

## **TERMS AND CONDITIONS FOR REPORTING**

### **to "PARTNERS GROUP BG" LTD**

#### **pursuant to Article 12, paragraph 4 of the Law on the Protection of Persons Reporting or Publicly Disclosing Information on Violations**

In view of the requirements of the Protection of Persons Reporting or Publicly Disclosing Information on Violations Act (promulgated in the State Gazette No. 11 of 02.02.2023, in force as of 04.05.2023), PARTNERS GROUP BG Ltd. (the Company) has adopted the Rules of PARTNERS GROUP BG Ltd. for internal reporting or public disclosure of information about violations and for follow-up actions under them (the Rules). The rules set out the terms and conditions for internal submission, registration and consideration of breaches by ensuring that the reporting person will not suffer retaliatory actions having the nature of repression and will not be placed at a disadvantage as a result of reporting or publicly disclosing information about breaches. The Rules available to all persons working for the Company specify the procedure for filing, registering and reviewing reports or publicly disclosing information about violations, in accordance with the Law on the Protection of Whistleblowers or Publicly Disclosing Information on Violations (Act).

These objectives are to provide accessible information on the terms and conditions for reporting through the internal reporting channel established by the Company or through the external reporting channel to the Central Authority for external reporting and for the protection of persons to whom such protection is provided under the Act - the Commission for Personal Data Protection.

#### **☐ Reporting or public disclosure of information on breaches**

Any person may be a reporting person under the Act and report in case of suspicion that a violation has been committed. The Company will consider the reports of alleged violations received in accordance with the Act, taking the necessary actions to protect the identity of the reporting person and ensuring that the reporting person will not be discriminated against or suffer adverse consequences due to the report.

The report shall be submitted to the officer responsible for handling reports, either in writing, including by e-mail, or orally. Oral reporting may take place by telephone and, at the request of the reporting person, by a personal meeting between the parties.

For the registration of signals, the Company uses a form approved by the Commission for Personal Data Protection, which contains at least the following data:

- ☐ the full name, address and telephone number of the sender, as well as an e-mail address, if any;
- ☐ the names of the person against whom the alert is filed and his/her place of work, if the alert is filed against specific persons and they are known;
- ☐ specific data of a breach or a real danger of such being committed, place and period of the breach, if such has been committed, a description of the act or situation and other circumstances, insofar as such are known to the reporting person;
- ☐ date of reporting; signature, electronic signature or other identification of the sender.

In view of the prohibition in the Act, the Company does not initiate proceedings on an anonymous signal.

The reporting officer shall be obliged to acknowledge receipt of a report within 7 days of receipt and to ensure that the identity of the reporting person and any other person named in the report is duly protected and shall take appropriate measures to restrict access to the report by unauthorised persons. The officer shall liaise with the reporting person and, if necessary, request additional information from the reporting person and third parties, as well as provide feedback to the whistleblower on the action taken within no more than three months of acknowledging receipt of the report. The reporting officer shall, upon request, provide whistleblowers with clear and easily accessible information on external reporting procedures to the competent national authority and, where appropriate, to European Union institutions, bodies, offices and agencies.

☒ Contact information of the Reporting Officer (internal reporting channel)

Name: Margarita Vasileva - Manager

Phone: +359 883 737 999

Email – [info@pgbg.bg](mailto:info@pgbg.bg)

The identity of the reporting person will not be disclosed without his/her written consent, except in the cases expressly provided for by the Act to competent state authorities. The Company shall ensure that all reasonable and necessary measures are taken to protect the identity of the reporting person.

In the presence of circumstances in which the person would like to, may report through an external reporting channel, the alert may be submitted to the Commission for Personal Data Protection, a central authority for external reporting - <https://www.cpdp.bg>