

PUBLIC

POLICY

Reporting irregularities - Whistleblowing

I. STATEMENT OF COMMITMENT

S&T (hereinafter referred to as "the Company") is committed to maintaining an ethical, transparent, and respectful work environment, where all employees and collaborators can contribute to the company's success and growth in a responsible manner.

The Whistleblowing Policy provides a framework that allows anyone within the organization to report illegal, abusive, or unethical behavior without fear of retaliation.

II. POLICY OBJECTIVES

2.1 Protecting the integrity of the organization

By implementing this policy, S&T's primary objective is to establish a clear and effective reporting structure for irregularities, thereby ensuring the integrity and reputation of the organization.

2.2 Promoting an Ethical and Transparent Work Environment

The company aims to create a climate of trust and transparency, where employees and collaborators feel supported in reporting illegal or unethical behavior without fear of retaliation.

2.3 Ensuring the protection of those who report abuses

Another essential objective is to protect the identity of those who report abusive acts, providing a secure and confidential mechanism to facilitate this process.

2.4 Improving internal procedures

By implementing this policy, S&T Company intends to continuously improve internal procedures, ensuring that all reports are handled correctly and with respect for the rights of all parties involved.

2.5 Increasing awareness of ethics and compliance

Another important objective of this policy is to increase awareness of the importance of adhering to ethical and legal standards and providing periodic training for all employees.

III. THE DEFINITION "WHISTLEBLOWING"

"Whistleblowing" refers to the act of reporting behaviors or activities that are illegal, immoral, unethical, or violate the company's internal regulations. Examples include, but are not limited to:

- ✓ Financial fraud or theft of property
- ✓ Harassment or discrimination in the workplace
- ✓ Violation of health and safety regulations
- ✓ Abuse of power or conflicts of interest
- ✓ Violation of relevant external laws or regulations

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IV. REPORTING CHANNELS

All employees, collaborators, and other interested parties can report any suspicious or abusive behavior through the following channels:

- ✓ Dedicated platform: [snt/compliance.md](https://snt.compliance.md)
- ✓ Dedicated email address: compliance@snt.md
- ✓ Internal online platform (accessible from the personal account) Reports can be anonymous, and the company guarantees that they will be handled with confidentiality.

V. CONFIDENTIALITY AND INDENTITY PROTECTION

S&T is committed to protecting the identity of those who report abuses. The name and sensitive information of the person making the report will be kept confidential, unless they are required for the official investigation.

VI. PROTECTION AGAINST RETALIATION

S&T Company prohibits any form of retaliation against those who report violations in accordance with this policy. Employees who report illegal or unethical behavior will not face penalties, discrimination, or any other form of harm as a result of their reporting. Any attempt to exert pressure on a "whistleblower" will be taken seriously and will result in disciplinary sanctions.

VII. INVESTIGATION PROCEDURE

All reports will be investigated promptly, in a fair and impartial manner, by the compliance department or a designated team, which will aim to establish the facts and take appropriate actions. If the report is valid, corrective actions will be taken, which may include disciplinary sanctions, procedural changes, or collaboration with the competent authorities.

VIII. DISCIPLINARY ACTIONS

Employees found responsible for violating internal regulations or applicable laws will be subject to disciplinary measures in accordance with the company's policy and current legislation. Sanctions may include warnings, suspension of activities, or termination of the employment contract.

IX. PROMOTING AN ETHICAL CULTURE

S&T is committed to creating an open and ethical work environment where every employee feels comfortable reporting any suspicious behavior, knowing that this will lead to improvements within the company. The company will also organize training and awareness sessions to support the proper implementation of this policy.

X. REVIEW OF THE POLICY

This policy will be reviewed annually to ensure compliance with current legislation and to improve the reporting process and protection of those who report abuses.

XI. CONTACT

For any questions or further clarifications regarding the Whistleblowing Policy, please contact the S&T compliance department at: compliance@snt.md.