

INTERNAL PROCEDURE
FOR WHISTLEBLOWER REPORTING OF LEGAL VIOLATIONS AND FOLLOW-UP
ACTION

applicable at Promedica Sp. z o.o.

(hereinafter referred to as the "Company")

Purpose of the Procedure:

1. The purpose of the Procedure is to:
 - a) enable whistleblowers to report legal violations;
 - b) counteract and respond to legal violations;
 - c) establish a procedure for receiving reports of legal violations;
 - d) establish a procedure for follow-up action, including recognition of reports and conducting investigations;
 - e) establish channels for whistleblowers to report legal violations;
 - f) provide information on how to file external reports.
2. The procedure applies to all organizational units of the Company and persons belonging to the management and supervisory bodies of the Company.
3. The Company is responsible for complying with the Procedure and protecting the rights of whistleblowers.

The representatives of persons performing work for the Company were consulted on the procedure between 21 August and 2 September 2025

§ 1.
PRELIMINARY PROVISIONS

1. This Internal Reporting Procedure (hereinafter referred to as the "Procedure") has been established pursuant to the provisions of Article 24 section 1 and Article 25 section 1

of the Whistleblower Protection Act dated 14 June 2024 (Polish Journal of Laws, item 928, hereinafter referred to as the “Act”).

2. The procedure establishes:

- a) the specific legal areas where a reported infringement can occur;
- b) an impartial internal organizational unit at the Company that is authorized to receive internal reports, as well as to take follow-up action, including verification of the internal report and further communication with the whistleblower, including requesting additional information and providing feedback to the whistleblower;
- c) methods of whistleblower report submission (reporting channels);
- d) procedure for dealing with information about legal violations reported anonymously;
- e) an obligation to confirm the receipt of the report to the whistleblower and the deadline for the performance of this obligation;
- f) the Company's obligation to follow-up in order to verify the information contained in reports of legal violations;
- g) the maximum deadline for providing feedback to the whistleblower;
- h) information on submitting external reports to the Commissioner for Human Rights, other public authorities and the institutions, bodies, offices or agencies of the European Union.

3. Basic concepts included in the Procedure (glossary):

- a) **Follow-up** – action taken by the Company or a public authority to assess the accuracy of the information contained in the report and to prevent the legal violation that is the subject of the report, including, but not limited to by investigating, initiating an inspection or administrative proceeding, bringing an accusation, action taken to recover funds or closing the procedure carried out as part of the internal procedure for reporting legal violations and taking follow-up actions (including this Procedure) or the procedure for receiving external reports and taking follow-up actions.
- b) **Retaliation** – direct or indirect act or omission in the context of work that is caused by the report or public disclosure and that violates or may violate the rights of the whistleblower or causes or may cause unjustified damage to the whistleblower, including unjustified initiation of proceedings against the whistleblower.
- c) **Legal violation information** – information, including a reasonable suspicion of an actual or potential legal violation that occurred or is likely to occur within

the Company, if the whistleblower participated in the recruitment process or other negotiations preceding the conclusion of a contract, works or worked at the Company, or maintains or maintained contact in a work-related context, or information regarding an attempt to conceal such a legal violation.

- d) **Feedback** – information provided to the whistleblower about follow-up action planned or undertaken and the reasons for such action.
- e) **Follow-up Committee** – an impartial organizational body or a person within the organizational structure of the Company, authorized to take follow-up action within the meaning of the Act.
- f) **Report Receiving Committee** – an internal organizational unit in the Company within the meaning of the Act and a organizational unit designated by a third party, authorized by the Company to receive internal reports, confirm the receipt of the report, provide feedback and provide information on the internal reporting procedure.
- g) **Work-related context** – past, present or future activities related to the performance of work on the basis of an employment relationship or another legal relationship constituting the basis for the provision of work or services or the performance of functions in or to the benefit of the Company, in the course of which information about a legal violation has been obtained and which is connected with potential retaliation.
- h) **Labor Code** – Act of 26 June 1974 - Labor Code (consolidated text: Polish Journal of Laws of 2023, item 1465, as amended).
- i) **Legal violation** – violation of the areas of law listed under § 1 section 2 of the Procedure.
- j) **Public authority** – supreme and central government administration bodies, local authorities of government administration, local government units, other state bodies and other entities performing by law tasks in the field of public administration, competent to take follow-up action within the fields indicated under Article 2 section 1 of the Act.
- k) **Reported person** – natural person, legal person or unincorporated organizational unit, which is granted legal capacity by an act, indicated in the report or public disclosure as the person who committed a legal violation or as a person with whom the person who committed the legal violation is associated.
- l) **Assisting person** – a natural person who assists the whistleblower in reporting a violation or public disclosure in a work-related context and whose assistance should not be disclosed.

