



PROCEDURE FOR REPORTING BREACHES IN THE PURO GROUP

1. Introduction and purpose of the Procedure

- 1.1. This procedure (hereafter: the Procedure) sets out the rules for the reporting of irregularities resulting from actual or potential unlawful acts or omissions which constitute or may constitute a breach of European Union or national law in the areas indicated in this Procedure, by persons who act as whistleblowers (hereafter: the Whistleblower) in the companies of the PURO Group.
- 1.2. The purpose of this Procedure is also to provide protection to the whistleblowers within the scope and according to the principles set out herein, to promote whistleblowing in PURO group companies and, consequently, to ensure the protection of PURO's interests and respect of legal principles.
- 1.3. All persons employed by PURO Group companies (irrespective of the basis of employment), subcontractors, associates and contractors, officers, interns, volunteers and apprentices gaining their professional qualifications with the group companies are required to comply with the provisions of this Procedure.

2. Definitions

- 2.1. **Procedure** means this procedure describing the process for reporting internal breaches of law in the Company and the rules for the protection of persons reporting such breaches.
- 2.2. **Company** means the company of the PURO Group concerned by the report, i.e. Puro Hotels Sp. z o.o., Puro Hotel Development Sp. z o.o., Puro Hotel Wrocław Sp. z o.o., Puro Hotel Kraków Sp. z o.o., Puro Hotel Poznań Sp. z o.o., Puro Hotel Gdańsk Sp. z o.o., Puro Hotel Kazimierz Sp. z o.o., Puro Hotel Warszawa Sp. z o.o., Puro Hotel Łódź Sp. z o.o., Puro Hotel Canaletta Sp. z o.o., Genfer Hotel Wrocław Sp. z o.o., Genfer Hotel Kraków Sp. z o.o., Genfer Hotel Poznań Sp. z o.o., Genfer Hotel Gdańsk Sp. z o.o., Genfer Hotel Kazimierz Sp. z o.o., Genfer Hotel Warszawa Sp. z o.o., Genfer Hotel Canaletta Sp. z o.o., Genfer Hotel Katowice Sp. z o.o., Genfer Hotel Orłąt Lwowskich Sp. z o.o., Genfer Hotel Waliców Sp. z o.o., Genfer Hotel Invest VII Sp. z o.o., Genfer Hotel Invest VIII Sp. z o.o.
- 2.3. **Whistleblower** means a natural person who reports or publicly discloses information on breaches acquired in the context of his or her activities related to work, temporary work, performance of a mandate or a specific work, provision of B2B services to the Company, or serving on the Company's bodies, including in the capacity of a contractor, intern, volunteer or apprentice of the Company.
- 2.4. **Information on breaches** means information, including a reasonable suspicion, about actual or potential breaches which occurred or are likely to occur in the Company, or information about attempts to conceal such breaches, in each case provided by the Whistleblower.
- 2.5. **Feedback** means the provision to the whistleblower of information on the action envisaged or taken as follow-up and on the grounds for such follow-up.
- 2.6. **Work-related context** means past, current or future activities related to the performance of work under an employment or other legal relationship which as basis for the performance of work or services or function in for the benefit of the Company, through which information on breaches was acquired and within which potential retaliation may be experienced.
- 2.7. **Follow-up** means any action taken by the Company or public authority to assess the accuracy of the allegations made in the report and, where relevant, to address the breach reported, including through actions such as an investigation, prosecution, an action for recovery of funds, or the closure of the procedure for receiving and reviewing reports.
- 2.8. **Retaliation** means any direct or indirect act or omission which occurs in a work-related context, is prompted by reporting or by public disclosure, and which affects or is likely to affect the whistleblower's rights, or causes or may cause unjustified detriment to the whistleblower, including unwarranted initiation of proceedings against the whistleblower.
- 2.9. **Breach** means an act or omission that is unlawful in the light of generally applicable laws in the areas falling within the material scope referred to in section 5 of this Procedure.
- 2.10. **Legal Department** means the Legal Department in the PURO Group.

