

**PROCEDURE**  
**ON WHISTLEBLOWING, CORRECTIVE ACTION AND PROTECTION OF**  
**WHISTLEBLOWERS**  
**AT ADAMPOL S.A. IN THE COMPANY IN ADAMPOL S.A. IN ZAŚCIANKI**

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## **1. Introduction**

*ADAMPOL S.A. It is a Company active in the field of Logistics, Transport and Freight forwarding.*

*ADAMPOL S.A. aims to be a global company that contributes to humanity's dreams with creative thinking and a relentless drive to overcome challenges. In order to meet our high standards, we may have to rely on the information and reports of everyone who works with us or become otherwise aware of any infringements and any form of misconduct within ADAMPOL S.A.*

*Therefore we encourage everyone to inform us about infringements in our company so we are able to clarify and stop such infringements. This Internal Regulation regulates the methods for persons, who wish to report such report infringements within the ADAMPOL S.A.*

*Within the framework of the Code of Conduct and the compliance organisation of the ADAMPOL S.A., this policy is intended to create the framework conditions for the report of information on possible compliance violations to specific persons or via an electronic whistleblowing system.*

## **2. Terms and Applicability**

### **2.1. Person of the Whistleblower and protected Information**

- (a) This Internal Regulation applies to all former and current employees and (whether temporary, fixed-term or permanent) and:
- 1) a person providing work on a basis other than employment relationship, including under a civil law contract;
  - 2) entrepreneur;
  - 3) proxy;
  - 4) shareholder or partner;
  - 5) a member of a body of a legal person or an organisational unit without legal personality;
  - 6) a person performing work under the supervision and management of a contractor, subcontractor or supplier;
  - 7) trainee;
  - 8) volunteer;

9) intern;

- (b) information concerning a infringement - shall mean information, including reasonable suspicion, relating to an actual or potential infringement that has occurred or is likely to occur in a legal entity with which the whistleblower has participated in recruitment or other pre-contractual negotiations, works or has worked, or in another legal entity with which the whistleblower has or has had contact in a work-related context, or information concerning an attempt to conceal such an infringement of law; in case of or the area of: A infrigment is an act or omission that is unlawful or intended to circumvent the law concerning:
- ba) corruption;
  - bb) public procurement;
  - bc) financial services, products and markets;
  - bd) anti-money laundering and terrorist financing;
  - be) product safety and compliance;
  - bf) transport safety;
  - bg) environmental protection
  - bh) radiological protection and nuclear safety;
  - bi) food and feed safety
  - bj) animal health and welfare;
  - bk) public health
  - bl) consumer protection
  - bm) protection of privacy and personal data;
  - bn) security of information and communication networks and systems
  - bo) financial interests of the State Treasury of the Republic of Poland, local government unit and the European Union;
  - bp) the internal market of the European Union, including the public law principles of competition and state aid as well as corporate taxation;
  - br) constitutional freedoms and rights of a human being and a citizen - occurring in the relations of an individual with public authorities and not related to the areas indicated in points ba)-br).
- (c) The person whose infringement is to be reported, may be a superior or subordinate to or have an equal position as the Whistleblower.

- (d) Unless legal, contractual or other duties or obligations stipulate otherwise, no individual is obliged to provide any notices or information under this Internal Regulation.
- e) The provisions of the Rules of Procedure shall also apply accordingly to a person assisting whistleblower to make an internal notification.

## **2.2. Object of the Information and Good Faith**

- (a) The information reported by the Whistleblower must relate to a infringement.
- (b) The Whistleblower must act in good faith. Reports may only be made if the Whistleblower believes that the infringement he or she is reporting is true. The Whistleblower is not acting in good faith, if he or she knows or have serious doubts that a reported information is untrue. In case of any doubts if the information concerns a infringement or not, the information must be presented as an assumption, assessment of the Whistleblower or if applicable as a statement by other persons.
- (c) Notice is made that a Whistleblower may be liable to prosecution if he or she alleges wilfully and intentionally untruthful information about other persons.

## **2.3. Report of Infringement**

The submission of reports on actual or suspected infringement are available to the following persons or systems:

- in the case of reports from employees, by reporting infringement confidentially to the supervisor, provided the supervisor himself/ herself/ itself is not involved in the infringement;

in addition, for all persons:

- by reporting directly to the compliance officer ;
- by reporting directly into the Compliance Reporting System “Integrity Line”;

- by reporting directly to authorities.

