



a coesia company

# Whistleblowing Policy

Molins S.R.O. (Czech Republic)

# Contents

<b>Part A - GLOBAL WHISTELBLOWING POLICY</b>	<b>3</b>
1. Purpose	4
2. Who can report	4
3. What can and cannot be reported at the global level	4
4. How to report	5
<b>Part B - POLICY ON INTERNAL NOTIFICATION SYSTEM</b>	<b>6</b>
1. Introductory Provisions	7
2. Basic concepts	7
3. Notification	10
4. Procedure after submission of the Notice and processing of the Notice	13
5. Protection of personal data and the prohibition of providing data	14
6. Corrective measures	16
7. Employer Notice	16
8. Common and Final Provisions	16

## **Molins, s.r.o**

Identification number: 252 47 875  
with registered office at Korandova 2883/12, 301 00 Pilsen  
registered in the commercial register of the Regional Court in Pilsen, section C, insert 12719  
(hereinafter referred to as “Molins Czech Republic” or “Employer”)

*This regulation governs in particular the implementation of the reporting system, the procedure for reporting and other rules for the reporting system, both at the global level and at the level of the Czech legislation (internal notification system).*

**A.**  
**GLOBAL**  
**WHISTELBLOWING**  
**POLICY**  
**(global level)**

*The following rules apply to global reporting in accordance with the Global Whistleblowing Policy of Coesia and Molins Czech Republic as its subsidiary. For national (internal) whistleblowing, the rules are set out in the second section “II. Policy on internal notification system (level of the Czech legislation)” below.*

## 1. Purpose

- 1.1 In particular, the purpose of Global Whistleblowing Policy is to provide all individuals<sup>1</sup> acting in the name or on behalf of, or in the interest of Coesia S.p.A. (including Molins Czech Republic as its subsidiary) with an operational tool for reporting violations of the Coesia Code of Ethics, breaches of the Legislative Decree 24/2023, as well as of all applicable national and international legislation effective in the countries of operation<sup>2</sup>.

## 2. Who can report

- 2.1 Anyone can submit a report. Coesia S.p.A. and Molins Czech Republic as its subsidiary extends the possibility of reporting to all individuals who, in the context of their work-related activities, become aware of a possible violation.

## 3. What can and cannot be reported at the global level

- 3.1 Anyone can report if they identify any suspected violations of:
- a. the Coesia Code of Ethics;
  - b. Coesia’s Policies;
  - c. National and Internal legislations and regulations<sup>3</sup>.

---

<sup>1</sup> **Internal Parties** (e.g.: all collaborators under any contractual agreement, including fixed-term contracts and contingent workers, volunteers and trainees) and **External Parties** (e.g.: individuals who have acquired information on breaches during the recruitment process or during their previous work-based relationship with the Coesia S.p.A. (including Molins, s.r.o. as its subsidiary), clients, suppliers, partners and, in general, all stakeholders). For further details please refer to the FAQ document.

<sup>2</sup> Except for specified national and internal legislation and other regulations in Part Two of this regulation II. Policy on internal notification system (level of the Czech legislation).

<sup>3</sup> Except for specified national and internal legislation and other regulations in Part Two of this regulation II. Policy on internal notification system (level of the Czech legislation).

- 3.2 Information acquired exclusively in the basis of unreliable speculations or gossip (i.e., “rumor mill”) cannot be reported.

## 4. How to report

- 4.1 Group Channels for submitting reports at the global level:

### WRITTEN FORM

Through the reporting digital platform accessible online via:

- computer at the following link **coesia.ethicspoint.com**;
- mobile at **coesia.navexone.eu** or by scanning the **QR code**:



### ORAL FORM

- toll-free numbers are available on the portal **coesia.ethicspoint.com** (24h – 7 days a week)

(The above channels allow anonymous reporting in the whistleblower’s native language)

After submitting the report, the Whistleblowers will receive an access code called a ‘report key’ which, along with a password, can be used to check for any reply or questions on the platform.