3. Personal scope of the reports of breaches

- 3.1. A whistleblower may be one of the following:
 - 1) employee within the meaning of the provisions of the Act of 26 June 1974 - Labour Code (Journal of Laws of 2023, item 1465 - hereinafter referred to as the "Labour Code"),
 - 2) temporary employee,
 - 3) contractor or person accepting an order within the meaning of the Act of 23 April 1964 – Civil Code (Journal of Laws of 2024, item 1061 – hereinafter the "Civil Code"),
 - 4) self-employed natural person carrying out business activity and cooperating with the Company on the basis of a civil law contract,
 - 5) member of the Company's bodies (management board, shareholders' meeting),
 - 6) intern,
 - 7) volunteer,
 - 8) apprentice,
 - 9) candidate for being hired by the Company (irrespective of the basis of employment),
 - 10) contractor of the Company.
- 3.2. In the breach report, the whistleblower shall clearly indicate that they wish to remain anonymous or shall state their identity.

4. Internal body authorised to receive breach reports

- 4.1. The Company delegates the authority to receive breach reports to the Legal Department, subject to the involvement of the Head of Human Resources of the PURO Group.
- 4.2. The Legal Department shall be authorised to follow up on reports, including the verification hereof and further communication with the Whistleblower, where possible, including requesting additional information and providing feedback to the Whistleblower.
- 4.3. The Legal Department ensures that the procedure for internal reporting and the processing of personal data associated with the receipt of reports prevent unauthorised persons from gaining access to the information covered by the report and ensure that the confidentiality of the identity of the Whistleblower, the person to whom the report relates and any third party named in the report is protected. The protection of confidentiality applies to information which may be used, whether directly or indirectly, to identify such persons.

5. Material scope of breach reports

- 5.1. A breach is defined as an act or omission that is unlawful or intended to circumvent the law relating exclusively to the following areas:
- 1) corruption,
 - 2) public procurement;
 - 3) financial services, products and markets;
 - 4) prevention of money laundering and terrorist financing;
 - 5) product safety and compliance;
 - 6) transport safety;
 - 7) protection of the environment;
 - 8) radiation protection and nuclear safety;
 - 9) food and feed safety;
 - 10) animal health and welfare;
 - 11) public health;
 - 12) consumer protection;
 - 13) protection of privacy and personal data;
 - 14) security of network and information systems;
 - 15) financial interests of the State Treasury of the Republic of Poland, of the local government unit and of the European Union;
 - 16) internal market of the European Union, including competition and state aid rules under the public law, and the rules of corporate taxation;
 - 17) constitutional freedoms and human and civil rights prevailing in the relations of the individual with public authorities and not related to the areas indicated in points 1-16.
- 5.2. The breach report should, as far as possible and to the knowledge of the Whistleblower, include the following information:
- 1) date of report;
 - 2) description of the case, indicating the essential facts relevant to the case;
 - 3) optionally, indication of the legal provisions in the areas referred to in section 1 above that have been breached according to the Whistleblower;
 - 4) identification of the person or organisational unit of the Company affected by the breach;
 - 5) indication of whether the breach has occurred once or whether there have been other known cases of such a breach in the past;
 - 6) indication how the Whistleblower became aware of the breach;
 - 7) identification of persons connected with the breach in any way, including witnesses to the event, if any;
 - 8) contact details of the Whistleblower (e-mail address, telephone) or, if the report is anonymous, a possible suggestion for how to communicate with the Whistleblower;
 - 9) any other information which the Whistleblower considers relevant to the report.
- 5.3. This Procedure shall not apply to breaches concerning labour law, and a person reporting such breaches shall not be given the status of a Whistleblower. All reports concerning the labour law shall be redirected to the Human Resources Department.
- 5.4. This Procedure shall not apply to reporting case concerning the private lives of the persons mentioned in section 1.3 of the Procedure or their conflicts with each other, unless they directly involve a breach of the areas of law indicated in section 5.1 of the Procedure.
- 5.5. In an internal report, the Whistleblower may also provide information on breaches of internal regulations or ethical standards established by the Company on the basis of and are consistent with generally applicable laws, in particular the PURO Code of Conduct.
- 5.6. The Whistleblower shall report to the best of his or her knowledge. If the Whistleblower does not provide all the information referred to in section 2 above in the report, this shall not disqualify the report, and the Legal Department shall consider the report on the basis of the information provided by the Whistleblower in the report.
- 5.7. The reporting or public disclosure of false information shall be penalised by the Company, including, in particular, when the Company has suffered damage as a result of such report.

