

INFORMATION REGARDING THE TERMS AND PROCEDURES FOR SUBMITTING ALERTS OR PUBLIC DISCLOSURE OF INFORMATION REGARDING VIOLATIONS OF BULGARIAN LEGISLATION OR ACTS OF THE EUROPEAN UNION THAT ENDANGER OR HARM PUBLIC INTEREST

This information is provided based on Article 12, paragraph 4 of the Act on Protection of Persons, Reporting Information, or Publicly Disclosing Information about Breaches (APPRIPDIB) (Whistleblower Protection Act).

This information has been published on the website of "iCard" AD www.icard.com and is available at the office of "iCard" AD in Varna, post code 9009, Business Park Varna, B1.

WHO CAN SUBMIT ALERTS

Persons who can submit alerts in accordance with the Whistleblower Protection Act are:

- Employee (current or former)/ hired person/ self-employed person, including those exercising a liberal profession and/or artisanal activity;
 - Volunteer;
 - Trainee– paid or unpaid;
 - Shareholder, sole owner of capital, member of the board of directors;
 - a person who works for contractors, subcontractors, suppliers of iCard AD;
 - a person whose employment or service relationship is about to begin, or a person who is about to enter into a contract for the provision of any type of service, in cases where the information regarding the violations was obtained during the selection process or other pre-contractual relations
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- an employee, as well as any other person listed above, who received the information within an employment, service or other legal relationship in a work context, which has been terminated at the time of filing the report or public disclosure;

Protection under the Whistleblower Protection Act is provided not only to the person submitting the alert and falling into one of the above categories, but also to persons who assist the alerting person in the process of submitting the alert and whose assistance should be confidential; persons who are connected through work or relatives to the alerting person and who may be subjected to punitive actions due to alerting; legal entities in which the alerting person holds a share, works for, or is otherwise connected in a work context.

Anonymous alerts are not considered.

WHAT TYPES OF ALERTS MAY BE SUBMITTED OR INFORMATION BE PUBLICLY DISCLOSED

The persons from the categories mentioned above can submit alerts or publicly disclose information about violations (actions or omissions) that have been committed or are very likely to be committed within the Company, as well as attempts to conceal violations of Bulgarian legislation or acts of the European Union that endanger public interest, which they have become aware of in relation to the performance of their work duties or in another work context:

- For violations of Bulgarian legislation or the acts of the European Union listed in the annex to the Whistleblower Protection Act in the following areas: public procurement; financial services, products and markets, and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety, animal health, and welfare; public health; consumer protection; protection of personal data and privacy; network and information systems security;
- For violations of Bulgarian legislation in the areas of: rules for payment of due public state and municipal receivables; labor legislation; legislation related to the performance of public service.
- For violations affecting the financial interests of the European Union within the meaning of Article 325 of the Treaty on the Functioning of the European Union and further specified in the relevant Union measures;
- For violations of the rules of the internal market within the meaning of Article 26(2) of the Treaty on the Functioning of the European Union, including the rules of the European Union and Bulgarian legislation on competition and state aid;
- For violations related to cross-border tax schemes aimed at obtaining a tax advantage contrary to the object or purpose of applicable law in the field of corporate taxation;
- For committed crimes of a general nature, which the alerting person has become aware of in relation to the performance of their work or in the execution of their official duties.

Violations outside the scope of the Whistleblower Protection Act and complaints related to interpersonal conflicts are not considered under this procedure - in these cases, you should contact your direct supervisor, the Human Resources Department, or the Executive Director.

CONDITIONS FOR PROTECTION OF ALERTING PERSONS

A person submitting an alert about violations through an internal or external channel within the meaning of the Whistleblower Protection Act has the right of protection when the following conditions are met simultaneously:

1. The person had reasonable grounds to believe that the information about the violation in the alert was true at the time of submission and that this information falls within the scope of Article 3 of the Whistleblower Protection Act; and
2. The person has submitted an alert about the violation under the conditions and in accordance with the procedure of the Whistleblower Protection Act.

