

General Counsel - Legal  
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Compliance Department

Human Resources Department



## Enforcement Policy & Report/Complaint Handling Procedure

Board Decision 19/01.03.2022

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## A. INTRODUCTION

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1. Public Power Corporation S.A. ("PPC", or "the Company") is committed to maintaining the highest level of moral and ethical professional conduct, repudiating explicitly and unequivocally any illegal and irregular acts that affect its reputation and credibility. With a view to fostering a strong corporate culture of integrity and ethical business practices, the Company has adopted a "Programme" under which it has redefined its ethical rules in line with the international best practices and drafted new rules, policies and procedures or revised existing ones, including the Code of Conduct.
2. PPC's Code of Conduct defines the clear obligation of all PPC personnel to comply with the Company's policies, rules, regulations and procedures and provides that failure to apply or violation thereof constitutes "misconduct" as set forth herein. In addition, the Company encourages and exhorts its executives, employees and associates to promptly report instances of violations and misconduct, as well as any act or conduct that deviates from appropriate conduct as described in the aforementioned Code and in all of its rules, policies and procedures constituting the aforementioned "Programme."
3. For this reason, the Company establishes the present Enforcement Policy (hereinafter "Policy"), which is a means to safeguard the integrity, prestige and reputation of the Company and contribute to the identification of risks and the taking of appropriate corrective actions.

## B. PURPOSE OF THE POLICY

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4. The "Policy" sets out the principles and operating framework based on which the Company manages all cases of violation of the "Programme". The existing PPC Staff Regulations in Chapters D and F provides for the obligations of PPC personnel and the disciplinary action procedure, and in particular the procedures for investigating and imposing sanctions, for employees and executives whose employment contracts are governed by the said Regulations. In the case of executives or employees whose employment contracts are not governed by the PPC Staff Regulations, as well as of other employees (under a



remunerated mandate, project or service contract or trainees, interns and apprentices), misconduct is managed on the basis of the "Policy", the provisions of which are harmonised with the PPC Staff Regulations.

5. The aim of the "Policy" is to ensure that all detected breaches of the "Programme" are investigated and controlled in a fair and consistent manner, while protecting the rights of all parties, as well as to help prevent recurrence.
6. The "Policy" is complemented by the **Report/Complaint Handling Procedure** Procedure/ (see Annex). Responsible for receiving, initially assessing and monitoring the whole process is the Compliance Department and a member of its executive staff designated as the Officer in charge of **Receiving/Monitoring Reports** (hereinafter "the Officer"), who is entrusted with the report/complaint handling channel, ensuring that reports are managed appropriately while maintaining communication with the reporting party/complainants. The responsibilities of the "Officer" are detailed in the Annex.

#### C. SCOPE AND APPLICABILITY

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7. This "Policy" applies to the members of the administration bodies, executives, employees in a dependent employment relationship, employees under project contracts or independent service contracts or remunerated mandate, those employed through third party service providers, as well as trainees, interns and apprentices.
8. The "Policy" applies to the occurrence or suspected occurrence of misconduct, as well as in case that relevant administrative and/or judicial proceedings have been initiated against the persons referred to in par. 7, in Greece or elsewhere.
9. The "Policy" includes guidelines for the Company's subsidiaries as well, which establish and implement similar policies and procedures.

#### D. SUBJECT MATTER OF REPORTS/COMPLAINS

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10. Reports of illicit, unethical, illegal or punishable conduct in relation to the Company's operations include - but are not limited to - the following:



- ✓ Fraud
- ✓ Corruption / Abuse of power
- ✓ Bribery, breach of gift and hospitality policy
- ✓ Conflict of interest
- ✓ Theft, embezzlement
- ✓ Forgery
- ✓ Breach of confidentiality and personal data
- ✓ Money laundering
- ✓ Infringement of law on competition
- ✓ Breaches in accounting and auditing matters
- ✓ Misuse of Company's resources
- ✓ Violation in health and safety matters
- ✓ Infringement of environmental legislation
- ✓ Discriminatory treatment of employees
- ✓ Harassment
- ✓ Intimidation, Extortion, Use of force
- ✓ Insult, defamation
- ✓ Violation of legislation and corporate policies
- ✓ Unethical behaviour.