6. Channels for whistleblowers to report breaches

- 6.1. The Whistleblower, subject to the following items of this section, may report a breach:
- a) internally, to the Legal Department,
 - b) externally – to a public authority or a central authority bypassing this Procedure,
 - c) in the form of public disclosure.
- 6.2. The Company encourages Whistleblowers to report internally, i.e. directly to the Legal Department.
- 6.3. The Legal Department provides the following facilities for receiving reports on breaches:
- 1) in electronic form on a dedicated digital form to ensure anonymity, publicly available on the website at: <https://forms.office.com/e/5xZZZq1k9> and in the digital Knowledge Base of the PURO Group;
 - 2) by e-mail to legal@purohotel.pl, which can only be accessed by the employees of the Legal Department;
 - 3) in paper form addressed directly to the Legal Department: Puro Hotels Sp. z o.o., Dział Prawny, al. Jana Pawła II 22, 00-133, Warsaw, marked "nie otwierać – do rąk własnych" (do not open – restricted delivery).
- 6.4. Where the report of a breach concerns an employee or staff member of the Legal Department, the report shall be received by another employee or staff member of the Legal Department who is not affected by the breach and shall keep the report confidential.
- 6.5. The proceedings initiated upon the reporting of a breach by the Whistleblower are held in camera, including the protection of anonymity of the Whistleblower, if they wish to remain anonymous.
- 6.6. Each application shall be treated with due seriousness and care, respecting the confidentiality of the information provided and taking into account the principle of impartiality and objectivity.
- 6.7. The Legal Department shall be obliged to confirm the acceptance of the report of breach to the Whistleblower within 7 days from the date on which the report was received by the Legal Department – in case the Whistleblower has provided his/her identity. In the case of anonymous reports, the Legal Department may inform the Whistleblower of the receipt of the report in the manner proposed by the Whistleblower in the report.
- 6.8. In the event that the report:
- a) is manifestly unfounded,
 - b) describes an act or omission that does not constitute a breach,
 - c) is forwarded to the Legal Department in such a way that precludes the conduct of proceedings because of the scope information provided therein, and such information cannot be supplemented,
 - d) indicates beyond any doubt that the Whistleblower is acting in bad faith in filing the report, i.e. provides false information,
 - e) does not fall under the personal or material scope of this procedure as defined in section 3.1 or section 5.1,
- no investigation shall be initiated and the Legal Department shall not be required to follow up.

7. Record keeping of the reports

- 7.1. The Legal Department shall keep records of breach reports.
- 7.2. The records of reports shall be kept in a manner that complies with data protection legislation.
- 7.3. The records of reports shall be kept taking into account the commitment to guarantee the anonymity of the Whistleblowers.
- 7.4. All cases of reported breaches shall be described in the records of reports, regardless of the subsequent course of the proceedings initiated as a result of the report.
- 7.5. The records of reports shall contain:
 - a) report number,
 - b) date of the breach report,
 - c) form of breach report,
 - d) subject of breach,
 - e) personal data of the Whistleblower and of the person concerned by the report, as required for their identification, if applicable,
 - f) contact address of the Whistleblower, if provided,
 - g) indication of the documents or information provided with the report, if applicable,
 - h) indication of the further course of action taken as a result of the report, in particular whether the claims of the report have been validated or refuted, and whether any follow-up action has been taken;
 - i) dates on which the Whistleblower received the confirmation of receipt of the report, and when the Whistleblower received feedback on the action taken, if any;
 - j) date of closing the case initiated by report;
 - k) in case when investigation is renounced, the reasons for such decision.
- 7.6. Access to the Records of reports shall be only given to the Legal Department. If law enforcement authorities are notified in connection with an investigation, access to the Records of reports shall be also given to these law enforcement authorities.
- 7.7. The data in the Records of reports shall be retained for a period of three years after the end of the calendar year in which the follow-up is completed or the proceedings initiated by such follow-up are concluded. After this date, reports shall be subject to erasure from the Records.
- 7.8. All documents received from the Whistleblowers must be classified and treated as confidential, and they shall be kept in the Legal Department.

