



GROUP WHISTLEBLOWING & INVESTIGATION POLICY



Revisions

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0.2	05.05.2022	Ljuba Kovačević	Second draft

Policy properties

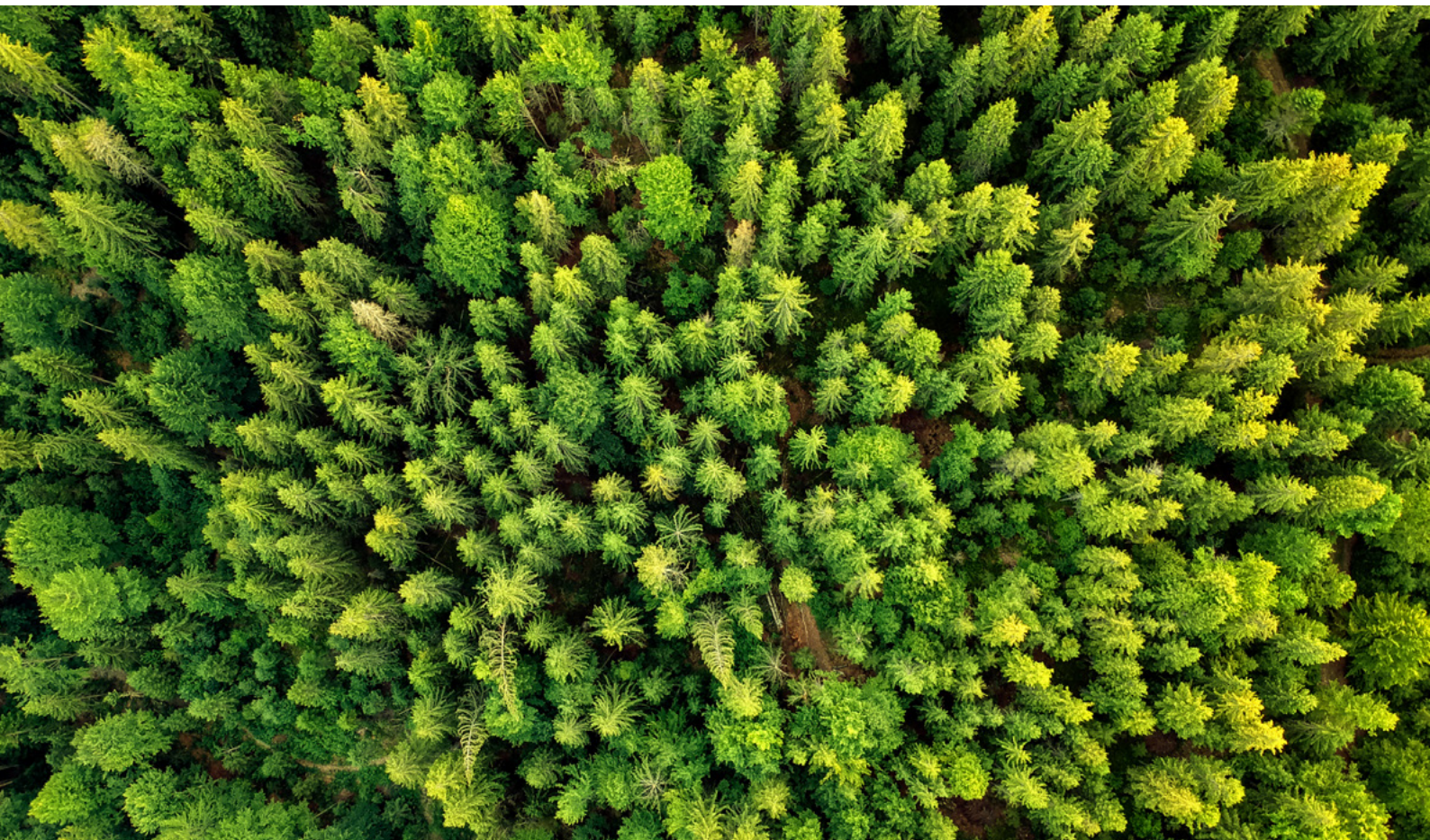
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Approved By	Boris Novorka, Group Chief People & Culture Officer Jan Kotous, General Counsel Pavel Kocián, Group Chief Sales & Support Functions Zdeněk Sobotka, Group CEO
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1. Policy Provisions

