

CSOB Insurance Company, a. s., a member of the CSOB holding company

Whistleblowing Policy

1. Objectives

The aim of this Policy is

- a) to provide guidance to whistleblowers who report suspected undesirable conduct that is contrary to the law and the rules of CSOB Insurance Company, a. s., a member of the CSOB holding company (hereinafter referred to as CSOB INS CZ) or may have an adverse impact on their business or reputation;
- b) to comply with Czech and EU legislation, in particular Act No. 171/2023 Coll., on the protection of whistleblowers (hereinafter referred to as the Act) and Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers, as amended;
- c) promote a culture of openness, accountability and integrity, creating awareness of the possibility to report illegal/unethical conduct (whistleblowing);
- d) to enable management to be informed at an early stage of violations and to take appropriate action;
- e) provide whistleblowers with full protection of their rights, including ensuring confidentiality;
- f) ensure that all allegations are properly investigated and remain strictly confidential and that any retaliatory action that may be taken against whistleblowers is addressed.

2. Definition

Violation - conduct that does not comply with laws, regulations, professional standards, internal policies, rules and procedures of CSOB INS CZ (hereinafter referred to as a Violation)

Whistleblowing - notification (internal or external) by any person regarding a Violation

Whistleblower - any natural or legal person who notifies a Violation that has occurred or is about to occur to a person for whom the whistleblower, even indirectly, has performed or is performing work or other similar activity, or to a person with whom the whistleblower has been or is in contact in connection with the performance of work or other similar activity pursuant to § 2 Section 3 of the Act (hereinafter referred to as a Whistleblower)

Obligated person - CSOB INS CZ

3. Scope

This Policy applies to Whistleblowers who have received information about Violations by the following persons/entities:

- a) persons with the status of employee or self-employed;

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- b) shareholders and persons belonging to an administrative, management or supervisory body, including non-executive members, as well as volunteers and paid or unpaid interns;
- c) any persons working under the supervision and direction of contractors, subcontractors and suppliers.

This Policy also applies to Whistleblowers if they have obtained information about the Violations while in an employment relationship that has ended or to Whistleblowers whose employment has yet to begin, as well as to Whistleblowers who have obtained information during the recruitment process or other pre-contractual negotiations.

Whistleblower protection measures also apply, where applicable, to:

- a) third parties who are associated with the Whistleblower and who may be subject to retaliation in connection with the work (e.g. colleagues or relatives);
- b) legal entities that the Whistleblower owns, works for or is otherwise associated with in a work context;
- c) CSOB INS CZ does not exclude receiving notifications from a person who does not perform work or other similar activities for the obliged entity as referred to § 2 in Section 3, letters a), b), h) or i) of the Act, e.g. volunteer activities.

This Policy sets out common minimum standards for the protection of Whistleblowers reporting Violations of law, rules or procedures of CSOB INS CZ.

A Violation may be reported that:

- 1. has the elements of a criminal offence;
- 2. has the characteristics of an offence for which the law provides for a fine of at least CZK 100,000,
- 3. violates the Act,
- 4. violates another legal regulation or a regulation of the European Union in the field of:
 - a. financial services, statutory audit and other assurance services, financial products and financial markets,
 - b. corporate income tax,
 - c. the prevention of money laundering and terrorist financing,
 - d. consumer protection,
 - e. compliance with product requirements, including product safety,
 - f. transport, transport and road safety,
 - g. protection of the environment,
 - h. food and feed safety and the protection of animals and their health,
 - i. radiation protection and nuclear safety,
 - j. competition, public auctions and public procurement,
 - k. protection of internal order and security, life and health,
 - l. protection of personal data, privacy and security of electronic communications networks and information systems,
 - m. protection of the financial interests of the European Union,
 - n. the functioning of the internal market, including the protection of competition and state aid under European Union law.

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Examples of such Violations include, but are not limited to, fraud, money laundering, bribery and corruption, immoral or unethical conduct, dereliction of duty (in particular, matters that threaten the credibility and reputation of CSOB INS CZ as a trustworthy provider of financial services).