#### E. DEFINITIONS

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11. **Misconduct** means any violation, by act or omission, of the Code of Conduct, the Policies and the Procedures included in the "Programme".
12. **Subject** means any staff member referred to in the above scope of applicability of the "Policy", who is alleged or reasonably suspected to have committed misconduct and is under investigation.

#### F. BASIC RULES

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13. The Company examines all reports/complaints/information that come to its knowledge concerning eventual reprehensible, illicit or illegal conduct and acts in each case, based on the following principles:



- (a) confidentiality of personal data
  - b) respect and anonymity
  - c) keeping a record and storing the report/complaint for a reasonable period of time
  - (d) collecting and examining all necessary documents and information in order to better handle the report/complaint
  - e) protecting from malicious actions and retaliation those who report in good faith. However, the Company reserves the right to take whatever action it deems appropriate against any executive, employee and/or associate if it is proved that he/she has knowingly/maliciously provided false information when reporting.
14. The procedure set out in this "Policy" is part of the Company's disciplinary - administrative procedure and concerns the private law relationship between the Company and the persons falling within the scope of the "Policy". Therefore, while persons under investigation for misconduct have certain rights commonly referred to as "due process" rights, these are in no way equivalent to the rights of persons who are subject to criminal or other judicial proceedings.
  15. As provided for in PPC Code of Conduct, PPC personnel must protect the Company from acts or omissions that are detrimental to the Company. Consequently, the personnel has an obligation, when it becomes aware of a conduct that is reprehensible or requires further investigation, and in any case, if elements punishable by law are detected in such conduct, to report it.
  16. Based on the Company's Services Structuring and Duties Code (KDY), the Compliance Department is entrusted with monitoring the proper implementation of the "Programme" and therefore with monitoring the management and investigation, by the competent bodies, of misconduct arising from non-compliance with the "Programme". In particular, the Compliance Department is responsible for monitoring and assessing misconduct involving high-ranking executives or causing significant detriment



to the Company (financial and reputational - "the front-page rule") or committed repeatedly. In such cases, it has, in addition, the authority to issue instructions in order to prevent any future occurrences. Finally, the Compliance Department is responsible for receiving, initially assessing, handling and in general monitoring the report/complaint channel, as detailed below.

#### G. IMPLEMENTATION OF THE "POLICY"

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##### DETECTING SUSPECTED MISCONDUCT - INVESTIGATIVE PROCESS

17. A potential violation of the "Programme" may be detected, by way of example, in any of the following ways:
  - a. By a Direct Manager of any hierarchical level who becomes directly aware of the misconduct of an employee under his/her supervision,
  - b. By an employee reporting to his/her hierarchy the misconduct of another employee or executive,
  - c. Following an audit conducted by the competent bodies of the Company,
  - d. Upon submission of a report/complaint to the relevant channel of the Compliance Department, against an employee or executive.
  - e. Upon notification by the competent State Authorities,
  - f. From media publications.
18. In cases where the subject of the misconduct is an employee or executive with an employment contract covered by the PPC Staff Regulations, the relevant provisions on Disciplinary Action under articles 26-33 of the Staff Regulations are applied. Depending on the Company's officer/body that becomes aware of the misconduct, the investigative process is initiated either by the Compliance Department (see the process in the Annex) or by the competent disciplinary hierarchy with simultaneous notification of the Compliance Department.





In cases where the subject of the misconduct is a member of an administration body or an executive with an employment contract not governed by the PPC Staff Regulations, the procedure provided for in the Annex shall be applied.