**IMPORTANT!**

**The Compliance Reporting System is not an emergency hotline that puts you in direct contact with the police, the fire brigade, the ambulance or other emergency departments!  
In case you need immediate help, please use emergency help lines**

There are no restrictions to report any actual or suspected infringement directly to authorities. However, ADAMPOL S.A. strives to deal with any actual or suspected infringement in a legally compliant and sensible manner and welcomes the use of the internal reporting in such cases. In any case ADAMPOL S.A. acts in accordance with legal regulations. If there is any suspected or actual infringement that is required to be reported to the authorities.

## **2.4. Protection of the Whistleblower and Prohibition of retaliation**

- 1) All reports, including references to the Whistleblower, will be treated and processed confidentially and within the framework of the applicable laws.
- 2) The Whistleblower has not to fear any form of retaliation against him/ her, including threats of retaliation and attempts of retaliation. ADAMPOL S.A. ensures that a Whistleblower who truthfully reports infringement is protected inter alia against:
  - a) refusal to establish an employment relationship;
  - b) termination or termination without notice of the employment relationship;
  - c) failure to conclude a fixed-term employment contract or an indefinite-term employment contract after termination of a probationary employment contract, failure to conclude another fixed-term employment contract or failure to conclude an indefinite-term employment contract after termination of a fixed-term employment contract - if the whistleblower had a legitimate expectation that such a contract would be concluded with him or her;
  - d) reduction of the amount of remuneration for work;

- e) withholding of promotion or omission from promotion;
- f) omission from or reduction in the amount of work-related benefits other than salary;
- g) transfer to a lower job position;
- i) suspension from employment or official duties;
- j) transfer to another employee of the whistleblower's existing duties;
- k) unfavourable change of the place of work or work time schedule;
- l) negative evaluation of work performance or negative opinion of work;
- m) the imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature;
- n) coercion, intimidation or exclusion;
- o) bullying;
- p) discrimination;
- r) unfavourable or unjust treatment;
- s) withholding of participation or omission in typing for participation in training courses improving professional qualifications;
- t) unjustified referral for medical examination, including psychiatric examination, unless separate provisions provide for the possibility to refer an employee for such examination;
- u) action aimed at making it more difficult to find a future job in a given sector or industry on the basis of an informal or formal sectoral or industry agreement;
- w) causing financial loss, including economic loss, or loss of income;
- x) causing other non-material damage, including damage to personal rights, in particular to the whistleblower's good name.

The provisions of this Chapter shall apply accordingly to a person assisting in the making of a report and to a person associated with the whistleblower.

## **2.5. Ways of report**

1. Internal notification may be made:

1) in writing addressed to ADAMPOL S.A. with the annotation 'whistleblower'.

This correspondence is subject to exclusion from the office circulation;

2) electronically to the email address

3) verbally by <https://glovis.integrityline.com/>

4) during a telephone conversation with the designated person authorised to receive notifications

5) orally in a face-to-face meeting with the Compliance Officer. The meeting should be arranged within 14 days of the date of receipt of such a request.

2. In the case of an oral report, with the whistleblower's consent, the report shall be documented in the form of:

1) a searchable recording of the conversation, or

2) a record of the meeting, reproducing its exact course, prepared by the person to whom the report is made;

3) The whistleblower may verify, correct and approve the minutes of the meeting by signing them.

A written application may be made using the form attached as Annex 1 to these Regulations.

## **2.6. Anonymous Report via Compliance Reporting System “Integrity Line”**

1. All persons have the possibility to report a infringement anonymous via GLOVIS Compliance Reporting System “Integrity Line”. It is accessible under <https://glovis.integrityline.com/>.

2. The notification system via <https://glovis.integrityline.com/> allows online notification in writing or verbally.

## **2.7. Procedure for the receipt of a whistleblower report**

1. The person authorised to follow up, including verification of the internal report and further communication with the whistleblower, including requesting additional information and providing feedback to the whistleblower, is the compliance officer.