### Anonymity and Confidentiality

Whistleblowers can report:

- **Openly**: Whistleblowers provide full details of their personal contact details;
- **Anonymously**: Whistleblowers can choose to provide their contact email to the NAVEX platform, this will not be forwarded to Molins Czech Republic or Coesia or any of its companies, but will enable the reception of notification emails when a reply or question is posted in the system or remain completely anonymous. In this case, it will be up to the Whistleblowers to use their password and ‘report key’ to access the system to check for feedback.

*More information on notifying at the global level is described in the “Global Whistleblowing Policy”.*

**B.  
POLICY ON  
INTERNAL  
NOTIFICATION  
SYSTEM  
(level of the  
Czech legislation).**

*The following rules apply to the internal notification (whistleblowing) system established in accordance with the Whistleblower Protection Act under Czech legislation. The rules for notifications at the global level are set out in the first section “I. Global Whistleblowing Policy (global level)” above.*

## 1. Introductory Provisions

- 1.1 This internal regulation is issued by the Employer company **Molins, s.r.o.** in accordance with section § 305 of Act No. 262/2006 Coll., Labor Code, as amended (hereinafter referred to as “ **Labor Code** ”), the Coesia Code of Ethics and the Coesia Global Whistleblowing Policy.
- 1.2 With this internal regulation, the Employer, in accordance with Act No. 171/2023 Coll., the Act on the Protection of Whistleblowers, as amended (hereinafter referred to as the “ **Act on the Protection of Whistleblowers** ”), and in connection with the Directive of the European Parliament and of the Council (EU) 2019/ 1937 of October 23, 2019, on the protection of persons who report violations of Union law, as amended, **introduces the so-called internal reporting system.**
- 1.3 This internal regulation governs in particular the introduction of the internal reporting system, basic terms, Notifications according to this internal regulation, the procedure after making the Notification, the protection of personal data, the Employer’s procedure, including corrective measures and other rules for the internal reporting system.

## 2. Basic concepts

- 2.1 **Whistleblower: Any person reporting a suspected violation of any illegal practice.**  
For the purposes of the Czech legislation, a whistleblower is a person who, even indirectly, performed or performs work or other similar activity for the Employer or was or is in contact with the Employer in connection with the performance of work or other similar activity and made a Notification addressed to the Employer according to the Whistleblower Protection Act and this internal regulation.

- 2.2 **Work and similar activity:** For the purposes of this internal regulation, work or other similar activity means:
- a. dependent work performed in a basic employment relationship, both full-time and part-time,
  - b. self-employment,
  - c. exercise of rights associated with participation in a legal entity,
  - d. performance of the function of a member of a body of a legal entity,
  - e. performance of tasks within the scope of the activity of a legal entity, in its interest, on its behalf or on its account,
  - f. management of the trust fund,
  - g. volunteering,
  - h. professional experience, internship, or
  - i. performance of rights and obligations arising from the contract, the subject of which is the provision of supplies, services, construction works or other similar performance.
- 2.3 **Notification:** For the purposes of this internal regulation, a notification is understood as a Notification made by the Notifier, particularly through the internal notification system containing information about a possible **Illegal Act that has occurred** (should have occurred) or such Illegal Act is to occur in the future at the Employer.
- 2.4 **Illegal conduct:** Illegal conduct in accordance with Section 2, paragraph 1 of the Act on the Protection of Whistleblowers means actions that:
- a. has elements of a criminal offence,
  - b. has 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. violates the Act on the Protection of Whistleblowers, or
  - d. violates another legal regulation or regulation of the European Union in the area of:
    1. financial services, statutory audit and other verification services, financial products and financial markets,
    2. corporate income taxes,
    3. preventing the legalization of proceeds from criminal activity and the financing of terrorism,
    4. consumer protection,
    5. compliance with product requirements, including their safety,
    6. safety of traffic, transportation and traffic on roads,
    7. environmental protection,
    8. food and feed safety and protection of animals and their health,
    9. radiation protection and nuclear safety,
    10. economic competition, public auctions and public procurement,



11. protection of internal order and safety, life and health,
12. protection of personal data, privacy and security of electronic communications networks and information systems,
13. protection of the financial interests of the European Union, or
14. functioning of the internal market, including the protection of economic competition and state aid according to European Union law.