#### H. RIGHTS AND OBLIGATIONS OF THE SUBJECT AND THE PARTICIPANTS IN THE INVESTIGATIVE PROCESS

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##### RIGHTS OF THE SUBJECT

19. The following basic rights of the Subject must be ensured during the investigative process of the report/complaint:

- **Disclosure:** The Subject mentioned (by his/her name) in the reports/complaints has the right to be informed of the misconduct of which he/she is accused, of the persons handling the information in the report/complaint, and of his/her right to be called to an interview. In particular for Category C misconducts (Annex, paragraph 4), short time limits for informing the Subject should be observed and, in any case, not more than one (1) month. If, however, it is considered that there is a risk that informing the Subject may impede the investigation of the case and the gathering of the required evidence, the time limit for informing the Subject may be extended until such risk is eliminated but in no case beyond three (3) months.
- **Interview:** The investigative body cannot complete the investigation without granting the Subject of the investigation the right to be heard. The Subject shall be entitled to request and be provided with all the information in the file resulting from the investigation at least four (4) days prior to the date set for the interview. The Subject may be represented by a proxy at the interview.
- **Witnesses/Evidence:** The Subject may propose witnesses, for written witness testimony, in support of his testimony, as well as provide, at any time during the investigation, evidence relevant to the alleged misconduct under investigation.





The above shall also apply to the Subjects whose employment contract is governed by the PPC Staff Regulations, in accordance with those specified in the relevant provisions of the PPC Staff Regulations (Articles 30 & 31) and the applicable legislation.

#### **RIGHT OF PARTICIPANTS IN THE INVESTIGATIVE PROCESS**

20. Any person falling within the scope of this "Policy" and performing his/her duties by participating in the investigative process shall have the right to be protected from any act of retaliation.

#### **RESPONSIBILITIES**

21. Any person falling within the scope of this "Policy", including the Subject, shall have the obligation to:
  - Cooperate fully and strictly maintain confidentiality.
  - Refrain from interfering with the investigation, knowingly providing any false or misleading information as well as from destroying or altering evidence relating to the case under investigation.
  - Adhere to the principles and rules set out in this "Policy".

#### **I. RIGHTS - OBLIGATIONS OF THE COMPANY**

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##### **RIGHTS**

22. In order to ensure the integrity of the investigation and preserve the evidence, as well as to prevent the repetition of a similar incident or conduct, the CEO or the Company's officers/bodies authorised by him/her may take the necessary appropriate and proportionate measures, as per case, against the Subject, such as change of position, working hours, place or manner of work/service provision, or temporary suspension of his/her duties with pay (pursuant to the provisions



of Article 29 of the PPC Staff Regulations) or relieving him/her from certain duties or suspending his/her access to IT or other facilities of the Company.

## RESPONSIBILITIES

23. The Company shall be responsible for ensuring that this "Policy" is applied in a consistent, prompt, impartial and non-discriminatory manner.
24. The Company shall have an obligation, as an employer, to conduct an investigation of the alleged misconduct committed by a person falling within the scope of this "Policy". The investigative process, as well as the competent bodies are set out in the Report/Complaint Handling Procedure (Annex), which supplements this "Policy", as well as in the provisions on Disciplinary Action of the PPC Staff Regulations/ (Chapter F, Articles 26-33).
25. The Company shall take all appropriate measures to protect the identity of the reporting parties/complainants in accordance with the applicable legislation.
26. The processing of personal data included in the reports is carried out in accordance with the national and European legislation on personal data, as well as with the relevant policies of the Company and the applicable legislation on the protection of individuals reporting violations of the national and EU law.

### J. RESPONSIBILITIES OF THE BODIES INVESTIGATING ALLEGED MISCONDUCT

27. The following persons are not allowed to participate in the investigative process of a report/complaint:
  - The spouse and the relatives of the Subject (by blood, collaterally up to the fourth degree and by marriage up to the second degree)
  - The persons involved in any way in the alleged case,
  - Persons with a conflict of interest,
  - Managers who have exercised their disciplinary authority.
28. The investigative bodies shall proceed to gather evidence by any appropriate means, having the right, including but not limited to, to:



- Call upon any employee or third party to submit evidence (hard copy, electronic) that is deemed to be of evidentiary value.
- Take written and signed witness statements from any employee or third party who is deemed to have knowledge of the facts contained in the report/complaint or who may provide information of evidentiary value to the investigation.
- Send questionnaires to employees and third parties for written and signed responses.
- Cooperate with special advisers (experts, psychologists when investigating incidents of violence and harassment, etc.).
- Conduct an on-the-spot inspection.
- Enter all premises of the Company to examine, copy and remove all or part of the contents of records (including electronic records), offices, closets and other storage areas, and require examination of any Company-owned electronic or telephone equipment.
- Call the Subject to an interview and a written/witness testimony.
- Extend the investigation to other misconduct committed by the same Subject or other Subjects, if such evidence arises in the course of the investigation.

