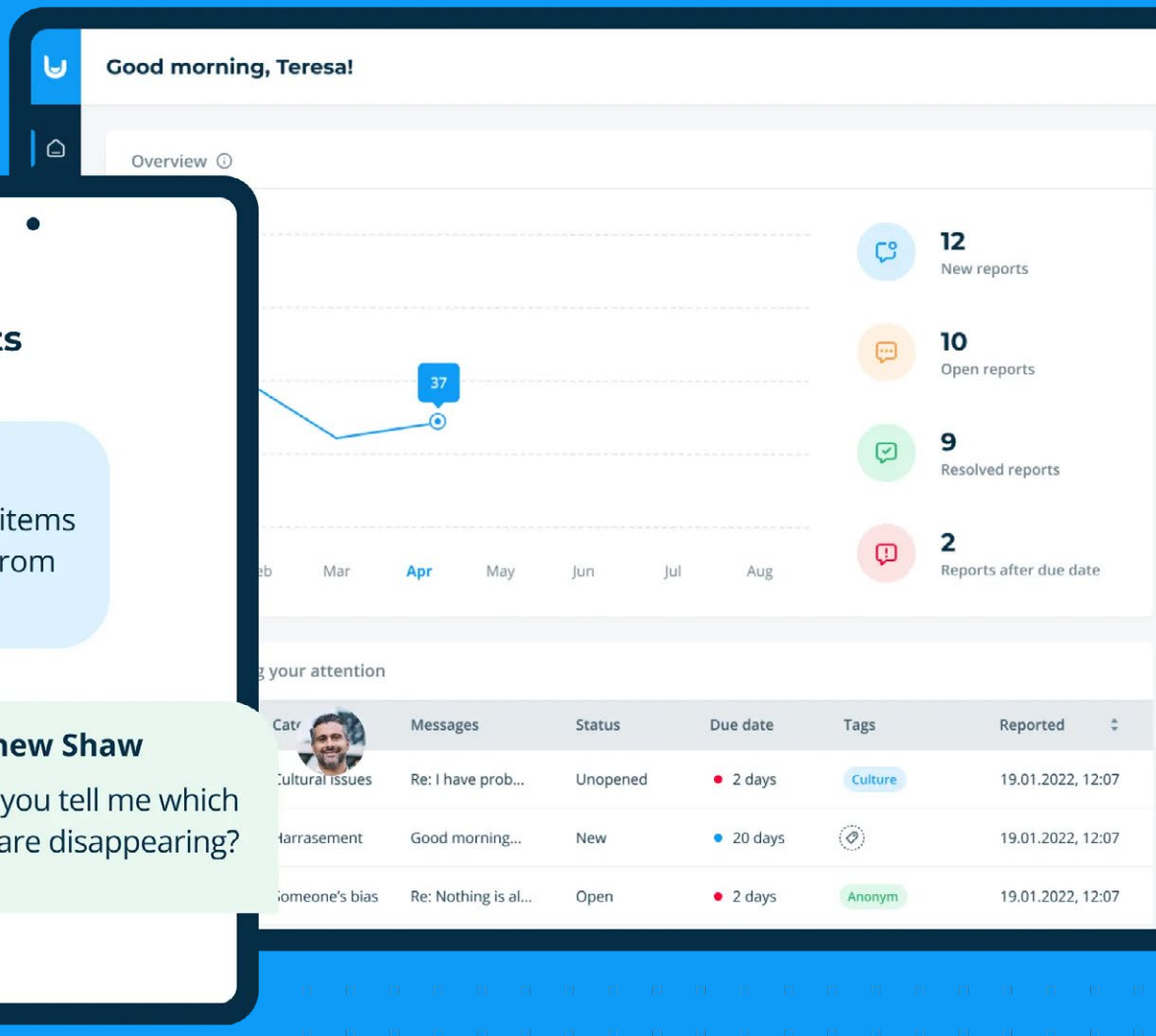




FaceUp – Whistleblowing Policy

August 2026

DeliGroup

Delirest

Deliservices

Primirest

1 Introduction

- 1.1 At DeliGroup (the companies comprising DeliGroup Holding LLC., trading under the brands Delirest, Primirest and Deliservices, herein the “Group”), our people and culture make the difference in what we do and how we service our consumers across the CEE region. We are committed to conducting our business with honesty and integrity, creating an inclusive environment where people feel empowered and safe to speak up.
- 1.2 We encourage you to use our whistleblowing resources below to seek guidance on ethical or compliance dilemmas and issues. We want you to express your views freely and to report, in confidence, any concerns regarding any unethical, illegal or other improper circumstances or behaviours which suggest our Business Conduct Policy (“BCP”) is not being followed.

2 Purpose

This policy has been put in place to ensure any concerns raised regarding any misconduct or circumstances in relation to the Group’s business are dealt with effectively, securely, appropriately, and in accordance with the applicable law. It is to encourage the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving the Group’s business. and to provide protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimization or reprisal.

This policy is to be provided to all employees and officers of the Group upon commencement of their employment or engagement and it will also be part of mandatory annual compliance training.

