

Internal Reporting Procedure

**at Daewon Europe Sp. z o.o., with its registered office in Lublin at ul. Frezerów 16
adopted by Management Board Order No. 521/2024 of September 30, 2024**

§ 1

General Provisions

1. The internal reporting and follow-up action procedure, hereinafter referred to as the "procedure," defines the process for receiving internal reports concerning information about violations of the law or regulations and ethical standards established at Daewon Europe Sp. z o.o., as well as taking follow-up actions in connection with these reports.
2. The procedure aims to introduce transparent rules for disclosing irregularities, taking appropriate remedial actions related to identified violations, and protecting whistleblowers.
3. The procedure applies to the whistleblower who submits an internal report in the work-related context, regardless of the legal basis of their employment or service.
4. The whistleblower is afforded the protection provided under this procedure from the moment the internal report is made, provided that they had reasonable grounds to believe that the information reported was true at the time of submission and constitutes information about a violation of the law.
5. The whistleblower is not afforded protection under this procedure if they knowingly submit a false internal report (bad faith).
6. The whistleblower may, in any case, submit an external report without first making an internal report.
7. External reports are submitted to the Ombudsman or another public authority competent to take appropriate follow-up actions regarding the subject of the report. In relevant cases, external reports may also be submitted to institutions, bodies, or agencies of the European Union.

§ 2

Definitions

Whenever the procedure refers to:

- 1) The Ethics Committee – this refers to a designated organizational unit consisting of at least three impartial members appointed by the Company's Management Board, whose tasks include receiving internal reports, requesting additional information from the whistleblower if necessary, and taking follow-up actions;
- 2) Follow-up action – this refers to actions aimed at assessing the veracity of the information contained in the internal report and preventing violations of the law,

particularly by conducting investigations, initiating inspections, or other proceedings under legal provisions, or dismissing the report;

- 3) Retaliatory action – this refers to any direct or indirect action or omission in a work-related context prompted by the internal report, which violates or may violate the whistleblower's rights or causes or may cause unjustified harm, including unwarranted initiation of proceedings against the whistleblower;
- 4) Information on the violation of the law – this refers to information, including a reasonable suspicion, about a past or potential violation of the law that occurred or is likely to occur at Daewon Europe Sp. z o.o., which the whistleblower learned about in a work-related context, or information about an attempt to conceal such a violation;
- 5) Feedback – this refers to providing the whistleblower with information about planned or taken follow-up actions and the reasons for those actions;
- 6) Work-related context – this refers to past, present, or future activities related to work in which information about the violation of the law was obtained and where there is a risk of experiencing retaliatory actions;
- 7) The subject of the report – this refers to a natural person, legal person, or organizational unit without legal personality indicated in the internal report as a person who committed a violation of the law or as a person associated with the one who committed the violation;
- 8) Person assisting with the report – this refers to a natural person who assists the whistleblower in making an internal report in a work-related context and whose assistance should not be disclosed;
- 9) Person associated with the whistleblower – this refers to a natural person who may experience retaliatory actions, including a colleague or family member of the whistleblower;
- 10) Internal report – this refers to an internal report submitted in accordance with this procedure.

§ 3

Subject of the Report

1. The subject of an internal report may be actions or omissions that are unlawful or aimed at circumventing the law concerning:
 - 1) Corruption;
 - 2) Public procurement;
 - 3) Financial services, products, and markets;
 - 4) Anti-money laundering and counter-terrorist financing;

- 5) Product safety and compliance;
 - 6) Transport safety;
 - 7) Environmental protection;
 - 8) Radiological protection and nuclear safety;
 - 9) Food and feed safety;
 - 10) Animal health and welfare;
 - 11) Public health;
 - 12) Consumer protection;
 - 13) Privacy and data protection;
 - 14) Security of network and information systems.
2. The subject of an internal report may also include violations of internal regulations and ethical standards applicable at Daewon Europe Sp. z o.o.

