



WHISTLEBLOWER PROTECTION POLICY

1. Objective

This policy sets out to inform reporting persons of the options available to them when reporting suspected illegal activity, which relates with VINOLOK, a.s. company. This policy contains information about the types of suspicions that should be reported, the rights of reporting persons, procedures for investigating reports and the notifying of reporting persons of the outcomes of such investigations.

2. Introduction

The term "whistleblowing" is used to describe a disclosure by an employee or another person of suspected wrongdoing within an organisation (VINOLOK, a.s.). It is essential that reporting persons, or whistle-blowers, feel safe and report their suspicions in early stages of the suspect activity. Early reporting of suspicions is beneficial, as it allows the matter to be investigated as quickly as possible and possible negative impacts to be reduced.

In our company VINOLOK, we support our employees and other persons in reporting matters that are deemed to contravene the rules and/or values upheld by VINOLOK, a.s. We implemented our own ethics line, which is available for various reporting channels that ensure the protection of the reporting person's identity. When the identity of the reporting person is known, it is never disclosed without the explicit consent of the reporting person. Similarly, no other information is disclosed that could be used to infer a reporting person's identity (unless required by law).

3. Who can file a report?

Reports may be filed by natural persons who have become aware of an illegal activity in connection with their work or similar activity performed for VINOLOK, a.s. Such persons include:

- employees (including former employees) and applicants for jobs
- employees on temporary work assignments ("agency workers")
- volunteers or interns
- sole traders acting as suppliers to CLIENT or bidding for a supply order for the company
- employees or other natural persons working under the supervision of VINOLOK, a.s. suppliers
- shareholders and/or members of statutory bodies of VINOLOK, a.s.

Persons whose legal relationship with CLIENT is yet to commence shall be subject to this policy only to the extent to which the reported information was obtained as part of pre-relationship negotiations, e.g., during the recruitment and selection of potential employees.



4. What should be reported?

The Ethics Line can be used to report suspicions of the following types of wrongdoing:

- criminal offence (including theft and fraud) or misdemeanour,
- violations of CLIENT principles and/or procedures,
- bullying, harassment, discrimination, or substance abuse,
- violations of rules pertaining to the protection of privacy and personal data, and the security of network and information systems,
- threats to health and/or safety or persons,
- damage to the environment,
- violations of other statutory obligations,
- attempts to suppress or conceal information regarding any of the above.

This policy is not concerned with grievances related to employment and/or relationships in the workplace. Solutions to work-related matters or any other issues not covered by this policy should be sought from the Human Resources department ("HR"). Any matters related to occupational health and safety should be reported in accordance with procedures defined in the internal regulations (DOKIS) unless the issue in question is serious and there exists a reasonable uncertainty about the advisability of reporting it through the standard channels. This policy also does not apply to any service-related complaints or complaints about unsatisfactory quality.

Reporting persons must have reasonable grounds for believing that the matter to be reported is concerned with one or more of the areas covered by this policy. It is possible to report past, current, or likely future matters. There is no requirement for definitive supporting evidence to be included with the report. Disclosures need only be made in good faith given the circumstances at the time of the disclosure.

If there is doubt as to whether a suspicion should be reported, it is advisable to discuss the matter with a superior or another person in a managing position who can be trusted and is not involved in the matter in any way. It is important not to share any information about possible suspicions with anyone involved in the matter or any third party other than the person from whom confidential advice is sought.

Anyone reporting a matter falling outside the scope of whistle-blower protection legislation will be notified of the fact without undue delay.

5. How to fill a report?

We recommend that all relevant suspicions be reported using the Ethics Line in the manner described below. This approach ensures a timely response and investigation.

It is best to use the Ethics Line portal for the reporting process. The Ethics Line is available on this link: [Ethics Line](#)

The acceptance, administration and impartial investigation of reports is conducted for us by employees of BDO Audit s.r.o., with its registered offices at V parku 2316/12, Chodov, post code 148 00, Prague 4, reg. No.: 45314381 ("BDO"). They have been authorised by the company to act as "competent persons" as per whistleblower protection legislation. Additional information is available on the Ethics Line portal.