#### K. DISCIPLINARY ACTION

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29. If the Company's Investigative Bodies find that an employee whose employment contract is governed by the PPC Staff Regulations has committed misconduct, the provisions of the PPC Staff Regulations and the labour legislation in force at the time shall apply.



For employees who are not governed by the PPC Staff Regulations, the relevant terms of their employment contract shall apply (e.g. termination of contract for good cause).

For those employed through third-party service providers, an order for the replacement of the Subject is issued in the case of a contract with a legal entity, while in the case of a natural person employed under his/her own service or project contract, the terms of the contract, which may be terminated for good cause, shall apply.

For apprentices or trainees, their employment with the Company is "terminated", with parallel notification of the relevant Educational Institution.

#### L. MONITORING AND REVIEW OF THE "POLICY"

30. The Compliance Department shall review the "Policy" at least every two years, or periodically as deemed necessary, in order to determine whether and how it should be revised or amended to reflect its objectives and comply with the applicable legal framework and the Company's internal policies and procedures. Any amendments to the "Policy" shall be approved by the Board of Directors, upon recommendation of the Chief Legal Affairs & Corporate Governance Officer and the Chief Human Resources & Organisation Officer. If required and upon relevant recommendation of the Chief Legal Affairs & Corporate Governance Officer and the Chief Human Resources & Organization Officer, the CEO is authorized to issue clarifying instructions on the implementation of the provisions set out in the 'Policy' and the Annex thereof.
31. This "Policy" and the Annex, which is an integral part thereof, was approved by the Board of Directors of PPC on 01.03.2022 and has become effective as of that date.



## ANNEX

### REPORT/COMPLAINT HANDLING AND INVESTIGATION PROCEDURE

#### **1. RESPONSIBILITIES OF THE COMPANY'S OFFICER IN CHARGE OF RECEIVING AND MONITORING REPORTS (HEREINAFTER REFERRED TO AS THE "OFFICER") WHO BELONGS TO THE COMPLIANCE DEPARTMENT:**

- provides information on the possibility to submit reports within the Company,
- receives the reports,
- takes the necessary steps for the competent bodies of the Company to deal with the report or closes the procedure if no violation is established,
- ensures the protection of confidential information regarding the reporting party and any third person named in the report,
- monitors the reports and maintains communication with the reporting parties during the submission process.
- coordinates the provision of assistance and access to any competent public, administrative or judicial authority in the course of investigation of such an incident or conduct, if requested by the authorities.

#### **2. GENERAL PRINCIPLES**

In the process of receiving, assessing, classifying and investigating reports/complaints, the following must be observed:

- The Report/Complaint Handling and Investigation Bodies of the Company shall be obliged to conduct the entire procedure with due confidentiality and discretion, avoiding unreasonable intrusion into the privacy of employees/associates, including both the person who reported the reprehensible conduct, irregular/unlawful act or omission and the Subject, as well as to safeguard the reputation of the parties involved.



- The Company, through the "Officer", shall inform the reporting parties/complainants about the progress of their report/complaint and the actions taken, within a reasonable period of time, which shall not exceed three (3) months from their receipt.

### 3. REPORT/COMPLAINT CHANNELS

Reports/complaints can:

- (a) be submitted through the report/complaint platform; or
- (b) be submitted orally by telephone or other voicemail systems, and at the request of the reporting party, through a personal meeting with the "Officer", within a reasonable period of time; or
- (c) be submitted by an employee's personal letter either hierarchically to any Manager, or directly to the Compliance Department and more specifically to the Head of Communication Channels & Complaints Handling Section; or
- (d) be sent by post to the Company's address, that is PPC S.A., 30 Chalkokondyli st., GR- 104 32 Athens, to the attention of the "Officer", marked as "Confidential" or
- e) result from audits performed by the Internal Audit Department or the Compliance Department or any other auditing body
- f) be submitted through the Authorities (Transparency Authority, Ombudsman, Hellenic Labour Inspectorate, etc.)