§ 4

Reporting Procedure

1. A whistleblower may submit an internal report:
 - 1) Electronically – via email at: sustainability@daewon.eu
 - 2) In writing – in a sealed envelope sent by external mail marked "Violation Report," placed in another sealed envelope addressed to Daewon Europe Sp. z o.o., ul. Frezerów 16, 20-209 Lublin.
2. To facilitate proper verification of the report and effective follow-up actions, the report should contain at least:
 - 1) The whistleblower's and the subject's personal data;
 - 2) The whistleblower's contact address;
 - 3) A detailed description of the violation;
 - 4) A description of the work-related context that enabled the observation of the violation;
 - 5) An indication of reasonable grounds for believing that the information on the violation of the law is true.
3. An internal report may also be submitted anonymously by delivering a sealed envelope marked "Violation Report" placed in another sealed envelope addressed to Daewon Europe Sp. z o.o., ul. Frezerów 16, 20-209 Lublin.

4. Anonymous reports that contain clearly unreliable information or unverifiable content will not be considered.
5. Within 7 days of receiving an internal report, the Ethics Committee provides the whistleblower with a confirmation of receipt unless the whistleblower did not provide a contact address for the confirmation.

§ 5

Handling of Reports

1. Internal reports are received by a designated member of the Ethics Committee, who conducts a preliminary verification to determine whether the report meets the conditions set out in this procedure. If necessary, the committee member may contact the whistleblower for clarification or additional information, if possible.
2. The Ethics Committee may decide not to consider a report that was previously submitted by the same or another whistleblower if no significant new information is provided compared to the earlier report. The committee informs the whistleblower of the decision not to review the internal report, stating the reasons, and in the case of a subsequent report, the committee may leave it without further review and does not inform the whistleblower.
3. If the internal report meets the conditions specified in paragraph 1 and the content justifies the initiation of an investigation, the Ethics Committee will take actions to clarify all the circumstances contained in the report.
4. If necessary, the Ethics Committee may summon any person working for Daewon Europe Sp. z o.o. to provide explanations. Summoned persons are required to appear and present all information and documents in their possession that could help clarify the circumstances of the reported violation.
5. The Ethics Committee may also seek assistance or opinions from representatives of other organizational units of Daewon Europe Sp. z o.o. or from a service provider, if the knowledge and experience of such individuals are necessary to clarify all circumstances of the reported violation.
6. After clarifying all circumstances of the report, the Ethics Committee decides on the validity of the report and issues recommendations for taking any necessary follow-up actions.
7. The Ethics Committee provides feedback to the whistleblower within 3 months of confirming receipt of the internal report, or if no confirmation was provided, within 3 months from the expiration of 7 days after the internal report was submitted.
8. The Ethics Committee does not provide feedback to the whistleblower if they did not provide a contact address to receive such feedback.

§ 6

Follow-up Actions

1. If:
 - 1) The violation of the law can be effectively addressed within the organizational structure of Daewon Europe Sp. z o.o., the Ethics Committee takes the remedial actions specified in the recommendations;
 - 2) The violation of the law cannot be effectively addressed within the organizational structure of Daewon Europe Sp. z o.o., the Ethics Committee notifies the Company's Management Board for further decisions;
 - 3) The report is found to be unfounded, the Ethics Committee dismisses the report and closes the proceedings under this procedure.
2. If the feedback provided in accordance with § 5 point 7 did not include the information specified in § 2 point 5, the Ethics Committee provides the whistleblower with additional feedback containing such information.
3. The Ethics Committee takes follow-up actions with due diligence and maintains full confidentiality regarding the whistleblower's identity.

§ 7

Whistleblower Protection

1. No retaliatory actions, nor attempts or threats to take such actions, may be taken against the whistleblower.
2. Prohibited retaliatory actions include, in particular:
 - 1) Refusal to establish an employment relationship;
 - 2) Termination or dismissal without notice from employment;
 - 3) Failure to enter into a fixed-term or indefinite employment contract after the expiration of a trial period;
 - 4) Failure to renew a fixed-term employment contract;
 - 5) Failure to enter into an indefinite employment contract after the expiration of a fixed-term contract, where the whistleblower had a reasonable expectation of such a contract;
 - 6) Reduction of remuneration;
 - 7) Delay or exclusion from promotion;
 - 8) Exclusion from receiving other employment-related benefits or reduction of such benefits;

