

[TTS Logo]

TTS  
(TRANSPORT TRADE SERVICES) S.A.  
BUCHAREST - ROMANIA

[Logo]

Reg. Com. No.: J 40/296/97;  
Unique Identification Code: 9089452  
Subscribed and paid-up share capital: 30,000,000 lei

27 Vaselor Street, Bucharest, Romania  
Tel: +40 21 210 29 07 | Fax: +40 21 210 35 43  
office@tts-group.ro | www.tts-group.ro

## PROCEDURE ON WHISTLEBLOWING

### 1. PURPOSE

The purpose of this procedure is to ensure the necessary internal framework for the application of the provisions of Law No. 361/2022 on the protection of whistleblowers in the public interest ("Law 361"), as well as to establish a mechanism through which any interested party can report irregularities observed in the activities of TTS (Transport Trade Services) S.A. ("TTS") or the TTS Group.

### 2. DEFINITIONS

For the purposes of this procedure, the following terms and expressions shall have the meanings set forth below:

**"Whistleblower"** – a natural person who makes a report regarding violations of the law or irregularities noticed in the activities of TTS or the 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., Bucharest ("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., Budapest ("FLUVIUS")
- Navrom Bac S.R.L., Galați ("NVR BAC")
- Navrom Shipyard S.R.L., Galați ("NVR SHIPYARD")
- Plimsoll Zrt., Budapest ("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, Vienna ("TTS VIENNA")



[TTS Logo]

TTS  
(TRANSPORT TRADE SERVICES) S.A.  
BUCHAREST - ROMANIA

[Logo]

Reg. Com. No.: J 40/296/97;  
Unique Identification Code: 9089452  
Subscribed and paid-up share capital: 30,000,000 lei

27 Vaselor Street, Bucharest, Romania  
Tel: +40 21 210 29 07 | Fax: +40 21 210 35 43  
office@tts-group.ro | www.tts-group.ro

“Responsible Person” – the person responsible for the implementation of the provisions of this procedure.

### 3. SCOPE OF APPLICATION

This procedure applies to the companies in the 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, appoint a Responsible Person, and establish their own communication channels.
  - The investigation of cases reported by Whistleblowers will be conducted by the respective company, with information provided to and supervision by the parent company, TTS or NAVROM, as appropriate.
2. Companies with fewer than 50 employees (AGRIMOL, BTL, CANOPUS, FLUVIUS, PLIMSOLL, PORT FAJSZ, SUPERQUATRO, TTS VIENNA):
  - Shall create a dedicated email address, such as [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 will be conducted by the respective company with assistance and in accordance with the procedure established by the parent company, TTS or NAVROM, as appropriate.

### 4. COMMUNICATION CHANNELS

Whistleblowers have the following communication channels available:

- Online via the form available on the TTS website ([https://ro.ttsgroup.ro/avertizor\\_integritate.html](https://ro.ttsgroup.ro/avertizor_integritate.html))
- By email at: [avertizor\\_integritate@tts-group.ro](mailto:avertizor_integritate@tts-group.ro)



[TTS Logo]

TTS  
(TRANSPORT TRADE SERVICES) S.A.  
BUCHAREST - ROMANIA

[Logo]

Reg. Com. No.: J 40/296/97;  
Unique Identification Code: 9089452  
Subscribed and paid-up share capital: 30,000,000 lei

27 Vaselor Street, Bucharest, Romania  
Tel: +40 21 210 29 07 | Fax: +40 21 210 35 43  
office@tts-group.ro | www.tts-group.ro

Reports concerning the companies NAVROM, DECIROM, NVR BAC, NVR SHIPYARD, TTS OPERATOR, and TTS FLUVIAL made using the TTS communication channels will be forwarded to the respective company for resolution.

Reports concerning the companies BTL and SUPERQUATRO made using the TTS communication channels will be forwarded to the respective company and NAVROM for resolution.

## 5. RESPONSIBLE PERSON

The Responsible Person within TTS is appointed by the Decision of the Chief Executive Officer of TTS.

## 6. CONTENT OF THE REPORT

The report must contain at least the following elements:

- The name, surname, and contact details of the Whistleblower
- The professional context in which the information was obtained
- The person concerned, if known
- A description of the act likely to constitute a violation of the law or an irregularity in the activities of the TTS Group
- Evidence supporting the report, if any
- The date of the report

Anonymous reports (those that do not include the name, surname, and contact details of the Whistleblower) are accepted and are subject to examination but are only resolved to the extent that they contain correct, complete information, and provide indications of violations of the law. In the case of such reports, the results and other information regarding the investigation cannot be communicated to the Whistleblower.

Optionally, to expedite the investigation, the report should indicate:



[TTS Logo]

TTS  
(TRANSPORT TRADE SERVICES) S.A.  
BUCHAREST - ROMANIA

[Logo]

Reg. Com. No.: J 40/296/97;  
Unique Identification Code: 9089452  
Subscribed and paid-up share capital: 30,000,000 lei

27 Vaselor Street, Bucharest, Romania  
Tel: +40 21 210 29 07 | Fax: +40 21 210 35 43  
office@tts-group.ro | www.tts-group.ro

- The group company to which the report refers
- The category in which the reported acts fall:
  - Acts or facts constituting a conflict of interest
  - Acts or facts of corruption or fraudulent nature
  - Bribery or acceptance of bribes
  - Acts or facts violating legislation on combating money laundering and terrorist financing
  - Acts violating human rights
  - Acts violating labour law
  - Violations of the company's internal policies, regulations, and procedures
  - Acts or facts endangering occupational health and safety
  - Acts or facts endangering the environment
  - Acts or facts endangering the safety of the transport of goods or people
  - Acts or facts endangering information security and internal IT systems
  - Breach of privacy or violation of personal data protection regulations

## 7. CONFIDENTIALITY OBLIGATION

The designated person is obliged not to disclose the identity of the Whistleblower, with the following exceptions:

1. The Whistleblower has given express consent;
2. The disclosure is made to fulfil a legal obligation, in compliance with the conditions and limits provided by law;
3. The Whistleblower has intentionally disclosed their own identity;

The confidentiality obligation remains even if the report mistakenly reaches a person other than the designated person, in which case the report shall be immediately forwarded to the designated person. Information contained in reports that constitutes trade secrets or falls into the category of privileged information may not be used or disclosed for purposes other than those necessary for resolving the report.



[TTS Logo]

TTS  
(TRANSPORT TRADE SERVICES) S.A.  
BUCHAREST - ROMANIA

[Logo]

Reg. Com. No.: J 40/296/97;  
Unique Identification Code: 9089452  
Subscribed and paid-up share capital: 30,000,000 lei

27 Vaselor Street, Bucharest, Romania  
Tel: +40 21 210 29 07 | Fax: +40 21 210 35 43  
office@tts-group.ro | www.tts-group.ro

## 8. PROTECTION OF WHISTLEBLOWERS

Any form of retaliation, threats of retaliation, or attempts at retaliation against Whistleblowers is prohibited.

To avoid any doubt, in the case of whistleblowers in the public interest, the protective measures established under Articles 20 - 22 of Law 361 shall apply.

The undersigned DANGL CRISTINA DIANA, certified interpreter and translator for ENGLISH based on the authorisation no. 37918 issued on 03.11.2015, by the Romanian Ministry of Justice, hereby certify the accuracy of this translation from ROMANIAN into ENGLISH, and the fact that through this translation the content and meaning of the document have not been distorted.

CRISTINA DIANA DANGL