## 2.5 **Competent persons, the Coesia Ethics Committee and Whistleblowing**

**Management Team for Molins Czech Republic:** Competent persons, for the purposes of this internal regulation, means individuals who are authorized by the Employer, among other things, to receive and assess the reasonableness of a Notice submitted through the internal notification system.

Following the Coesia Global Whistleblowing Policy, notices are received by the Coesia Ethics Committee – an independent and autonomous body chaired by the President of Coesia, composed of Isabella Seràgnoli, Iole Anna Savini, Giorgia Capuzzo, Paolo Fabiani and Paola Lanzarini.

At Group level, the Coesia Whistleblowing Management Team is composed of two members of the Group Ethics Committee: Paolo Fabiani and Paola Lanzarini.

At local level, the Whistleblowing Management Team for Molins Czech Republic, is composed of two members from the Coesia Ethics Committee, Paolo Fabiani and Paola Lanzarini, and other two members as Local Contact Persons: Claire Millsop and Rachel Shorter.

Once a notification is received by the Coesia Ethics Committee and the Coesia Whistleblowing Management Team for Molins Czech Republic, the Local Contact Persons will execute the investigation plan. The Local Contact Persons, in accordance with the Coesia Whistleblowing Management Team for Molins Czech Republic, will propose measures to the Employer to correct or prevent the illegal situation following the submitted Notice (unless this procedure could reveal the identity of the Whistleblower or a person who, in accordance with Section 4 of the Act on the Protection of Whistleblowers, may be subject to Retaliatory Measures be exposed).

2.6 **Retaliatory measures:** For the purposes of this internal regulation, retaliatory measures are actions or omissions in connection with the work or other similar activity of the Reporter, which was caused by making the Report, and which may cause harm to the Reporter or the person referred to in section. Section 4, paragraph 2 of the Act on the Protection of Whistleblowers, while the fulfillment of the above-mentioned conditions is considered as a Retaliatory measure in particular:

- a. termination of the employment relationship or non-extension of the employment relationship for a fixed period,
- b. cancellation of the legal relationship established by an agreement on the performance of work or an agreement on work activities,
- c. dismissal from the position of a senior employee,

- d. imposing a disciplinary measure or disciplinary penalty,
- e. reduction of wages, salary or remuneration or non-granting of personal allowance,
- f. transfer or transfer to another job,
- g. employment report,
- h. failure to enable professional development,
- i. change of working hours,
- j. requiring a medical opinion or an occupational medical examination,
- k. termination or withdrawal from the contract, or
- l. interference with the right to the protection of personality.

## 3. Notification

- 3.1 The Act on the Protection of Whistleblowers establishes the conditions and rules for filing a Notice through the internal notification system established by the obliged entity, i.e. the Employer.  
Anyone can submit a report.  
In accordance with the Coesia Global Whistleblowing Policy, Molins Czech Republic (Molins, s.r.o. extends the possibility of reporting to all individuals who become aware of a possible violation or illegal act.

