



GENESIS PROPERTY

COMPLAINT RESOLUTION POLICY

Last update: 14 October 2022

Purpose

One of the core values of Genesis Property companies is integrity. The purpose of this policy is to provide advice and guidance to those who work with or within Genesis Property and who may sometimes feel the need to report or bring to the attention of the responsible persons certain matters or issues related to work activities. The objective is to identify deviations, complaints and any other violations, including those of the law, in order to counteract their occurrence in the future and to take appropriate preventive measures.

Genesis Property is committed to the highest standards of transparency, integrity and accountability and makes every effort to prevent and discourage any inappropriate behavior, as well as any violation of the law. Any employee of any company within Genesis Property is encouraged to promptly raise and report any misconduct, dissatisfaction or negligence, without fear of being exposed to any risk or disadvantage, both in their professional and personal lives.

This policy applies to all people working for Genesis Property companies or on our behalf in any capacity, including employees (permanent and temporary), directors, managers, employees of various contractors and suppliers, volunteers and external consultants.

Responsibilities and Management

The notification represents the drafting and issuance of information related to facts that are supposed to be inappropriate or that may cause damage of any kind to the activities and the reputation of the Genesis Property companies.

This policy is intended to handle serious or sensitive matters such as:

- giving or taking bribes, fraud of any kind, money laundering, facilitating tax evasion or any other criminal activities,
- failure to comply with any legal obligation or regulatory or compliance requirements, including, but not limited to, breach of personal data protection law, harassment, discrimination or intimidation,
- risks for the health and safety of people,
- damage to the environment,
- behavior likely to affect reputation or financial well-being,
- modern slavery or human trafficking,
- unauthorized disclosure of confidential information,
- negligence,
- deliberately concealing any of the above or any other important business matters.

This list is only an indicative one in relation to the forms or methods of deviations or dangers at workplace that may cause concern, but it is not an exhaustive one.

We expressly point out that reports containing information known to be false or misleading will be omitted.

Analysis and resolution

Any person from the group of persons specified at the end of the first chapter who has knowledge of a violation can use the following email address to send a notification: sesizare@genesisproperty.net. Use of this address is voluntary.

The address for sending the notification is configured in such a way that it is safe and reliable, ensuring the confidentiality of the content and the identity of the persons mentioned in the notification, the access of unauthorized persons not being allowed.

All notifications are handled by the human resources manager, Mr. Teodor Stoica, who is also responsible for the implementation of subsequent actions.

Notifications can be made both in writing, in Romanian or in English, but also verbally at the phone number +40 21 539 01 07.

The content of the notification will be discussed in detail with the human resources manager, in order to understand exactly all the issues that concern the complaining person. Any possible investigation will be carried out discreetly and as soon as possible, and in some situations, it may be necessary to report to other competent authorities.

Within 7 (seven) days of the submission of the notice, the claimant receives a confirmation message regarding the receipt of his notice. It will receive an additional response within no more than 30 calendar days.

Confidentiality

Genesis Property undertakes to ensure the confidentiality of the content of the notification and the identity of the persons indicated therein, respecting all the requirements and provisions of *Regulation no. 679 of April 27, 2016, regarding the protection of natural persons regarding the processing of personal data and regarding the free movement of such data*. Verbal notifications will be kept in written form.

The content of this document is updated annually or whenever deemed necessary, based on the results obtained and the experience gained.