This Policy is not intended to call into question financial or business decisions made by members of CSOB INS CZ nor should it be used to reassess other matters that have already been addressed under other CSOB INS CZ procedures, rules or regulations.

4. Safeguards

4.1. Whistleblower Protection

The basic prerequisite for providing protection to the Whistleblower against any adverse effects arising from the notification is that the report is made in good faith in the accuracy and legitimacy of the notification made without any ulterior intention to unjustifiably harm the person or body against whom the report is directed (e.g. defamation).

The Whistleblower is guaranteed full protection through the Board of Directors of CSOB INS CZ against any adverse consequences of the notification.

Protection against retaliation is not available to a person who made a report without having reasonable grounds to believe that it was based on true information.

CSOB INS CZ takes the necessary measures to prohibit any form of retaliation against Whistleblowers (including threats and attempts to retaliate) in accordance with § 4 in Section 1 of the Act, in particular in the form of:

- a) termination of the employment relationship or non-renewal of the fixed-term employment relationship,
- b) dismissal from service, out-of-service assignment or termination of service,
- c) the termination of a legal relationship based on an agreement to perform work or an agreement on work activity,
- d) removal from the post of senior staff member or from the post of superior,
- e) the imposition of a disciplinary measure or a disciplinary penalty,
- f) a reduction in pay, salary or remuneration or the non-award of a personal allowance,
- g) transfer or reassignment to another job or post,
- h) a service appraisal or performance review,
- i) failure to allow professional development,
- j) change of working or service hours,
- k) requiring a medical report or an occupational medical examination,
- l) resignation or withdrawal from the contract; or
- m) interference with the right to protection of personality.

A Whistleblower may not be subjected to a reprisal in accordance with § 4 in Section 2 of the Act, nor:

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- a) a person who has provided assistance in ascertaining the information which is the subject of the notification, filing the notification or assessing its validity,
- b) a person who is close to the Whistleblower,
- c) a person who is an employee or colleague of the Whistleblower,
- d) a person controlled by the Whistleblower,
- e) a legal person in which the Whistleblower has an interest, a person controlling it, a person controlled by it or a person who is controlled by the same controlling person as the legal person,
- f) a legal person of which the Whistleblower is a member of an elected body, a person controlling, controlled or controlled by the same controlling person,
- g) a person for whom the Whistleblower performs work or other similar activity; or
- h) a trust of which the Whistleblower or a legal person referred to in point e) or f) is a settlor or a defendant or in relation to which the Whistleblower or a legal person referred to in point e) or f) is a person who substantially increases the assets of the trust by contract or by acquisition on death.

CSOB INS CZ shall ensure that Whistleblowers have easy access to support measures, in particular comprehensive and independent information and advice on available procedures, protection from retaliation and on their rights.

If a Whistleblower believes that they may be subject to bullying or harassment at their place of work after reporting a case, management may consider transferring them to another appropriate location at their request. However, this assurance does not apply where it can be shown that the individual has made the report in order to deal with personal grievances or where he/she has been involved in a complaint about a minor matter.

CSOB INS CZ shall take appropriate consequences (e.g. disciplinary proceedings, criminal charges) according to its internal procedures against natural or legal persons who:

- a) prevent or attempt to prevent the notification;
- b) plan to retaliate against Whistleblowers;
- c) bring harassment actions against Whistleblowers;
- d) breach the obligation of confidentiality of the identity of Whistleblowers.

CSOB INS CZ shall also draw consequences against Whistleblowers if it is proven that they knowingly reported false information and shall establish measures to compensate for damages resulting from such reporting in accordance with internal procedures.

4.2. Protection of persons concerned

CSOB INS CZ ensures that the affected persons (those affected by the notification) are protected in a manner that maintains a balance between the interests and rights of the various parties involved (including the right of CSOB INS CZ to investigate the Violation). CSOB INS CZ provides protection to the affected persons in accordance with § 7 et seq. of the Act.