### How to report:

#### WRITTEN FORM

Through the reporting digital platform accessible online via:

- computer at the following link **coesia.ethicspoint.com**;
- mobile at **coesia.navexone.eu** or by scanning the **QR code**:



By sending it in written / paper form to the competent persons:

Claire Millsop, care of MPRD Ltd, Rockingham Drive, Milton Keynes,  
MK14 6LY, Velká Británie. Email: [claire.millsop@coesia.com](mailto:claire.millsop@coesia.com)  
Telefonní číslo: +44(0)1908233833

For the option of submitting the notification in written (paper) form in Czech:  
Mgr. Radka Lišková, Molins s.r.o., Human Resources,  
Korandova 2883/12, 301 00 Plzeň.  
Email: [radka.liskova@molins.com](mailto:radka.liskova@molins.com)  
Phone number: +420 378 080 313.

### ORAL FORM

- toll-free numbers are available on the portal **coesia.ethicspoint.com** (24h – 7 days a week)

After submitting the report, the Whistleblowers will receive an access code called a 'report key' which, along with a password, can be used to check for any reply or questions on the platform.

In person (Face to Face meeting) at the request of the Notifier.

For Face to Face meeting in local language (Czech language) option:  
 Radka Lišková, Molins Czech Republic, Human Resources, Korandova 2883/12,  
 301 00 Pilsen.

### Confidentiality

Whistleblowers can report:

- Openly: Whistleblowers provide full details of their personal contact details.

- 3.2 The notifier may also submit his Notification to the Ministry of Justice or publish it in accordance with section § 7 paragraph 1 letter c) of the Whistleblower Protection Act. Such a Whistleblower is entitled to protection according to this internal regulation and the law on the protection of whistleblowers, especially if he is a person according to Article 2, paragraph 2.1 of this internal regulation.
- 3.3 Identification data of the person responsible for receiving and handling Notifications submitted through the internal notification system, including their contact details, are published on the Employer's website in the Contact section: **<https://www.molins.com/en/contacts>**. Only the Appropriate Person has access to the telephone line and email address so that the identity of the Notifier is protected.
- 3.4 At the request of the Notifier, the Notifier shall submit the Notification to the Competent Persons in person. The Competent persons are obliged to accept the Personal Notification of the Notifier within 14 days at the latest from the day on which the Notifier requested it.
- 3.5 The Notice concerning Molins Czech republic, i.e. the Czech legal system must contain information about the Notifier's name, surname (or business name), date of birth and contact details of the Notifier, through which the Notifier can be contacted (e.g. telephone number, email, residential address). The notification may contain other data on the basis of which

the identity of the Notifier can be ascertained/inferred. The Notification does not have to contain identification data about the person of the Notifier in the event that the Identity of the Notifier is known to the Competent Persons, i.e. especially in cases where the Notification is submitted personally or the Notifier informs the Competent Persons that he has submitted such a Notification. If it is not possible to identify the person of the Notifier from the Notification concerning Molins Czech republic, i.e. the Czech legal system, the Relevant Person will not deal with it further.

- 3.6 It must be clear from the submitted Notice what the Illegal Act is considered to be, or in what specific facts the Unlawful conduct consists. Furthermore, the Informant shall state what corrective measures he requests. If the Notifier has documents to prove the Illegal Act, he shall attach them to the Notification as evidence.
- 3.7 Verbal Notification is made by the Notifier by telephone or by leaving a voice message on the Competent Telephone Line of the Competent Persons. The Notifier can send the Written Notice to the relevant email address of the Competent Persons or send it in paper form to the Competent Persons. Such written document must be marked with the term “ Whistleblowing ”. Documents marked “ Whistleblowing ” can only be opened by the Competent Persons, and not by any other employee of the Employer or any other person other than the Competent Persons.
- 3.8 With the consent of the Notifier, an audio recording or recording will be made of the Notice made in person and orally, which captures the true essence of the Notice. The reporting person will be given the opportunity by the Competent Persons to comment on the recording or transcription of the audio recording. The Informant’s statement is attached to the recording or transcription of the audio recording.