2. Once a complaint has been received and formally verified, the compliance officer confirms to the whistleblower the acceptance of the internal report within 7 days of receipt, unless the whistleblower has not provided a contact address to which the confirmation should be forwarded. Confirmation of acceptance shall be made using the form attached as Annex 2 to these Rules.
3. The Compliance Officer is IMPARTIAL, performs his/her tasks independently and with due diligence, based on the written empowerment of ADAMPOL SA. Feedback will be provided to the whistleblower within a maximum of 3 months from the date of acknowledgement of the internal report or, if no acknowledgement is provided, within 3 months from the expiry of 7 days from the date of the internal report, unless the whistleblower has not provided a contact address to which feedback should be provided.
4. Anonymous oral internal notification is made exclusively via GLOVIS Compliance Reporting System "Integrity Line". Report is recorded, re-playable and saved in the system, and the compliance officer has access to the recording, to what the whistleblower agrees by making a report verbally through the system. The confidentiality rules described in the regulations apply mutatis mutandis also to the oral internal notification.

## **2.8. Confidentiality and Data Protection**

1. All information, regardless of its truthfulness, are potentially damaging to the reputation of the persons concerned, the Whistleblower as well as ADAMPOL S.A. Therefore we will treat all information with particular confidentiality over and above the obligations arising from the data protection laws.
2. A duly and constantly updated record of processing activities is kept. In addition, it shall be recorded in writing which persons may have access to the reports and related data and which rights they have in the context of the data processing. These persons are obligated to observe special confidentiality requirements. Only persons with written authorisation from ADAMPOL S.A. are allowed access to the information. Authorised persons are obliged to maintain confidentiality with regard to the information and personal data they have obtained in the course of receiving and verifying internal reports, and to take



follow-up action, even after the termination of the employment relationship or other legal relationship under which they performed this work.

3. Personal data of the reporting person and the third party indicated in the notification will be solely processed in a technically secure and fully anonymous manner, warranting the integrity of the data and compliance with the European General Data Protection Regulation (GDPR). The system used by ADAMPOL S.A. offers high standards of data protection and data security, assuring compliance with all relevant regulations. Providers and other third parties do not have access to the systems from a technical point of view, as the data provided by the reporting person and the system itself are stored in different databases.
4. Personal data that is not relevant to the processing of the application shall not be collected and, if accidentally collected, shall be deleted immediately. The deletion of such personal data shall take place within 14 days of the determination that it is not relevant to the case.
5. Information on the principles of personal data processing, as well as on the rights of data subjects, is contained in Appendix 3 to the Regulations and will be provided to such persons by the Compliance Officer as soon as the data is received and the application is confirmed.

## **2.9. Exception of Confidentiality**

1. The identity of a person who intentionally or through gross negligence reports inaccurate information concerning infringement is neither protected by this Internal Regulation nor by the laws.

2. Further Information about the identity of a person reporting information or about other circumstances that allow conclusions about the identity of a reporting person may be disclosed to a competent authority:

- in the case of consent of the person,
- at the request of the prosecuting authorities in criminal proceedings,
- on the basis of an order in administrative proceedings subsequent to a report, including administrative fine proceedings,
- on the basis of a court decision.

## **2.10. Register of internal notifications**

1. The register of internal notifications shall include:

- 1) the notification number;
- 2) the subject of the infringement;
- 3) personal data of the whistleblower and the person to whom the notification relates, necessary to identify them;
- 4) the whistleblower's contact address
- 5) the date on which the notification was made
- 6) information on the follow-up action taken;
- 7) the date of termination of the case.

The personal data and other information in the register of internal notifications shall be retained for a period of 3 years after the end of the calendar year in which the follow-up actions were completed or after the completion of the proceedings initiated by those actions.

## **3. Follow-up procedure for internal reports**

*If the company becomes aware of a suspicion of non-compliance to applicable laws and regulations or internal guidelines this suspicion must first be checked internally for plausibility by Compliance, as a prerequisite for conducting an internal investigation. Only if the suspicion proves to be relevant after this preliminary or plausibility check is the CEO actually obliged to initiate an internal investigation at the second stage.*

### **3.1. Preliminary Review**

*An internal investigation is therefore not necessary if a plausibility check carried out within the company without significant expenditure of time and money shows that*