CSOB INS CZ shall ensure that the persons concerned fully enjoy their fundamental rights, such as fair treatment, the right to defence (including the right to be heard and

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the right of access to the file) and the presumption of innocence. The Compliance Department ensures that the identity of such person is protected while the investigation triggered by the notification is ongoing. The protection of the identity of Whistleblowers extends to the protection of the identity of the persons concerned.

The persons concerned are entitled to information (name of the data processor, on what basis they are suspected, who are the recipients of this information) and also have the right to access, rectify and remove incomplete and incorrect information concerning their person, in accordance with the data protection rules.

These rights do not entitle the persons concerned to make copies of documents or other material relating to the investigation, findings and measures taken.

The exercise of these rights may be delayed to prevent obstruction of the investigation or restricted to protect the rights of other persons involved. Whether these rights should be limited shall be decided on a case-by-case basis.

5. Competent person

CSOB INS CZ as the obliged person shall designate the competent person. The competent person may only be a natural person who is of good character, of legal age and fully competent.

Competent person:

- a) receives and assesses the validity of the notification,
- b) ensure communication with the Whistleblower, informing the Whistleblower of the progress and outcome of the investigation,
- c) conduct an investigation to determine whether a Violation has occurred,
- d) propose to CSOB INS CZ measures to remedy or prevent the Violation following the notification,
- e) comply with the instructions of CSOB INS CZ,
- f) act impartially in the performance of its activities,
- g) be subject to strict ethical rules, in particular as regards the observance of due discretion and the necessary restraint,
- h) shall maintain confidentiality of the facts of which it has become aware in the course of its activities, even after it has ceased to carry out those activities.

The competent person shall not be penalised for the proper performance of his/her activities under the Act. Every employee and co-worker is obliged and committed to cooperate in good faith with the competent person. The competent person in CSOB INS CZ is designated as Ing. Romana Špášová (mobile: +420 603 144 500, email: compliance@csobpoj.cz).

In case of need (e.g. conflict of interest or threat to independence), an external party may be contacted to conduct an investigation. In such a case, a specific non-disclosure agreement must be concluded.

6. Responsibilities of the Compliance Department

The Compliance Department ensures:

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1. reporting to the relevant reports (e.g. to the Board of directors or supervisory body);
2. ensuring the confidentiality of the identity of the Whistleblower, unless the Whistleblower has breached a confidentiality obligation, does not consent to disclosure of his/her identity or is required by law, e.g. a criminal trial (this does not preclude that the Whistleblower, as well as all other persons involved, may be interviewed in relation to the Violation);
3. taking the necessary protective measures in relation to the Whistleblower or other persons concerned;
4. notification of facts which must be reported to the official authorities;
5. protecting the rights of the persons concerned;
6. receiving and disposing of all whistleblowing cases;
7. proposing follow-up actions from individual investigations, if any, and monitoring their implementation;
8. compliance with this policy;
9. an information campaign to disseminate this policy.

7. Reporting channels and notification procedure

7.1. Information about Violations may be reported through the Reporting Channels:

- a) <https://Integrityline.kbc.com/> (preferred method of notification, also offers the option of anonymous notification);
- b) reporting to your line manager (by email, phone, in person, letter)
- c) reporting to the Compliance Department:
 1. by email: compliance@csobpoj.cz ;
 2. by phone: +420 603 144 500 (working days 7:30 a.m. - 3:30 p.m.)
 3. in person at the office of the Compliance Department at the headquarters of CSOB INS CZ, Masarykovo náměstí 1458, 530 02 Pardubice;
 4. by letter addressed to the Compliance Department, at Masarykovo náměstí 1458, 530 02 Pardubice.

If the Whistleblower requests a meeting with the Compliance Department staff for the purpose of reporting, CSOB INS CZ ensures, with the consent of the Whistleblower, that complete and accurate records of the meeting are kept, in which case CSOB INS CZ has the right to document the meeting:

- a) by making a recording of the conversation in a durable and retrievable form (audio recording) with the consent of the Whistleblower; or
- b) by means of an accurate record of the meeting prepared by the employees responsible for processing the notification.

