

Organisational Regulation

0-01-15

Whistleblowing Policy

written by
Eva Gieslová
Generalist HR senior

approved by
Václava Jersáková
HR Director



Valid from
25.03.2022

last revision no. 0
25.03.2022

This document becomes an uncontrolled copy after printing.

The document text was written for use of SIPRAL UK Ltd. Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

Contents

- Amendments2
- 1 Introduction4
- 1.1 Scope4
- 1.2 Aim4
- 2. Whistleblowing4
- 2.1 What is Whistleblowing?4
- 2.2 How to raise a concern?4
- 3. Confidentiality5
- 4. External disclosures5
- 5. Protection and support of whistleblowers6
- 6. Protection of Personal data6

This document becomes an uncontrolled copy after printing.

The document text was written for use of SIPRAL UK Ltd. Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

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.

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. 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.

4. 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.

5. 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.

6. 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.