*- the suspicions are obviously not plausible or conclusive from the outset,*

- *the suspicion is based on a mere rumour that is not supported by any factual evidence,*
  - *the suspicion can be dispelled by simple means (e.g. by asking the HR or accounting department), or*
  - *demonstrably only a minor violation is involved.*
- In principle, the preliminary examination shall be carried out by Compliance Officer.*

### **3.2. Starting an Internal Investigation**

1. If there are indications of non-compliance from an internal or external source (in particular whistleblowers; press reports; official investigations; consultants and customers) and these are recognized as plausible, as a result of the preliminary review, an internal investigation must be initiated.
2. To this end, the result of the internal investigation carried out will be submitted to the CEO. In this case, the CEO is in principle entitled to determine the appropriate methods of investigation, the required detail of the investigation and the organisational implementation of the investigative measures at his discretion.
3. An internal investigation is characterised by increased formalisation or institutionalisation. In this context, the key features of an internal investigation include:
  - a formal investigation order issued by the CEO,
  - a clearly defined and documented 'scope of investigation',
  - an investigation plan,
  - Conduct of specific investigative activities based on this investigation plan (e.g. document control, checking of emails, interviews).
4. Where the scope of the investigation is extensive or the proceedings otherwise require it, the CEO may appoint a team to conduct the investigation, consisting of persons from different departments. The team members act on the basis of written delegations of authority granted by the company.

5. The Compliance Officer may request such an investigation order in a documented manner. In cases where the CEO is absent, an investigation order by one member of the Management Board will be sufficient..

6. The CEO may additionally appoint experts who are or are not employees of the Team to carry out certain specialist activities during the proceedings.

7. A member of the Team or an expert may not be:

1) the whistleblower who forwarded the report that is the subject of the investigation;

2) a person affected by the report;

3) a person who is a direct subordinate or superior of the person to whom the report pertains;

4) a person close to the person to whom the report relates (within the meaning of the provisions of the Criminal Code);

5) a person who performs activities or handles matters whose regularity will be investigated;

6) a person whose participation in the proceedings would give rise to justified doubts as to their impartiality for other reasons.

## **1) Decision on the start of the Internal Investigation**

The decision to initiate the internal investigation must be based on "sufficient factual evidence". These must be concrete facts that prove that the life circumstances examined contain non-compliance. Assumptions and speculations or purely theoretical possibilities, such as general considerations on the probability of illegal benefits being granted, for example due to the susceptibility to corruption of certain industries or due to payments via certain countries, are not suitable on their own to justify an initial suspicion.

The obligation to clarify the suspicions exists, if:

- the initial suspicions are *firstly* based on a concrete core of facts,

-*secondly*, these suspicions make a breach of law in the sphere of the company appear possible and not entirely improbable, and

- *thirdly*, the potential violation of the law is relevant from a compliance point of view.

## **2) Relevant sources**

### **1.Sources within the Company**

Internal sources, including whistleblower reports, are an important internal source of suspicion. In addition to tips from whistleblowers, there are often indications of compliance violations from ongoing internal monitoring, such as audits conducted in the area of compliance (ESG).

### **2.Sources outside of the Company**

External sources of suspicion can also provide plausible indications of compliance violations. These include:

- Advice from auditors or other advisors of the company,
- reports in the press or industry publications,
- Investigations by law enforcement agencies.

### **3) Responsibilities**

If there are indications of compliance incidents that are of no economic importance or for the reputation of the company, taking into account the size and area of activity of the company, both the initiation and implementation of investigative measures - possibly also anticipated - can be transferred to the responsible departments. The delegation and the resulting responsibilities and reporting obligations should also be clearly regulated and documented in a corresponding guideline in this case.

### **3.3. Scope and Limits**

If an internal investigation was initiated based on a plausible compliance indication from one of the sources set out above, the scope of the investigation will be determined after all circumstances have been taken into account. In the course of the investigation, various circumstances may arise that make it necessary to subsequently change or expand the subject of the investigation. These will often be “findings” from the internal investigation itself. If a change in the scope of an examination is necessary, this must be documented.

Particularly high documentation requirements apply regularly when an investigation is terminated prematurely or the original subject of the investigation is subsequently changed or restricted.

### **3.4. Procedure**

#### **1. Methods**

##### **(1) Interviews of employees**

The obligation under labor law to take part in interviews and the employee's obligation to provide information is based on the employer's right to issue instructions. Insofar as the questions relate to the employee's immediate area of work or his perceptions in connection with the work performance, he must answer them truthfully and completely.