8. Protection of the Whistleblower against retaliation

- 8.1. The anonymity of the Whistleblowers shall be ensured under this Procedure.
- 8.2. The Legal Department, as the function within the Company authorised to receive reports of breaches, is obliged to refrain from any action related to the intention of revealing the identity of the Whistleblower, provided that the Whistleblower wishes to remain anonymous.
- 8.3. The communication of a report of breach by the Whistleblower cannot constitute a reason for any retaliatory action against the Whistleblower, unless section 6.8 or section 5.7 of the Procedure apply to the report.
- 8.4. If the Legal Department becomes aware of any signs of retaliation taken in connection with a report of breach, the Legal Department shall take any action it deems appropriate to prevent retaliation and to support the Whistleblower who filed the report.
- 8.5. Retaliation may consist in particular in:
 - 1) denial of employment;
 - 2) termination of employment with or without notice;
 - 3) failure to conclude an employment contract for a definite or indefinite term following to the termination of a probationary employment contract, failure to conclude a subsequent employment contract for a definite term or failure to conclude an employment contract for indefinite term following to the termination of an employment contract for a definite term, in case when the Whistleblower had a legitimate expectation that such a contract would be concluded with them;
 - 4) reduction in compensation for work;
 - 5) withholding promotion or being passed over for promotion;
 - 6) being passed over in the award of work-related benefits other than the compensation, or reduction in the level of such benefits;
 - 7) transfer to a lower job position;
 - 8) suspension from employment or official duties;
 - 9) transfer of the Whistleblower's current responsibilities to another employee;
 - 10) unfavourable change in the place of work or working time schedule;
 - 11) negative performance appraisal or negative job review;
 - 12) imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature;
 - 13) coercion, intimidation or exclusion;
 - 14) mobbing;
 - 15) discrimination;
 - 16) unfavourable or unfair treatment;
 - 17) withholding participation or being passed over in selection for professional qualification training;
 - 18) unjustified referral for medical examinations, including psychiatric examinations, unless separate provisions provide for the possibility of referring the employee for such examinations;
 - 19) attempts to make it more difficult [for the Whistleblower] to find future work in a particular sector or industry on the basis of an informal or formal sectoral or industry agreement;
 - 20) causing financial loss, including economic loss, or loss of income;
 - 21) infliction of other non-material damage, including damage to personal rights, in particular to the Whistleblower's good name.
- 8.6. An attempt or threat to use any of the above measures set out in section 5 above shall also be deemed to constitute retaliation for reporting a breach or public disclosure.

9. Follow-up

- 9.1. For each reported breach, the Legal Department shall undertake the necessary investigations to review the information on breaches and the measures applicable in the event of a breach, and shall subsequently decide on further action.
- 9.2. The review of each report shall be carried out by the Legal Department as soon as the report is received and acknowledged (if acknowledgement of the report is possible).
- 9.3. If the nature of the reported breach so requires, the Legal Department shall review the report in consultation with the head of the organisational unit where the breach occurred or of the organisational unit concerned with the subject matter which is the basis for reporting the breach.