When the above conditions are met, the right of protection also applies to the person submitting an alert about a violation under Article 3 to institutions, bodies, services, or agencies of the European Union. Such submission of an alert is considered to be made through an external channel.

CONDITIONS FOR PROTECTION OF PERSONS WHO PUBLICLY DISCLOSE INFORMATION ABOUT VIOLATIONS

A person who publicly discloses information about a violation has the right of protection under the Whistleblower Protection Act when they had reasonable grounds to believe that the information about the violation was true at the time of disclosure and that this information falls within the scope of Article 3 of the Whistleblower Protection Act, and one of the following conditions is met:

1. The person has submitted an alert under the conditions and in accordance with the procedure of the Whistleblower Protection Act, but no corresponding actions were taken on the alert within the timeframes provided in Sections I and II of Chapter Two of the Whistleblower Protection Act;
2. The person has reasons to believe that:
 - a) the violation may pose an immediate or obvious threat to public interest or there is an extraordinary situation or risk of irreversible harm;
 - b) in the case of external submission of an alert, there is a risk of punitive actions or there is a possibility that the violation will not be effectively investigated due to the risk of concealment or destruction of evidence, suspicion of the existence of a secret agreement between the competent authority and the perpetrator of the violation, or complicity of the authority in the violation, as well as due to other specific circumstances in the case.

The company guarantees the confidentiality and protection of data and provides protection to the alerting person against any form of retaliatory measures, directly or indirectly, for reasons related to the alert.

CASES NO PROCEEDINGS ARE INITIATED

No proceedings are initiated for anonymous alert.

RIGHT OF PROTECTION OF ANONYMOUS ALERT SUBMITTERS

Persons who anonymously submitted an alert not in accordance with the Whistleblower Protection Act or publicly but anonymously disclosed information about violations, and who afterwards have been identified and were subject to retaliatory actions, have the right of protection when the conditions for protection of alerting persons/persons who publicly disclose information about violations, described above, are met.

HOW TO USE THE ALERT CHANNELS

In order to quickly prevent a violation or mitigate its consequences, the alert should be preferably submitted through the internal channel for alerting, unless there is a risk of retaliatory actions or discrimination against the alerting person, or if effective measures to investigate the alert and rectify the violation are not likely to be taken.

The alert can be submitted through either an internal or external channel for alerting, or through both.

PROCEDURE FOR INTERNAL SUBMISSION OF ALERTS VIA THE INTERNAL ALERTS CHANNEL AT "iCard" AD

The alert is submitted to the employee responsible for handling alerts, in accordance with the Rules of "iCard" AD for internal alert submission and subsequent actions under the Whistleblower Protection Act, in written form to the address of "iCard" AD in Varna, postal code 9009, Business Park Varna, B1, also via email to alerts@icard.com or verbally - by phone: +35952706378, and upon request of the alerting person - via personal meeting at a suitable time agreed between the parties.

The alert is registered by the employee responsible for handling alerts, using a form approved by the Commission for Personal Data Protection (CPDP) as the central authority for external alert submission.

The written alert is submitted by the sender by completing the template form approved by the CPDP and available on the CPDP website https://www.cpdp.bg/?p=sub_rubric&aid=282.

The verbal alert is registered by completing a form by the employee responsible for handling alerts, who offers the alerting person to check, correct and approve it by signing it. Upon explicit consent of the alerting person, the verbal report submitted via a telephone line or other voice messaging system, or through a personal meeting, may also be documented by recording on a durable medium allowing its retrieval.

WHAT THE ALERT SHOULD CONTAIN

The alert should contain at least the following information:

- The full name, address, and telephone number of the sender, as well as an email address if available;
- The name of the person against whom the alert is filed, and their position, if the alert is filed against specific individuals and they are known;
- Specific information on the violation or the real danger of it, including the place and period of the violation, if it has occurred, a description of the act or situation, and any other circumstances known to the alerting person;
- Date of alert submission;
- Signature, electronic signature, or other identification of the sender.