With regard to perceptions that go beyond the immediate work area of the employee - i.e. those that he made outside of the regular workplace, but for example on business trips or at business meals - there is a duty to provide information derived from the contractual duty of loyalty.

##### **a) Informing the interviewee**

The respondents must be informed about their legal rights before the survey in order to comply with the rule of law concept of fairness. All affected employees

should be informed in the same way. The following shall be explained to the employee:

- that unjustified refusal to provide information may have consequences under labor law;
- that there is a right to have a record (protocol) of the interview taken, as well as to inspect and approve it;
- that there is the possibility of the interview recording being passed on to the investigative authorities and used there to the detriment of the respondent.
- that the interviewee may hire a lawyer for the protection of its own rights.

**b) Offer to resign from the employer's rights under employment law (amnesty)**

Amnesties can be offered to the employee in order to improve the scope and density of the possible information or to receive the information more quickly. Amnesties are promises to the employee to provide various advantages in the event of his truthful and comprehensive participation in the investigation. Depending on the situation, the employer decides on the possibility and subject of amnesty declarations.

Taking all aspects into account, the following can be offered:

- Waiver of labor law measures, such as transfer, warning or termination;
- Waiver of the assertion of claims for damages;
- Forgoing criminal charges and criminal complaints;
- Assumption of legal defense costs;
- Taking over fines and penalties;
- Assurance of the confidentiality of the information communicated, to the extent defined by law.

When designing the amnesty program, the company management is subject to labor law, corporate law and criminal law limitations.

Management must act diligently and for the benefit of the company. Before an amnesty is granted, it must be weighed up on a case-by-case basis as to

whether the promises and waivers are appropriate. The interest in clarification must outweigh the interest in sanctions.

The conditions for the occurrence of the individual amnesties are to be formulated as precisely as possible and made binding.

### **c) Interview**

In order to clarify the facts as comprehensively as possible, the interviewer needs detailed and truthful information. The way in which these can be obtained is a question of the individual case.

### **d) Protocol**

The interview of the person providing information must be documented in writing. The interviewed employee cannot demand to stop the documentation. The value of the protocol is dependent on the transcript to reflect the statements of the interviewee as unfalsified as possible.

For reasons of proof and in order to meet the requirements for a complete and objective record, transcripts should be made by a second person, other than the interviewer, who is also familiar with the matter.

In addition to written records, there is the option of recording or filming interviews using a dictaphone and later transcribing them. However, this method requires the written consent of all participants in the conversation.

The protocol is to be made accessible to the interviewee after the interview. After the interview, the protocol should be made available to the interviewed person. After reviewing the content, the employee should be asked to approve and sign the protocol. If the employee refuses to sign, the refusal should be documented along with the reasons provided.

Care should be taken to ensure that changes to the minutes are marked in color or with a different font so as not to call into question the probative value of the minutes as a whole.



## **2) Evaluation of physical documents and files**

For the comprehensive clarification of the facts, documents that are in the custody of employees as part of the official files must be identified and evaluated.

Spontaneously visiting the employee at the workplace is permitted. A specific occasion or prior announcement is not required. Defamation, discriminatory, discouraging behaviour or behaviour that may embarrass the employee on the part of the investigating person or the supervisor is to be avoided during such controls.

The inspection of an employee's office is also permitted without the knowledge and consent of the employee. The inspection of unlocked objects located in this office is also considered permissible.

The employer can view official documents without restriction through superiors or colleagues of the person concerned. The employee may not refuse to inspect or surrender, because he is the person in possession of the official documents.

This also applies to the relationship between the employee and a third party commissioned by the employer to carry out the investigation.

If employees have private documents at the workplace, personal rights must be observed for private files. The same applies for the protection of the secrecy of correspondence. Due to that, the employer is denied access to private documents and files. However, the employee must be aware that an inspection may be permitted regarding the private use of the company computer.

Personal rights must also be observed when accessing personnel files. The personnel file must not be accessible to the general public, but must be carefully stored. The information contained there must be treated confidentially and only a small group of employees may have access to the personnel files.

Within the framework of internal investigations, employees in the human resources department or the managing director(s) have the usual right of inspection. If third parties have access to the personnel files, the company must ensure special confidentiality and take precautions against unauthorized disclosure.

