaten or harm the public interest and European Union law shall be in accordance with the legal requirements. The main principles regarding whistleblowers or public disclosures are:

- protection;
- compensation;
- support;

"MULTIFORMS A.S. Ltd. is responsible and able to prove that it complies with the basic principles relating to the protection of whistleblowers or publicly disclosed information about violations of Bulgarian law or European Union acts that threaten or harm the public interest and European Union law.

4. Objectives of the Policy

The adoption and implementation of this policy by MULTIFORMS A.S. Ltd., in accordance with Bulgarian law and Directive (EU) 2019/1937, sets out the rules regarding the protection of whistleblowers or publicly disclosed information about violations of Bulgarian law or European Union acts that threaten or harm the public interest and European Union law.

The adoption and implementation of this MULTIFORMS A.S. Ltd. policy, in accordance with the Whistleblower Protection and Public Disclosure Act (the "Whistleblower Protection and Public Disclosure Act" or "the Act") of the Republic of Bulgaria and Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers, protects the fundamental rights and freedoms of natural persons, in particular their right to whistleblower protection.

Through this policy, MULTIFORMS A.S. Ltd aims to ensure:

- Protection of whistleblowing and its processing by MULTIFORMS A.S. Ltd;
- The rights of whistleblowers;
- Compliance with the requirements of the Regulation for MULTIFORMS A.S. Ltd. as a private legal entity, including:
 - The terms, conditions and safeguards;
 - Records of alert handling activities;
 - Appropriate technical and organisational measures, which shall be reviewed and updated as necessary;
 - Risk assessment measures relating to the protection of whistleblowers;
 - Compliance with whistleblowing requirements;
- The duties of whistleblowers who have access to whistleblower submissions and work under the direction of whistleblowers, their liability for failing to fulfil these duties;

Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity to the rights and freedoms of natural persons, MULTIFORMS A.S. Ltd, as a private legal entity, shall implement appropriate technical and organisational measures to ensure a level of security appropriate to that risk;

Ensures compliance with the basic principles for handling whistleblowing.

5. Scope

Definitions:

- "Violations" are acts or omissions that are:
 - (a) unlawful and related to Bulgarian or European Union legislation in the areas under the Whistleblower Protection or Whistleblower Public Information Act ("WPIPIA");
 - (b) are contrary to the object or purpose of the rules in European Union acts;
- "Employer" means any natural person, legal person or subdivision thereof, as well as any other organisationally and economically distinct entity (enterprise, establishment, organisation, cooperative, farm, establishment, household, company and the like) which independently employs employees under an employment or service relationship, including for the performance of homeworking and teleworking and for sending them to perform work in a user undertaking;
- "Information of wrongdoing" means information, including reasonable suspicion, about actual or potential wrongdoing that has occurred or is likely to occur in the organisation where the whistleblower works or has worked, or in another organisation with which the whistleblower is or has been in contact in the course of his or her employment, and about attempts to cover up wrongdoing;
- "Work context" means current or past work activities in the public or private sector through which, regardless of their nature, individuals receive information about wrongdoing and within which those individuals may be subject to retaliation if they report such information.

- An 'affected person' is a natural or legal person who is identified in the submission of a whistleblowing or public disclosure of information as the person to whom the infringement is attributed or with whom that person is associated.
- 'Feedback' means the provision of information to the whistleblower about the action that is intended or has already been taken as a follow-up, as well as the reasons for that follow-up.
- 'Rejection' means an act or omission intended to isolate the whistleblower or the whistleblower's public disclosure from the professional environment.
- 'Undertaking' means any natural person, legal entity or civil partnership carrying on a business regardless of its ownership, legal or organisational form.
- "Persons associated with the whistleblower" are third parties who may be subject to retaliation in a work context, such as co-workers or relatives without limitation in degree.
- "Repeat" means an offence committed within one year of the entry into force of the penalty order by which the person was punished for the same type of offence.
- "Retaliatory action" means any direct or indirect act or omission that occurs in a work context, is caused by an internal or external whistleblowing or public disclosure, and that causes or is likely to cause adverse consequences that harm the whistleblower.
- 'Follow-up' means any action taken by the whistleblower or a competent authority to assess the accuracy of the allegations made in the whistleblowing report and, as appropriate, to address the reported misconduct, including through actions such as an internal inquiry, investigation, prosecution, discovery action or closure.
- "Sufficient evidence" means evidence from which a reasonable inference can be made that a violation has occurred that falls within the scope of this Act.
- An 'apparently minor offence' exists where the offence committed reveals an apparently insignificant degree of public danger in view of the absence or insignificance of harmful consequences.
- A "serious infringement" exists when the infringement committed has had or is likely to have a significant and lasting negative impact on the public interest.
- 'Internal whistleblowing' is the oral or written communication of information about wrongdoing within a private or public sector entity.
- 'External whistleblowing' is the oral or written communication of information about infringements to the competent authorities.
- 'Durable medium' means any medium of information which enables obliged entities to store information, which allows it to be easily used in the future for a period corresponding to the purposes for which the information is intended, and which allows the information stored to be reproduced unchanged.
- 'Privacy' means any interference with privacy within the meaning of Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) (OJ L 201/37 of 31 July 2002). The Whistleblower Protection Policy governs the manner in which MULTIFORMS A.S. " EOOD, regulates the conditions, modalities and measures for the protection of persons shall be applied in accordance with the requirements of the Law on the Protection of Whistleblowers or Public Disclosers ("the PDPA" or "the Law") of the Republic of Bulgaria and Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers.