3 Scope

This policy applies to all Group personnel, including directors, officers, employees, workers, consultants and contractors. In addition, anyone who has concerns or information relating to misconduct that give rise to a potential or actual breach of our BCP may raise such concerns under this policy. This includes but is not limited to agents, intermediaries, consultants, suppliers, and other business partners.

4 Reportable misconduct

Anyone who has reasonable doubts, concerns or information relating to misconduct that give rise to a potential or actual breach of our BCP may raise such concerns under this policy. This includes but is not limited to: breaches of our BCP, standards, policies and procedures, illegal conduct, such as theft, dealing in, or use of illegal drugs, violence or threatened violence, harassment, discrimination, victimization or bullying, criminal damage against property, fraud, money laundering, terrorist financing, tax evasion or misappropriation of funds, offering, giving or accepting a bribe, conflicts of interest, financial irregularities including false accounting, financial misstatements and misrepresentations.

5 Making a report

- 5.1 The Group relies on its employees maintaining a culture of honest and ethical behavior. Accordingly, if you have concern of circumstances inconsistent with our BCP are being contemplated, occurring, or may have occurred, it is expected that you will make a disclosure under this policy.
- 5.2 There are several ways in which you may report or disclose any issue or behaviour which you consider to be reportable misconduct. You can report such misconduct to:
 - your manager or unit manager,
 - your local HR manager (“HR”) or Listen Up Champion (“LUC”),
 - a member of your country, or Group/Regional Legal and Compliance Team (“Legal”);
 - or raise your concern through the **FaceUp platform**.
- 5.3 Reports of misconduct received by and raised directly to management must be referred to the country or regional Listen Up Champion and/or General Counsel and, in turn, will be assessed and entered into the FaceUp system.
- 5.4 We understand and respect that some people feel more comfortable not disclosing their identity, so you can report concerns anonymously and remain anonymous if you wish. We ask everyone who chooses to use the FaceUp platform take note of their reference number and check back in regularly.
- 5.5 The Group Compliance team will review any report made through any of the channels specified in clause 5.2 above and will determine next steps. Where appropriate, the reported concerns will be investigated. When the investigation is finalized, the case is closed, and where appropriate, corrective actions are implemented.

6 Investigation

- 6.1 If appropriate, your report will be allocated for investigation. Investigations will be conducted respectfully, impartially and fairly. If you have provided contact details and/or are contactable anonymously through the FaceUp platform two-way messaging facilities, you will receive an acknowledgment that your report has been received and will be updated if your case is allocated to investigation or follow-up in due time or as required under the applicable legislation.
- 6.2 You may be asked to confidentially participate in the investigation by continuing to provide information or additional details as needed. We will endeavor to provide you with appropriate progress updates, as necessary, and you will be informed when the case is ready to close and provided feedback on the outcome, subject to legal, privacy, and confidentiality considerations.
- 6.3 If you are found to have been personally involved in misconduct including a breach of our BCP or other policies, standards and procedures, reporting it will not absolve you from accountability, but your cooperation with the investigation will be considered as part of any decision that we make.

7 Confidentiality

- 7.1 We will seek to protect the confidentiality of any person making a report under this policy. Reports may be submitted using our whistleblowing resources in way you feel most comfortable with, including whether you wish to provide your personal identification details or remain anonymous.
- 7.2 It may be helpful though for you to identify yourself so that you can be contacted for additional information that may assist with following up your concern. If, however, you feel that you are not comfortable disclosing your identity, anonymous reports should contain sufficiently detailed information to enable us to effectively follow up on and address the reported concern.
- 7.3 If you have any information about any report and related investigation, you must treat this as confidential.
- 7.4 Identity of the report will not be disclosed without their consent to anyone except with those dealing with and investigating the concerns or those included on a strict need-to-know basis to receive and act upon the findings or remedial actions, unless this is necessary and proportionate in the context of looking into the matter, undertaking an investigation and/or seeking legal advice.

8 Protection against retaliation

- 8.1 We strictly prohibit and do not tolerate retaliation or detrimental conduct in response to you raising a concern or being able to raise a concern. This protection against retaliation also applies to individuals conducting, assisting or participating in an investigation under this policy.
- 8.2 We will protect you from being retaliated against or being subjected to detrimental conduct, having the ability to, contemplating or in fact raising concerns in good faith or in circumstances in which issues raised in your report turn out to be mistaken or unfounded.
- 8.3 Should you be subject to any form of retaliation or detrimental conduct as a result of contemplating making a report, having raised a concern or assisting in any investigation, or you witness retaliation against someone else, you should use any of the reporting channels specified in clause 5.2 above to report it.
- 8.4 We will follow through every reported concern of suffered retaliation.

9 Others matters

- 9.1 Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment. In the case of business partners, this may include but may not be limited to termination of any relationship with the Group. Similarly, any person who is found to have intentionally made a false allegation, provided false or misleading information in the course of an internal review or investigation or is otherwise found to have acted in bad faith may be subject to disciplinary action.
- 9.2 Any exceptions to this policy require approval from the Group Legal and Compliance Team.
- 9.3 We will retain records of your personal data if provided, in compliance with applicable data protection and retention guidelines.



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