



## Management system

Shark Technology Ltd

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**Delegation system:** the company - although not obliged by its relevant legislation - has equipped itself with an external supervisory body. The documents relating to the system of powers and delegations in force at the Company must be sent to the ODV and kept constantly updated.

**Reports from company representatives or third parties:** at the same time, any information, of any type, deemed relevant to the implementation of the Control Model in the areas of activity at risk as identified within it must be brought to the attention of the Supervisory Body . The obligation mainly concerns the results of the activities carried out by the Company, as well as the atypicalities and anomalies found.

In this regard the following provisions apply:

reports must be collected relating to possible hypotheses of any crime being committed or, in any case, conduct not in line with the rules of conduct adopted by the company;

disciplinary proceedings initiated for violations of the Internal Model/Code of Ethics must be communicated to the ODV as well as the dismissal provisions of the proceedings in question and the related reasons. Furthermore, any sanctions applied for violations of the Model and/or the procedures established for its implementation must be communicated to the SB;

any measures adopted by judicial police bodies and/or any other Authority, including administrative, which involve top management, managers, partners or employees must be communicated to the Supervisory Body;

the Supervisory Body must be made aware of any disputes concerning the Company;

the SB will evaluate the reports received and adopt the consequent measures, after having listened, if deemed appropriate, to the author of the report and the person responsible for the alleged violation;

must be reported to the ODV:

any sponsorships and donations;

subjects who have access to privileged information;

communications made in response to extraordinary investigations/requests by the Supervisory Authorities where present, and/or Judicial;

partnership agreements stipulated;

employed employees who find themselves in situations of potential conflict of interest on European territory;

accidents in the workplace.

any "data breach";

All reports may be made in written form and concern any violation or suspected violation of the Internal Model/Code of Ethics and of the company procedures adopted. The SB will act in such a way as to guarantee the reporting parties from any form of retaliation, discrimination or penalisation, also ensuring the absolute confidentiality of the identity of the reporting party.

The email must be sent to the address: [odv@shark-technology.eu](mailto:odv@shark-technology.eu)

In addition to this, all information containing relevant elements in relation to supervisory activity must necessarily be transmitted to the SB, such as:

measures or information coming from police bodies or any other authority from which investigations are being carried out;

all requests for legal assistance made by the Company;

any request for the granting of public funds under management or for obtaining forms of financing for funds already under management;

information relating to the implementation, at all company levels, of the Organizational Model with evidence of the disciplinary proceedings undertaken and any sanctions imposed, or of the measures to dismiss such proceedings.

In relation to information obligations, the following provisions apply:

all reports relating to the commission of crimes must be collected;

the influx of reports must be channeled to the company's Supervisory Body;

the ODV, having evaluated the reports received, having heard the parties involved (author of the report and presumed responsible for the violation), will determine the appropriate measures;

the reports must be formalized in writing;

they must concern any violation or suspected violation of the Model/Code of Ethics.

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The ODV has the obligation to protect the whistleblowers against any form of retaliation, discrimination or penalisation, also ensuring the confidentiality of the identity of the whistleblower and the protection of the rights of the company or of the people accused erroneously and/or in bad faith.

All employees as well as the members of the Corporate Bodies of the Company have the obligation to promptly report the commission, as such or only presumed, of crimes referred to in the Decree of which they become aware as well as any violation or alleged violation of the adopted Model/Code Ethics by the Company or the procedures established in implementation thereof of which they become aware.

In order to allow confidentiality in any reports, anyone who is aware of relevant events can make a report using:

- an email address: [odv@shark-technology.eu](mailto:odv@shark-technology.eu)

Reports to the Supervisory Body are kept by the same.

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In processing the reports received, the Company guarantees the anonymity of the reporter and the person reported or, where the report is nominal, confidentiality regarding the identity of the person transmitting information.

The Supervisory Body, following a report, carries out the necessary checks in the presence of detailed information, based on precise and consistent factual elements, regarding illicit conduct and/or violations of the Model.

Violation of the Model must also include failure to comply with the information obligations towards the ODV or the protection measures of the whistleblower as well as the sending of a report with malice or gross negligence which proves to be unfounded and instrumental to the pursuit of defamatory purposes towards individuals or the Company.

**NB. This is a free and organized management model for the purpose of greater structured protection also for third parties.**

Sofia, 06.01.2024

Shark Technology ltd