- m) **Person associated with the whistleblower** – a natural person who may experience retaliation, including the whistleblower's co-worker or closest family member/partner within the meaning of Article 115 paragraph 11 of the Act of 6 June 1997 – Criminal Code (Polish Journal of Laws of 2024, item 17), i.e. a spouse, an ascendant, descendant, brother or sister, relative by marriage in the same line or degree, a person in an adoptive relationship, as well as their spouse and a domestic partner.
- n) **Person providing work for the Company** – an employee or another person providing work for the Company against remuneration on a basis other than an employment relationship, if they do not employ other persons for this type of work, regardless of the basis of employment (a contractor, a person providing work as part of their business activity).
- o) **Legal entity** – a private entity, including the Company or a public entity.
- p) **Private entity** – a natural person conducting business activity, legal person or unincorporated organizational unit, granted legal personality by an act, or employer, if they are not public entities.
- q) **Public entity** – an entity indicated under Article 3 of the Act of 11 August 2021 on Open Data and the Reuse of Public Sector Information (Polish Journal of Laws of 2023, item 1524).
- r) **Third party** – Danone SA (registered in Paris under the number RCS 552 032 534, with its registered seat at 17 Boulevard Haussmann, 75009 Paris, France) and Danone sp. z o.o. registered in the National Court Register under the number 000014227, which operate and service the Danone Ethics Line.
- s) **Employee** – a person employed by the Company pursuant to an employment contract, irrespective of its type and their working time,
- t) **Procedure** – this procedure.
- u) **Representatives of persons providing work for the Company** – representatives of employees or other persons providing work for the Company against remuneration on a basis other than an employment relationship, if they do not employ other persons for this type of work, regardless of the basis of employment.
- v) **Company:** Promedica Sp. z o.o. with its registered seat in Warsaw, registered in the National Court Register under the number **0000980621**.
- w) **Whistleblower** – a natural person who reports or publicly discloses information about a legal violation obtained in a work-related context, including the following persons: 1) employee; 2) temporary employee; 3) persons

providing work on a basis other than an employment relationship, including on the basis of a civil law contract; 4) entrepreneur; 5) holder of the commercial power of attorney; 6) shareholder or partner; 7) member of a body of a legal person or an unincorporated organizational unit; 8) person performing work under the supervision and direction of a contractor, subcontractor or supplier; 9) intern; 10) volunteer; 11) apprentice.

- x) **Public disclosure** – providing information about a legal violation to the public.
- y) **Act** – the Act of 14 June 2024 on the protection of whistleblowers (Polish Journal of Laws, item 928).
- z) **Report** – an oral or written internal or external report, submitted in accordance with the requirements set out in the Act.
- aa) **Internal report** – an oral or written submission of information to the Company about a legal violation.
- bb) **External report** – an oral or written submission of information about a legal violation to the Commissioner for Human Rights or a public authority.

4. The Company must ensure that all employees and other individuals performing work for the Company are familiar with this Procedure before they are admitted to begin working or before their legal relationship with the Company is established. These individuals shall confirm that they have read the contents of the Procedure by signing an appropriate statement. Upon the request of such an individual, the Company shall make available the contents of the Procedure.

§ 2.

SCOPE

(reportable items)

1. A legal violation that can be reported under the Procedure is an act or omission that is unlawful or intended to circumvent the law and relates to the following:
 - 1) corruption;
 - 2) public procurement;
 - 3) financial services, products and markets;
 - 4) anti-money laundering and terrorist financing;
 - 5) product safety and compliance with product requirements;
 - 6) transport 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 data protection;
 - 14) network and computer system security;
 - 15) financial interests of the State Treasury of the Republic of Poland, local government units and the European Union;
 - 16) internal market of the European Union, including public law competition and state aid rules, as well as corporate taxation;
 - 17) constitutional freedoms, human and civil rights – occurring in interactions between individuals and public authorities and not related to the areas indicated under items 1–16.
2. Reports cannot relate to violations regarding the protection of classified information and other information that is not subject to disclosure under generally applicable law for reasons of public security, professional secrecy of medical and legal professions, secrecy of judicial deliberations and criminal proceedings – within the scope of secrecy of preparatory proceedings and secrecy of court hearings closed to the public.

§ 3

WHISTLEBLOWER

1. Reports of violations mentioned under paragraph 2 section 1 may be made by the persons mentioned under paragraph 1 section 3 item c (see definition of a whistleblower).
2. The whistleblower shall enjoy the legal protection provided for in the Act.

