

/PROCEDURE

# Procedure for Internal Reporting at Polskie Linie Lotnicze LOT S.A.

2024/

The Procedure for Internal Reporting has been developed to ensure compliance with the provisions of the Act and provide for the most efficient management of reports made by Whistleblowers, Internal Investigations and other processes relating to reception, consideration and processing of internal reports.



/GLOSSARY OF DEFINITIONS AND ABBREVIATIONS/

<b>DD</b>	Safety and Control Office of PLL LOT
<b>DE</b>	Compliance and Regulation Office of PLL LOT
<b>Follow-up</b>	Actions taken by the Company to verify the accuracy of the information made in the Breach Report and, where relevant, to address the breach reported, including through actions such as e.g. Internal Investigation, prosecution, an action for recovery of funds, or the closure of the procedure for the submission and verification of Reports.
<b>Retaliation</b>	A direct or indirect act or omission which occurs in a context related to work or provision of services, is prompted by a Breach Report, whether internal or external, or by public disclosure, and which violates or may violate the Whistleblower's rights or causes or may cause unjustified detriment to the Whistleblower.
<b>Form</b>	The Breach Report Form available at <a href="https://pgl.whiblo.pl">https://pgl.whiblo.pl</a>
<b>PGL Group</b>	A group of companies which consists of the following entities: Polska Grupa Lotnicza S.A., Polskie Linie Lotnicze LOT S.A., LOT Aircraft Maintenance Services sp. z o.o., LS Airport Services S.A., WRO-LOT Usługi Lotniskowe sp. z o.o., LS Technics sp. z o. o., PGL Leasing S.A., LOTair S.A., Polska Akademia Lotnicza sp. z o. o., LOT Crew Sp. z. o.o., LOT Team Sp. z. o.o., LOT Travel Sp. z. o.o., LOT Cabin Crew Sp. z. o.o.
<b>Candidate</b>	A person applying for a job under an employment relationship or any other legal relationship that forms the basis for the provision of services.
<b>Coordinator</b>	A person or an organisation unit designated within the Company, responsible for carrying out an Internal Investigation into the Breach.
<b>Abuse</b>	An action or omission done by a Co-Worker or a third party that breaches the provisions of law or internal regulations of the Company concerning: corruption; public procurement; financial services, products and markets; prevention of money laundering and terrorist financing; product safety and compliance; transport safety; ICT network and system safety; financial interests of the Company.
<b>Breach</b>	An Abuse or Irregularity as defined by this procedure.
<b>Irregularity</b>	A report other than an Abuse as defined by this procedure.

<b>Facilitator</b>	A natural person who assists the Whistleblower in reporting or Public Disclosure in a work-related context, and whose assistance should be confidential;
<b>Person Connected <i>with</i> the Whistleblower</b>	A natural person who may suffer Retaliation, including the Whistleblower's co-worker or closest relative as defined in Article 115 § 11 of the Criminal Code Act of 6 June 1997.
<b>Compliance policy</b>	A document entitled "Compliance Policy" which is in force at the Company.
<b>Internal Investigation or Investigation</b>	An investigation initiated by the Company's competent organisational unit, in accordance with this procedure, which commences upon acknowledgement of receipt of the Report.
<b>Procedure</b>	This Procedure for Internal Reporting at Polskie Linie Lotnicze LOT S.A.
<b>Account</b>	An account from the Internal Investigation into a Breach reported.
<b>Register</b>	A register of Breaches reported, kept in accordance with the Procedure by the responsible unit or designated person.
<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
<b>Company or PLL LOT</b>	Polskie Linie Lotnicze LOT S.A. with its registered office in Warsaw.
<b>Whistleblower</b>	A natural person who reports or publicly discloses information on a Breach of law acquired in the context of work or provision of services.
<b>Public Disclosure</b>	The making of information on a Breach of law available in the public domain.
<b>Act</b>	The Act of 14 June 2024 on whistleblower protection (Journal of Laws of 2024, item 928).
<b>Co-Worker</b>	A person employed under an employment relationship or a person (including an undertaking) that cooperates with the Company under other civil-law contract, regardless of the position held.
<b>Report</b>	The oral or written communication of information on a Breach to the Company, other than an external report.