- 9.4. In case when the report is refuted and the suspicions raised therein are dismissed, no further action shall be taken on the report of breach.
- 9.5. In case when the report is confirmed, the Legal Department shall decide on further action. Follow-up shall be dependent on the reported breach and may vary in each case, depending on the situation.
- 9.6. The Legal Department shall be required to provide feedback to the Whistleblower in relation to the reported breach within 3 months counting from the date when, in accordance with section 6.7 hereof, the Whistleblower received an acknowledgement of receipt of the report, when the Whistleblower provided his/her identity; if the Whistleblower did not provide his/her identity, this shall be done within 3 months after the lapse of 7 days from the date of reporting the breach. In case of anonymous reports, the Legal Department may provide feedback to the Whistleblower in the manner proposed by the Whistleblower in the report.
- 9.7. The Whistleblower should, to the extent possible, be informed of circumstances in which disclosure of the Whistleblower's identity becomes necessary in the light of generally applicable laws, e.g. in the event of criminal proceedings.
- 9.8. If the reported breach is found to have caused damage to the Company's assets, the Legal Department may recommend obligatory repair of the damage in accordance with the provisions of the Civil Code or under the terms of a settlement between the parties.
- 9.9. The Legal Department, as a result of the investigation, may recommend disciplinary proceedings against the employee concerned with the reported breach, and may also recommend civil, criminal or administrative proceedings against the person concerned, depending on the nature of the breach.
- 9.10. If it is suspected that an illegal act has been committed in relation to the persons referred to in section 1.3, or to the Company's property by the person concerned by the reported breach, the Legal Department may recommend that the Company's management board notify the law enforcement authorities.

10. External reports

- 10.1. A Whistleblower may file an external report without first filing an internal report.
- 10.2. The external report shall be received by either the Ombudsman or a public authority.
- 10.3. External reports can be anonymous or allow the identification of the Whistleblower. In order to effectively follow up and communicate the follow-up action taken, the Whistleblower shall provide their correspondence address or e-mail address in the external report.
- 10.4. The external report may be made orally, on paper or electronically.
- 10.5. An external report in the form of documents may be filed on paper to the correspondence address indicated by the Ombudsman or the public authority receiving the report;
- 10.6. An external electronic report may be made to the e-mail address or electronic mailbox address or electronic delivery address indicated by the Ombudsman or the public authority receiving the report, or via a dedicated web form or application indicated by the public authority as the correct application for electronic reporting.
- 10.7. The Ombudsman or the public authority receiving the external report shall acknowledge receipt of the report at the contact address without delay, but no later than 7 days after receipt of the notification, provided that the Whistleblower has provided a contact address.
- 10.8. If the external report concerns information on a breach, the Ombudsman shall forward the notification without undue delay, and at the latest within 14 days after the notification, to the competent public authority to follow up on the report.
- 10.9. The Ombudsman shall refrain from forwarding the external report if the report does not concern information on a breach, and shall inform the Whistleblower of its decision.
- 10.10. The public authority shall:
 - 1) receive an external report;
 - 2) carry out a preliminary verification of the external report to determine whether the report concerns information on a breach, and to determine whether the report concerns breaches within its field of activity and, if not, to determine the public authority competent to follow up on such report;
 - 3) consider the external report when the report concerns breaches in the area of its competence;
 - 4) forward the external report without undue delay, and at the latest within 14 days from the date of report, and in justified cases no later than 30 days, to the public authority competent to follow up on the report, if the report concerns breaches in an area outside the scope of the authority, and shall inform the Whistleblower thereof;
 - 5) follow up on the report while exercising due care;
 - 6) provide feedback to the Whistleblower.
- 10.11. The public authority may ask the Whistleblower for clarification or additional relevant information that may be in their possession, using the contact address. If the Whistleblower objects to the sending of the requested clarification or additional information, or the fulfilment of such requests may jeopardise the protection of that person's identity, the public authority shall refrain from requesting the clarification or additional information.
- 10.12. In justified cases, the public authority shall, without undue delay, forward the information contained in the notification to the competent institutions, authorities or bodies of the European Union for further investigation.
- 10.13. The public authority shall provide feedback to the Whistleblower within a maximum of 3 months from the date of receiving the report, and in particularly justified cases, within 6 months from that date. The feedback shall be provided to the contact address and, in the case of external submissions in the form of an electronic document, via the ICT system.
- 10.14. Both the Ombudsman and public authorities shall:
 - a) ensure that the procedure for receiving external reports and the processing of related personal data prevents unauthorised persons from gaining access to the information covered by the report and protects the confidentiality of the identity of the Whistleblower and of the person concerned by the report;
 - b) designate, from among their staff, persons authorised to receive and review reports, and to contact the Whistleblower;
 - c) keep records of the reports of breaches.
- 10.15. A report filed to a public authority or a central authority with bypassing this Procedure shall not have the effect of depriving the Whistleblower of the protection provided for under this Procedure and under generally applicable laws.

