

Receiving reports about possible unlawful conduct under the Act on Whistleblower Protection at Lučební závody Draslovka a.s. Kolín

This document contains detailed information regarding reports about possible unlawful conduct received pursuant to the Act No. 171/2023 Coll, on Whistleblower Protection, as amended (hereinafter as the “Act”) by Lučební závody Draslovka a.s. Kolín (hereinafter as the “Company”).

What can be reported

Report means any inquiry, suggestion or other information which is related to **violation of laws, regulations - internal or external, including the Company’s ethical principles**, and that should have occurred in the course of the Company’s activities.

Who can submit a report

Employees and other persons conducting work or work-related activities for the Company, including volunteers and interns, as well as third parties such as suppliers, contractors and customers can submit a report, even if the relationship has already ended or is yet to begin.

The Company deals also with anonymous reports. However, when submitting a report through an external reporting channel (Ministry of Justice, see below), it is necessary to provide the reporting person's identification data.

Content of the report

To effectively contribute to resolution of the identified issue, the report should be as clear as possible and include, if known, the following:

- Identification details of the reporter, if they wish to state it,
- Date, time, place of the illegal or unethical conduct,
- Persons involved, or any other information that may help to identify the source of the problem,
- Other additional details, and
- Preferred follow-up communication channel, if different from the original one.

How to submit the report

(A) Via the [Ethics Hotline](#)¹

- Online in writing or via phone at 800 144 330,
- **The Company recommends using this channel, because it allows also anonymous follow-up communication,**
- As a next step, preferably chose to submit the report on Company level – Lučební závody Draslovka a.s. Kolín,
- Reports on Draslovka Group Global Headquarters level are also possible. Such reports will be processed according to similar, but not identical principles (Draslovka Group operates in several countries).

(B) Via confidential email address

- The confidential email address is podnety@draslovka.com.

¹ The Ethics Hotline is accessible at <https://secure.ethicspoint.eu/domain/media/en/gui/109105/index.html>.

(C) Via mail

- Addressed to Lučební závody Draslovka a.s. Kolín, Ethics Committee, Havlíčkova 605, Kolín, 280 02, Czech Republic,
- Mark the envelope as *"confidential-do not open-report"*, or *"confidential-do not open-whistleblowing"*.

(D) In person

- It is possible to submit the report in person after prior agreement with the Ethics Committee. The date of the meeting will be determined by the Ethics Committee within 14 days.
- Reports are received by the designated person also via phone (to the member of the Ethics Committee).
- The persons designated to receive the reports are:
 - **Jaroslav Makeš**, email: jaroslav.makes@draslovka.com, +420 321 335 181,
 - **Kateřina Buřivalová**, email: katerina.burivalova@draslovka.com, +420 321 335 315,
 - **Simona Coufalová**, email: simona.coufalova@draslovka.com, +420 321 335 378,
- The in-person reports will be audio recorded with the reporter's consent.
- Transcript of the in-person report or of the recording will be provided to the reporter for comments.

Reporters may choose also the **external reporting channel**. In the Czech Republic, the Ministry of Justice is responsible for operating this channel. Reports can be made via an online form available on <https://oznamovatel.justice.cz/chci-podat-oznameni/>, via unrecorded phone number +420 221 997 840, or via email address oznamovatel@mzp.justice.cz. Please note that the scope of the reports that the Ministry accepts is limited by the [Act](#) (link in Czech).² Detailed information is available here, in Czech <https://oznamovatel.justice.cz/informace-pro-oznamovatele/>.

How the Company processes the report

The reporter will receive a confirmation of receipt within **seven calendar days**. After the initial evaluation, the report is submitted to the Ethics Committee, which is established by the Company to ensure independent assessment and suggestion of adequate corrective measures. The Ethics Committee is composed of the following members who are designated persons (in Czech *"příslušná osoba"*) as defined by the Act:

1. **Jaroslav Makeš**, chairman of the Ethics Committee, email: jaroslav.makes@draslovka.com, +420 321 335 181,
2. **Kateřina Buřivalová**, member of the Ethics Committee, email: katerina.burivalova@draslovka.com, +420 321 335 315,

² The Ministry of Justice receives reports related to information about a possible illegal act that occurred or is to occur with a person for whom the informant, even if indirectly, performed or is performing work or another similar activity, or with a person with whom the informant was or is in contact in connection with the performance of work or other similar activities, and which **a)** has the characteristics of a criminal offense, **b)** has the characteristics of a misdemeanor for which the law establishes a fine rate, the upper limit of which is at least CZK 100,000, **c)** violates the Act, or **d)** violates another legislation or regulation of the European Union in the area of: 1. financial services, statutory audit and other verification services, financial products and financial markets, 2. corporate income tax, 3. prevention of money laundering and terrorist financing, 4. protection consumers, 5. compliance with product requirements, including their safety, 6. traffic safety, transport and traffic on roads, 7. environmental protection, 8. food and feed safety and protection of animals and their health, 9. radiation protection and nuclear security, 10. economic competition, public auctions and public procurement, 11. protection of internal order and safety, life and health, 12. protection of personal data, privacy and security of electronic communications networks and information systems, 13. protection of the financial interests of the European Union, or 14. the functioning of the internal market, including the protection of economic competition and state aid according to European Union law.