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**/EXECUTIVE SUMMARY /**

This Procedure for Internal Reporting at Polskie Linie Lotnicze LOT S.A. has been developed to ensure compliance with the provisions of the Act and provide for the most efficient management of Reports made by Whistleblowers, Internal Investigations and other processes relating to reception, consideration and processing of Internal Reports. Polskie Linie Lotnicze LOT S.A. is constantly involved in the prevention of Irregularities and Abuse, and implements modern organisational culture standards based on the compliance of the Company's employees with legal and ethical norms.

## 1. /GENERAL PROVISIONS:/

- 1.1. The purpose of the Procedure is to:
  - 1.1.1. ensure that protection is provided to the Company's Co-Workers who report Irregularities and Abuse,
  - 1.1.2. ensure transparency of Internal Investigations through defining uniform rules of carrying out such investigations,
  - 1.1.3. standardise the rules of Breach reporting,
  - 1.1.4. establish the process for managing Reports that originate from other sources than Whistleblowers.
- 1.2. The subject of the Procedure includes:
  - 1.2.1. designate the organisational unit authorised by the Company to receive Reports,
  - 1.2.2. designate communication channels for Whistleblowers to provide their Reports,
  - 1.2.3. authorise the competent organisational unit to take Follow-Up, including carry out Internal Investigations following Internal Reports,
  - 1.2.4. establish the procedure for handling anonymous Whistleblowing Reports,
  - 1.2.5. describe the process of handling an Internal Report,
  - 1.2.6. providing time limits for the examination of matters in an Internal Investigation,
  - 1.2.7. define the form and scope of protection of Whistleblowers against Retaliation,
  - 1.2.8. define the rules of protection of personal data of persons involved in Internal Investigations,
  - 1.2.9. establish the Register of Reports.

## 2. /COMPETENCIES AND JURISDICTION/

- 2.1. Jurisdiction to carry out Follow-Up in respect of Reports on Irregularities at the Company shall be conferred upon DE.
- 2.2. Jurisdiction to carry out Follow-Up in respect of Reports on Abuses at the Company shall be conferred upon DD.
- 2.3. Where a Report has been submitted to a wrong responsible unit, it should be referred promptly, in consultation between the responsible units, to the competent responsible unit that will carry out the relevant Internal Investigation.
- 2.4. Other responsible units may also be assigned to assist in examining Reports, provided that this is in line with their scope of competence and necessary for the Internal Investigation to be carried out.
- 2.5. Where a Breach reported concerns the person of the Director or a Co-Worker of DE, then the person concerned must preclude themselves from the Investigation, and the Investigation shall be carried out by DD.
- 2.6. Where a Breach reported concerns the person of the Director or a Co-Worker of DD, then the person concerned must preclude themselves from the Investigation, and the Investigation shall be carried out by DE.
- 2.7. Reports made by the Company shall be examined by DE and DD. Where a Report concerns a Breach in another company from the Company's capital group or PGL Group, the case shall be referred for

examination to the person who is in charge of examining Reports at the company concerned.

- 2.8. Persons whom the Company cleared to receive and verify Reports, take Follow-Up and process personal data shall be authorised in writing by the Company to perform those actions.
- 2.9. Where an Internal Investigation concerns a person who is a member of the Company's Management Board, the final account of the case shall be transmitted to the Supervisory Board.

### 3. /REPORTING/

- 3.1 The following communication channels shall be made available for the purpose of reporting:
  - 3.1.1. The Form for anonymous reporting, available at <https://pgl.whiblo.pl>
  - 3.1.2. Electronic mail sent to the address of Co-Workers of the Compliance and Regulation Office (applicable to Irregularities) at [biurocompliance@pgl.pl](mailto:biurocompliance@pgl.pl);
  - 3.1.3. Electronic mail sent to the address of Co-Workers of the Safety and Control Office (applicable to Abuse) at [naduzycia@pgl.pl](mailto:naduzycia@pgl.pl);
  - 3.1.4. Traditional mail sent to the address of the **Compliance and Regulation Office** (applicable to Irregularities) **or the Safety and Control Office** (applicable to Abuse), i.e. **ul. Komitetu Obrony Robotników 43, 02-146 Warszawa**, with the annotation **REPORT** and/or **SENSITIVE**;
  - 3.1.5. Conversation (including by telephone or means of audio-video or electronic communication), held either directly or through the superior, with Co-Workers of DE or DD, respectively;
  - 3.1.6. at the Whistleblower's request - a meeting with DE or DD Co-Workers within 7 days after the date of the Whistleblower's request to hold such a meeting; the request can be made in writing, by telephone or by e-mail.
- 3.2. A Report of a Breach can be:
  - 3.2.1. **public** - the Whistleblower discloses their data when reporting the Breach and consents to reveal their identity, but the consent must be expressed in writing or electronically in a manner that raises no doubts;
  - 3.2.2. **sensitive** - the Whistleblower discloses their data when reporting the Breach, but the report-specific data based on which the Whistleblower's identity can be established, whether directly or indirectly, is not disclosed in any manner. The Whistleblower's data shall be treated as sensitive, unless its disclosure is required by law;
  - 3.2.3. **anonymous** - the Whistleblower does not disclose their identity at any stage, not even to the persons who are responsible for receiving the Report and taking Follow-Up.
- 3.3. The Whistleblower, Facilitator, Persons Connected with the Whistleblower, the superior/entity that supervises the provision of services via whom a Breach has been reported, as well as any other persons who have obtained information on the content and scope of the Report and on persons involved in the Report must keep secret the said information and any other information that might be disclosed to them in the course of the investigation. The secrecy obligation shall not apply when it is in conflict with law. The Investigation's documentation should contain information on the persons involved.

