

Organisational Regulation

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Whistleblowing Policy

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1 Introduction

1.1 Scope

Rules and procedures stated in this company regulation are valid for all employees of SIPRAL a.s., LBSH a.s. and Sipral UK Ltd. (hereinafter "Sipral") and for all companies working on behalf of Sipral.

The standard provides employees and other stakeholders guidance on how to report unethical or illegal conduct in connection with Sipral's activities and defines the proper procedure for investigating such conduct.

1.2 Aim

Sipral is committed to conducting our business with honesty and integrity and we expect all our employees to maintain high behaviour and performance standards. Our culture of openness and accountability is essential in order to prevent any harbouring illegal or unethical conduct even if unknowingly.

2. Whistleblowing

2.1 What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, unethical or immoral behaviour and any breach of legal or professional obligations.

2.2 How to raise a concern?

We encourage all our employees, business partners and third parties to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.

In many cases, employees will be able to raise any concerns with their direct superior. However, where you prefer not to raise it with your direct superior nor even contact the Sipral UK **Managing Director** or **HR Director** of Sipral Group, for any reason, you may use our anonymous line:

whistleblowing@sipral.com. The ethical line is accessible through Sipral websites as well.

The ethical line serves primarily for those that are not sure how or whether to report unethical conduct. Using the ethical line is completely voluntary and discreet.

The ethical line can be used by:

- Sipral employees,
- Sipral's business partners,
- third parties,

that are aware of improper, unethical, or unlawful conduct.

Please, provide as much detailed information as possible about the alleged violation of rules of conduct. However, you should not engage in any conduct that could constitute a criminal offense in obtaining evidence of the facts reported.

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All received reports are objectively and independently investigated by the Sipral's senior representative, **HR Director**. Remedial measures are adopted based on the established facts.

Another way to report wrongdoing is a drop-box. One drop-box is located at the VLC Jirny at the entrance to the dressing rooms, the other one is located at the lobby area of the group headquarters.

The ethical line application/email or the drop-box allows to report information to the maximum extent anonymously. If the whistleblower chooses to provide contact details, he / she will be informed of the investigation results.

3. Investigation process

A whistleblower investigation begins when someone files a report using one of the dedicated channels. The independent investigator, i.e. **HR Director**, will look into the claims to find out if they are true and, if so, establish how wrongdoing has occurred and what must be done to correct it and bring the perpetrators to account.

Each investigation is different, by nature of the fact there are many different types of potential wrongdoing. However, some key elements will form the basis of any of our investigation.

3.1 Identification of the type of report

The designated investigator ascertains that he / she remains impartial when investigating. As a next step he / she considers whether the report falls under the scope of the EU Whistleblowing Directive. In order to foster a culture of openness, where whistleblowing is encouraged for the good of the majority, we treat all whistleblowing reports in the same manner. We get as much information as possible to determine if the report is actually a whistleblowing matter or something that can be dealt with by internal department (e.g. HR department, Financial department, Facility department etc.)

3.2 Examination of the issue

When we decide that there has been a potential breach then we will investigate the whistleblower report thoroughly to establish the exact facts. This involves following up on evidence and interviewing witnesses and those accused of wrongdoing. If necessary, we will decide who will be involved in the internal investigation team.

3.3 Taking corrective measures

Once the independent investigator establishes that there has been a breach of the law within Sipral, we can take corrective measures. This might involve investigating disciplinary procedures against an employee or employees, as well as informing the authorities.

We may also review our systems and attempt to understand how the illegal activity could have occurred in the first place. Once this is established, we will take measures to prevent it from happening again. Depending of the weight of the reported wrongdoing, we may run a security audit of the organisation as a whole to check that there are no vulnerabilities anywhere else.

3.4 Contacting the whistleblower

We acknowledge receipt of the report within seven days to the reporting person. Dealing with a report can take a long time, so we explain to the whistleblower how we will respond to the information obtained, how the information will be handled, and that it can remain confidential.

Following the investigation, the reporting person is informed about the outcomes of the investigation no longer than in three months. When we report back to the whistleblower, we also inform them of their options going forward. They can for example make external disclosure.

4. Confidentiality

We believe that our employees feel able to voice whistleblowing concerns openly. Completely anonymous disclosures are difficult to investigate. However, if you choose to provide contact details, or want to raise your concern confidentially, we will make every effort to keep your identity secret. You should treat any information about the investigation as confidential as well.

While we cannot always guarantee the outcome you are seeking, we will deal with your concern fairly and in an appropriate way.

5. External disclosures

If you are uncertain whether something is within the scope of this policy, you should seek advice from the **Managing Director** or **HR Director**.

The aim is to provide a mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

However, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a state regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

Depending on the type of conduct, it is possible to turn to helpline of independent organisation such as Transparency International.

In the United Kingdom, Public Concern at Work (independent whistleblowing charity, www.pcaw.co.uk) operates a confidential helpline: (020) 7404 6609 or you can contact them by email: whistle@pcaw.co.uk.

An employee making a “protected disclosure” is given statutory protection from victimisation under the Public Interest Disclosure Act 1998 (PIDA), provided the disclosure is in the public interest.

6. Protection and support of whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. Sipral aims to encourage openness and will support whistleblowers who raise genuine concern, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the **Managing Director** or **HR Director** immediately.

It is forbidden to threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

However, if it is concluded that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

7. Protection of Personal data

As part of the operation of the ethical hotline or drop-box and the subsequent processing of the notifications received, your personal data (if you provide it) and/or the data of third parties may be processed.

The controller of the processed personal data, within the meaning of the EU General Data Protection Regulation (GDPR), is Sipral.

Personal data is processed to detect unethical or unlawful acts and ensure an adequate response to such acts.