3. **Simona Coufalová**, member of the Ethics Committee, email: simona.coufalova@draslovka.com, +420 321 335 378.

General manager of the Company may be present at the meetings of the Ethics Committee (at his/her discretion) in an advisory role, but will not get to know the identity of the reporter, according to the requirements of the Act.

The Company has implemented a preliminary assessment and investigation scheme which ensures that a member of the Ethics Committee who may be potentially affected by the report is not involved in that case. Besides the Ethics Committee, other persons may be involved in the investigation of the report, based on their expertise. However, those persons will only be familiar with anonymized summary of the investigation. In order to resolve certain types of reports, it may be necessary to disclose the identity of the reporter, or persons associated with them, to other persons. In such cases, the Company will contact the reporter, or even the persons associated with them, to obtain a consent. If the consent is not provided, the protection of the identity takes precedence over successful case resolution.

Unless the report was classified as unacceptable or clearly unjustified during the initial evaluation, a member of the Ethics Committee will, within 30 calendar days, reach out to the reporter, to convey whether, based on the investigation, the report was found justified, or whether the Company needs 30 calendar more days to investigate (can be extended once more, to the maximum of 90 calendar days). Finally, the reporter is informed about the corrective measures as soon as they are adopted.

In case the report was received via Ethics Hotline, the follow-up communication is uploaded on the confidential online Ethics Hotline portal, where the reporter can log in to learn about report status and related communication. If the report was made using a different channel, or if the reporter expressly chose different method for future communication, the follow-up communication will be delivered via the channel that was used or chosen respectively.

Retaliation against the reporters or persons associated with them is unacceptable. The Company, or even Draslovka Group, will thoroughly investigate any suspicion of retaliatory measures applied, with the possibility of a strict punishment.

According to the Act, the Company stores information about submitted reports for a period of 5 years from the date of receipt. The database is accessible only to the designated persons who process the data solely for the purposes of resolution of the report.

Detailed information about personal data protection is available on the next [page](#).

Information on the processing of personal data in connection with the protection of whistleblowers

Our company Lučební závody Draslovka a.s. Kolín, company identification number: 463 57 351, with registered office at Havlíčkova 605, Kolín IV, 280 02 Kolín (hereinafter referred to as the "**Controller**" or the "**Company**") pays great attention to the protection of personal data. In this document, you will find information about what personal data about you as a data subject (hereinafter referred to as "**Data Subject**") we process in connection with the protection of whistleblowers. This document also informs about the legal reason based on which we process your data, for what purposes we use it, to whom we can transfer the data and what rights you have in connection with the processing of your personal data.

Personal data of the Data Subjects

The Controller processes the below listed personal data of the Data Subjects:

- Identification data
- Contact information
- Data contained in the report and data resulting from the assessment of the report

Purposes and legal basis for processing personal data of Data Subjects

The Controller collects, uses, transfers and stores personal data exclusively for the following purpose:

- compliance with legal and other obligations related to the protection of whistleblowers according to Act No. 171/2023 Coll., on Whistleblower Protection (hereinafter referred to as the "**Act**").

Means of processing of personal data of the Data Subjects

The Company strictly protects personal data. Their processing takes place manually and in electronic information systems, which are subject to strict physical, technical and procedural control. In order to protect personal data, the Company has set up security mechanisms including technical, organizational and personnel measures. The Company does not use automated decision-making or profiling when processing personal data.

The personal data that the Controller collects about Data Subjects must be collected to fulfill the legal obligations arising from the Act.

Retention period

The Controller keeps the personal data of the Data Subjects processed for the stated purposes for the period determined by the relevant legal regulations, namely for a period of 5 years from the date of receipt of the notification. In the event of initiation of judicial, administrative or other proceedings, personal data are processed to the extent necessary for the entire duration of such proceedings

Recipients of personal data of Data Subjects

The Company uses professional and specialized services of other entities to process personal data, which process personal data only on the basis of the Controller's instructions. A contract on the processing of personal data is concluded with each such entity, in which the processor has obligations to protect and secure personal data. The processors are the following companies:

- Technical solution providers such as NAVEX.

As part of the fulfillment of its legal obligations, the Controller also transfers personal data to administrative bodies and authorities under the conditions established by applicable legislation.

In some cases, personal data may also be transferred to recipients in countries outside the European Economic Area. These countries may have different laws and standards regarding the protection of personal data. In such cases, the Company has taken appropriate measures to ensure that personal data is processed in accordance with the GDPR, for example by concluding standard contractual clauses issued by the European Commission.

Rights of the Data Subjects

Based on the GDPR, Data Subjects have the following rights:

- Right to access personal data (Article 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- The right to object to processing (Art. 21 GDPR)
- The right to file a complaint with the supervisory authority (Art. 77 GDPR)

Due to the scope of personal data processing, the Controller is not obliged to establish the position of a personal data protection officer (DPO). You can contact the Controller with your questions, requests, objections and complaints regarding the processing and protection of personal data through the following contacts:

- a) Via e-mail: podnety@draslovka.com
- b) Via mail: Lučební závody Draslovka a.s. Kolín, Havlíčkova 605, Kolín IV, 280 02 Kolín, Czech Republic