6. Terms of protection of whistleblowers:

- Have reasonable grounds to believe that the information submitted about breaches was correct at the time of submission and that such information falls within the scope of Directive (EU) 2019/1937;
- Have made a report under the Whistleblowers or Whistleblowers Protection Act (WHIPPA);

7. Confidentiality. Whistleblowers' rights are processed by MULTIFORMS A.S. Ltd.

- The identity of the whistleblower shall not be disclosed to anyone other than the employees authorized to receive or follow up on the whistleblower's report without that person's express consent.
- The identity of the whistleblower and any other information may be disclosed only where this is a necessary and proportionate obligation imposed by Union or national law in the context of investigations by national authorities or judicial proceedings, including with a view to safeguarding the rights of defence of the person concerned.
- The whistleblower shall be informed before his or her identity is disclosed, unless such information would jeopardise the investigations or judicial proceedings concerned. Upon informing the whistleblower, MULTIFORMS A.S. Ltd. shall send a written explanation explaining the reasons for the disclosure of the relevant confidential data.
- MULTIFORMS A.S. Ltd. shall ensure that, upon receipt of breach information involving trade secrets, it does not use or disclose such trade secrets for purposes that go beyond those necessary to take appropriate follow-up action.

8. Processing of personal data

- Any processing of personal data carried out pursuant to the Whistleblower Protection or Whistleblowing Public Information Act ("WPIPIA"), including the exchange or transfer of personal data by competent authorities, shall be carried out in accordance with the Data Protection Act, Regulation (EU) 2016/679 and Directive (EU) 2016/680. Any exchange or transmission of information by Union institutions, bodies, offices or agencies shall be carried out in accordance with Regulation (EU) 2018/1725.
- Personal data which are manifestly not relevant for the examination of a specific alert shall not be collected and, if incidentally collected, shall be deleted without undue delay.

9. Keeping a register of alerts

"MULTIFORMS A.S. Ltd. shall keep a register of each alert received in accordance with the confidentiality requirements set out in Article 16 of Directive (EU) 2019/1937. Alerts shall be kept for no longer than is necessary and proportionate in order to comply with the requirements imposed by the Whistleblowers or Whistleblowers Protection Act (WHIPPA) and Directive (EU) 2019/1937.

10. Measures to ensure protection

- Prohibition of retaliation: MULTIFORMS A.S. Ltd. shall take the necessary measures to prohibit any form of retaliation against whistleblowers by establishing Internal Company Rules.
- Support Measures: MULTIFORMS A.S. Ltd. shall provide support to whistleblowers by providing comprehensive and independent information and advice, which is easily accessible and free of charge, on the procedures and legal remedies available in relation to protection against retaliation and on the rights of the person concerned;
- **Measures to protect against retaliation:** MULTIFORMS A.S. Ltd. shall ensure that whistleblowers are protected against retaliation in accordance with the Whistleblower Protection or Whistleblower Public Disclosure Act (WIPPA) and Directive (EU) 2019/1937.

11. Changes to the Whistleblower Protection Policy

"MULTIFORMS A.S. Ltd. has the right to update, amend and supplement the Whistleblower Protection Policy at any time when circumstances so require.

12.Document Owner and Approval

The Manager and the Company's designated Whistleblower Protection Officer (WHPO) are the owners of this document and are responsible for keeping this procedure under review and updated in accordance with internal policies, legal requirements and the requirements of Directive (EU) 2019/1937.

The current version of this document is available from the Company's office at the above address.

01/Version 01 was approved by the Manager on 04.05.2023.