



## **Whistleblowing Policy of Hydroenergy Company Jsc., Bulgaria**

### **1. Policy Objectives**

This Policy shall set the conditions, procedure, and measures for protection of persons in the public and private sectors who report or publicly disclose information about breaches of Bulgarian legislation or of European Union acts, which threaten or harm the public interest.

This Policy meets the requirements of the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998) and its Bulgarian equivalent – ACT ON THE PROTECTION OF PERSONS WHO REPORT OR PUBLICLY DISCLOSE BREACHES (WHISTLEBLOWERS PROTECTION ACT), In force from 06.05.2023.

Effective, confidential, and safe ways for reporting breaches and types of wrongdoing at work shall be established under this Policy.

### **2. Area of application**

This Policy applies for employees of Hydroenergy Company Jsc (HEC Jsc.) in the office premises and any working sites in Bulgaria and abroad where HEC is presented.

### **3. Policy**

- 3.1. A Whistleblowing report shall only be processed by an employee of HEC Jsc.
- 3.2. The registering and processing functions shall be done by an employee and their deputy. This shall be established in an internal administrative act signed by the top management of the Company.
- 3.3. Wrongdoing disclosures shall be registered in an official template governed by the Bulgarian Commission for Personal data Protection (template in Bulgarian [here](#)). This template shall be used to facilitate the collection of all necessary details but is not a mandatory document for the whistleblower.
- 3.4. The whistleblowing process of HEC Jsc. includes the following channels of reporting:

#### **3.4.1. Internally to HEC:**

- In written to the postal address of the Headquarter office of HEC Jsc. in Blagoevgrad: 15 Industrialna Zona 3 Street, Pokrovnik village 2708. The envelope shall be titled "A Whistleblowing Report".
- Via Email at [compliance@hec.bg](mailto:compliance@hec.bg). The report shall be digitally signed.

- Via a dedicated telephone line +359 893 06 36 75 contacting a prescribed person from HEC Jsc, who shall start dealing with the issue raised filling out the template while taking the conversation. The template is available in Bulgarian language here.

3.4.2. **Externally to** the Bulgarian Commission for Personal Data Protection

- In written to the postal address of the Bulgarian Commission for Personal Data Protection: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592. The envelope shall be titled "A Whistleblowing Report".
- Via Email at:whistleblowing@cp
- dp.bg. The report shall be signed.

3.5. A procedure shall be documented to cover the rules of this policy.

3.6. This policy shall be reviewed annually and shall be updated in accordance with relevant amendments.

#### **4. Concluding provisions**

This Policy does not claim to be exhaustive and does not cover all statements of the Bulgarian Whistleblowers Protection Act nor the 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.

End of document

Signature:

A handwritten signature in blue ink, appearing to be 'Ivan Chapov', written over a light blue rectangular background.

*Ivan Chapov, CEO*  
**Hydroenergy Company Jsc**

1<sup>st</sup> December 2023