

# WHISTLEBLOWING POLICY

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**“Whistleblowing”** means the reporting by employees, stakeholders, or third parties of suspicions of misconduct, unlawful actions, or failures to act in accordance with the regulations of the TT Cables Group (hereinafter: GTTK) and applicable laws. The purpose of this Policy is to encourage employees and other stakeholders who have serious concerns about any aspect of GTTK’s operations to speak up and raise those concerns. Employees are often the first to notice that something may be seriously wrong within GTTK.

The TT Cables Group considers whistleblowing to be a positive act that can make a valuable contribution to the effectiveness and long-term success of GTTK. Speaking up is not disloyal. The TT Cables Group is committed to achieving the highest possible standards for its goods and services and the highest ethical standards in all its practices. In order to achieve these standards, freedom of expression is encouraged.

If you are considering raising a concern, please read this Policy first. It explains:

- what types of issues may be reported,
- how the person raising a concern will be protected from victimization and harassment,
- how to raise a concern, and
- what GTTK will do in response.

## 1. POLICY OBJECTIVES

This Policy is designed to enable you to raise concerns about wrongdoing or irregularities within GTTK without fear of victimization, subsequent discrimination, disadvantage, loss of contract or business relationship, or dismissal. It is also intended to encourage and enable serious concerns to be raised within GTTK rather than ignored or “blown outside” the organization.

The objectives of this Policy are to:

- encourage you to feel confident in raising serious concerns as early as possible and to question and act when you observe suspicious practices;
- provide channels through which you can raise concerns and receive feedback on actions taken;
- ensure that you receive a response to your concerns and know how to pursue them further if you are not satisfied;
- reassure you that you will be protected from possible retaliation (dismissal, demotion, threats, negative performance evaluation, etc.) or victimization if you make a disclosure in good faith;
- ensure that GTTK provides training for employees and management on the Whistleblowing Policy and raises awareness through GTTK’s internal communication tools.

## **2. SCOPE**

This Policy is intended to enable anyone who becomes aware of irregularities within GTTK that affect another person or a service to report their concerns as soon as possible so that they can be properly investigated.

The Whistleblowing Policy does not replace existing procedures:

- If your concern relates to your own treatment as an employee, it should be raised under the existing grievance or harassment procedures.
- If a customer has a concern regarding services or goods provided, it should be submitted as a complaint to GTTK.
- Complaints regarding misconduct by GTTK employees are addressed through a separate procedure.

### **Who can raise a concern under this Policy?**

This Policy applies to:

- GTTK employees;
- employees of contractors working for GTTK (e.g., agency workers, construction workers, drivers);
- suppliers and their employees;
- customers and their employees;
- persons providing services under a contract or other arrangement with GTTK, whether on their own premises or elsewhere.

### **What should be reported?**

Any serious concerns relating to the provision of goods and/or services or the conduct of GTTK employees or others acting on behalf of GTTK. Serious concerns include situations that:

- cause discomfort in relation to known standards;
- are not in line with GTTK policies;
- deviate from established standards of professional practice; or
- constitute inappropriate conduct.

Such concerns may relate to:

- conduct that constitutes a criminal offense or breach of law (including failure to comply with legal obligations);
- actions that may lead to injustice or a miscarriage of justice;
- racial, gender, disability, or any other form of discrimination;
- endangering the health and safety of the public and/or employees;

- environmental damage;
- unauthorized use of funds or other assets;
- possible fraud or corruption;
- conflicts of interest;
- neglect or abuse of service users; or
- other unethical or improper conduct.

(The above list is not exhaustive and is provided by way of example only.)

### **3. PROTECTION OF THE REPORTER**

#### **3.1 Your Legal Rights**

This Policy has been prepared taking into account existing laws that protect workers and other persons who disclose certain matters of concern. Applicable laws make it unlawful for GTTK to dismiss or allow the victimization of anyone for making an appropriate and lawful disclosure.

In rare cases, an employee may have been involved in the activity giving rise to the concern. In such cases, it is in the employee's interest to come forward as early as possible. While GTTK cannot promise that no action will be taken against such an employee, the fact that they have come forward may be taken into account.

#### **3.2 Harassment or Victimization**

The TT Cables Group is committed to good practice and high standards and to supporting you as an employee or stakeholder. GTTK recognizes that deciding to raise a concern can be difficult. If you honestly and reasonably believe that what you are raising is true, you should not be afraid, as you are fulfilling your duty to your employer, business partners, colleagues, and those to whom you provide goods or services.

GTTK will not tolerate any harassment or victimization of a reporter (including informal pressure) and will take appropriate measures to protect you when you raise a concern in good faith. Such conduct will be treated as a serious breach of work discipline and addressed in accordance with disciplinary rules and procedures.

#### **3.3 Support for You**

Throughout the process:

- you will have the full support of senior management;
- your concern will be taken seriously; and
- the highest level of GTTK management will do everything possible to support you during the investigation.

For individuals who are not GTTK employees, GTTK will, where possible, seek to provide appropriate advice and support.

### 3.4 Confidentiality

All concerns will be treated confidentially, and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow an investigation, it may not be possible to take action without your assistance, and you may be asked to come forward as a witness. If you agree, you will be offered advice and support.

