INFORMATION ABOUT THE CONDITIONS AND PROCEDURE FOR INTERNAL REPORTING OF WHISTLEBLOWING CASES AT Eleven Investments KDA, UIC 205173314, AND ELEVEN PARTNERS AD, UIC 206322469

1. Who has the right to submit reports?

• Current and/or former employees;
• Individuals working under civil contracts;
• Individuals practicing liberal professions and/or skilled craft;
• Volunteers and interns;
• Contractors, subcontractors, and/or suppliers;
• Job candidates who have participated in a competition or other selection process for employment and who have received information about a breach in this context;
• Individuals submitting reports about breaches they became aware of in the work context.

Important! Anonymous reports will NOT be considered.

2. What types of breaches can you report?

Breaches of Bulgarian and European legislation in various areas, including:
• Public procurement;
• Public health;
• Transport safety;
• Consumer protection;
• Protection of privacy and personal data;
• Security of networks and information systems;
• Breaches related to cross-border tax schemes;
• Crimes of a general nature;
• Labor legislation;
• Legislation related to the execution of public service duties;
• Rules for the payment of outstanding public state and municipal claims, etc., as specified in the PPWRPDIBA.

Important! Reports will not be considered for breaches that do not fall within the scope of the PPWRPDIBA, nor for breaches committed more than 2 (two) years ago.

3. How can you submit a report to Eleven Investments KDA, UIC 205173314, and to ELEVEN PARTNERS AD, UIC 206322469?

You may submit a written report by completing a template form, through one of the following methods:

• In person to the responsible employee or by phone at: +359 888 136 095;
• Electronically to the following email: **whistleblowing@11.vc**;
• By post or courier to the address of Eleven Investments KDA, UIC 205173314, in the city of Sofia, 31 Alexander Malinov Blvd., Campus X, Building 1, and the address of ELEVEN PARTNERS AD, UIC 206322469, in the city of Sofia, 31 Alexander Malinov Blvd., Campus X, Building 1, clearly specifying the responsible individual as the recipient of the mail/courier package, or writing on the envelope/package that it contains a report under the PPWRPDIBA.

Important! Reports must be signed by the individuals submitting them. When submitted electronically, the form must be signed with a qualified electronic signature.
Important! The form is NOT mandatory, but is for your convenience and contains the required information that you need to fill out. If your report does not meet any of the legal requirements, the employee responsible for the reports will send you a message requesting correction of the irregularities within 7 days of receiving the report. If the irregularities are not corrected within this period, the report and its attachments will be returned to you.

It is recommended to attach any written evidence you have. Additionally, you may list individuals who could confirm the reported facts or provide additional information.

You may submit an oral report by one of the following methods:
• By phone to our employee responsible for reports, Martin Ouzounov, at: +359 888 136 095;
• In a personal meeting with our employee responsible for reports, which should be pre-arranged by calling the mentioned phone number.
In these cases, our employee responsible for reports will complete the form and provide you the opportunity to verify, correct, and agree with the text of the conversation in writing, as well as the content of the form, which you will sign.

4. What happens after submitting the report?
• We will confirm receipt of the report within 7 (seven) days and will register it with a unique identification number. If the report does not meet the requirements of the PPWRPDIBA, we will inform you to correct the irregularity within 7 days.
• A review of the report will be conducted by an individual who has no conflict of interest.
• Within 3 (three) months from the confirmation of receipt, we will provide feedback with the results of the review and the actions taken.

5. What protection do individuals who submit reports have?
• Individuals who have the right to submit reports, as well as their associated persons (e.g., colleagues and/or relatives), are protected against the unjustified disclosure of their identity, except in cases allowed by the PPWRPDIBA.
• It is prohibited to take retaliatory actions against protected persons, including: temporary removal from work, dismissal, demotion, negative performance evaluations, imposition of financial and disciplinary liability, physical and verbal coercion, threats, hostility, infringement of their dignity, discrimination, etc.

6. What are the conditions for providing protection?
• The person submitting the report must have a reasonable belief that the information in the report about the breach was accurate at the time of submission and that the information falls within the scope of the PPWRPDIBA, and
• The report about the breach must have been submitted under the conditions and procedures specified by the PPWRPDIBA.

Important! Individuals named in the report as perpetrators have the right to compensation for all material and non-material damages if it is established that the reporting person deliberately submitted false information.

7. How can you submit a report to the Commission for Personal Data Protection (CPDP)?

The CPDP is the central authority for **external reporting of breaches**. You may submit your report directly to it by one of the following methods:

• In writing:

- By email: whistleblowing@cpdp.bg;
- By post to: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.;
- Via the Secure electronic delivery system.

• Orally – in person at the CPDP office at: Sofia 1592, Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.

You may use the template form for registering a breach report published on the CPDP website. The form is not mandatory. If you decide to use it, however, you should complete only Sections I–V, including, and sign it: if sending the form by post – with a handwritten signature; if sending by email – with a qualified electronic signature. If using the Secure electronic delivery system, the CPDP employee responsible for reviewing the report will contact you to complete the breach report form under the PPWRPDIBA.

Please also review:

Notice on the protection of personal data when submitting breach reports.