Any kind of information sources supporting the claims made in the alert and/or references to documents, including providing information about individuals who could confirm the reported data or provide additional information, can be attached to the alert.

Upon receipt of an alert, the employee responsible for handling alerts in the Company confirms its receipt within a period of 7 days and registers it with a unique identification number.

If the alert does not meet the requirements of Article 15, paragraph 1 of the Whistleblower Protection Act (submitted to the employee responsible for handling alerts, in writing, including via email, or verbally - by phone, through other voice messaging systems, or through a personal meeting), the alerting person receives a message to rectify the deficiencies within a 7-day period from receiving the alert. If the deficiencies are not rectified within this period, the alert, along with its attachments, is returned to the alerting person.

Every alert is investigated for its credibility. Alerts that do not fall within the scope of the Whistleblower Protection Act and whose content does not provide grounds to be considered plausible are not considered. Alerts containing obviously false or misleading factual claims are returned to the sender with instructions to correct the claims and for the responsibility they bear for misleading.

Upon receipt of an alert, the employee responsible for handling alerts initiates actions for conducting an internal investigation and subsequent actions, in accordance with the Rules of "iCard" AD for internal alerts submission and subsequent actions under the Whistleblower Protection Act.

Within a period of up to three months from confirming receipt of the alert, feedback with the results of the investigation and the actions taken is provided to the alerting person.

"iCard" AD manages a register of violation alerts in accordance with Article 18 of the Whistleblower Protection Act and the Rules of "iCard" AD for internal alert submission and subsequent actions under the Whistleblower Protection Act.

PROCEDURE FOR EXTERNAL SUBMISSION OF ALERTS TO THE CENTRAL BODY FOR EXTERNAL SUBMISSION OF ALERTS

The central authority for external submission of alerts in the Republic of Bulgaria is the Commission for Personal Data Protection (CPDP).

Address: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592, Bulgaria;

Email: kzld@cpdp.bg

Website: <https://www.cdpd.bg/>

For the purposes of reviewing alerts and publicly disclosed information about violations, as well as taking appropriate actions to prevent violations or mitigate their consequences, the CPDP promptly forwards the alert, but no later than 7 days after receiving them, to the authority competent on the subject of the alert, according to Article 20 of the Whistleblower Protection Act.

The CPDP publishes on its website <https://www.cdpd.bg/> information about the conditions under which the right of protection under the Whistleblower Protection Act is provided; contact information regarding the use of the external alert submission channel; procedures applicable to the submission of alerts for violations, including how the CPDP may request the alerting person to clarify the information submitted or provide additional information, the deadline for providing feedback to the alerting person, the nature and content of the feedback; the privacy regime applicable to the alerts, and information about the processing of personal data in connection with the alerts; the subsequent actions taken in connection with the alerts; the opportunities for confidential consultation for individuals considering submitting an alert, the procedures and legal remedies against retaliatory actions; the conditions under which the alerting person, submitting an alert to the CPDP, is protected from liability in case of breach of confidentiality under Article 36, paragraph 2 of the Whistleblower Protection Act. CPDP has an established channel for external reporting, in accordance with the requirements of the Whistleblower Protection Act. An alert should be submitted in writing or verbally. The verbal alert may be carried out by telephone, by other voice messaging systems, and at the request of the alerting person - through a personal meeting within a suitable time agreed between the parties.

For registration of an alert, an employee of the CPDP unit - external reporting channel, uses the template form, which contains at least the following data: The full name, address, and telephone number of the sender, as well as an email address if available; The name of the person against whom the alert is filed, and their position, if the alert is filed against specific individuals and they are known; Specific information on the violation or the real danger of it, including the place and period of the violation, if it has occurred, a description of the act or situation, and any other circumstances known to the alerting person; Date of alert submission; Signature, electronic signature, or other identification of the sender.