## 4. Procedure after submission of the Notice and processing of the Notice

- 4.1 The Competent Persons shall keep electronic records of all Notifications submitted to the Competent Persons in accordance with this internal regulation in connection with the Act on the Protection of Whistleblowers. In the report of the Notification, the Competent persons shall state the identification data of the Notifier, the date of receipt of the complaint, the subject of the complaint, the identification of the persons to whom the Notification relates (against whom it is directed), the measures which the Notifier seeks to adopt, if indicated, the evaluation of the reasonableness of the Notification, the measures taken by the Employer and the date the Notice was issued.
- 4.2 Access to records Notification according to Article 4, paragraph 4.1 of this internal regulation from above is only available to the Competent Persons. The Competent persons are obliged to keep the Notice and documents related to the Notice for a period of 5 years from the date of receipt of the Notice.
- 4.3 After receiving the Notice, the Competent Persons shall notify the Notifier in writing of the receipt of the Notice no later than 7 days from the date of its receipt. The Competent Persons do not have to notify the Notifier of the receipt of the Notification according to the previous sentence in the event that the Notifier has expressly requested the Competent Persons not to notify him of the receipt of the Notification or it is clear that such notification would reveal the identity of the Notifier to a third party.
- 4.4 Within 30 days from the date of receipt of the Notice, the Competent persons, after agreeing with the Coesia Ethics Committee or the Coesia Global Whistleblowing Management Team or the Whistleblowing Management Team for Molins Czech Republic, shall assess the reasonableness of the Notice and notify the Notifier in writing of the results of its assessment. If the case is factually or legally complex, the deadline for processing the Notice according to the previous sentence can be extended by up to 30 days, but no more than twice. If the Competent Person extends the deadline for handling the Notification, he shall notify the Notifier in writing of the extension and the reasons for the extension of this deadline before its expiration, unless the cases are in accordance with Article 4, paragraph 4.3 of this internal regulation from above.

- 4.5 The Competent persons shall handle the Notification within the specified period in one of the following ways:
- a. **in writing** without undue delay.
  - b. The notification is evaluated as justified and will propose measures to the Employer i.e. to Coesia Ethics Committee or the Coesia Global Whistleblowing Management Team or the Whistleblowing Management Team for Molins Czech Republic, to prevent or correct the illegal situation. It shall notify the Notifier in writing of such an evaluation without undue delay.
  - c. If the Notification is evaluated as reasonable, but is submitted by the Notifier who does not perform work or other similar activity for the Employer, the Competent Persons propose corrective measures to the person for whom the Notifier performs work or other similar activity, unless the nature of the matter precludes this. If this person (obligatory entity) does not take the measures proposed by the Competent Persons, he will take other appropriate measures to prevent or correct the illegal situation; this does not apply if it is a measure proposed to a person other than the obliged entity that designated this Competent Persons, i.e. the Employer. The obliged entity shall immediately notify the Competent Persons of the measure taken, who shall notify the Informant in **writing** without undue delay.
  - d. The Notification is evaluated as unfounded, it shall notify the Notifying Party in writing without undue delay that, based on the facts stated in the Notification, or from the documents submitted by the Notifying Party and from the circumstances known to it, it has not found suspicion of the commission of an Illegal Act, or has found that the Notification is based on false information, and instructs the Notifier on the right to file a Notification with a public authority.

## 5. Protection of personal data and the prohibition of providing data

- 5.1 The Competent persons will not provide information to any third party that could defeat or jeopardize the purpose of submitting the Notice. The same obligation applies to a third party who gains access to Notifications or to records of data on received Notifications.
- 5.2 With the written consent of the Informant and persons according to Section 4(2) of the Act on the Protection of Whistleblowers, it is possible to provide information about their identity. Information about the identity of persons according to the previous sentence can be provided even without consent in the event that the Competent Persons is obliged to provide such

information to public authorities according to legal regulations. The Competent Persons is obliged to inform the Informant in advance about the provision of information about the identity of the Informant to public authorities, while describing the reasons for which he is obliged to provide information about the identity. The Competent Persons shall allow the whistleblower to comment on the provision of information about his identity.