### 3.5 Anonymous Reports

This Policy encourages you, wherever possible, to provide your name when raising a concern. If you do not tell us who you are, it will be much harder to protect your position or provide feedback. This Policy is not ideally suited to anonymous reports. Anonymous concerns are significantly less powerful, but GTTK may consider them at its discretion.

In deciding whether to proceed, the following will be considered:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources.

## 4. FALSE REPORTS

If you raise a concern in good faith and with a reasonable belief that it is true, but it is not confirmed during the investigation, GTTK will respect your concern and you will have nothing to fear. However, if you raise a concern frivolously, maliciously, or for personal gain, appropriate measures may be taken, including disciplinary action.

## 5. MAKING A REPORT

### 5.1 How to Raise a Concern

You may raise your concern in one of the following ways:

- by telephone: +387 39 702-116;
- in person by visiting the Human Resources Department;
- in writing by sending an email to: [whistleblower@ttcables.com](mailto:whistleblower@ttcables.com), using **GOB18 – Whistleblowing Report Form**; or
- via an anonymous message through the internal JENZ platform.

The earlier you raise a concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be well-founded;
- the background and history of the concern (including relevant dates);
- other information required in the GOB18 – Whistleblowing Report Form.

You are not expected to prove your concerns beyond doubt, but you will need to demonstrate that you have a genuine concern regarding the alleged wrongdoing or irregularities within GTTK and that there are reasonable grounds for your concern. You may wish to discuss your concern with a colleague beforehand, and it may be easier to raise the matter if two or more of you have had the same experience or concerns.

## 5.2 What GTTK Will Do

The TT Cables Group will respond to your concerns as quickly as possible. Please note that verifying your allegations is not the same as accepting or rejecting them. GTTK's guiding principle will be the interests of GTTK. To ensure fairness to all employees, including those who may have been wrongly or mistakenly accused, initial checks will be carried out to determine whether an investigation is appropriate and, if so, in what form.

An investigation may be conducted in strict confidence, i.e., without informing the person concerned unless and until this becomes necessary. In certain cases, such as allegations of abuse, immediate suspension from work may be considered. The protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through disciplinary or grievance procedures;
- be referred to the police;
- be referred to an external auditor; or
- be the subject of an independent investigation.

Within ten working days of submitting a report, the person investigating your concern will write to you:

- acknowledging receipt of the report;
- indicating how GTTK intends to proceed;
- providing information on internal/external support mechanisms; and
- advising whether further investigations will be carried out and, if not, why.

The extent of contact between you and those considering the matter will depend on the nature of the issues raised, potential difficulties, and the clarity of your information. You are likely to be interviewed to fully understand your disclosure. GTTK will do what it can to minimize any difficulties you may experience as a result of raising a concern. For example, if you are required to give evidence in criminal or disciplinary proceedings, GTTK will arrange for you to receive appropriate advice and support.

You can be assured that your disclosure will be properly handled. Unless there are legal reasons preventing this, you will be kept informed of the progress and outcome of any investigation. GTTK will acknowledge receipt of the report within a maximum of 7 days and provide feedback to the reporter on actions taken or planned within a maximum of 3 months from the acknowledgment of receipt.

### 5.3 Responsible Person

The Human Resources Manager has overall responsibility for maintaining and implementing this Policy. In the event of a conflict of interest, the Human Resources Department will be excluded, and the Compliance Department will assume responsibility for implementation.

### 5.4 What to Do If You Are Not Satisfied with GTTK's Response

This Policy is intended to provide you with an internal channel within GTTK for raising concerns. GTTK hopes that you will be satisfied with the actions taken. If you are not, and you believe it is appropriate to raise the matter outside GTTK, the following are prescribed external contacts:

- the authorized external auditor;
- the police;
- other competent authorities prescribed by law.

If you raise concerns outside GTTK, you must ensure that you contact one of these prescribed bodies. Public disclosure to anyone else may exclude you from the protection provided by this Policy. You must not disclose information that is confidential to GTTK or to any other party, such as a GTTK client or contractor, except to those listed as prescribed contacts. This Policy does not prevent you from seeking independent legal advice.

### 5.5 Corporate Record-Keeping and Oversight

The Human Resources Department (HR) will maintain a corporate register containing all reported concerns. All persons responsible for considering individual reports must ensure that HR is provided with sufficient details for entry into the corporate register. HR will review the register and prepare an annual report to Management as part of the HR report.

The report will include a summary of concerns raised, the departments to which they related, the job roles involved (where not confidential), and lessons learned. The report will not include employees' names. The purpose is to ensure that:

- GTTK and/or relevant departments learn from mistakes and do not repeat them; and
- consistency of approach across departments is ensured.

The corporate register and annual reports will be available for review by internal and external auditors, with all confidential data removed.

The TT Cables Group will review this Policy every three years.

### 5.6 Personal Data Protection

Processing of reports under this Policy will be carried out in accordance with applicable laws and by-laws on personal data protection, as well as relevant internal GTTK acts, with regard to the purpose of processing, legal basis, retention periods, data subject rights, and access restrictions.