1.1. Objective

The SOLEK Group is guided by its internal values. These values are the foundation of how SOLEK Group conduct itself and interact with others, its clients, members, suppliers, shareholders, and other stakeholders.

The SOLEK Group is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

The SOLEK Group encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent, or undesirable conduct involving the SOLEK Group's business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimization or reprisal.

1.2. Purpose

The purpose of this Policy is the introduction of an internal reporting system (whistleblowing system) via Reporting Channels in accordance with the Code of Conduct. This Policy aims to enable Notifiers to safely file a notification concerning a liable entity within the framework of internal mechanisms and ensure that Notifiers and other persons are protected from potential Retaliation.

Additionally, this Policy outlines the process of investigation.

1.3. Scope

This Policy applies to: (i) Employees, (ii) Service Providers, and (iii) Third Parties, irrespective of their location of work or delivery of services, regarding actions taken in the course of their employment or service.

This Policy is intended to apply to the above persons in all countries in which the SOLEK Group operates a business.

2. Definitions and Abbreviations

For the purpose of this document the terms shown below has the following meaning:

Term	Description
Code of Conduct	The Code of Business of Conduct and Ethic of SOLEK Group adopted by the SOLEK Group
Company	SOLEK HOLDING SE, ID No.: 29202701, with registered seat at Voctářova 2497/18, Libeň, 180 00 Prague 8, registered in Commercial Register kept by the Municipal Court in Prague, file No. H 218
Concern	A matter that engages a person's attention, interest, or care and that affects SOLEK Group's interest.
Employee	All employees, officers, contractors, directors or members of statutory bodies of all Group Companies
Group Company	All companies that are part of the SOLEK Group
Internal Policies	The set of SOLEK Group's internal regulations that establish standards in different areas and regulates Employees behavior.
Notifier	Any Employee, Service Provider or Third Party who had made a Report, or is believed to be about to make a Report.
Policy	The Group Whistleblowing & Investigation Policy
Prohibited Practice	Any direct or indirect acts of bribery, corruption, money laundering, or other illicit conduct, in each case constituting a violation of any Anti-Corruption laws or AML legislation.
Report	A spoken or written account of something that one has observed, heard, done, or investigated.
Reportable Conduct	An intentional, reckless or negligent failure by an Employee, Service Provider or Third Party to observe, any laws or regulations, the Code of Conduct, and any other Internal Policies that are in force or might be in force in the future and that creates an obligation to the individuals previously mentioned which is further specified in Section 3.1 of this Policy.
Reporting Channels	Shall have the meaning set forth in Section 3.2. of this Policy.
Retaliation	Any direct or indirect detrimental action recommended, threatened or taken against a Notifier because they have made a Report, or are believed to be about to make a Report. Retaliatory actions may include, but are not necessarily limited to, harassment, discriminatory treatment, inappropriate performance appraisals, salary freeze or adjustment, work assignments, demotion, termination of employment, or the withholding of an entitlement.
Service Provider	An individual who has a direct contractual relationship with SOLEK Group for the provision of services. It includes consultants, contractors, experts performing missions for the Group Company, interns, secondees, etc.
SOLEK Group	The Company and all its subsidiaries
Third Party	Any person or entity that is not an Employee or a Service Provider.

