

Internal whistleblowing system of Elanor a.s. (Whistleblowing)

The main **objective of the internal whistleblowing system of Elanor is to enable detection of suspicions of unlawful conduct in a timely manner and thus prevent possible accidents, damage to health, violation of legislative requirements, damage to reputation, financial losses and other possible** negative consequences. At the same time, the internal whistleblowing system is also a part of internal environment that makes it possible **to assess the justification of the notification and to take appropriate measures to remedy or prevent an unlawful situation** following the submitted Notification.

How can you file a Notification of possible unlawful conduct

You may address a notification of possible unlawful conduct to the Competent Person within the meaning of Section 10 of Act No. 171/2023 Coll., on the Protection of Whistleblowers (hereinafter referred to as the "Notification", "Competent Person" and "Act"), whom is:

Mgr. Barbora Pompe

whistleblowing@elanor.cz

+420 774 375 936



Notifications can be submitted through the following **methods** and **channels**:

by post in a paper form to the address: Elanor a.s. Jemnická 1138/1, 140 00 Prague 4 Michle, Czech Republic (the letter must be marked "**Only for the attention of the Competent person**" or "**Whistleblowing**");



through **a telephone line +420 774 375 936** used to:

- making a Notification by a recorded voice message;
- making a Notification in the form of a recorded call;
- Submit a Notification in the form of an unrecorded call, from which the recording;



electronically **by e-mail** to whistleblowing@elanor.cz;



in person to the Competent person, upon prior telephone or written request. The Competent person shall provide the whistleblower with the opportunity to meet in person no later than within 14 days of the date on which he or she requests a personal meeting.

Alternatively, the Notification can also be made through **the external reporting system of the** Ministry of Justice of the Czech Republic here: [Whistleblower – Ministry of Justice \(justice.cz\)](https://justice.cz).

Who can file the Notification

A Notification of possible misconduct may be submitted through the above channels if the whistleblower is a person **who has performed or is performing dependent work for the company in a basic employment relationship, volunteering, professional experience or internship and a job applicant.**

Within the meaning of the Relevant Provisions of the Act Section 9(2)(a) of the Act, Elamor **has not excluded the possibility of filing a Notification through the internal whistleblowing system to persons who do not perform work or other similar activities for the company** pursuant to Section 2(3)(a), (b), (h) or (i) of the Act.

The company does not accept anonymous Notifications.

What you can report via a Notification

The subject of the Notification should be, in particular communication of possible unlawful conduct **that has the characteristics of a criminal offense or misdemeanor**, for which the law sets a fine of at least CZK 100,000, which violates the Act or violates other legal regulations or regulations of the European Union in the areas defined in Section 2(1)(d) of the Act.

If, when assessing the reasonableness of the Notification, the Competent Person discovers that the Notification does not fulfill the meaning of the Act, it shall notify the whistleblower in writing without undue delay.

What information shall be included in the Notification

- d) **the name and surname of the whistleblower** (or other data enabling his/her identification);
- e) **a description of the alleged infringement** (date and place where it is alleged to have occurred, identification of persons involved in the infringement or information enabling their identification, identification of other persons who can attest to the veracity of the reported information, if such persons exist);
- f) **related infringement documentation**, if any.

While we are committed to accepting, analysing and dealing with all Notifications received and/or communicated, please note that **protection from retaliation does not belong to a person who has knowingly filed a false Notification.** At the same time, such conduct meets the characteristics of an offense, for which a fine of up to CZK 50,000 can be imposed.

How we process received Notifications

Upon receipt of the Notification we will promptly inform the whistleblower of the receipt of the Notification without delay, no later than 7 days after receipt of the Notification, unless

- (a) the whistleblower expressly requests the Competent person not to notify her and/or him of receipt of the Notification, or
- (b) it is clear that informing of receipt of the Notification would result in the disclosure of her and/or his identity to another person.

We **will carefully study** the Notification and, if necessary, **ask** the whistleblower and/or persons involved in the subject of the Notification **about other facts** necessary for a detailed analysis of the content of the Notification.

In the event that, during the analysis of the content of the Notification, we have all the relevant information needed to resolve the Notification and assess the reasonableness of the Notification, we will notify the whistleblower within 30 days from the date of receipt of the Notification. In the event that the content and subject matter of the Notification requires a deeper analysis and a more extensive solution, we will have to extend the deadline, up to 90 days, of which the Competent person will inform the whistleblower in advance.

When analysing and resolving the content of the Notification, **we undertake to act in such a way as to interfere as little as possible with the rights of the investigated persons and entities only to the extent necessary to achieve the objective of the investigation.** We also undertake to maintain confidentiality about all findings.

Whistleblower protection

As part of the whistleblowing process, **we are committed to protecting the whistleblower** as well as **other affected and involved persons**, in particular by:

- **we maintain the confidentiality of information;**
- We provide **awareness in the area of ethical conduct**, where, among other things, we strictly prohibit retaliation of any kind.

The protection of whistleblowers does not apply to knowingly false Notification and to conduct that aims to abuse the internal whistleblowing system to the detriment of Elamor or its employees.

The protection of the whistleblower is further governed by the provisions of § 7 of the Act.

Processing of data related to the Notification

We keep records of Notifications for a period of 5 years from the date of their receipt, and only the Relevant Person has access to this record.

The processing of personal data is governed by the applicable legislation, namely 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, Act No. 110/2019 Coll., on the processing of personal data, as amended.