

# **Information for whistleblowers reporting through the internal notification system**

## **Introductory information**

The company COLAS CZ, a.s., with its registered office at Rubeška 215/1, 190 00 Prague 9, Id. No.: 261 77 005 (hereinafter referred to as the "Company"), maintains an internal reporting system and ensures the protection of whistleblowers based on the legal obligations imposed on the Company as the so-called to a mandatory entity under the Act on the Protection of Whistleblowers (hereinafter also referred to as "ZOCH").

Through the Company's internal reporting system, upon fulfillment of the specified conditions, an authorized natural person (hereinafter also referred to as "Whistleblower") can submit a notification of an illegal act of which the informant became aware in connection with the work performed or other similar activity for the Company (hereinafter also referred to as the "Notification").

## **What infringement notifications can and cannot be made**

Notifications can be made through the Company's internal notification system if they

contain information about a possible illegal act that occurred or is expected to occur at the Company for which the whistleblower performed or performs work or other similar activity, or at the person with whom the whistleblower was or is in contact in connection with the performance of work or other similar activity (in a work context), and which:

- a) have elements of a criminal offence,
- b) have the characteristics of an offense for which the law stipulates a fine rate, the upper limit of which is at least CZK 100,000,
- c) violate the Law on the Protection of Whistleblowers or
- d) violate another legal regulation of the Czech Republic or a regulation of the European Union in the area of:
  - financial services, statutory audit and other verification services, financial products and financial markets,
  - corporate income taxes,
  - preventing the legalization of proceeds from criminal activity and the financing of terrorism,
  - consumer protection,
  - compliance with product requirements, including their safety,
  - traffic safety, transport and road traffic,

- environmental protection,
- food and feed safety and protection of animals and their health,
- radiation protection and nuclear safety,
- economic competition, public auctions and public procurement,
- protection of internal order and safety, life and health,
- protection of personal data, privacy and security of electronic communications networks and information systems,
- protection of the financial interests of the European Union or
- the functioning of the internal market, including the protection of economic competition and state aid according to European Union law.

Notifications that are in the nature of false or knowingly false information, personal disputes between employees, or which are to be resolved as a part of normal business relations (complaints, customer complaints) cannot be submitted through the Company's internal notification system.

### **Who can report an infringement**

A whistleblower who can submit a report through the Company's internal reporting system is any natural person who performs or has performed work or another similar activity for the Company and submits a report in this work context in particular as:

- a) an employee who performs work for the Company in an employment relationship or on the basis of an employment agreement or an agreement on the execution of work;
- b) former employee of the Company;
- c) applicant for employment with the Company;
- d) a person who performs or has performed volunteer work, professional practice or an internship at the Company;
- e) a person who is a member of a statutory or other body of the Company;

A natural person is entitled to whistleblower protection under the Whistleblower Protection Act if:

- the above conditions are met and at the same time if
- this person has legitimate reasons to believe that the information reported to him was true at the time of the notification, and that the notification was necessary for the detection of the aforementioned illegal act.

Notification under the Act on the Protection of Whistleblowers does not replace the statutory reporting obligation under the Criminal Code (obligation to report serious crimes to law enforcement authorities).

### **Possible ways to report an infringement**

A notification of infringement can be submitted via the Company's internal notification system in accordance with the requirements of the Act on the Protection of Whistleblowers in the following ways:

- a) electronically to the secure e-mail address [etickalinka@colas.cz](mailto:etickalinka@colas.cz) (hereinafter referred to as the "E-mail address");
- b) in writing in paper form sent as a letter to the Company's postal address: Rubeška 215/1, 190 00 Prague 9, provided that the envelope is marked with the words: "DO NOT OPEN - to the hands of Mrs. Eva Blažková";
- c) by phone (i.e. orally) at + 420 771 299 082, when the announcement will be recorded on the answering machine

Repeated notification from the same whistleblower and on the same matter is not admissible and will not be re-investigated, with the whistleblower being informed of this with an appropriate brief justification. This does not apply if this additional notification contains new information and facts compared to the previously submitted notification.

In connection with his submission, the whistleblower agrees to the processing of his personal data.

### **Who is the competent person to receive and process notifications**

Only the competent person is authorized to receive the notification, to assess its justification and to further related procedures within the internal notification system.

The competent person at the Company is: Mgr. Eva Blažková, LL.M., Head of the Legal Department

E-mail: [etickalinka@colas.cz](mailto:etickalinka@colas.cz) Tel: + 420 771 299 082

### **Deadlines for notifying the whistleblower and for assessing the reasonableness of the notification**

The competent person shall notify the whistleblower of the receipt of the notification no later than seven (7) days from the date of submission of the notification.

Exceptions:

- a) the whistleblower explicitly asks the competent person not to inform him of the receipt of the notification, or
- b) it is obvious that the identity of the whistleblower would be revealed to another person by the notification of receipt of the notification.

The competent person is obliged to assess the validity of the notification and inform the whistleblower in writing of the results of the assessment within thirty (30) days from the date of receipt of the notification.

In factually or legally complex cases, this period can be extended by up to another thirty (30) days, but no more than twice, i.e. the maximum length of time for assessing the reasonableness of the notification can in exceptional cases be ninety (90) days from the date of submission of the notification.

The competent person always informs the whistleblower in writing about the extension of the deadline and the reasons for its extension before it expires.

### **Prohibition of retaliation against whistleblowers**

As part of the management of the internal reporting system, as well as during related and/or other activities of all employees and/or members of the Company's bodies, there is a strict ban on the application of any retaliatory measures against whistleblowers.

The prohibition of retaliatory measures also applies to other protected persons, in particular to a person who provided assistance in finding out the information that is the content of the notification, to a person who is close to the whistleblower, or to a person who is an employee or colleague of the whistleblower.

### **Additional channels and options for reporting infringements**

If the legal conditions are met, the notification can also be submitted via the external notification system of the Ministry of Justice and/or directly to the relevant public authority. In this case, the notification is received, investigated and assessed by the Ministry of Justice or another relevant public authority.

COLAS CZ, a.s.