#### **e) Evaluation of electronical documents and files**

Since the private use of the electronical hardware and software is not permitted, the employer can generally assume contractual use and does not have to take any special precautions in the context of investigations.

The employer has an unrestricted right to inspect official files and documents in electronic form. In this context, the employer can deny the employee access to the electronic data, for example by means of an electronic access block or by removing computers used for business purposes. However, the data protection regulations must be observed for the evaluation. If the information is to be transmitted to recipients outside the EU as part of international investigations, the EU-adequate level of data protection.

#### **f) Documentation**

Conducting the internal investigation requires documentation at each step of the review. The sources of information, the scope, the methods used and the results must be recorded in writing and archived.

### **4. Report and Decision**

In case of an Internal Investigation ordered by the managing director(s) an official report shall be submitted in writing to the Board. Such official report shall be documented and archived. As a result of the Internal Investigation further measures can be decided upon, including but not limited to:

- closing the case (suspicions were not confirmed),
- investigating further (e.g. with external resources),

- giving recommendation to the internal committee, In accordance with the employer's internal regulations.
- reporting to the Authorities

Compliance shall indicate a recommendation in the report to the Board. The Board shall decide on the recommendations as well as on any other further measures.

## **5. INFORMATION ON EXTERNAL NOTIFICATIONS**

1. Notification may also be made in any case to a public body or a central authority bypassing the procedure provided for in this Procedure, in particular when:

- 1) the Employer fails to follow up or provide feedback within the time limit for feedback established in the Regulations;
- 2) the whistleblower has reasonable grounds to believe that the violation of the law may constitute a direct or obvious threat to the public interest, in particular, there is a risk of irreparable harm;
- 3) making an internal report will expose the whistleblower to retaliation;
- 4) if an internal notification is made, there is little likelihood that the Employer will be able to effectively counter the violation of the law due to the particular circumstances of the case, such as the possibility of concealment or destruction of evidence or the possibility of collusion between the Employer and the violator of the law or the Employer's participation in the violation of the law.

2. A report made to a public authority or a central authority bypassing an internal report shall not have the effect of depriving the whistleblower of the protection guaranteed by the provisions of the Whistleblower Protection Act.

Annex 1 to the Procedure  
on Reporting Breaches,  
Corrective Action and Protection of Whistleblowers in  
ADAMPOL S.A. in Zaścianki

**NOTIFICATION FORM**

Date of notification
Name and Surname:
Position:
Place of work/organizational unit:
Contact information:
Date of occurrence of the infringement, date of information:
Indication of which regulations, laws or standards the notification relates to:
DESCRIPTION OF THE SUBJECT OF THE INFRINGEMENT/ EVENT: description in detail of the circumstances and how it came to be known, including persons relevant to its occurrence, indication of time and place, indication of potential witnesses (including persons contacted by the reporter), other relevant to the case:
Identification of evidence relevant to the case:
Nature of the irregularity: indicate the area of the infringement from the Regulations § 3 describing the irregularity* tick the appropriate box: - Failure to comply with duties - Abuse of power - Breach of regulations ( indicate ) - Other what?
Potential witnesses to irregularities: Name of witness, position, place of work / organizational unit.

<p>Declaration by the applicant:  I declare that in making this notification:</p> <ol style="list-style-type: none"> <li>1. I am acting in good faith and not for gain,</li> <li>2. I have a reasonable belief that the allegations contained in the information disclosed are true,</li> <li>3. the information disclosed is true to the best of my knowledge and I disclose all facts and circumstances known to me concerning the subject matter of the report,</li> <li>4. I am aware of the whistleblowing procedure</li> </ol>	
<p>I have taken note:</p>	<p>Date and signature of the notifying party</p>

**NOTE**

- 1.If it is established in the course of the investigation that the whistleblower knowingly provided untruths or concealed the truth in his/her whistleblowing report, the whistleblower, who is an employee, may be held liable under the provisions of the Labor Code. Such behavior may also be qualified as a grave breach of fundamental labor obligations and as such result in termination of the employment contract without notice.
- 2.In the case of an applicant providing services or goods to the Company on the basis of a civil law contract, a finding of making a false report of irregularities may result in termination of the contract and definite termination of cooperation between the parties.
- 3.Irrespective of the consequences indicated above, a declarant who knowingly makes a false declaration may be held liable for damages in the event of damage to the Company in connection with the false declaration.