When filing a report using the Ethics Line, reporting persons will be asked to specify the following:

- relationship to the VINOLOK,a.s. (employee, supplier, etc.)
- description of the reported matter including specification of time and place of occurrence
- names of persons who may have witnessed the matter or may possess additional information related to the reported matter (any of the named persons may be contacted during the investigation stage)
- any other information and evidence that may be of use in the investigation of the report

It is also possible to provide name and contact information. Such information may speed up the investigation considerably, but its inclusion is voluntary. If a report is to be made by other means instead of the Ethics Line portal, the reporting person will be asked to provide at least the information specified above.

Reports may also be filed by telephone on the following number +420 241 046 199 between 9:00 and 16:00 in working days. You can also submit a notification by e-mail: whistleblowing@vinolok.com.

6. Right to protection of reporting persons

It is understandable that potential reporting persons may be apprehensive about reporting their suspicions and possible consequences befalling them. VINOLOK,a.s. has developed this policy to implement a framework which ensures that employees and third parties are listened to and can share their justified suspicions of wrongdoing without fear of retaliation. VINOLOK,a.s. thus ensures the protection of persons reporting their suspicions in good faith even if the suspicions subsequently prove to be unjustified. Reports made with the intention to provide knowingly false information and damage VINOLOK,a.s. do not enjoy such protections and may be penalised in compliance with whistle-blower protection legislation.

Reporting persons may decide to file their reports anonymously. Where the reporting person shares their identity, VINOLOK, a.s. will not disclose any personal information without the explicit consent of the reporting person to any person other than the competent persons authorised to investigate reports. The same applies to any other information from which the identity of reporting persons could be inferred (unless required by law, such as in connection with investigation by law enforcement authorities or as part of judicial proceedings).

7. Protection of persons affected by report

Persons affected by the investigation of a report are entitled to fair treatment during the investigation. This includes the unbiased and objective assessment of relevant facts, the prohibition of discrimination and the protection of personal data as stipulated by applicable legal regulations.

8. Process of report evaluation

The receipt of a report will be confirmed by BDO within seven days. BDO also notifies designated persons within VINOLOK,a.s. about the receipt of a report, together with information regarding the nature of the report.

Next, BDO evaluates whether a breach was committed as specified by whistle-blower protection legislation and/or associated national legislation for the purposes of the subsequent confirming or disproving of the reported suspicion.



BDO is not authorised to share any specific information with the reporting person regarding the course of the investigation. Where possible, the reporting person will be informed as to whether the report is to be investigated or is subject to an ongoing or concluded investigation.

BDO may use a system of confidential communication with the reporting person to obtain additional information as necessary. BDO may also request a meeting with the reporting person as an opportunity for the latter to explain their suspicions in detail and provide any available evidence. The reporting person is not obliged to agree to such a meeting.

BDO may also request cooperation from any person to whom the report is related and/or other CLIENT employees who may assist in the investigation. Any information so obtained remains confidential. Any notes created will form part of the file maintained by competent persons during the investigation.

Information regarding received reports will be retained for at least five years from the date of receipt.

Should a reporting person feel at any point during the investigation that they are the subject of retaliatory measures as a result of their report, they must notify BDO of the fact at their earliest opportunity. Any such claim will be reviewed as part of the investigation and any person found to have participated in any retaliatory measures will be treated in compliance with applicable labour law provisions.

9. Conclusion of report evaluation

Based on the information acquired, BDO determines whether an evaluated report is justified. The conclusions of the evaluation will be described and included in the file. Anonymised conclusions will be submitted to designated persons within VINOLOK along with any recommendations for the rectification of identified shortcomings and/or mitigation of identified risks.

The reporting person will be notified of the conclusion regarding the justification of their report within 30 days from the receipt of the report. This period may be extended in complicated cases by up to 30 days, no more than twice. The reporting person will be notified of any extension of the notification period.

Where measures are introduced as a result of the report evaluation with the aim of rectifying identified shortcomings or mitigating identified risks, BDO will inform the reporting person of the fact. Neither the measures introduced, nor the information provided may encroach and/or jeopardise any interest protected by law, including objectives of criminal proceedings, misdemeanour proceedings or any other proceedings regarding an activity that bears the characteristics of a misdemeanour.

In Jablonec nad Nisou, date: December 14th, 2023

Ing. Aleš Urbánek, CEO