

# GREECE SUPPLEMENTAL RULES TO GLOBAL WHISTLEBLOWING POLICY

## (“GREECE POLICY”)

### 1. Introduction

Law 4990/2022 *on the protection of persons who report breaches of EU law*, which transposed Directive (EU) 2019/1937 (hereinafter the “**Law**”), gives legal protection to persons who make disclosures about matters falling within the scope of the Law.

Consistent with the Law, and as set out in this Greece Policy, Zimmer Biomet Hellas SA (“**ZB Hellas**”) has established internal reporting channels and procedures, to enable the making of disclosures by persons covered by the Law.

As per the global whistleblowing policy, contained in the Global Compliance Program (COMP 300), workers and other potential reporting persons (see below) of ZB Hellas are encouraged to report any compliance related policy violations or misconduct, including matters contemplated in the Law and this Greece Policy, to the Zimmer Biomet Global Compliance Hotline (available [here](#)). Such cases will be dealt with in accordance with Zimmer Biomet’s Global policies and procedures. It is important to note that whistleblowers who follow this procedure will not benefit from the protections provided by the Law.

Alternatively, should reporting persons wish for a matter to be addressed in line with the Law and this Greece Policy, they have the option to report any matter that fall within the scope of the Law by e-mail [hellashotline@zimmerbiomet.com](mailto:hellashotline@zimmerbiomet.com)].

This Greece Policy is informed by Zimmer Biomet’s legal obligations pursuant to the Law, in accordance with EU Directive 2019/1937. This legislation gives legal protection to those who make disclosures that fall within its scope, including protection for employees from being dismissed or penalised by their employer.

### 2. Scope of this Greece Policy

This Greece Policy applies to reports made in a work-related context connected to Zimmer Biomet’s operations in Greece, by any “reporting person” as defined under the Law. This includes employees (permanent or temporary, full-time or part-time), workers, self-employed persons, consultants, any person working under the supervision and direction of contractors, subcontractors and suppliers, trainees and volunteers, shareholders, members of administrative, management or supervisory bodies (including non-executive members), and persons whose employment relationship has ended or has not yet begun where the information was acquired during recruitment or pre-contractual negotiations (collectively referred to as “**reporting persons**” or “**you**”).

This Greece Policy applies when a reporting person makes a report using the assigned e-mail address ([hellashotline@zimmerbiomet.com](mailto:hellashotline@zimmerbiomet.com)) or publicly discloses information about:

- i. Breaches falling within the scope of EU law that concern the following areas:
  - (a) public procurement;

- (b) financial services, products and markets, crypto-asset markets, and prevention of money laundering and terrorist financing;
  - (c) product safety and compliance;
  - (d) transport safety;
  - (e) protection of the environment;
  - (f) radiation protection and nuclear safety;
  - (g) food and feed safety, animal health and welfare;
  - (h) public health;
  - (i) consumer protection; and
  - (j) protection of privacy and personal data, and security of network and information systems;
- ii. Breaches affecting the financial interests of the EU as referred to in Article 325 TFEU and as further specified in relevant EU measures;
- iii. Breaches relating to the internal market, as referred to in Article 26 (2) TFEU, including breaches of EU competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law; and
- iv. Breaches of Greek law regulating bribery and influence peddling, in particular, venality/ bribery of politicians, venality/ bribery of civil servants, venality/ bribery of judicial officers, influence peddling and intermediaries, liability of private sector legal entities for bribery offences.
- v. Breaches of restrictive measures of the EU, as established pursuant to Article 29 of the Treaty on European Union or Article 215 of the Treaty on the Functioning of the European Union.

### **3. What is not in Scope**

This Greece Policy should not be used to raise complaints relating to interpersonal grievances exclusively affecting you, namely grievances about interpersonal conflicts between you and another worker, or a matter concerning a complaint by you to, or about, Zimmer Biomet which concerns you exclusively. In such circumstances, it would be more appropriate that the matter is dealt with through Zimmer Biomet's other policies, as appropriate.

This Greece Policy does not apply to wrongdoings which it is in your function or Zimmer Biomet's function to detect, investigate or prosecute and does not involve an act or omission on the part of Zimmer Biomet.

If you are uncertain whether something is within the scope of this Greece Policy, you should seek advice from the Regional Compliance Team at [compliance.emea@zimmerbiomet.com](mailto:compliance.emea@zimmerbiomet.com).

Lastly, anonymous complaints are excluded from this Greece Policy. Anonymous reports will be handled under the global whistleblowing policy.

