



Internal Reporting Procedure

Release 1.

Effective from **22 may 2024**

Approved by: Rafał Mroziński – 30.04.2024 r.

After consultation with the Employees' Representative - protocol Z3

1. Purpose

The purpose of this procedure is to ensure an effective internal reporting system that complies with national and European law for the functioning of the organization. This is achieved by introducing a mechanism to prevent and combat irregularities related to the organization's operations in the form of channels for reporting irregularities, and establishing a mechanism for effectively reviewing them. It also aims to protect the interests of whistleblowers and ensure they are protected from potential retaliation. The procedure defines the accepted methods for making Reports at the Legal Entity (Locotranssped sp. z o.o.), the procedures for handling them, and the units responsible.

2. Responsibilities

1.1 Board of Directors:

- Establishing the internal reporting procedure
- Appointing Coordinators
- Ensuring means of protecting data and information provided by the Whistleblower
- Fulfilling obligations arising from the Whistleblower Protection Act

1.2 Coordinators:

- Receiving internal reports
- Taking follow-up actions including: verifying the internal report and further communication with the Whistleblower, including requesting additional information and providing feedback to the Whistleblower
- Fulfilling obligations arising from the Whistleblower Protection Act

3. Definitions

3.1.1. Violation: an action or omission that is unlawful or aims to circumvent the law regarding:

1. Labor laws;
2. Corruption;
3. Public procurement;
4. Financial services, products and markets;

5. Countering money laundering and terrorist financing;
 6. Product safety and compliance requirements;
 7. Transportation safety;
 8. Environmental protection;
 9. Radiological protection and nuclear safety;
 10. Food and feed safety;
 11. Animal health and welfare;
 12. Public health;
 13. Consumer protection;
 14. Privacy and personal data protection;
 15. Security of networks and information systems;
 16. Financial interests of the Treasury of the Republic of Poland, local government units and the European Union;
 17. The EU's internal market, including public competition rules, state aid and corporate taxation;
 18. Constitutional freedoms and human and civil rights - occurring in relations between individuals and public authorities and unrelated to the areas indicated in points 1-17.
- 3.1.2. Report: written submission to the Legal Entity of information about a Violation
- 3.1.3. Whistleblower: a natural person who makes a Report of a Violation
- 3.1.4. Coordinator: a person designated by the Legal Entity to receive and process Reports - in accordance with point 4.3 below and Article 25 points 1 and 3 of the Whistleblower Protection Act.
- 3.1.5. Reporting System: the set of technical and organizational means adopted by the Legal Entity for making and managing Reports
- 3.1.6. Legal Entity: Locotranssped spółka z ograniczoną odpowiedzialnością (Locotranssped Limited Liability Company)
- 3.1.7. The Act: The Whistleblower Protection Act

4. Principles of Handling Reports

- 4.1. The Legal Entity guarantees that the Internal Reporting Procedure and the processing of personal data related to receiving Reports prevents unauthorized persons from accessing information covered by the Report and ensures the confidentiality of the identity of the whistleblower, the person concerned by the report, and any third party mentioned in the report. Confidentiality protection applies to information that could directly or indirectly identify such persons.
- 4.2. The Legal Entity ensures that, thanks to the technical solutions applied, each Report will be handled in accordance with applicable national regulations while maintaining confidentiality and impartiality.
- 4.3. The Coordinator is a person who has been granted written authorization by the Legal Entity. The Coordinator is always the person responsible for the Legal Area at the Legal Entity and - if the Report concerns the person responsible for the Legal Area or in that person's absence, the Coordinator is the person designated to substitute the main Coordinator in accordance with the authorization granted.

5. Making Reports

- 5.1. The Legal Entity accepts Reports in written electronic form.
- 5.2. Reports can be made through:
 - Written report via email to: whistleblowing@locotranssped.eu using the Internal Report Form or in free written form;
 - Written report via the dedicated anonymous reporting platform Esignaller available at www.esignaller.pl link: <https://app.esignaller.pl/breach/report/locowhistleblower>, to which a link is publicly provided on the Legal Entity's website;
- 5.3. When making a Report, the reporting person may provide their mailing address or email address, which will be treated as a "contact address".
- 5.4. The Violation Report should provide a clear and comprehensive explanation of the subject matter and contain in particular:

- 1) The date and place of the Violation or the date the information about the Violation was obtained,
- 2) A description of the specific situation or circumstances that could lead to a Violation,
- 3) Indication of the entity to which the Violation Report relates,
- 4) Indication of any witnesses to the Violation,
- 5) Indication of all evidence and information available to the reporter that may prove helpful in handling the Violation.