- 5.3 In the event that the Notifier had legitimate reasons to believe that the submission of the Notification was necessary for the detection of the Illegal Act, this is not a breach of the contractual obligation to maintain confidentiality, the obligation to maintain confidentiality pursuant to Act No. 280/2009 Coll., Tax Code, as amended, nor obligations to maintain confidentiality according to other legal regulations governing work or other similar activities. All of this except:
- a. the obligation to ensure the protection of classified information and information, the disclosure of which could obviously jeopardize ongoing criminal proceedings, or the protection of special facts pursuant to Act No. 240/2000 Coll., on crisis proceedings and on the amendment of certain laws (Crisis Act), as amended, or
  - b. obligation to maintain confidentiality when providing legal assistance in proceedings before a court or other public authority.
- 5.4 In the same way, the Notification or subsequently provided information in connection with the Notification is not a violation of a contractual or legal obligation, unless the Notifier or the persons referred to in section. Section 4, paragraph 2 of the Act on the Protection of Whistleblowers, had no legitimate reason to believe that the Notification was necessary for the detection of a possible Illegal Act.
- 5.5 All processing of personal data of the Notifier and persons according to sec. Section 4, paragraph 2 of the Act on the Protection of Whistleblowers will be implemented in accordance with applicable laws and regulations of the European Union, in particular Regulation of the European Parliament and Council (EU) No. 2016/679 of 27 April 2016, on the protection of natural persons in connection with the processing of personal data and the free movement of such data and the repeal of Directive 95/46/EC (General Regulation on the Protection of Personal Data), as amended (GDPR).
- 5.6 The Competent persons maintains the confidentiality of all facts learned during the performance of his activities in accordance with this internal regulation in connection with the Act on the Protection of Whistleblowers even after termination of his activities, unless otherwise required by law.

## 6. Corrective measures

- 6.1 In the event that the Notification is evaluated as justified, the Employer, in agreement with the Coesia Ethics Committee or the Coesia Global Whistleblowing management Team of the Whistleblowing management Team for Molins Czech Republic, will take appropriate measures to correct or prevent the illegal situation following such Notification. In taking corrective action, the Employer shall proceed with all professional care that can fairly be required of it.

## 7. Employer Notice

- 7.1 The Employer will not provide protection from Retaliatory Measures to a person who makes a Notification without having legitimate reasons to believe that the Notification is based on true information.
- 7.2 A person who knowingly makes a false Notification commits an offense under section § 23 of the Whistleblower Protection Act. For an offense according to the previous sentence, in accordance with section § 23 paragraph 2 of the Whistleblower Protection Act to impose a fine of up to CZK 50,000.

## 8. Common and Final Provisions

- 8.1 Other rules for the internal reporting system implemented by the Employer of **Molins, s.r.o.**, not expressly regulated by this internal regulation, are laid down in the Act on the Protection of Whistleblowers.
- 8.2 The Employer has also published information about the Competent Persons, about the methods of reporting according to the internal reporting system and the Ministry of Justice on its website <https://www.molins.com/en>.
- 8.3 This internal regulation is binding for the Employer and all its employees. This internal regulation is publicly available to all persons who forge work or other similar activities for the Employer, including at the premises of the Employer's headquarters at the address Korandova 2883/12, 301 00 Plzeň.



- 8.4 In accordance with sec. § 305, paragraph 3 and paragraph 4 of the Labor Code, the Employer is obliged to notify the employee of the issuance, change or cancellation of the internal regulation within 15 days at the latest. The internal regulation must be accessible to all employees of the Employer. The employer is obliged to keep the internal regulation for a period of 10 years from the date of its expiry.
- 8.5 This internal regulation takes effect on **16.05.2024** and is issued for an indefinite period.

**In Pilsen on 16.05.2024**

**Molins, s.r.o**  
Employer