§ 4

ENTITY AUTHORIZED TO RECEIVE REPORTS AND TAKE FOLLOW-UP ACTION

1. The entity authorized by the Company to receive internal reports from whistleblowers is the Report Receiving Committee.
2. The entity authorized by the Company to take follow-up action is the Follow-up Committee.
3. The Follow-up Committee consists of at least 1 member appointed by the Company's Management Board from among the Company's employees or persons cooperating with the Company on the basis of a civil law contract.

4. The Company may also appoint an external expert (legal advisor or attorney from an external law firm) to the Follow-up Committee, provided they have relevant experience in conducting investigations for the type of infringement being reviewed.
5. The Company shall ensure impartiality in the verification of reports by the Follow-up Committee and its members.
6. The members of the Follow-Up Committee and the Follow-Up Committee itself shall not be subordinate, on an official or organizational basis, to any person, entity or internal body within the Company as part of their activities under the Procedure.
7. If the report concerns a member of the Management Board, the Follow-up Committee shall communicate with the Chairman of the Supervisory Board.
8. The activities mentioned under sections 1 and 2 shall not be carried out by an individual:
 - a) submitting the report;
 - b) to whom the report relates – within the meaning of Article 2 item 7 of the Act;
 - c) who is assisting in making a report - within the meaning of Article 2 item 8 of the Act;
 - d) who is related to the whistleblower – within the meaning of Article 2 item 9 of the Act;
 - e) if the content of the report reveals a circumstance other than those listed under items a)-d) that suggests the individual's direct or indirect involvement, or any other factor that might raise suspicion about their impartiality in the case; this includes, but is not limited to, a person who:
 - f) is married to or has a relationship of direct consanguinity or affinity or secondary consanguinity or affinity up to the second degree, adoption, custody or guardianship or domestic partnership with the reported person;
 - g) remained or remains in an employment relationship or performed or performs work on the basis of a contract of mandate, contract for performance of specific tasks, agency contract or another contract of a similar nature with the reported person or received remuneration from them on other grounds;
 - h) held or holds a function in, or is or has been employed by, an entity in which the reported person is or was a member of that entity's bodies;
 - i) remains in such a legal or factual relationship with the reported person that there is reasonable doubt as to their impartiality or independence because of their direct or indirect financial, economic or personal interest in the outcome of the proceedings.
9. The person referred to under section 9 shall be excluded from performing the activities referred to in the Procedure.

10. In the event of a prolonged absence from work of one of the members of the Report Receiving Committee or the Follow-up Committee, the Company shall have the right to grant an ad hoc written authorization to receive and verify reports and, if necessary, participate in follow-up actions. A model authorization form is attached as Appendix 1 and 1a to the Procedure.
11. The Company shall issue appropriate written authorizations to receive, verify and follow-up on reports to the members of the Report Receiving Committee and Follow-up Committee.
12. In the event that an external expert is appointed to the Report Receiving Committee and the Follow-up Committee, the Company authorizes them in writing to participate in the work of one of the aforementioned committees, including the receipt and verification of reports and participation in the conduct of follow-up action. A model external expert appointment document constitutes Appendix 2 to the Procedure.
13. The Company may appoint a recording clerk to support the Follow-up Committee work, including, but not limited to for the purpose of recording witness interviews. The recording clerk shall be allowed to take up work in this committee after signing the authorization. A model authorization form is attached as Appendix 3 to the Procedure.

§ 5

REPORT MODALITIES AND REPORTING REQUIREMENTS

1. A legal violation can be reported according to the Procedure using an electronic form available on the Danone Ethics Line online platform
2. The report form is available at: <https://... www.danoneethicsline.com>.
3. The report should contain a clear and comprehensive explanation of the subject of the report, as well as at least the following information:
 - a) the company to which the report relates;
 - b) indication that the report is made in accordance with the Act;
 - c) indication of the type of the reported legal violation, in accordance with paragraph 2 item 1 of the Procedure;
 - d) the date, place and other circumstances relating to the actual or potential legal violation that occurred or is likely to occur at the Company;
 - e) indication of the reported person (see paragraph 1 section 3 item k of the Procedure);
 - f) indication of potential witnesses of the violations;

- g) indication and/or copies of all evidence and information available to the whistleblower that may be helpful in the legal violation report review process (e-mails, paper and/or electronic documents, recordings, photos, etc.).
- 4. The Company accepts anonymous reports under the Procedure.
- 5. Anonymous reports are processed on the same terms as non-anonymous reports.
- 6. The whistleblower is required to treat the information in their possession regarding a suspected legal violation as a business secret and refrain from discussing the reported suspected legal violation in public, unless they are required to do so by law.

