



Whistleblowing Policy of AS CleanR Grupa

AS CleanR Grupa's (hereinafter the Group) key workplace values are openness and mutual trust, therefore, to facilitate an open conversation about a possible conflict or known violation, we have created our own Hotline, a group-wide whistleblowing system.

To make sure the Group complies with the relevant state laws and regulations, follows corporate governance principles, and pursues ethical treatment of all stakeholders, we have drawn up CleanR Grupa's Code of Professional Conduct, which sets out guidelines for all involved parties.

Hotline is a group-wide whistleblowing system where the Group's employees and external stakeholders may safely and confidentially report suspected or known violations. Hotline has been designed to ensure confidentiality of information and deny unauthorized persons access to it.

Blowing the whistle

Whistleblowing is a process where a whistleblower reports violations at the workplace or during interaction with the Group's employees, or actions that violate CleanR Grupa's Code of Professional Conduct.

- A whistleblower may be a physical person who reports a suspected or known violation that may harm the interests of the Group, its companies, or society
- A whistleblower may be an employee of the Group or its companies, or any other stakeholder—a customer, business partners, supplier

Making of deliberately false statements does not constitute whistleblowing and invokes responsibility set out in the normative acts. Complaints related to customer service (including the quality of products and services) are not regarded as whistleblowing.

Whistleblowing procedure

Anyone who wants to report a suspected or known violation reports it to the Group by filling out an electronic application form on the Hotline, the Group's whistleblowing system available on the Group's homepage.

Content of a whistleblower report

When reporting a violation, the following information should be provided:

- By choice—the report may be anonymous, or the whistleblower may indicate their name, surname, contact details
- Detailed information on the suspected or known violation, providing facts, involved persons, and adding evidence if such exists

A report is considered as a whistleblower report if it is related to:

- Breaches of CleanR Grupa's Code of Professional Conduct
- Breaches of policies or values of CleanR Grupa or its subsidiary companies which are related to the management style and business conduct
- Concerns about dubious accounting, internal control, audit, financial reporting, or intentional actions to illicitly gain unwarranted benefits, for example, money, property, or services
- Concerns related to human rights or workplace safety violations at CleanR Grupa or its subsidiary companies
- Significant violations related to fair commercial practice and information security violations



Review of a whistleblower report

CleanR Grupa's Head of Human Resources is responsible for the implementation of the whistleblowing policy across the Group and its subsidiary companies.

The Group's Head of Legal is responsible for the review of a whistleblower report and they:

- receive and register the whistleblower report
- conduct a preliminary assessment of the report and take a decision on further course of action
- store and destroy the report and related documents accordingly
- give whistleblowing-related advice if necessary

A whistleblower report is reviewed immediately, with due care, ensuring feedback to the whistleblower (if the report is personalized), adopting adequate measures and informing external agencies if necessary.

CleanR Grupa regularly reports on the anonymously filed whistleblower reports and their review results on the Group's internal communication channels and in its non-financial reports.

Whistleblower's protection

The whistleblower's personal data are protected in accordance with the relevant laws and regulations. After the receipt of a whistleblower's report, the submitter's data are pseudonymized.

The whistleblower's personal data, report, and its accompanying written or material evidence, as well as the review documents of the whistleblower's report have a restricted access information status.