- 9) Demotion to a lower position;
 - 10) Suspension from duties or official responsibilities;
 - 11) Assignment of the whistleblower's duties to another employee;
 - 12) Unfavorable changes to the workplace or work schedule;
 - 13) Negative work performance evaluation or negative work opinion;
 - 14) Imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature;
 - 15) Coercion, intimidation, or exclusion;
 - 16) Mobbing;
 - 17) Discrimination;
 - 18) Unfair or unfavorable treatment;
 - 19) Exclusion from or omission in assigning training that would enhance professional qualifications;
 - 20) Unjustified referral to medical examinations, including psychiatric evaluations;
 - 21) Actions aimed at hindering future employment in a specific sector or industry, based on informal or formal agreements within the sector or industry;
 - 22) Causing financial or economic loss, or loss of income;
 - 23) Causing other intangible harm, including violating personal rights, particularly the whistleblower's good name.
3. Prohibited retaliatory actions also include terminating any contract in which the whistleblower is a party, particularly contracts concerning the sale or delivery of goods or services, withdrawing from such a contract, or terminating it without notice.
 4. The prohibition on retaliatory actions extends to the person assisting in the reporting process, the person associated with the whistleblower, and any legal or organizational entity assisting or connected to the whistleblower, particularly if owned by or employing the whistleblower.

§ 8

Report Register

1. Each internal report is registered directly by a designated employee of the Ethics Committee.
2. The internal report register includes:
 - 1) Report number;

- 2) Subject of the violation;
 - 3) Personal data of the whistleblower and the subject of the report, necessary to identify these individuals;
 - 4) The whistleblower's contact address;
 - 5) Date of report submission;
 - 6) Information on follow-up actions taken;
 - 7) Date of case closure.
3. The internal report register also includes anonymous reports. If the whistleblower did not provide their personal data or contact address, the report is marked as anonymous.
 4. Information regarding the report is stored in the internal report register for 3 years after the end of the calendar year in which the follow-up actions were completed, or after the conclusion of other proceedings initiated by these actions.

§ 9

Final Provisions

1. The Management Board of Daewon Europe Sp. z o.o. is responsible for the accuracy and effectiveness of this procedure.
2. The Management Board informs all individuals working for Daewon Europe Sp. z o.o. about the adoption and content of this procedure, as well as any amendments.
3. An individual applying for work, based on an employment relationship or other legal basis for providing work or services, is provided with information about the procedure upon the start of recruitment or negotiations preceding the conclusion of a contract other than an employment contract.
4. The procedure takes effect 7 days after it is communicated to all individuals working for Daewon Europe Sp. z o.o.

GDPR Clause

Information on the processing of personal data in connection with receiving reports of legal violations and conducting follow-up actions:

1. The Data Controller is Daewon Europe Sp. z o.o., ul. Frezerów 16, 20-209 Lublin.
2. For matters related to the processing of personal data by the Data Controller, contact can be made using the above data or with the designated Data Protection Officer via email: rodo@daewon.eu
3. Personal data will be processed for the purpose of receiving the report and conducting an investigation based on the legal obligation imposed on the Data Controller under the Act of June 14, 2024, on the protection of whistleblowers.

4. The Data Controller ensures the confidentiality of data in connection with the received report. Accordingly, the data may be disclosed only to entities authorized by law and entities providing services to the Data Controller necessary for the execution of the Procedure, i.e., email provider, postal operator, legal office.
5. Personal data processed in connection with receiving a report or taking follow-up actions, as well as documents related to the report, will be stored for 3 years after the end of the calendar year in which the report was submitted or follow-up actions were concluded, or after the conclusion of proceedings initiated by those actions. Personal data not relevant to the report will not be collected, and if accidentally collected, will be immediately deleted. The deletion of such personal data occurs within 14 days after it is determined that the data is not relevant to the matter.
6. Each person whose data is processed by the Data Controller has the right to request access to their personal data, as well as to request its rectification (correction). You also have the right to request the deletion or restriction of processing, as well as to object to the processing, provided that it only applies in situations where further processing is not necessary for the Data Controller to fulfill a legal obligation and no other overriding legal grounds for processing exist.
7. If the data was not provided directly to the Data Controller, it means that the Controller received it from a whistleblower as part of a report. In such cases, the data is shared to the extent necessary for identification and, where appropriate, contact (e.g., name, surname, phone, email, address, position).
8. At any time, you may exercise the right to file a complaint with the President of the Office for Personal Data Protection (uodo.gov.pl) regarding the processing carried out by the Data Controller.
9. Providing data is voluntary.

Prezes Zarządu

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