The abovementioned communication network under a' operates as a 24/7 "hotline" for reports/complaints. Reports/complaints submitted via this hotline shall be assigned a file reference number and the reporting party /complainant shall be automatically informed by the system of the receipt of the report/complaint and the file reference number.

Reports/complaints sent as described in items (b) to (d) above shall be forwarded to the Compliance Department and the "Officer", registered on the platform by a designated user of the said Department and assigned a file reference number. In each



of the cases referred to above under items (a) to (d), the platform shall inform in an automated way both the reporting party/complainant within 7 days as from the receipt of the report/complaint and the Report/Complaint Assessment Bodies (see item 4 below).

Issues that may arise from reports/complaints submitted through other communication channels, other than those mentioned above, as well as from relevant press or electronic publications, shall be examined in accordance with the procedure set out in this Annex.

The above reporting/complaint channels shall not be used for issues related to the Company's products or services. Such issues shall be directed exclusively to the Company's "Contact Us" channel.

#### **4. ASSESMENT - CLASSIFICATION - INVESTIGATION OF REPORTS/COMPLAINTS**

##### **1. Initial assessment**

Initial assessment and classification of reports/complaints based on the criteria/parameters defined.

##### **2. Assessment by the "Officer"**

The "Officer", assisted by the Head of Communication Channels and Complaint Handling Section of the Compliance Department, shall examine and assess in a reasoned manner the reports/complaints, classify them on the basis of the criteria/parameters defined in par. 4 hereof, and inform accordingly the Director of the Compliance Department. Based on the classification of the reports/complaints, the "Officer" shall forward them to the competent bodies for further investigation.

##### **3. Assessment Committee**





The Assessment Committee shall be established by the CEO and consist of the Director of the Compliance Department, the Director of the Internal Audit Department, a Director of the Human Resources & Organisation Division and their respective deputies.

The task of the Assessment Committee, in cooperation with the "Officer", shall be to determine whether the classification of the reports/complaints under Category C is correct.

The Committee may make a reasoned decision to change the classification of a report/complaint into Category B or A.

#### **4. Classification of Reports/Complaints - Investigative Bodies**

##### **Category A. Report/Complaint inadmissible, unfounded, vague**

These reports/complaints shall not be forwarded for investigation by the "Officer", but shall be filed and both the Director of the Compliance Department and the reporting party/complainant shall be notified, when:

- They do not concern operations, employees, associates of the Company,
- They have been submitted with the same content and have been already answered,
- They are unclear,
- They are unfounded or vague, due to lack of completeness and substantiation of the alleged conduct, act or omission.

##### **Category B. Medium Risk Report/Complaint**

Reports/complaints concerning employment or personal relationships and in particular acts or omissions related to daily work (mainly of an administrative nature), which do not cause detriment to the Company, are forwarded for further investigation, after informing the Director of the Compliance Department,:



- by the "Officer", with the cooperation of the Head of Communication Channels and Complaint Handling Section of the Compliance Department, to the competent Director, if the report/complaint is against:
  - a) an employee or executive under his/her supervision, whose employment contract is governed by the PPC Staff Regulations,
  - b) an employee who is under his/her supervision and whose employment contract is for a fixed term (8 months, 60 daily wages),
  - (c) an apprentice or trainee under his/her supervision
  - d) an employee of a contractor of the Department concerned
  - e) an employee with a contract for work/service/remunerated mandate who under his/her supervision
  - f) a supplier, associate of the Department concerned.
  
