



Galeyo Whistleblower Policy

Effective Date: September 1, 2025

Version: 1.0

1. Purpose

Galeyo is committed to the highest standards of integrity, ethics, and accountability. This policy empowers employees, partners, and stakeholders to report suspected misconduct without fear of retaliation, in compliance with:

- Law on Protection of Whistleblowers in FBiH and RS
- EU Directive 2019/1937 on the protection of whistleblowers (as best practice)

2. Scope

This policy applies to:

- Current and former employees
- Contractors, trainees, interns, and job applicants
- Suppliers, service providers, and other business partners

3. What Can Be Reported

Whistleblowers can report any reasonable suspicion or knowledge of:

- Violations of law or company policy
- Fraud, corruption, bribery, or theft
- Discrimination or harassment
- Environmental or health risks
- Data privacy violations
- Unsafe practices or negligence

4. Reporting Channels

Reports can be submitted via:

- Email: compliance@galeyo.com
- Anonymous Form: Available on our internal platform
- Optional Meeting: On request, virtual or in person with our HR.

All reports are treated confidentially. You may report anonymously.

5. Protection from Retaliation

Galeyo prohibits any retaliation against whistleblowers. Disciplinary measures will be taken against anyone who harasses or penalizes a reporting person.



6. Process

1. Submission: Whistleblower submits report through one of the channels.
2. Acknowledgment: Galeyo acknowledges receipt within 7 business days.
3. Review & Investigation: Our internal Compliance Team investigates within 90 days.
4. Outcome: A summary of findings is shared with the whistleblower (unless anonymous).

7. Confidentiality

The identity of whistleblowers and persons named in a report is protected throughout the entire process. Only authorized personnel may access this information.

8. False Reports

Reports made in bad faith or with knowingly false information may result in disciplinary or legal action.

9. Policy Review

This policy is maintained by the HR Officer and reviewed annually.

For questions or clarification, contact compliance@galeyo.com