§ 6

RECEIPT AND REVIEW OF A REPORT

Receipt and confirmation of report

- 1. Confirmation of receipt of a report is provided by a member of the Report Receiving Committee via the Danone Ethics Line online platform within 7 days from the date of its receipt, unless the whistleblower has not provided a contact address to which the confirmation should be sent.

Review of the report and decision on launching follow-up actions

- 2. . After confirming receipt of the report to the whistleblower, the Report Receiving Committee shall submit the report for preliminary verification to the Follow-up Committee, which shall include determining whether the report covers a legal violation listed under paragraph 2 section 1 of the Procedure and whether it is filed by an entity entitled to report in accordance with paragraph 3 section 1 of the Procedure.
- 3. The Follow-Up Committee shall not continue processing the report in the following cases:
 - a) if the report does not concern a legal violation in the areas mentioned under paragraph 2 section 1 of the Procedure;
 - b) when the report comes from a person other than a whistleblower within the meaning of Article 4 section 1 of the Act;
 - c) when the report does not contain information nor evidence that in any way justifies the occurrence or potential occurrence of a legal violation.
- 4. In the cases referred to under section 3, the Follow-up Committee shall decide not to continue processing the report and shall inform the whistleblower thereof immediately, justifying the reasons for such decision.
- 5. If the report does not relate to a legal violation mentioned under paragraph 2 section 1 of the Procedure, but concerns the report of a violation of the procedures or policies in

force at the Company or the Danone Group, the report shall be processed in accordance with the procedures in force at the Company, outside of this Procedure.

§ 7
INVESTIGATION PROCEDURE
AND FOLLOW-UP

1. The Company shall, without undue delay and with due diligence, take follow-up action and a decision as to the measures to be taken in response to identifying a legal violation.
2. Follow-up actions include:
 - a) deciding to continue processing a report and initiate an investigation;
 - b) conducting an investigation, including evidentiary proceedings, in order to assess the veracity of the information contained in the report;
 - c) the Follow-up Committee drafting a summary report ("Summary Report") on the investigation, which is then sent to the Company's Management Board; if the report concerns a member of the Management Board, the Report is sent to the Chairman of the Company's Supervisory Board.
 - d) The Summary Report should contain a statement whether the report is justified and whether a legal violation has occurred and if it is not possible to verify the report, information that it is not possible to determine the validity of the report based on the scope of competence and evidence held;
 - e) the Company submitting to the relevant public authorities a report of the possibility of committing a crime or another violation of generally applicable law;
 - f) closing the proceedings;
 - g) termination of the employment contract or imposing other sanctions provided for in labor law onto the employee who has committed a legal violation;
 - h) termination of a contract concluded with a natural person, legal entity or an organizational unit without legal personality, which has concluded a contract with the Company or which provides work, performs services or delivers goods to the Company on any legal basis;
 - i) initiating proceedings to pursue a claim related to a legal violation.
3. Minutes shall be drafted from the meetings of the Follow-up Committee. A model of the minutes is attached as Appendix 4.
4. Employees shall be required to appear before the Follow-up Committee at its request and submit testimony and evidence in their possession in connection with their

employment, under pain of sanctions provided for in labor law for violation of the obligation to protect the employer's interests.

5. All organizational units of the Company, all employees and persons performing work for the Company are required to cooperate with the Follow-up Committee and send documents and information at its request, without the need to obtain approval for such actions from their direct and indirect superiors and the Company's Management Board.
6. The Management Board of the Company shall ensure the impartiality and independence of the Follow-up Committee and shall not interfere with its decisions regarding the initiation and conduct of the proceedings and in relation to any action taken by the said Committee to clarify the truthfulness of the information contained in a report.
7. The Management Board of the Company shall provide the Follow-up Committee with the conditions, tools and means necessary to receive reports and take follow-up action.
8. Members of the Committee retain the right to remuneration for working time in connection with the receipt and processing of reports, including, but not limited for the time of their participation in an investigation.
9. The Follow-up Committee may authorize one of its members to carry out part of an investigation. A model authorization to conduct proceedings is attached as Appendix 5.
10. Investigations shall be conducted by at least 2 members of the Follow-up Committee.
11. In the course of an investigation, the Follow-up Committee or its member shall have the right to:
 - a) request internal organizational units, employees, persons performing work for the Company and from the Management Board of the Company to provide any explanations and documents generated in any form (paper, electronic) that will contribute to the clarification of the information contained in the report;
 - b) summon and interview employees and persons working for the Company as witnesses (a model witness examination report is attached as Appendix 6);
 - c) request third parties to send information or documents that will contribute to clarifying the information contained in the report;
 - d) request the necessary documents and information from Danone Group's global structures.
12. Minutes shall be drafted from any witness examinations. Before an examination, the witness shall be instructed that they are being examined under the Procedure, as well as about the obligation to testify the truth and to maintain the confidentiality of the fact of having been requested to appear before the Follow-up Committee, the conduct of the meeting and the questions asked. The witness signs the minutes after reading it,