- by the "Officer", with the assistance of the Director of the Compliance Department, to the Investigative Committees, if the report/complaint is against:
  - a) the Company's Managers with a fixed-term contract of three-year duration (Heads of Units/Assistant Directors, Directors, Chief Officers),
  - b) the Special Advisors,
  - c) the Deputy CEOs,
  - d) the CEO; and
  - e) the Chairperson and the members of the Board of Directors

**Category C: High Risk Report/Complaint**



Reports/complaints that mainly concern incidents or behaviours that are considered by the "Officer", in cooperation with the Assessment Committee, to be of great interest and high risk, since they are directed against the Company's property and/or may cause serious harm and detriment to the Company, as well as to the wider society.

These reports/complaints are forwarded by the "Officer" for further investigation:

- to the competent Chief Officer, or Deputy CEO (for Departments reporting directly to him/her), or to the Chief Human Resources & Organisation Officer (for Departments reporting directly to the CEO), if the report/complaint is directed against:
  - a) an employee or executive under the supervision of the above-mentioned persons, whose employment contract is governed by PPC Staff Regulations,
  - b) an employee under the supervision of the abovementioned persons, whose employment contract is for a fixed term (8 months, 60 daily wages),
  - c) an apprentice or trainee under the supervision of the abovementioned persons,
  - d) an employee of a contractor under the supervision of Department, Division or Business Unit, Deputy CEO and CEO concerned,
  - e) employees under a work/service contract or remunerated mandate under the supervision of Department, Division or Business unit, Deputy CEO and CEO concerned and
  - f) a supplier, associate of the Department concerned under the supervision of Department, Division or Business Unit, Deputy CEO and CEO.
- to the Investigative Committees, if the report/complaint is directed against:



- a) the Company's Managers with a fixed-term contract of three-year duration (Heads of Units/Assistant Directors, Directors, Chief Officers),
- b) the Special Advisors,
- c) the Deputy CEOs,
- d) the CEO and
- e) the Chairperson and the members of the Board of Directors

#### **5. Reports/Complaints Investigative Committees**

The abovementioned Investigative Committees, depending on who the report/complaint is directed against, are composed of:

1. The members of the Nomination, Remuneration and Recruitment Committee for reports/complaints against the Deputy CEOs, the CEO, the Chairperson and members of the Board of Directors.
2. One (1) Deputy CEO and two (2) Chief Officers for reports/complaints against Chief Officers and Special Advisors.
3. Three (3) Chief Officers for reports/complaints against Directors and
4. One (1) Chief Officer and two (2) Directors for reports/complaints against Heads of Units and Assistant Directors.

The Investigative Committees under items 2, 3 and 4 shall be constituted along with their alternate members by decision of the CEO for a term of at least two years.

The direct managers of the Subjects, as well as the persons referred to in paragraph J 27 of the "Policy" shall not participate in these committees.

#### **6. Completion of the Investigation of the report/complaint - Submission of an Investigation Report**



Upon completion of the investigation, the Investigative Body prepares a full and complete Investigation Report, which includes:

- the misconduct investigated,
- a description of the available evidence relating to the misconduct under investigation,
- conclusions as to whether evidence substantiates that the misconduct was or was not committed,
- the person or persons involved,

The Report of the Investigative Committees shall be submitted to the Human Resources & Organisation Division for initiating disciplinary action (K par. 29 of the "Policy") and in parallel the Compliance Department shall be informed.

## **7. REPORTS REGISTER**

The "Officer" shall keep a register of all reports received:

- If the report is considered unfounded, personal data shall be deleted from the report within two (2) months from the date of its filing.
- If legal action is taken for the reported situation, personal data shall be deleted upon issuance of a final court decision on the matter.
- In the event that the report results in substantiated findings against an executive of the Company, the personal data is retained throughout the duration of their employment/relationship with the Company and shall be deleted twenty (20) years after the termination of the said employment/relationship in any way whatsoever.

## **8. MONITORING AND REMEDIAL ACTION**

1. Taking of appropriate actions by the competent authorities in order to eliminate, if possible, the event that gave rise to the report/complaint.
2. Recommendations to take the necessary measures to prevent similar incidents in the future.



3. The "Officer" in collaboration with the Director of the Compliance Department, through the Chief Legal Affairs & Corporate Governance Officer, shall inform the Management regularly, and at least on a semi-annual basis, on the incidents reported and their progress.
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