### 4. /LEGAL PROTECTION OF WHISTLEBLOWERS/

- 4.1. A Whistleblower shall qualify for protection, including against any Retaliation, provided that they had reasonable grounds to believe that the information on breaches reported was true and constituted information about a Breach at the time of reporting. A Whistleblower may not draw any professional, financial or personal gains from the fact of reporting.
- 4.2. Protection shall also be extended to Facilitators and Persons Connected with the Whistleblower.
- 4.3. Protection of Whistleblowers shall mean, but not be limited to, protection against the following forms of adverse treatment (including any attempt or threat to use those forms) caused by the Report or Public Disclosure:
  - 4.3.1. refusal to establish an employment relationship or a civil-law relationship;
  - 4.3.2. termination of the employment relationship or termination of the employment relationship without notice;
  - 4.3.3. termination of a legal relationship other than employment relationship;
  - 4.3.4. failure to conclude a fixed-term or temporary employment contract after the termination of a probationary employment contract, failure to conclude another fixed-term employment contract or failure to conclude a temporary employment contract after the termination of a fixed-term employment contract, or failure to establish a civil-law relationship - where the Co-Worker had a legitimate expectations that they would be offered such a contract;
  - 4.3.5. reduction of the remuneration for work or services provided;
  - 4.3.6. adverse change of the conditions of work and salary or the provision of services;
  - 4.3.7. withholding of promotion or being overlooked for promotion;
  - 4.3.8. being overlooked for the award of work or service-related benefits other than salary;
  - 4.3.9. transfer of the Co-Worker to a lower position;
  - 4.3.10. suspension from the provision of services or from the performance of employee or official duties;
  - 4.3.11. transfer of the current employee duties or services rendered to another Co-Worker;
  - 4.3.12. adverse change of location of place of work/provision of services or change in working/service hours;
  - 4.3.13. withholding of participation in or being overlooked for participation in training organised to improve professional qualifications;
  - 4.3.14. negative performance/service assessment or negative work/service reference;
  - 4.3.15. imposition or administering of any disciplinary measure, including a financial penalty, or a measure of a similar nature;
  - 4.3.16. unjustified medical referrals, including psychiatric referrals, unless separate regulations provide for a possibility to refer an employee for such examinations;
  - 4.3.17. blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
  - 4.3.18. mobbing, exclusion and discrimination in the work/service environment, unless the Company proves that it was guided by objective reasons when taking the aforementioned actions with respect to the Whistleblower.
- 4.4. Where the Whistleblower prefers to remain anonymous, the Coordinator must not allow their actions to

lead to disclosing the Whistleblower's identity. The Whistleblower may decide to disclose their identity at any stage of the Investigation.

- 4.5. Where any Retaliation occurs, the Whistleblower shall report it to the DE Director or DD Director, respectively, who shall prepare a separate account with recommendation after considering the case.
- 4.6. A person who refused to participate in a Breach or facilitated disclosure of a Breach, e.g. by providing information to the Whistleblower or by submitting relevant clarifications, shall be protected to the same extent as the Whistleblower.
- 4.7. Where a Whistleblower discloses a Breach in which they participated themselves, the fact of having reported the Breach internally shall not relieve the Whistleblower from the liability for the Breach identified, but it shall be considered as an attenuating circumstance when making decisions concerning disciplinary measures, in the case of a contract of employment, or continuation of cooperation, where the work for the Company is based on grounds other than a contract of employment.
- 4.8. Using the Procedure contrary to its purpose, in particular for personal gains, may result in initiation of a disciplinary procedure (in the case of a contract of employment) or termination of cooperation (other legal grounds for cooperation) and initiation of a criminal procedure. In this regard, where there is a breach of law, the said circumstance shall be reported to the law enforcement authorities and the Whistleblower shall not be subject to protection as defined in this Section.