3. Key Principles

3.1. Reportable Conduct

The Employee, Service Providers, or Third Party may make a Report under this Policy if they have reasonable grounds to believe that other Employee, Service Provider, or Third Party, or other person who has business dealings with the SOLEK Group, and/or the particular Group Company has engaged in Reportable Conduct, which for the purposes of this Policy is among others:

- Dishonest, fraudulent or corrupt;
- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
- Unethical including any breach of the SOLEK Group's and/or Group Company's policies such as the Code of Conduct;
- Oppressive or grossly negligent;
- Potentially damaging to the SOLEK Group, and/or Group Company, its Employees, Service Provider, or a Third Party;
- Misconduct or an improper state of affairs;
- A danger, or represents a danger to the public or financial system;
- Harassment, discrimination, victimization or bullying.

Any disclosures, that do not fall within the definition of Reportable Conduct, will be at the SOLEK Group, and/or the Group Company's discretion whether it considers there is a reasonable suspicion that the Reportable Conduct is occurring and/or whether the conduct constitutes misconduct or improper state of affairs.

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. A personal work-related grievance is a grievance about any matter in relation to a staff member's current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for the Company. Examples of personal work related grievances are as follows:

- An interpersonal conflict between the Employees;
- A decision relating to the engagement, transfer or promotion of the Employee;
- A decision relating to the terms and conditions of engagement of the Employee;
- A decision to suspend or terminate the engagement of the Employee, or otherwise to discipline the Employee.

Personal work-related grievances should be reported to the Employee's supervisor or to the local HR Department.

3.2. Reporting Channels

If an Employee, Service Provider, or eligible Third Party would like to make a report under this Policy, they have these Reporting Channels available:

a) For SOLEK Group worldwide by:

- Contacting Group Compliance Officer personally at the address SOLEK HOLDING SE, Voctářova 2497/18, Libeň, 180 00 Prague 8, the Czech Republic;
- Contacting Group Compliance Officer via whistleblowing mobile hotline: **+420 737 182 977;**

- Sending a mail via post at the address SOLEK HOLDING SE, Voctářova 2497/18, Libeň, 180 00 Prague 8, the Czech Republic;
- Sending an email at **compliance@solek.com**;

b) For Group Companies in Chile by:

- Contacting Local Compliance Officer personally at the address: SOLEK, Apoquindo 5400, 21st floor, Las Condes, Santiago Chile;
- Contacting Local Compliance Officer via whistleblowing mobile hotline: **+56 9 2167 2994**;
- Sending a mail via post at the address: SOLEK, Apoquindo 5400, 21st floor, Las Condes, Santiago Chile;
- Sending an email at: **compliance@solek.cl**;
- Placing the Report into physical boxes in the offices at the address: Apoquindo Office at Apoquindo 5400, 21st floor, Las Condes, Santiago Chile; and Badajoz Office at Badajoz 45, 15th floor, Las Condes, Santiago Chile.

3.3. Anonymity and Confidentiality

The SOLEK Group respects and protects identity to the Notifiers if they choose to make an anonymous Report. Everybody can choose to remain anonymous while making a Report, interacting with Compliance Officers during an investigation of their Report, as well as after their case is closed.

At any given time, the Notifier can identify itself, but this is their choice, and at no point will they be forced to provide identity. The SOLEK Group and/or Group Company will work to protect its identity, and if the Notifier decides to disclose its identity.

SOLEK Group and/or Group Company will also take all steps necessary and outlined in this Policy to ensure the Notifier does not suffer any Retaliation.

It is worth noting that SOLEK Group and/or Group Company will make every endeavor possible to investigate the Report, but in some cases, there are limitations of what can be achieved if the Notifier decides to remain anonymous.

3.4. The Investigative Process

It is important for the SOLEK Group to be transparent with the Employees, the Service Providers and/or the Third Parties and outline what is the process to investigate a Report submitted through its Reporting Channels.