CSOB INS CZ offers the Whistleblower the opportunity to review, correct and sign the minutes of the meeting or the transcript of the audio recording.

7.2. Procedures for reporting and handling Violations

The Whistleblower may determine how to report the suspected Violation.

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The competent person shall register the report and send an acknowledgement of receipt to the Whistleblower within 7 working days of receipt - exceptions to the obligation to inform the Whistleblower:

- the Whistleblower has expressly requested the competent person not to notify him or her of the receipt of the report; or
- it is clear that notification of receipt of the notification would disclose the identity of the Whistleblower to another person.

The competent person must assess the validity of the notification and inform the Whistleblower in writing of the results of the assessment within 30 days of the date of receipt of the notification. In factually or legally complex cases, this period may be extended by up to 30 days, but not more than twice. The competent person shall inform the Whistleblower in writing of the extension of the time limit and the reasons for it before the expiry of the time limit.

In the case of a notification, the Whistleblower will be required to indicate at least:

- the name, surname and contact details (telephone, e-mail, correspondence address) of the Whistleblower (in the case of an anonymous notification, these details will not be required);
- a description of the infringement, including any other relevant facts relating to the infringement;
- the reason for the notification and an indication of where the event in question occurred or may occur in the future if adequate measures are not taken;
- how the Whistleblower obtained information about the infringement;
- which persons are involved in the infringement and which persons may further corroborate the facts reported (witnesses) and with whom the Whistleblower has already discussed the alleged facts;
- the organisational unit where the infringement occurred and an estimate of the potential financial impact.

Written feedback shall be provided to the Whistleblower no later than 3 months after receipt of the notification. The competent person may, after due consideration of the matter, decide that the reported Violation is clearly minor and does not require further action other than termination. In such a case, the competent person shall communicate this decision and the reasons for it to the Whistleblower. The same approach may be applied in the case of repeated notifications which do not contain any new or significant information about the Violations compared to the previous notification in relation to which the investigation was terminated.

If the notification is substantiated, the competent person shall propose corrective action to the obliged person. The obliged entity shall promptly notify the relevant person of the action taken, who shall notify the Whistleblower in writing without undue delay.

If the notification is not found to be justified, the competent person shall, without undue delay, inform the Whistleblower in writing that, on the basis of the facts stated in the notification and the circumstances known to him, he does not suspect that an infringement has been committed, or that the notification is based on false information,

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and shall inform the Whistleblower of his right to lodge a notification with a public authority.

8. Confidentiality, data protection and record keeping of notifications

8.1. Confidentiality

The identity of a Whistleblower shall not be disclosed to anyone other than authorized personnel responsible for receiving or processing the report without the express consent of that person. This also applies to any other information from which the identity of the Whistleblower can be inferred.

The identity of a Whistleblower and any other information relating to such a person may be disclosed only if it is a necessary and proportionate obligation imposed by law in connection with an investigation by national public authorities, including in order to protect the rights of the person concerned. The competent person shall inform the Whistleblower in advance of such disclosure to the public authority, together with the reasons for which it is obliged to disclose the identity information and shall give the Whistleblower the opportunity to comment on the disclosure.

8.2. Protection of personal data

Any processing of personal data carried out under this Policy, including the exchange or transfer of personal data, shall be carried out in accordance with the laws of the Czech Republic and the internal regulations and policies of CSOB INS CZ. Personal data that are clearly not relevant to the processing of a particular notification will not be collected or, if collected accidentally, will be deleted without undue delay.

8.3. Record keeping of notifications and final provisions

CSOB INS CZ shall keep records of all notifications received in accordance with the confidentiality requirements. Notifications shall not be kept longer than strictly necessary and shall be processed in accordance with the Filing and Shredding Regulations (see Decision of the Board of Directors of CSOB INS CZ No. 19).

The Whistleblower Protection Policy is stored in the Document Library (CSOB POJKA - intranet) and at <https://Integrityline.kbc.com/>.

The Whistleblower Protection Policy is part of the mandatory e-learning training.