unless they testify remotely (in which case the minutes are signed only by the members of the Follow-up Committee, mentioning that the examination took place remotely). In order to preserve the confidentiality of the proceedings, the witness is not issued a report nor sent a draft to be signed.

13. After conducting an investigation, the Follow-up Committee is required to draft a Summary Report, presenting recommendations to the Company's Management Board, including, but not limited to the potential need to take appropriate action to counteract the legal violations listed under paragraph 2 section 1 of the Procedure at the Company, including organizational, management or corrective measures. The Summary Report should contain a statement whether the report is justified and if it is not possible to verify the report, information that it is not possible to determine the validity of the report based on the scope of competence and evidence held.
14. The Management Board of the Company shall be required to review the Report and recommendations of the Follow-up Committee and make appropriate decisions in the event that the report is justified.
15. In the event of a legal violation, the Company shall take any and all available, legal and appropriate measures to prevent legal violations and to apply legal sanctions to persons who have committed legal violations.
16. The decisions referred to under section 14 shall include, in particular:
 - a) in relation to employees: disciplinary interview, disciplinary penalty, termination of an employment contract by notice, termination of work and remuneration conditions, deprivation of bonuses or other cash benefits in accordance with the provisions of the collective labor law acts in force at the Company, denying promotion, termination of an employment contract without notice due to the fault of the employee;
 - b) termination of the contract with a person who performs work for the Company on a basis other than an employment relationship;
 - c) termination of the contract with a supplier, contractor or subcontractor;
 - d) summoning a person who has committed a legal violation to perform a specific action or refrain therefrom;
 - e) initiating proceedings, including court proceedings, to pursue the Company's claims;
 - f) in relation to a member of the Management Board of the Company: dismissal from office and/or termination of the contract on the basis of which the member of the Management Board performs work for the Company; the decision in this respect is made by the body that adopted the resolution on the appointment and the body that concluded the contract;

- g) reporting the offence to law enforcement authorities.
17. The Management Board shall inform the Follow-up Committee of the decisions taken in a timely manner, so as to allow feedback to be sent to the whistleblower in accordance with section 18.
 18. Following an investigation, the Follow-up Committee shall notify the whistleblower within 3 months from the date of acknowledgement of receipt of their report, and if no report receipt confirmation has been provided, within 3 months from the expiry of 7 days from the moment the report was filed, informing them of the following:
 - a) follow-up actions taken or planned and the reasons therefor;
 - b) a statement that, as a result of the investigation, the report is justified or unjustified, stating the reasons for the position taken.
 - unless the whistleblower has failed to provide a contact address where the feedback should be sent.
 19. The Follow-up Committee shall maintain a file of the proceedings in which the anonymized report and any documents relating to the investigation shall be placed. The file does not include feedback mailing receipt and the feedback itself, as well as confirmation of receipt of the report, if this would entail processing the whistleblower's personal data.
 20. The file should be stored at a location only accessible to the members of the Committee or other persons authorized in writing to assist the Committee, as well as members of the Management Board. Each person who has access to the file should have the authorization mentioned under paragraph 8 section 4.

§ 8

PROTECTION OF CONFIDENTIALITY AND PERSONAL DATA

1. The controller of personal data processed in connection with the submitted report is the Company, including personal data stored in the Reports Register.
2. The organization of receipt and verification of reports, follow-up and related processing of personal data should prevent unauthorized persons from gaining access to the information covered by the report and ensure that the identity of the whistleblower and the reported person remains confidential. All information that could be used to directly or indirectly determine the identity of these individuals must be kept confidential.
3. The personal data of witnesses, a person associated with a whistleblower and helping them make a report are also protected against disclosure.

4. Only persons with a written authorization from the Company, a model of which is attached as Appendix 1 to the Procedure, may be admitted to receive and verify reports, take follow-up actions and process personal data. Authorized individuals must keep all personal data and information learned during the proceedings confidential.
5. Personal data of the whistleblower and other data enabling the identification of the whistleblower shall not be disclosed, unless with the express and written consent of the whistleblower.
6. The Management Board of the Company, members of the Follow-up Committee and persons authorized to participate in the reports receipt procedure shall have the right to collect and process the personal data of the reported person, even without their consent.
7. Neither the Company nor the Follow-up Committee or the individuals referred to under section 6 shall notify the reported person of the source and scope of processing of their personal data, unless the whistleblower acted in violation of Article 6 of the Act (in bad faith).
8. Personal data that is clearly irrelevant to the processing of a specific report shall not be collected and, in the event of accidental collection, shall be deleted without undue delay.