#### **4. How your Concern is managed internally**

As referred above, reporting persons connected to ZB Hellas may raise concerns in two ways: (i) by using the Zimmer Biomet Global Compliance Hotline available at <https://app.convercent.com/en-us/LandingPage/92247c61-1a72-eb11-a97a-000d3ab9f296>; or (ii) if they wish the matter to be addressed in line with the Law and this Greece Policy, by using the dedicated email [hellashotline@zimmerbiomet.com](mailto:hellashotline@zimmerbiomet.com).

ZB Hellas has designated an Officer for Greece responsible for the Receipt and Following Up on Reports (the “**Officer**”). The Officer will forward the report pseudonymised to the competent investigation team/department of Zimmer Biomet for further actions (if required, will forward the report to competent independent Authorities and/or judicial Agencies), or will terminate the procedure, in case the report is unintelligible, or abusive, or does not include facts constituting a breach of EU or Greek law, or there are no serious indications of such breach.

In case the report does not include facts constituting a breach within the scope of the Law, but includes information on a breach, that another investigation team/department has responsibility on (e.g., harassment), the Officer will forward the report to the competent team/department.

Where a conflict of interest arises, the Officer will abstain and the report will be referred to the National Transparency Authority, and you will be informed accordingly.

You will be provided with an acknowledge of the report, in writing, within 7 days of the report being submitted.

You will be provided feedback within a reasonable time, being not more than 3 months from the date the acknowledgement of receipt.

#### **5. Conflicts with the Law**

This Greece Policy shall be regarded as an “*internal procedure*” for the purposes of the Law. Should any inconsistencies exist between the terms of this Greece Policy in respect of protected disclosures and the terms of the Law, then the terms of the Law shall prevail.

#### **6. External Reporting to the National Transparency Authority**

The reporting person has always the option to file a report to the National Transparency Authority (“NTA”). In particular, the reporting person can report a breach directly with the NTA, for instance, if they reasonably believe that their report cannot be effectively addressed internally (e.g., in case of conflict of interest), or if there is a risk of retaliation. Reports can be made in writing, orally by telephone or request a face-to-face meeting with the person appointed by the NTA, or through the electronic platform

of the NTA, accessible to persons with disabilities too. In particular, external reports may be submitted to the NTA following the manners mentioned below:

- Electronically: Via the electronic platform of the NTA, available here: [External NTA Whistleblowing Platform](#)
- In writing: in person or by post at the headquarters of the NTA (195 Lenorman & Amfiarou, 10442, Athens), in an envelope marked “External report under Law 4990/2022” or bearing another indication that the report falls within the provisions of Law 4990/2022, or by email at the following email address: [external.whistle@aead.gr](mailto:external.whistle@aead.gr).
- Orally: by means of a face-to-face meeting with the authorised Inspector-Auditor, upon reporting person’s request, submitted at the following email address: [external.whistle@aead.gr](mailto:external.whistle@aead.gr) or by phone call: (+30) 2132129900 (Monday – Friday 9:00 a.m. to 2:00 p.m.).

The Hellenic Telecommunications and Post Commission (EETT) serves as the external reporting channel for breaches of EU competition law in the electronic communications and postal and courier services markets. Reports can be submitted here: [info@eett.gr](mailto:info@eett.gr).

Also, the reporting person, where applicable, can make a report to institutions, bodies, offices or agencies of the EU that are competent in each instance for the subjects that are the object of the report.

## **7. Processing of Personal Data**

Processing of personal data in the context and for the needs of operation of the whistleblowing channel shall be carried out in compliance with the General Data Protection Regulation EU 679/2016 (GDPR), Greek law 4624/2019, the decisions and guidance of the Greek Personal Data Protection Authority and any relevant rules, including the opinions and guidelines of the European Data Protection Board.

Further information on the processing of your personal data can be found here: [Privacy Notice Page | Zimmer Biomet | Zimmer Biomet](#).

## **8. Status of the Greece Policy**

Employees should note that the procedures outlined in this Greece Policy do not form part of any contract of employment and may be amended by Zimmer Biomet from time to time.

## **9. Review of this Policy**

The Greece Policy will be subject to periodic review and will be amended and updated from time to time in line with best practice, any changes in the Law or relevant codes of practice.

## **10. Further information**

All questions relating to the execution or interpretation of this Greece Policy should be referred to the Regional Compliance Team at [compliance.emea@zimmerbiomet.com](mailto:compliance.emea@zimmerbiomet.com)