

Reporting illegal conduct (whistleblowing)

Reporting pursuant to Act No. 171/2023 Coll., on the protection of whistleblowers (the "Act")

Report

A report is understood to be an oral or written report by a natural person containing information about possible illegal conduct that the whistleblower has learned about in connection with their work or other similar activity. Reports may also be anonymous, but protection under the Act can only be granted to identified whistleblowers.

Whistleblower

Any natural person who reports or discloses information about a violation of legal regulations that they have obtained in connection with activities related to the performance of work or other similar activities. Reporters may be employees, job applicants, contractors providing supplies, services, construction work or similar services and their employees, or even those interested in contracts.

Obligated entity

The obligated entity is a company of the ORLEN Unipetrol group, which is required to establish an internal reporting system and designate a responsible person.

Legal regulation

The protection of whistleblowers is comprehensively regulated by the Act in accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council (EU) 2019/1937 of October 23, 2019 on the protection of persons who report breaches of Union law and Act No. 172/2023 Coll., amending certain acts in connection with the adoption of the Act on the Protection of Whistleblowers, and further in accordance with the internal organizational act Policy, Rules for Reporting Violations of Legal Regulations and Protection of Whistleblowers.

Subject of the notification

The content of the notification is information about possible illegal activity that

- has the characteristics of a criminal offense
- has the characteristics of an offense for which the law stipulates a fine of at least CZK 100,000,
- violates the Whistleblower Protection Act or violates another legal regulation or European Union regulation in the areas defined in Section 2(1)(d) of the Whistleblower Protection Act and furthermore, which is in conflict with the provisions of Section 4.6 of the Policy.

If the report does not concern the above-mentioned conduct, the reporting person will be informed that the report does not fall under the Act. Methods of filing a report

Ways of submitting a report

Reports can be submitted via:

- 1) the internal reporting system specified in the Policy, Internal Anti-Corruption Program, Appendix C,
- 2) directly in person or by email to the relevant persons,
- 3) the external reporting system administered by the Ministry of Justice or by publication, or directly to the relevant public authorities.

Internal reporting system

The reporting person submits the report via the internal reporting system exclusively to the relevant person and is entitled to submit it in writing or orally. The persons authorized to manage the internal reporting system for SPOLANA s.r.o. are:

- 1) Lenka Galádová, Executive Assistant, email address: lenka.galadova@spolana.cz , tel. 736 505 577
- 2) Martina Lehká, PR and Marketing Manager, email address: martina.lehka@spolana.cz , tel. 736 506 556
- 3) Karel Hromek, FM and Security Manager, email address: Karel.Hromek@spolana.cz , tel. 736 505 572

To submit a report via the internal reporting system, the reporter may also use:

- the telephone lines of the relevant persons every working day from 8:00 a.m. to 12:00 p.m.,
- a personal meeting with the relevant person by prior arrangement.

External reporting system

All whistleblowers, without exception, may contact the Ministry of Justice, Vyšehradská 16, 128 10 Prague 2, as the so-called external reporting system, in connection with their report.

<https://oznamovatel.justice.cz/informace-pro-oznamovatele/>. Persons considering filing a report of illegal activity may contact the Ministry of Justice free of charge and confidentially in writing (oznamovatel@msp.justice.cz) or verbally (tel.: 221 997 840) to request a consultation on the matter before filing the report. Direct submissions can be made using the Ministry of Justice form - <https://oznamovatel.justice.cz/chci-podat-oznameni/>.

Information on knowingly false reports

A natural person who submits a knowingly false report is not entitled to protection against retaliatory measures. The reporter commits an offense by submitting a knowingly false report, for which a fine of up to CZK 50,000 may be imposed.