§ 9

REPORTS REGISTER

1. The Company maintains a register of internal reports.
2. An entry into the register of internal reports is made on the basis of an internal report.
3. The register of internal reports collects the following data:
 - 1) report number;
 - 2) subject of the legal violation;
 - 3) personal data of the whistleblower and the reported person, necessary to identify these persons;
 - 4) the whistleblower's contact address;
 - 5) date of filing the report;
 - 6) information on follow-up action taken;
 - 7) case closing date.

§ 10

ADDITIONAL INFORMATION

1. In any case, information about a legal violation may, without prior internal reporting, also be reported to the Commissioner for Human Rights or a public authority, bypassing this Internal Reporting Procedure.
2. External reporting bypassing this Procedure shall not result in any retaliation from the Company against the whistleblower.
3. The external report shall be received by the Commissioner for Human Rights or a public authority.
4. Initial verification of an external report by the Commissioner for Human Rights consists in determining whether the report concerns information about a legal violation and identifying the public authority competent to take follow-up action.
5. If the report concerns information about a legal violation, the Commissioner for Human Rights shall immediately, but not later than within 14 days from the date of reporting, forward the report to the public authority competent to take follow-up action.
6. The Commissioner for Human Rights informs the whistleblower about forwarding the external report. This information shall include at least an indication of the public authority to which the external report has been forwarded and the date of forwarding.
7. The Commissioner for Human Rights shall refrain from forwarding an external report if the report does not concern information about a legal violation.
8. The Commissioner for Human Rights informs the whistleblower about their decision not to forward an external report, stating the findings of the initial verification of the report.
9. By refraining from forwarding an external report, the Commissioner for Human Rights may inform the whistleblower that the information covered by the report shall be reviewed in the manner provided for in separate provisions, including, but not limited to as part of civil action, notification on suspicion of committing a criminal offence, complaint to the administrative court, complaint, application or petition, or may be submitted to the competent authorities for consideration in another manner. Providing information to the whistleblower does not affect the admissibility of any subsequent legal action, the running of time limits or deadlines, the content of the final decision, or the way the proceedings are concluded. The information provided to the whistleblower shall contain instructions in this regard.
10. The public authority:
 - 1) establishes a procedure for accepting external reports and taking follow-up action, which shall specify, but not be limited to a procedure for dealing with information on legal violations reported anonymously, hereinafter referred to as the "external reports procedure";
 - 2) receives an external report;

- 3) performs a preliminary verification of the external report, consisting in determining whether the report concerns information about a legal violation and determining whether the report concerns legal violations within the authority's scope of activities, and if not – determining the public authority competent to take follow-up action;
 - 4) examines an external report – if the report concerns legal violations within the authority's scope of activities;
 - 5) forwards an external report immediately, but no later than within 14 days from the date of reporting, and in justified cases – no later than within 30 days, to the public authority competent to take follow-up action – if the report concerns legal violations in a field outside the scope of activity of that authority – and informs the whistleblower thereof;
 - 6) takes follow-up actions with due diligence;
 - 7) provides feedback to the whistleblower.
11. In order to effectively follow up and provide feedback, the whistleblower shall provide a contact address.
12. External reporting may be made orally or in writing.
13. An external report in a documentary form may be made: 1) in paper form – to the correspondence address indicated by the Commissioner for Human Rights or the public authority receiving the report; 2) in electronic form – to the e-mail address or electronic register box, or address for electronic delivery, indicated by the Commissioner for Human Rights or the public authority receiving the report, or by means of an Internet form or application designated for this purpose by the public authority as the appropriate application for submitting reports in electronic form.
14. All information about external reports is contained in the provisions of Articles 30 – 50 of the Act.

§ 10

FINAL PROVISIONS

1. The Procedure shall enter into force after 7 days from the date when it is notified to employees and persons performing work for the Company in the manner adopted at the Company. Any changes to the Procedure shall enter into force in the same manner and on the same date.
2. Amendments to the Procedure must be made in writing and consulted with representatives of persons performing work for the Company.

3. The procedure shall be reviewed at least every 2 years from the date of its entry into force.
4. The Follow-up Committee shall submit annually to the Company's Management Board a report on its work with recommendations for amendments to the Procedure, changes in the way the Committee cooperates with the Company's organizational units and persons performing work for the Company.