The investigative process is therefore following:

- Report (anonymous or otherwise) is received.
- The relevant Compliance Officer is assigned to the Report to assess it and confirm its receipt till 7 days.
- The relevant Compliance Officer will do an initial assessment to confirm if the Report is a valid and request permission to investigate.
- The relevant Compliance Officer will begin their investigation. This can include corresponding with the Notifier if there is a channel to do so.
- Once the relevant Compliance Officer has finalized their investigation and final report, management and the Notifier will be informed. The investigation shall be terminated within 30 days of receipt of the Report (in complicated cases this period may be extended; however max. two times).

- At this point, the relevant Compliance Officer will hand the case over to management for any subsequent action to take place with the proposal of the corrective actions.

The SOLEK Group or the Group Company will investigate all matters reported under this Policy as soon as practicable after the matter has been reported. The relevant Compliance Officer will investigate the matter in cooperation with the senior member of the Legal Team, and the correspondent senior manager of the area to which the concern is related to. Where necessary, the relevant Compliance Officer will also appoint an external investigator to assist in conducting the investigation.

All investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the Report is not anonymous, the relevant Compliance Officer will contact the Notifier by preferred method of communication to discuss the investigation process and any other matters that are relevant to the investigation.

Where the Notifier has chosen to remain anonymous, his identity will not be disclosed to the relevant Compliance Officer or to any other person and the SOLEK Group or the Group Company will conduct the investigation based on the information provided to it.

The SOLEK Group or the Group Company will strive to provide as much feedback on the investigation as possible to the extent permitted by law. However, due to SOLEK Group's privacy guidelines, there are often information that cannot be shared with the Notifier.

If, after receiving the summarized report of the investigation, the Notifier is not satisfied with the result, they can escalate this to the Group CEO or the CEO of the Group Company. The Notifier can provide this escalation in writing so that a formal review can take place.

While the Group CEO or the CEO of the Group Company commits to review the request, SOLEK Group or the Group Company is under no obligation to reopen the investigation. If the Group CEO or the CEO of the Group Company concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

3.5. Retaliation

Any form of Retaliation is prohibited within all SOLEK Group. Employees, Services Providers and/or Third Parties must not commit an act of Retaliation against a Notifier, that makes, has made, or is believed to be about to make a Report of a Reportable Conduct, suspected Prohibited Practices, or a Concern regarding the conducting of business within SOLEK Group.

Any Notifier, who believes that they have been subjected to Retaliation, may report it through one of the Reporting Channels.

3.6. Evidence and Reporting

Trend analysis of Reports received through the Reporting Channels and their resolution will be conducted on an aggregated, anonymized basis to identify potential recurrent themes or topics of concern. The outputs of this process and general feedback will be reported to the SOLEK Group management every quarter.

Reports or investigations carrying an undue amount of risk will be reported to the SOLEK Group management outside of the quarterly updates. The SOLEK Group management at any time can ask about anonymous reports, investigations, as well as the state of SOLEK Group's whistleblowing program.

4. Local Implementation

Pursuant to the provisions of this Policy, the Legal and Compliance Department shall develop and keep updated internal procedures to ensure the compliance of this Policy at the Group level, which shall be implemented by said department and which shall be mandatory for all members of the management teams and Employees of the Group Companies.

Likewise, the Legal and Compliance department of each Group Company shall establish local internal procedures to adapt the content on this Policy in accordance with applicable law in their respective jurisdictions.

5. Mandatory Training

Each Group Company is responsible to regularly, at least once a year, train all its Employees regarding this Policy and the procedures related to it.

6. Enforcement and Disciplinary Action

Any breach of this Policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

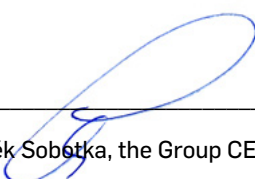
The SOLEK Group may unilaterally introduce, vary, remove or replace this Policy at any time.

Employees are encouraged to read this Policy in conjunction with other relevant SOLEK Group Internal Policies, including:

- The Code of Business Conduct and Ethics

7. Approval Authority Signature and Date

In Prague, on 15. 6. 2022



Zdeněk Sobotka, the Group CEO