### **Information clause on the principles of processing the whistleblower's personal data**

1. The controller of personal data within the meaning of 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), (hereinafter referred to as "GDPR"), is ADAMPOL S.A. with its registered office in Zaścianki (15-521) at Usługowa 3 .
2. In any matter regarding the processing of personal data by Adampol S.A. you can contact us via e-mail: [rodo@adampolsa.com.pl](mailto:rodo@adampolsa.com.pl)
3. Personal data will be processed on the basis of:
  - art. 6 section 1 letter c) GDPR- the obligation of the administrator, in connection with the provisions of the Act of 14 June 2024 on the protection of whistleblowers in order to carry out tasks related to handling internal reports;
  - art. 9 section 2 letter g) GDPR in connection with the provisions of the Whistleblower Protection Act, if such personal data is included in the whistleblower's report;
  - art. 6 section 1 letter a) GDPR in connection with consent to the disclosure of identity.
4. Personal data will be made available only to entities authorized to process them under the law. Personal data will be made available to entities providing, on the basis of contracts concluded by the administrator, support for the administrator's activities (e.g. IT service providers). Personal data may be made available to external entities supporting the administrator in accepting internal notifications. Personal data will be made available to separate controllers, i.e. competent authorities, in the event of follow-up actions.
5. Personal data will be stored for a period of 3 years after the end of the calendar year in which follow-up activities were completed or after the completion of proceedings initiated by these activities.
6. You have the right to access your data and the right to rectify it, delete it in cases provided for by law and limit processing.
7. You have the right to lodge a complaint with the supervisory authority - the President of the Personal Data Protection Office - if you believe that the processing of your personal data violates the provisions of the GDPR.
8. Providing personal data is voluntary.
9. Personal data will not be subject to profiling and no decisions will be made in an automated manner based on this data.

**CONFIRMATION OF THE REPORT OF INFRINGEMENT**

The notification of the infringement made by ..... is hereby acknowledged. on .....  
and concerns an infringement consisting of .....

.....  
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.....

It is hereby established that the applicant has been granted/refused whistleblower status.

The refusal to grant whistleblower status to the applicant is due to the following  
reasons: .....

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.....

signature of the person responsible for accepting  
the application

## **Information Clause on Personal Data Processing of the Person Concerned by a Whistleblower's Report**

1. The data controller, within the meaning of 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), hereinafter referred to as "GDPR," is ADAMPOL Joint Stock Company with its registered office in Zaścianki (15-521), at 3 Usługowa Street, Zaścianki.
2. For any matters concerning the processing of personal data by Adampol S.A., you can contact via email: [rodo@adampolsa.com.pl](mailto:rodo@adampolsa.com.pl).
3. Personal data will be processed on the basis of:
4. Your personal data will be processed based on:
  - Article 6(1)(c) GDPR — compliance with a legal obligation to which the controller is subject, in connection with the Act of 14 June 2024 on the protection of whistleblowers, for the purpose of handling internal reports;
  - Article 6(1)(f) GDPR — for the purpose of establishing or defending against claims.
5. Your personal data was provided by the whistleblower.
6. Personal data will be shared only with entities authorized to process it based on legal regulations. Personal data will be shared with entities providing services to the controller under agreements concluded by the controller (e.g., IT service providers). Personal data may be shared with external entities supporting the controller in handling internal reports. Personal data will be shared with separate controllers, such as competent authorities, in the event of follow-up actions.
7. Personal data will be stored for a period of 3 years after the end of the calendar year in which follow-up actions were concluded or after the completion of proceedings initiated by these actions.
8. You have the right to access your data, with the reservation that Article 15(1)(g) GDPR regarding the provision of information about the source of personal data does not apply unless the whistleblower does not meet the conditions specified in Article 6 or has given explicit consent to such disclosure.  
You have the right to rectify personal data, delete it in cases provided for by law, and restrict processing.
9. You have the right to lodge a complaint with the supervisory authority — the President of the Personal Data Protection Office, if you believe that the processing of your personal data violates GDPR regulations.
10. Personal data will not be subject to profiling, nor will any automated decisions be made based on this data.