Alert in writing is submitted by the alerting person via filling in the CPDP template form. The verbal alert is registered by completing a form by the employee of the CPDP unit - external reporting channel, responsible for handling alerts, who offers the alerting person to check, correct and approve it by signing it. Upon explicit consent of the alerting person, the verbal report submitted via a telephone line or other voice messaging system, or through a personal meeting, may also be documented by recording on a durable medium allowing its retrieval. Any sources of information in support of the alert may be attached to the alert, as well as references to documents, including pointing out data for persons who may confirm the provided data or to provide additional data, may be made

Upon receipt of an external alert, the employees of the CPDP unit - external reporting channel: immediately and in any case within 7 days of receiving the alert, confirm its receipt, unless the alerting

person has explicitly requested otherwise or the employee has reason to believe that confirmation of receipt of the signal would put at risk the protection of the identity of the alerting person; under the rules of Whistleblower Protection Act provide feedback to the alerting person within a term no more than three months, which in duly justified cases requiring in-depth investigation may be extended to 6 months; promptly and in any case within 7 days of receipt of the alert, transmit the information contained in the alert, as appropriate, to the competent institutions, bodies, offices or agencies of the European Union for the purpose of subsequent investigation, where breaches of Union law are concerned and this is provided for in Union law or in national law.

During the review, CPDP employees examining received alerts maintain continuous communication with the alert submitter and the competent authority responsible for conducting the inspection, assisting in the exchange of information between the two parties regarding requests or provision of additional data and information; in conducting independent inspections on alerts for violations committed by the authorities specified in Article 20 of the Whistleblower Protection Act, they have the right to request and receive information from state and municipal authorities other than those under Article 20, paragraph 1, item 2 of the Whistleblower Protection Act, as well as from legal and natural persons necessary to establish additional factual circumstances related to the alert; authorities and persons are obliged to provide the necessary information and documents within a 7-day period from receiving the request.

Based on a report from the respective employee, the head of the unit proposes to the CPDP to take specific measures to stop the violation in cases where it is found; or to send the information contained in the alert to the competent institutions, authorities, services, or agencies of the European Union for further investigation, when provided for in acts of the European Union (in these cases, the alerting person is notified of the referral within a 7-day period); or to refer the case to the prosecutor's office in cases of established crime; or to take measures to protect the person who submitted the alert; or to terminate the inspection. The CPDP considers the proposed report in closed session and issues a decision, which is subject to appeal by interested parties under the Administrative Procedure Code. In cases of final termination of the inspection, except under Article 25, paragraph 1, item 5, sub-item "b" of the Whistleblower Protection Act, a motivated decision is sent to the alerting person.

The CPDP issues a report on the actions taken within a period of no more than three months or, in duly justified cases, 6 months from the receipt of the alert. The report is communicated to the alerting person and the affected person.

The CPDP creates and maintains a register of alerts.

The CPDP is subject to external audit regarding the performance of obligations under the Whistleblower Protection Act and the proper handling of alerts and protection of their submitters. The audit is carried out by the Ombudsman of the Republic of Bulgaria.

MEASURES FOR PROTECTING INDIVIDUALS WHO SUBMIT ALERTS OR PUBLICLY DISCLOSE INFORMATION ABOUT VIOLATIONS

Any form of retaliatory actions against individuals who have submitted alerts or publicly disclosed information about violations, which may have the character of repression and put them in an unfavorable position, is prohibited. This includes threats or attempts of such actions, such as:

Temporary suspension, dismissal, or application of other grounds for termination of the employment relationship; Demotion or delay in promotion; Change of workplace or job nature, working hours, or reduction of remuneration; Refusal to provide training for maintaining and improving the professional qualifications of the employee or worker; Negative performance evaluation, including in job

recommendations; Imposition of property and/or disciplinary liability, including disciplinary penalties; Coercion, rejection, or threats to take retaliatory actions or actions expressed physically, verbally, or otherwise, aiming to undermine the dignity of the individual and create a hostile work environment; Direct or indirect discrimination, unequal or unfavorable treatment; Denial of the opportunity to transition from a fixed-term employment contract to an indefinite-term employment contract when the employee or worker had a lawful right to be offered permanent employment; Premature termination of a fixed-term employment contract or refusal to renew it when permissible by law; Harms, including to the reputation of the individual, especially on social media, or financial losses, including loss of business and income; Inclusion in a list, drawn up based on an official or unofficial agreement, in a sector or industry, which may prevent the individual from obtaining employment or providing goods or services in that sector or industry (blacklisting); Premature termination or disruption of a supply contract for goods or services when the individual is a supplier; Revocation of a license or permit; Referral of the individual for medical examination.

If retaliatory actions are taken against a person who has submitted an alert or publicly disclosed information about a violation, the competent authorities under Article 20, paragraph 1 of the Whistleblower Protection Act take corrective measures, which are applied by these authorities regardless of their powers provided in other laws.

A person who has submitted an alert or publicly disclosed information about a violation, against whom retaliatory actions have been taken, may request restoration of the situation in which they were before the retaliatory actions were taken.

In the event of a violation of the prohibition on retaliation against a person who has filed an alert or has publicly disclosed information about a violation, this person is entitled to compensation for the material and non-material damages suffered.

In the event that legal proceedings have been initiated, the alerting person may file an application to the court to suspend the retaliatory actions taken until the court decision is rendered. A person who has submitted an alert or publicly disclosed information about a violation has the right to access the following support measures: comprehensive, independent, free, and accessible information and advice, provided individually and confidentially regarding the procedures and protective measures under Articles 34a, 36, 37, 38, and 39 of the Whistleblower Protection Act, provided by the CPDP; Assistance before any authority necessary for their protection against retaliatory actions, including through properly informing that they have the right to protection under this law, provided by the CPDP; Legal assistance in criminal, civil, administrative, and international disputes related to the protection of the alerting person concerning the submitted alert or disclosed information, in accordance with the Law on Legal Aid, provided by the National Bureau for Legal Aid; Extrajudicial resolution of cross-border disputes through mediation in accordance with the Mediation Act, provided by a mediator registered in the Unified Register of Mediators.

Alerting persons are not responsible for obtaining the information for which the alert was submitted or which was publicly disclosed, or for accessing it, provided that such acquisition or access does not constitute a separate offense.

Alerting persons are not responsible for violating restrictions on disclosing information provided by a contract, law, sub-legal regulatory act, or administrative act, provided that they have reasonable grounds to believe that the submission of the alert or the public disclosure of the information was necessary to reveal the violation.

When a person submits an alert or publicly discloses information about violations falling within the scope of this law, and this information includes trade secrets and when this person meets the

conditions of this law, such submission of the alert or public disclosure is considered lawful within the meaning of Article 7, paragraph 2 of the Trade Secret Protection Act. Damage caused to the reporting person in connection with the report submitted by him or the publicly disclosed information shall be deemed to have been caused intentionally until proven otherwise.

Where criminal, civil or administrative proceedings have been initiated against a person in connection with an alert submitted by him/her or publicly disclosed information, he/she shall have the right to request the termination of such proceedings if there was reasonable cause to believe that the submission of the alert or the public disclosure of the information was necessary for the detection of a violation.

Alerting persons are liable under Bulgarian legislation and the law of the European Union for actions or omissions that are not related to the submission of the alert or its public disclosure or that are not necessary to reveal the violation.

When it is found that a person has knowingly submitted an alert or publicly disclosed false information, that person bears administrative and criminal liability under the Whistleblower Protection Act.

Individuals identified in the alert as violators have the right to compensation for all material and non-material damages when it is identified that the reporting individual knowingly submitted an alert with false information, as well as when, under the circumstances, he/she should have assumed that the information was false.