



Whistleblowers

- Internal reporting is not used to report labor law violations.
- Internal reporting is not used to report violations of the law that occurred at locations other than Wawel SA.
- The internal reporting procedure will not accept anonymous reports or reports made in any other way than described in the procedure.

I. A Whistleblowers may be a persons who:

- 1) Are performing, have performed, or have sought to perform work for Wawel SA, including under an employment or other legal relationship that is the basis for work for Wawel SA. In particular, if: are employees of Wawel SA, have applied for employment, are serving or have served an internship, apprenticeship, volunteer work, are providing or have provided services as a contractor.
- 2) Have obtained, in connection with their work for Wawel SA, information that the law has been violated at Wawel SA or at another entity cooperating with Wawel SA, in particular if they have a reasonable suspicion of an actual or potential violation of the law that has occurred, or will occur, in the work process, recruitment process or other pre-contract negotiations. This may also include information on an attempt to conceal such a violation of the law.
- 3) The violation of the law involved one of the areas listed in the Whistleblower Law.

This means that there was an illegal act or omission or circumvention of the law relating to: (1) corruption; (2) public procurement; (3) financial services, products and markets; (4) anti-money laundering and terrorist financing; (5) product safety and compliance; (6) transportation safety; (7) environmental protection; (8) radiological

protection and nuclear safety; (9) food and feed safety; (10) animal health and welfare; (11) public health; (12) consumer protection; (13) privacy and personal data protection; (14) security of networks and information and communication systems; (15) financial interests of the State Treasury of the Republic of Poland, a local government unit and the European Union; (16) the internal market of the European Union, including public law principles of competition and state aid and taxation of legal entities; (17) constitutional freedoms and rights of man and citizen - occurring in the relations of the individual with public authorities and unrelated to the above-mentioned areas.

II. Information on violation of the law

Internal notification can be made through a confidential communication channel available at: <https://wawel.whiblo.pl>

Each time, the designated coordinator will confirm to you the receipt of the notification.

The notification should contain all relevant information necessary for its verification and evaluation of the violation of the law:

- 1) whether you are our employee, contractor, service provider, former employee, job applicant, volunteer, intern, trainee, or work in our contractor's, subcontractor's, supplier's, or other person's organization;
- 2) whether there are persons aggrieved by the violation of the law that you report, if so, who is it;
- 3) who is the person who violated the law;
- 4) what violation of the law you are reporting, what it consisted of, when and where it occurred, how it occurred and for what reason; whether you are reporting evidence of the violation of the law, if so, what evidence; whether you have reported this violation of the law before, if so, when, to whom, in what form; whether you have received a response to this report, if so, what response. The notification may contain other additional information that you consider important.

In the notification, the whistleblower should indicate a contact address or e-mail address.

III. From the moment the notification is made, the notifier acquires the status of a whistleblower,

and this means that:

- 1) data and information provided in the notification and obtained in the course of its handling with confidentiality and impartiality, guaranteeing you a sense of security and minimizing the risk of retaliation or reprisals. We will not disclose data allowing us to determine your identity, unless you give us permission to do so, or to such authorities as courts and prosecutors. Only authorized employees of Wawel SA who have been obliged to maintain confidentiality will be allowed to review the application;
- 2) within 7 days, receipt of the notification will be confirmed and will be forwarded for verification;
- 3) any recordings involving the whistleblower will be made only with the whistleblower's consent, and the whistleblower will be allowed to review and correct the transcriptions of conversations and the minutes of the activities carried out with the whistleblower's participation.
- 4) after the investigation, but no later than 3 months from the confirmation of receipt of the report, the whistleblower will be informed of the follow-up actions planned or taken and the reasons for them.

The whistleblower's data will be kept as long as required by the Law on the Protection of Whistleblowers. After this period, the data will be deleted and documents related to the notification will be destroyed.