11. Public disclosure

- 11.1. A Whistleblower making a public disclosure shall be protected when they file:
 - a) an internal report, and subsequently an external report, and the Company and then the public authority, within the time limit for feedback set out in the Procedure and then within the time limit for feedback set out in the applicable external procedure of the public authority, fail to take any appropriate follow-up action, or to provide the Whistleblower with feedback; or
 - b) directly the external report, and the public authority does not take any appropriate follow-up action or provide feedback to the Whistleblower within the time limit for feedback set out in the applicable external procedure, unless the Whistleblower has not provided a contact address to which such feedback should be provided.
- 11.2. A Whistleblower making a public disclosure shall also be protected if he or she has reasonable grounds to believe that:

- a) the breach is likely to constitute a direct or evident threat to the public interest, in particular where there is a risk of irreparable damage, or
- b) filing the external report will expose the Whistleblower to retaliation, or
- c) where an external report is filed, there is little likelihood of successfully addressing the breach due to the particular circumstances of the case, such as the possibility of concealing or destroying evidence, the existence of collusion between the public authority and the perpetrator of the breach, or the involvement of the public authority in the breach.

12. Protection of personal data and confidentiality of the information provided

- 12.1. The Whistleblower's personal data which allow their identification shall not be disclosed to unauthorised persons, except with the Whistleblower's express consent.
- 12.2. Either the Company or the public authority, upon receipt of a report, shall process the personal data to the extent necessary for receiving the report or for any follow-up. Personal data that is not relevant for the processing of the report shall not be collected and, if accidentally collected, shall be immediately deleted. The deletion of such personal data shall take place within 14 days of the determination that it is not relevant to the case.
- 12.3. Measures to ensure the confidentiality of the Whistleblower's personal data shall include, in particular:
 - a) methods of reporting breaches as defined in this Procedure,
 - b) correspondence by traditional mail addressed directly to the Legal Service marked "nie otwierać – do rąk własnych" (do not open – restricted delivery).
 - c) obligation for the Company to grant the necessary authorisations to employees and associates of the Legal Department to carry out all activities related to the handling of reports filed by Whistleblowers.
- 12.4. The Company is the controller of the personal data collected in the Records of reports.
- 12.5. The Ombudsman and the public authority are separate controllers in respect of the personal data provided in an external report that has been received by either of them.

13. Final provisions

- 13.1. This Procedure shall be made available to all persons listed in sections 1.3. and 3.1. hereof.
- 13.2. To be valid, an amendment to the Procedure shall require the adoption of a resolution by the Management Board of the Company.
- 13.3. This Procedure was approved after consultation with Employee representatives, selected in accordance with the relevant procedure adopted by the Company.
- 13.4. The responsibility for the implementation, application and updating of the Procedure in the event of a change in current legislation shall rest with the Management Board of the Company.
- 13.5. To the extent not regulated in this Procedure, the relevant provisions of the Whistleblower Protection Act of 14 June 2024 (Journal of Laws of 2024, item 928) and the Directive of the European Parliament and of the Council (EU) No. 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L 305, p. 17) shall apply.
- 13.6. This Procedure shall be effective as of 25 September 2024.