## 5. /COURSE OF AN INTERNAL INVESTIGATION/

- 5.1. The Investigation shall be initiated upon acknowledgement that the Report has been received by, respectively, DE or DD.
- 5.2. Where the Whistleblower has provided their contact details, the receipt of the Report shall be acknowledged promptly, but not later than after 7 days from the date of receipt of the Report.
- 5.3. In the case of an anonymous Report made through the dedicated Form, the receipt of the Report shall be acknowledged automatically.
- 5.4. The Investigation into a Breach shall be aimed at:
  - 5.4.1. clarifying the circumstances of the case;
  - 5.4.2. gathering and securing evidence;
  - 5.4.3. identifying the perpetrator(s) of the Breach;
  - 5.4.4. establishing the extent of the actual or threatening harm, or identifying the Company's interest at risk;
  - 5.4.5. identifying the provisions of law or internal regulations of the Company that have been breached;
  - 5.4.6. putting an end to a conflict within the Company, where that conflict is connected with the Breach committed;
  - 5.4.7. submitting recommendations to the competent responsible units, which shall be understood as Follow-Up or actions meant to prevent the Breached reported from occurring in the future.
- 5.5. In the course of the Investigation, the Coordinator shall have the right to:
  - 5.5.1. request that the Co-Worker or the Company make available all documents and materials and

- provide all information necessary to investigate the case;
- 5.5.2. order responsible units of the Company to carry out specific actions in order to either confirm or obtain information necessary to investigate the case;
  - 5.5.3. request that the Co-Worker provide relevant clarifications;
  - 5.5.4. contact other Company Co-Workers, as well as persons who are not Co-Workers but whose contribution can be of importance to the case under investigation, in order to gather information;
  - 5.5.5. inspect a site or things;
  - 5.5.6. where necessary, secure - against a receipt - the Company's equipment or documents which can contain information necessary to investigate the case.
- 5.6. Any and all information provided orally by Co-Workers and non-Co-Workers whose contribution can be of importance to the case under investigation shall be recorded in writing or documented within the meaning of the Civil Code.
  - 5.7. The person in charge of the Investigation shall produce a memo and photographic footage of the inspection of a site or things where one has been carried out.
  - 5.8. Reports shall be considered in line with the principle of impartiality. Each party (where the parties to the case can be identified by the Coordinator) shall be allowed to present their position.
  - 5.9. The Co-Workers approached by the Coordinator must provide evidence and facts of importance to the resolution of the case.
  - 5.10. The Investigation into a Breach should be completed and the feedback provided to the Whistleblower within 3 months after the date of acknowledgement of receipt of the Report, or where no acknowledgement is made - then within 3 months after the expiry of the 7-day period after the Report was made, provided that the Whistleblower has specified the address to which the feedback should be sent.
  - 5.11. Where a Report is made anonymously through the dedicated Form, the return address shall be the relevant information channel assigned to the Whistleblower, i.e. the token number which appears after the Report is sent through the Form and which the Whistleblower should note down to be able to log in to their Report in the Whiblo system in the future.
  - 5.12. The Coordinator in charge of an investigation must, after the investigation is completed, make an Account of the investigation and upload it to the system in which Internal Investigation data is stored.
  - 5.13. Where it transpires from the Account that there is a reasonable suspicion of an offence, the DD Director shall - in order to prepare a notification to the competent law enforcement agencies - request the Company's Legal Office to draft a notification of the suspected offence to the competent law enforcement authorities. Where the case concerns an Irregularity, the notification shall be drafted at the request of the DE Director.
  - 5.14. Where the Whistleblower has provided a return contact in their Report, the DE/DD Director or the person authorised to take Follow-Up on the completed investigation must give feedback to the Whistleblower including a description of the action envisaged or taken as Follow-Up and on the grounds for such Follow-Up, subject to the time limit provided in Clause 5.10.
  - 5.15. The persons authorised to take Follow-Up, including the DD/DE Director, shall exercise due diligence to

ensure that investigations into Breaches are carried out only for as long as is necessary to investigate the Breaches in a fair and objective manner while maintaining anonymity of the Whistleblower who provided their personal data but did not consent to its disclosure.