Appendices:

1. Authorization to receive internal reports and personal data processing (Appendix 1).
2. Authorization to receive and verify reports and take follow-up action, as well as to process personal data (Appendix 1a).
3. Appointment of an external expert as a member of the Committee (Appendix 2).
4. Authorization for the recording clerk to participate in the work of the Follow-up Committee, including access to information covered by a legal violation report (Appendix 3).
5. Minutes of a Follow-up Committee meeting (Appendix 4).
6. Authorization for a member of the Committee to conduct an investigation into a report of a violation or potential legal violation (Appendix 5).
7. Witness examination report (Appendix 6).

Appendix 1 to the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

**Authorization to receive internal reports and personal data processing
(model)**

Pursuant to the provisions of Article 27 section 2 of the Whistleblower Protection Act of 14 June 2024, Article 29 of the 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"), and Article 4 section 12 of the Internal Reporting Procedure in force at the Company

I hereby authorize

Mr./Ms.
(name and surname)

holding the position
/ employed based on a civil law contract /

/ performing services for the Company under the contract concluded on ...

/ appointed to the Committee as an external expert¹ /

to receive internal reports, confirm the receipt of the report, provide feedback and provide information on the internal reports procedure using technical and organizational solutions ensuring compliance of these activities with the Act, as well as to process personal data of the whistleblower, persons assisting in making the report, persons associated with the whistleblower, reported persons and persons examined as witnesses in the investigation. At the same time, you are hereby required to process personal data in accordance with the authorization granted and the provisions of the GDPR, the Whistleblower Protection Act ("Act"), the Labor Code and the Act of 10 May 2018 on the Protection of Personal Data, as well as to keep confidential all information and personal data obtained in the course of receiving internal reports within the meaning of Article 2 section 16 of the Act and paragraph 8 section 4 of the Procedure.

This authorization shall be valid from..... to
.....

signature of the person(s) representing the Company

Appendix 1a to the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

Authorization to receive and verify reports and take follow-up action, as well as to process personal data (model)

Pursuant to the provisions of Article 27 section 2 of the Whistleblower Protection Act of 14 June 2024, Article 29 of the 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"), and Article 4 section 12 of the Internal Reporting Procedure in force at the Company

I hereby authorize

Mr./Ms.
(name and surname)

holding the position

¹ Select suitable grounds

/ employed based on a civil law contract /

/ performing services for the Company under the contract concluded on ...

/ appointed to the **Committee** as an external expert² /

to receive and verify reports and to take follow-up action, as well as to process personal data of the whistleblower, persons assisting in making the report, persons associated with the whistleblower, reported persons and persons examined as witnesses in the investigation. At the same time, you are hereby required to process personal data in accordance with the authorization granted and the provisions of the GDPR, the Whistleblower Protection Act ("Act"), the Labor Code and the Act of 10 May 2018 on the Protection of Personal Data, as well as to keep confidential all information and personal data obtained in the course of receiving reports and taking follow-up action within the meaning of Article 2 section 1 of the Act and paragraph 8 section 4 of the Procedure.

This authorization shall be valid from..... to
.....

signature of the person(s) representing the Company

Appendix 2 to the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

Appointment of an external expert as a member of the

Follow-up Committee at Promedica Sp. z o.o.

(model)

Acting pursuant to the provisions of paragraph 4 section 13 of the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

(the "Company")

I hereby authorize and appoint

² Select suitable grounds

Mr./Mrs.

(an external expert) from the law firm

to take part as an expert in the work of the Follow-up Committee concerning the report No submitted on

The Committee's duties include, but are not limited to:

1. examining the case covered by the report;
2. taking evidence, including personal and material evidence;
3. assessing whether a violation has been committed;
4. taking follow-up action;
5. presenting the Company's Management Board with recommended follow-up actions and measures that may be taken in the event of a confirmed legal violation.

Signing the following documents, constituting appendices to this letter, shall be the condition for working in the aforementioned Committee:

- 1) confidentiality statement;
- 2) data processing authorization;

and consent to the appointment as a member of the Committee.