5.5. Making a Report of a Violation that did not occur constitutes a violation of law and is subject to penalties specified in the Act.

5.6. The Legal Entity allows anonymous reporting of Violations (as specified in point 5.2 second bullet above). The Legal Entity reserves the right to disregard anonymous reports. To maintain anonymity, the Legal Entity provides the dedicated Esignaller platform, whose structure allows Whistleblowers to anonymously submit Violation and Misconduct Reports and for the Legal Entity to handle reports and communicate with Whistleblowers in an anonymous and encrypted environment compliant with applicable regulations.

6. Handling Reports

6.1. The Legal Entity maintains a confidential Internal Reports Register. An entry is made in the internal reports register based on the internal report. The entry in the Reports Register contains:

- 1) Report number;
- 2) Subject of the Violation;
- 3) If provided by the Whistleblower - personal data of the Whistleblower and the person concerned, necessary to identify them;
- 4) If provided by the Whistleblower - the Whistleblower's contact address;
- 5) Date the Report was made;
- 6) Information on follow-up actions taken;
- 7) Date the case was closed.

- 6.1.1. The Reports Register is maintained electronically and stored with access restricted only to the Coordinators and top management of the Legal Entity.
- 6.2. The Coordinators designated by the Legal Entity shall take, with due diligence, follow-up actions aimed at assessing the truthfulness and verifying the information contained in the Report, with a view to preventing the violation of law that is the subject of the Report, and presenting recommendations on further actions within the Legal Entity.
- 6.3. The Coordinator conducts an internal investigation into the Report to determine whether there has been a violation of laws or internal regulations applicable to the Legal Entity.
- 6.4. The Whistleblower receives confirmation of receipt of the Report within 7 days of its receipt by the Legal Entity, unless the whistleblower did not provide a contact address to send the confirmation to.
- 6.5. Within 3 months of confirming receipt of the Report, the Whistleblower receives feedback on the handling of the Report, unless the Whistleblower did not provide a contact address to send the feedback to.
- 6.6. All persons performing work for the Legal Entity are obliged to cooperate and provide assistance to the Coordinators in the course of their follow-up actions.
- 6.7. The procedure for handling information on violations of law reported anonymously is analogous to the procedure for other reports, with the reservation that it is done through the Esignaller platform. The Legal Entity allows for the possibility of disregarding an anonymous report if the subject matter does not fall within the scope of violations covered by the Procedure. The decision to disregard an anonymous report is made by the Coordinator who enters the justification for this decision in the Internal Reports Register.

7. Personal Data Protection Rules and Information Provided by the Whistleblower

- 7.1. Personal data of whistleblowers and individuals mentioned in the reports are protected in accordance with applicable laws, including the General Data Protection Regulation (GDPR) and the Personal Data Protection Act. The data

controller ensures an adequate level of protection for whistleblowers' personal data.

7.2. The legal entity guarantees that the internal reporting procedure and the processing of personal data related to receiving reports prevent unauthorized access to information covered by the report. It also ensures the confidentiality of the whistleblower's identity, the person mentioned in the report, and any third party indicated in the report. This confidentiality protection applies to information that directly or indirectly identifies such individuals.

7.3. The data controller for whistleblowers' personal data and other personal data included in the report, as well as data collected in the internal reporting register, is the legal entity.

7.4. Personal data processed in connection with the acceptance of a report are stored for a period of 3 years after the end of the calendar year in which follow-up actions were completed or after the conclusion of proceedings initiated based on these actions.

8. Final Provisions

8.1. Whistleblowers may also make external reports to the Ombudsman or public authorities and, where appropriate, to institutions, bodies, or organizational units of the European Union. External reports can be made following the procedure described in Chapter 4 of the Act.

8.2. Whistleblowers are protected from retaliatory actions as specified in the Act.

8.3. The Internal Reporting Procedure comes into effect 7 days after being communicated to employees in the manner established by the legal entity, i.e., publication in the COMARCH HRM system.

9. Attachments

Z1 – Internal Reporting Form

Z2 – Authorization for the Coordinator

Release 1.

Internal Reporting Procedure

Z3 – Protocol of Consultation on the Procedure before Implementation with the
Employee Representative

10. Changes table

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