



# WHISTLEBLOWING REPORTING PROCEDURE

## 1. PURPOSE

The purpose of this procedure is to set up the internal framework for compliance with the provisions of Law no. 361/2022 on the protection of whistleblowers in the public interest ("Law 361"), as well as a mechanism through which any interested party can report irregularities in the activity of TTS (Transport Trade Services) S.A. ("TTS") or TTS Group.

## 2. DEFINITIONS

The following terms and expressions have the following meanings:

**"Reporting person"** - a natural person who makes a report regarding violations of the law or irregularities observed in the activities of TTS or TTS Group, based on information obtained in a professional context;

**"TTS Group"** – the group of companies consisting of TTS together with its subsidiaries:

AGRIMOL TRADE S.R.L. București ("AGRIMOL")

Bunker Trade Logistics S.R.L. Constanța ("BTL")

Canopus Star S.R.L. Constanța ("CANOPUS")

CNFR NAVROM S.A. Galați ("NAVROM")

DECIROM S.A. Constanța ("DECIROM")

Fluvius Kft. Budapesta ("FLUVIUS")

Navrom Bac S.R.L. Galați ("NVR BAC")

Navrom Shipyard S.R.L. Galați ("NVR SHIPYARD")

Plimsoll Zrt. Budapesta ("PLIMSOLL")

Port of Fajsz Kft. Fajsz ("PORT FAJSZ")

SUPERQUATRO GRUP S.R.L. Galați ("SUPERQUATRO")

TTS Operator S.R.L. Constanța ("TTS OPERATOR")

TTS Porturi Fluviale S.R.L. Galați ("TTS FLUVIAL")



TTS (Transport Trade Services) GmbH. Viena ("TTS VIENA")

"Designated person" - the person responsible for implementing the provisions of this procedure.

### 3. SCOPE OF THE PROCEDURE

This procedure applies to the companies within TTS Group as follows:

1. Companies with at least 50 employees (NAVROM, DECIROM, NVR BAC, NVR SHIPYARD, TTS OPERATOR, and TTS FLUVIAL):
  - Shall develop their own whistleblowing procedure, nominate a Designated person, and set up their own communication channels.
  - Investigations of reported incidents will be conducted by the company, under the supervision of its parent company, TTS or NAVROM, as the case may be.
2. Companies with fewer than 50 employees (AGRIMOL, BTL, CANOPUS, FLUVIUS, PLIMSOLL, PORT FAJSZ, SUPERQUATRO, TTS VIENNA):
  - They will create a dedicated email address: [avertizor\\_integritate@\[domain\\_name\].ro](mailto:avertizor_integritate@[domain_name].ro) or [whistleblower@\[domain\\_name\].hu](mailto:whistleblower@[domain_name].hu) (or .at, as applicable).
  - Investigations of reported incidents will be conducted by the respective company following the procedure established by, and with the assistance of, its parent company, TTS or NAVROM, as the case may be.

### 4. REPORTING CHANNELS

Reports can be filed using the following channels:

- Online, by using through the form posted on the TTS website (<https://www.tts-group.ro/whistleblower.html>)
- By email at: [avertizor\\_integritate@tts-goup.ro](mailto:avertizor_integritate@tts-goup.ro)

Reports concerning NAVROM, DECIROM, NVR BAC, NVR SHIPYARD, TTS OPERATOR, and TTS FLUVIAL that are submitted using TTS communication channels, will be redirected for examination and resolution to each of the aforementioned companies.



Reports concerning BTL and SUPERQUATRO that are submitted using TTS communication channels will be redirected to each of the aforementioned companies, and to their parent company NAVROM for examination resolution.

## 5. DESIGNATED PERSON

The Designated person within TTS shall be appointed by the CEO of TTS.

## 6. CONTENTS OF THE REPORT

The report will contain at least the following data:

- Name, surname, and contact information of the Reporting person
- Description of the work-related context in which the information was acquired,
- The concerned person, if known,
- Description of the incident that might constitute a breach of law or an irregularity in the TTS Group's activities
- Supporting evidence, if any
- The date of the report

Anonymous reports, i.e. those lacking the name, surname, and contact details of the Reporting person, will be registered and examined, but they will be resolved only if information presented is correct and complete, and if there are indications of a breach of law. The conclusions and any other information regarding the investigation cannot be communicated to the Reporting person.

Optionally, for the prompt conduct of the investigation, the report will indicate:

- The company the report refers to;
- Category of the reported incident:
  - Acts or facts of conflict of interest
  - Acts or facts of corruption or of a fraudulent nature
  - Bribery
  - Breaches of the anti-money laundering and anti-terrorist financing law
  - Acts of human rights violations
  - Acts of labor law violations



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Violation of the company's internal policies, regulations, and procedures  
Acts or facts endangering occupational safety and health  
Acts or facts endangering the environment  
Acts or facts endangering the safety of freight or passenger transport  
Acts or facts endangering IT security and internal IT systems  
Violation of privacy or breach of personal data protection regulations

## 7. CONFIDENTIALITY

The Designated person must not disclose the identity of the Reporting person, except when:

1. The Reporting person has given an express consent;
2. Disclosure is made in fulfillment of a legal obligation, under the conditions and limits provided by the law;
3. The Reporting person has voluntarily disclosed his or her identity.

The confidentiality obligation also applies if the report is mistakenly received by a person other than the Designated person, in which case the report must be immediately handed to the Designated person.

Information contained in the reports that constitute trade secrets or insider information cannot be used or disclosed for purposes other than those necessary for the resolution of the.

## 8. PROTECTION OF WHISTLEBLOWERS

Any form of retaliation, threat of retaliation, or attempt of retaliation against the Reporting person is prohibited.

For the avoidance of doubt, in the case of reporting persons for public interest, the protection measures established by Articles 20 - 22 of Law 361 are applicable.