Appendices:

- non-disclosure statement;
- authorization to personal data processing.

date and signature of the person representing the Company

date and signature of the person representing the Company

date and signature of the person consenting to the appointment as a member of the Committee

NON-DISCLOSURE STATEMENT

I, the undersigned, _____ in connection with being appointed as a member of the Follow-up Committee at Promedica Sp. z o.o. on _____,

hereby declare that I have been instructed about the obligations related to participation in the work of the Committee, including, but not limited to the following information:

- 1) Committee members shall be required to keep confidential personal data, as well as all facts and information that they have learned or obtained in connection with their participation in the work of the Committee;
- 2) Committee members shall be required not to use the above-mentioned data, facts and information for purposes other than those resulting from the tasks and obligations entrusted to them in connection with their participation in the work of the Committee;
- 3) the confidentiality obligation concerning the aforementioned data, facts and information means that they cannot be processed in a manner inconsistent with the rules set out in the Company's

internal regulations and generally applicable legal regulations, as well that they cannot be disclosed (in any form, including electronic, as well as copies thereof) for any purpose to persons that have not been authorized by the Company;

- 4) the above obligations of a member of the Committee shall extend in perpetuity;
- 5) a Committee member shall be prohibited from leaving documents containing the above-mentioned data, facts and information in a place accessible to unauthorized persons. These persons shall be required to properly secure the documents containing such data, facts and information in such a way as to prevent unauthorized persons from accessing them.

signature of the person submitting the
statement and date

Appendix 3 to the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

**Authorization for the recording clerk to participate in the work of the Follow-up Committee,
including access to information covered by a legal violation report
(model)**

Pursuant to the provisions of Article 27 section 2 of the Whistleblower Protection Act of 14 June 2024, Article 29 of the 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"), and Article 4 section 14 of the Internal Reporting Procedure in force at the Company

I hereby authorize

Mr./Ms.

(name and surname)

holding the position
employed at ...³

to support the works of the Committee, which shall include obtaining access to data covered by legal violation reports / the legal violation report No ... dated ... and processing data contained in violation reports, including, but not limited to the processing of personal data of whistleblowers, persons assisting in making the report, persons associated with the whistleblower, reported persons and persons examined as witnesses in the investigation.

At the same time, you are hereby required to process personal data in accordance with the authorization granted and the provisions of the GDPR, the Whistleblower Protection Act ("Act"), the Labor Code and the Act of 10 May 2018 on the Protection of Personal Data, as well as to keep confidential all information and personal data obtained in the course of receiving reports and taking follow-up action within the meaning of Article 2 section 1 of the Act and paragraph 8 section 4 of the Procedure.

Appendix 4 to the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

(place), on

MINUTES OF THE Promedica Sp. z o.o. FOLLOW-UP COMMITTEE MEETING

Started at ...

Committee Members:

1.
2.
3.

Recording clerk:

On ... the Committee ...

³ An employee of an external law firm supporting the work of the Committee may perform the duties of a recording clerk.

/ e.g. analyzed the course of the investigation resulting from the report no...., which included, but was not limited to collecting evidence.

The Committee has reached the following decision

The meeting ended at ..

.....

Signature of the Committee member

.....

Signature of the Committee member

Appendix 5 to the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

**Authorization for a member of the Follow-up Committee to conduct an investigation into a report of a violation or potential legal violation
(model)**

Pursuant to the provisions of paragraph 7 section 9 of the Internal Reporting Procedure in force at the Company

the Committee hereby authorizes

Mr./Ms.
(name and surname)

holding the position
employed at ...⁴

to support the work of the Committee by carrying out part of the investigation as part of follow-up actions, including:

⁴ An employee of an external law firm supporting the work of the Committee may perform the duties of a recording clerk.

.....
e.g. examination of witnesses

Appendix 6 to the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

(place), on

WITNESS MINUTES OF EXAMINATION

(full name of the examined person)

as part of the investigations into the legal violation report no. ...

at Promedica Sp. z o.o.

Started at ...

Committee Members:

1.
2.
3.

Recording clerk:.....

Having been informed by ... (Member of the Committee) that these proceeding are based on the Internal procedure for whistleblower reporting of legal violations and follow-up action applicable at Promedica Sp. z o.o.

... (Member of the Committee) has indicated that these proceedings are confidential in accordance with the Procedure. The employee (interrogated person) should not share information about the meeting and its course. The Committee nor any other authorized employees of the Company, who will have access to the body of materials collected in the proceedings as part of their official duties, shall share information about the course of the proceedings, including this meeting, with anyone. Minutes of the meeting shall be taken, which will then be presented to the interrogated person for signature. A copy of the minutes shall not be provided to the interrogated person after it has been signed. Only persons authorized in writing to receive reports, organize them and carry out follow-up action under the Procedure have access to the files of the proceedings.

XYS (full name) testified as follows:

.....
.....
.....

The minutes were read.

This concluded the present proceedings at:

.....

Signature of the examined person

.....

Signature of the Committee member

.....

Signature of the Committee member

.....

Signature of the recording clerk