## 6. /PROVISION OF ACCOUNTS/

- 6.1. The DE Director shall provide the Management Board with an annual account of registered cases including, in particular, the number and categories of Reports made, the number of confirmed Reports, the number of anonymous Reports, and general recommendations on the prevention of future risks that may arise for the Company from the Reports.
- 6.2. The Director of the Office in charge of an Internal Investigation must notify the President of the Company of the findings of the Internal Investigation where a threat to the business continuity of the Company or to human life or health, or a significant reputational or economic risk to the Company, have been identified.
- 6.3. The Director of the Office in charge of an Internal Investigation may decide to notify the Management Board of the Company or persons in charge of specific responsible units at the Company of the findings of the Internal Investigation in cases other than referred to in Clause 6.2. in order to take corrective actions or to mitigate the risks identified during the Follow-Up, provided that the Director considers doing so as appropriate.
- 6.4. The notification referred to in Clauses 6.2. and 6.3. shall be made without any data that can lead to identification of the Whistleblower and subject to all the provisions of Section 9 of the Procedure.

## 7. /REGISTER OF REPORTS/

- 7.1. The Director of the Compliance and Regulation Office shall keep a Register of Breaches Reported.
- 7.2. The Director and Co-Workers of the Safety and Control Office must inform the DE Director of receipt of any reports and related data that must be updated in the Register of Breaches Reported, provided that the Report was made through a communication channel other than those said in Clauses 3.1.1. or 3.1.2.
- 7.3. The Register shall be kept in electronic form.
- 7.4. The Register shall be kept in a manner that ensures protection of personal data of the Whistleblowers.
- 7.5. At least the following data shall be gathered in the Register:
  - 7.5.1. Report number,
  - 7.5.2. subject of the Breach,
  - 7.5.3. personal data of the Whistleblower and the person concerned, if provided,
  - 7.5.4. contact address of the Whistleblower, if provided,
  - 7.5.5. the date when the Report was made,
  - 7.5.6. information on the Follow-Up taken,
  - 7.5.7. date when the case was closed.
- 7.6. The DE Director may authorise a Co-Worker to keep the Register. To this end, the DE Director, within their own remit granted by the Company, shall authorise such a Co-Worker in writing to keep the register.

7.7. Personal data and other information contained in the Register shall be retained for a period of 3 years after the end of the calendar year in which the Follow-Up has been completed or the investigations initiated by those actions have been closed.

## 8. /OTHER BREACHES/

8.1. Where information on a Breach or threatening Breach becomes known to the Director or a Co-Worker, whether at DE or DD, from a source other than a Whistleblower, an Internal Investigation shall be initiated accordingly.

8.2. An Internal Investigation shall also be initiated where the person of the Whistleblower cannot be identified.

8.3. Where there is any doubt concerning proper assessment of information on a Breach, the final decision in this respect shall be made by the Director of the competent responsible unit which is in charge of investigating the Breach.

8.4. Once an Internal Investigation has been initiated under this Section, the provisions of Section 5 "Course of an Internal Investigation" and Section 6 "Provision of Accounts" shall be applied accordingly. Third parties (natural persons) who report Breaches but are not connected with the Company through cooperation under a contract of employment or any other legal basis shall be protected on the same grounds as Whistleblowers.

8.5. Information about Breaches referred to in this Section shall be entered by the DD and DE Directors in separate dedicated registers, in accordance with their competencies.

8.6. At least the following data shall be gathered in the registers referred to in Clause 8.5:

8.6.1. Report number,

8.6.2. subject of the Breach,

8.6.3. personal data of the person concerned, where applicable,

8.6.4. date when information about the Breach became known,

8.6.5. information on the Follow-Up taken,

8.6.6. date when the case was closed.

8.7. Subject to the application of Legal Protection of Whistleblowers provided for in Section 4 of this Procedure, matters which involve aviation occurrences shall be regulated by the provisions of Point 6, Chapter 11, Part A of the Operations Manual in force at PLL LOT S.A.

## 9. /PERSONAL DATA PROTECTION/

9.1. Personal data of the Whistleblower and participants in an Internal Investigation shall be subject to specific protection in order to reduce their personal risk, including any negative consequences from the persons and entities whom the Report concerned.

9.2. The Company shall be the data controller in respect of Reports made by Whistleblowers, Internal Investigations and other processes relating to the receipt, examination and processing of the Reports.

