

Whistleblowing Policy

Purpose

This Data Protection Policy outlines how TotalView handles, protects, and secures personal data in compliance with legal and regulatory requirements, including the General Data Protection Regulation (GDPR), national data protection laws, and specific provisions related to commercial, governmental, and European projects. As a company operating in satellite imagery tasking, processing, delivery, and IT project development, we are committed to ensuring that all personal data is handled responsibly, transparently, and securely.

Scope

This policy applies to all employees, contractors, partners, and third parties that handle personal data in relation to:

- Satellite imagery tasking, processing, and delivery.
- IT project management and development.
- Commercial, governmental, and European projects involving sensitive data.

As a company involved in commercial, governmental, and European projects, TotalView is subject to multiple regulatory frameworks, including:

Purpose

The purpose of this Whistleblowing Policy is to provide a clear and confidential process for employees, contractors, suppliers, and other stakeholders to report incidents of bribery, fraud, corruption, and any other illegal or unethical behavior within the company. This policy is designed to comply with legal requirements and best practices, especially for companies involved in commercial, governmental, and European Union (EU) projects in the fields of satellite imagery tasking, processing, delivering, and IT services.

Scope

This policy applies to all employees, contractors, consultants, suppliers, and stakeholders associated with TotalView. It covers incidents related to:

- Bribery
- Fraud
- Corruption
- Financial malpractice
- Unlawful activity
- Regulatory breaches
- Misuse of company assets

- Any other form of illegal or unethical behavior

This policy extends to all projects, including commercial, governmental, and EU projects, particularly those concerning satellite imagery and IT services.

Legal Framework

This policy is compliant with relevant laws and regulations, including:

- The EU Whistleblowing Directive (Directive (EU) 2019/1937), which mandates protections for whistleblowers.
- The European Anti-Fraud Office (OLAF) guidelines for detecting and reporting fraud in EU-funded projects.

Definitions

Whistleblowing: The act of reporting, by any employee or stakeholder, on suspected or actual illegal or unethical conduct occurring within the organization.

Bribery: Offering, giving, receiving, or soliciting something of value as a means to influence the actions of an individual or organization.

Fraud: A deliberate deception to secure an unfair or unlawful gain.

Corruption: Dishonest or unethical conduct by someone entrusted with a position of authority, often to acquire personal benefit.

Confidentiality: Ensuring that the identity of the whistleblower is protected unless the whistleblower consents to disclosure.

Reporting Mechanism

Who Can Report?

Any employee, contractor, supplier, client, or stakeholder of TotalView can report suspicions or incidents.

What to Report?

Bribery: Offers of gifts, favors, or cash in exchange for preferential treatment or contract awards.

Fraud: Manipulation of financial data, misrepresentation of project expenses, theft of assets.

Corruption: Collusion with third parties, misuse of authority, or accepting unlawful commissions.

Other Incidents: Violation of contractual obligations, conflicts of interest, unethical behavior.

How to Report?

Reports can be made through the following channels:

- Dedicated Email Address
- Anonymous Reporting Web Form
- Direct Reporting to Designated Officers: The Compliance Officer.

All reports should contain sufficient information to enable an investigation, including dates, names, locations, and any supporting documents or evidence, if available.

Anonymous Reporting

Reports may be made anonymously, although individuals are encouraged to provide their identity to facilitate a thorough investigation. Regardless, all reports will be treated with the strictest confidentiality.

Protection for Whistleblowers

TotalView is committed to ensuring that anyone who reports suspected misconduct in good faith will not suffer retaliation, harassment, or discrimination as a result. The company offers the following protections:

Confidentiality: The identity of the whistleblower will remain confidential unless disclosure is required by law.

Protection from Retaliation: Any form of retaliation, including demotion, dismissal, harassment, or discrimination, is strictly prohibited. Violations of this will lead to disciplinary actions.

Support for Whistleblowers: The company will provide necessary support, including legal advice and counseling if needed.

False Reporting

If a whistleblower knowingly makes a false report or acts with malicious intent, disciplinary action may be taken. However, individuals who make reports in good faith, even if proven unfounded, will not be subject to any disciplinary action.

Investigation Process

Initial Assessment

Upon receiving a report, the Compliance Officer or designated investigator will conduct an initial assessment to determine whether there is sufficient cause for a formal investigation. If the matter does not fall under this policy (e.g., personal grievances), it will be redirected to the appropriate channel.

Investigation Team

A specialized team, including members from the Legal, HR, and Compliance departments, will be assembled to investigate the allegations. External investigators may be engaged if necessary.

Investigation Procedures

Confidentiality: Investigations will be conducted in a confidential manner, respecting the rights of all parties involved.

Interviewing Witnesses: Investigators may interview the whistleblower (if identified), witnesses, and other relevant individuals.

Evidence Collection: Relevant documentation, electronic data, and other records will be gathered to support the investigation.

Interim Measures: In cases where immediate action is required to prevent further misconduct, interim measures (such as suspension of involved personnel) may be taken.

Reporting the Outcome

Upon completion, the investigation findings will be reported to senior management. Disciplinary actions or legal proceedings will be recommended if misconduct is proven. If the allegations are unfounded, the case will be closed with no further action.

Disciplinary Actions

If the investigation confirms a violation of the company's anti-bribery, anti-fraud, or anti-corruption policies, appropriate disciplinary measures will be taken, including but not limited to:

- Termination of employment or contract.
- Legal action for recovery of financial losses.
- Referral to law enforcement or regulatory bodies.

Confidentiality

The whistleblower's identity, as well as the details of the case, will be kept confidential to the greatest extent possible. However, disclosure may be required by law, or during legal proceedings. In such cases, the whistleblower will be informed prior to any disclosure.

Training and Awareness

TotalView will regularly conduct training and awareness programs to educate employees, contractors, and other stakeholders about this policy. Training will include:

- How to identify bribery, fraud, and corruption.
- How to report concerns confidentially.
- Legal protections for whistleblowers.

Record Keeping

The Compliance Officer will maintain a secure log of all whistleblowing reports. This log will contain:

- A summary of the report.
- Dates of the report and investigation.
- Outcome of the investigation and any disciplinary measures taken.

This log will be reviewed annually by senior management to ensure compliance and to identify patterns or areas of concern.

Monitoring and Review

The whistleblowing policy will be reviewed annually, or sooner if required, to ensure that it remains effective and compliant with applicable laws and regulations. Amendments will be made as needed to improve the process or respond to legislative changes.

Contact Information

Email: Whistleblower@totalview.gr

Anonymous Reporting Form: <https://rg8ri4vigw5.typeform.com/to/dsXpzVa5>

Compliance Officer: George Keradinidis

Acknowledgment

All employees and stakeholders are required to acknowledge their understanding and acceptance of this policy. This acknowledgment is part of the company's commitment to transparency, integrity, and ethical business practices.