9.3. The Data Protection Officer is a person who can be contacted concerning protection of personal data via e-mail at [iod@lot.pl](mailto:iod@lot.pl) or in writing at the official address of the Company.

- 9.4. The data of the Whistleblower and participants in the Investigation shall remain confidential and may not be disclosed in the course of the Investigation to the parties to or participants in that Investigation without their clear and express consent or unless expressly required by law.
- 9.5. A person receiving a Report shall register it as a separate case with a reference number appropriate for Whistleblower Reports in order to minimise the risk of disclosing the Whistleblower's data at later stages of the investigation.
- 9.6. Personal data shall be provided on a voluntary basis, and the decision not to provide it shall not entail any negative consequences.
- 9.7. Neither the Whistleblower nor participants in an Internal Investigation shall be requested to provide any additional personal data other than that already provided by them, even if the said data does not allow accurate identification.
- 9.8. Personal data shall be processed for the period referred to in Clause 7.7 above.
- 9.9. Personal data shall be processed under Article 6(1)(c) GDPR, i.e. a legal obligation to which the controller is subject under the Act, in particular the obligation to:
  - 9.9.1. establish whether the action or omission reported represents an actual or potential Breach,
  - 9.9.2. detect Irregularities at the Company, such as breaches of internal procedures and generally applicable provisions of law,
  - 9.9.3. consider Reports,
  - 9.9.4. carry out Investigations,
  - 9.9.5. take actions to prevent any irregularities identified,
  - 9.9.6. and where a Breach reported amount to a criminal or tax offence, the personal data shall be processed also to meet legal obligations, in particular the obligation to report offences.
- 9.10. In accordance with the GDPR, the Whistleblower and participants in an Internal Investigation shall have the following rights exercised by contacting the Company through any channel of communication:
  - 9.10.1. the right of access to their personal data;
  - 9.10.2. the right to demand rectification of their personal data;
  - 9.10.3. the right to demand erasure of their personal data;
  - 9.10.4. the right to demand restriction of processing of their personal data;
  - 9.10.5. the right to personal data portability;
  - 9.10.6. the right to object to processing of their personal data based on a legitimate interest for reasons connected with a particular situation;
  - 9.10.7. the right to lodge a complaint with the supervisory authority (the President of the Personal Data Protection Office).
- 9.11. Personal data shall not be processed by automated means, including profiling.

## 10. [/EXTERNAL REPORTS/](#)

- 10.1. A Whistleblower can submit an external report to the Commissioner for Human Rights or a public authority without submitting any prior Internal Report and, where applicable, to institutions, authorities or organisational units of the European Union.

10.2. The Commissioner for Human Rights and a public authority shall be separate controllers of the personal data provided in any external report that they receive.

## 11. /FINAL PROVISIONS/

11.1. This Procedure shall enter into force after 7 days from the date of the promulgation of the Resolution of the Management Board concerning its application in a standard manner practised at the Company.

11.2. This Procedure shall be subject to updates. The responsibility for updating the Procedure shall rest on the DE Director, and the provisions of the Procedure which concern the DD's jurisdiction shall be updated in consultation with the DD Director. Each update of the Procedure shall require consultations with the social side.

11.3. The HR Office shall provide information about the Procedure upon the commencement of recruitment or negotiations preceding the conclusion of a contract with a Candidate. The foregoing shall involve informing the Candidate about the implementation of the Procedure and providing a link to the website where the Candidate can find the content of the Procedure.

11.4. A Candidate who is beginning cooperation with the Company on any legal basis must submit a written statement that they have read the Procedure at the latest on the first day of cooperation with the Company.

11.5. At a written request of the Whistleblower, the Whistleblower may be represented in the case of the Breach by a labour union of the Whistleblower's choosing, with the right to protection - as a personal right - to be available only to the Whistleblower, not their representatives.

11.6. A Whistleblower who makes an External Report or Public Disclosure shall not, by doing so, be in breach of any Company policies which they otherwise would have breached had they acted (i.e. submitted the Report) under circumstances other than submitting the Report. This shall apply in particular to the Media Policy adopted at the Company.

11.7. Any doubts concerning the application of this Procedure shall be resolved by the DE Director.

11.8. Where a case concerns also matters falling within the DD's remit, it shall be required to seek an opinion of the Director of that Office. In the event of a jurisdiction dispute between the DD and DE, the final decision shall be made by the President of the Management Board of the Company.

11.9. The responsibility for implementing and supervising the proper application of the Procedure shall rest on the DE Director.