

Regulations
on the acceptance of notifications
and follow-up
of such notifications
in force at Trend Group sp. z o.o.

§ 1

General principles

1. The present Regulations on the acceptance of notifications and follow-up of such notifications in force at Trend Group sp. z o.o. with its registered office in Wola Korzeniowa set out the principles and procedures for the anonymous notification by Whistleblowers of infringements, violation of procedures and ethical standards applicable at Trend Group sp. z o.o. pursuant to the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws 2024, item 928).
2. The process of accepting Notifications is one of the key elements of proper and safe management of the Company, one of the objectives of which is to identify irregularities in the Company's operations and to take action to eliminate them and reduce risks at all levels of the Company's organisation.
3. The process implemented in the Company for the anonymous acceptance of Notifications allows all Whistleblowers to make Notifications through specific and independent channels of communication, in a manner that ensures protection against repressive, discriminatory or other types of unfair treatment listed in Article 12 § 1 of the Act that may follow from such Notifications.
4. The fact that Notifications are made in good faith may not result in retaliatory actions or other undesirable actions against the Whistleblower, in particular dismissal from work, exploitation of the Whistleblower's professional dependence or exerting influence on persons with whom the Whistleblower cooperates, which could worsen the conditions of the Whistleblower's working environment.
5. Whistleblowers who make a Notification in bad faith or who make a non-serious Notification or a Notification that is in fact abusive are not protected by the Regulations. This protection also does not apply to Whistleblowers who intentionally and knowingly provide false or misleading information

when making Notifications.

6. The Regulations do not apply if:

- a. the infringement has been reported on the basis of separate provisions, in particular as a complaint or as a notification of a possible criminal offence;
- b. the infringement notice does not relate to the subject matter covered by the Regulations and the Act;
- c. the infringement harms only the rights of the Whistleblower or the Notification of the infringement occurs exclusively in the individual interest of the Whistleblower.

§ 2

Definitions

Terms used in the Regulations shall have the following meanings:

HR Director - the Director responsible for the day-to-day operation of the process and the implementation of the tasks under the Regulations, designated by the Management Board of the Company, who is also the Chairperson of the Committee;

Committee - a committee responsible for investigating Notifications consisting of at least: HR Director, a representative of the Legal Department, the Authorized Representative, the head of the division related to the Notification and an employee representative;

Regulations - these Regulations on the acceptance of notifications and follow-up of such Notifications, in force at Trend Group sp. z o.o. with its registered office in Wola Korzeniowa;

Company - Trend Group sp. z o.o. with its registered office in Wola Korzeniowa (KRS 0000703098);

Whistleblower - a natural person employed, applying for employment or cooperation, a natural person cooperating with the Company, regardless of his/her position, function or form of employment or cooperation, through which the Company conducts its activity, also a businessman, authorized representative, shareholder, partner, member of a body of a legal person or organisational unit without legal personality, trainee, volunteer, apprentice and other entities indicated in Article 4 § 1 of the Act, making a Notification or public disclosure concerning violations of the law, procedures and ethical standards applicable to the Company;

Act - Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws 2024, item 928);

Notification - an action identified by the Whistleblower which is an infringement, a violation of procedures and ethical standards applicable to the Company and carried out by the Whistleblower through the communication channels intended for this purpose. An infringement is an action or omission that is unlawful or intended to circumvent the law concerning, in particular:

- a. corruption;
- b. public procurement;
- c. financial services, products and markets;
- d. anti-money laundering and counter-terrorist financing;
- e. product safety and compliance;
- f. transport security;
- g. environmental protection;
- h. radiological protection and nuclear safety;
- i. food and feed safety;
- j. animal health and welfare;
- k. public health;
- l. public protection;
- m. consumer protection;
- n. privacy and data protection;
- o. security of ICT networks and systems;
- p. financial interests of the State Treasury of the Republic of Poland, of the local government unit and of the European Union;
- q. the internal market of the European Union, including public law competition and state aid rules and corporate taxation;
- r. violations of fundamental principles of labour law, including the principle of equality of workers, discrimination in employment, the right to fair remuneration, the right to rest, the principle of equal

treatment.

§ 3

Means of making Notifications

1. The Whistleblower may make a Notification as follows:
 - a. electronically via email address: sygnalista@trendglass.pl;
 - b. in writing, through the internal mail system (that is, through a box located at the Company's headquarters, the location of which ensures the anonymity of the notification) or externally, in a sealed envelope marked "CONFIDENTIAL - WHISTLEBLOWERS".
2. In order for the Committee to process the Notification efficiently and to follow up effectively, it is recommended that the Notification contains, in particular:
 - a. the name of the organisational unit of the Company to which the Notification relates;
 - b. the approximate duration of the infringement;
 - c. the details of the Whistleblower to whom the Notification relates and of other persons who have or may have a relationship with the Whistleblower;
 - d. any other information relevant to the Notification, including any documents;
 - e. an indication of the preferred method of responding, ensuring that the principle of anonymity is maintained, e.g. by using a dedicated and private e-mail address of the Whistleblower, created specifically for this purpose.
3. The box labelled "Notification box" is checked periodically, i.e. every day from Monday to Friday by a member of the HR Department.
4. The purpose of providing the information referred to in section 2 lit. e. above, is to enable the Whistleblower to be contacted in the event that it is necessary to do so, where more information may be required to process the Notification than was originally indicated in the Notification.
5. The Company takes all legally permissible steps to gather the necessary information and documents for the effective recognition of the Notification before leaving it unprocessed.
6. Only Notifications made in good faith (i.e. relating to events that have actually occurred and may constitute a potential breach) are dealt with on a confidential basis, ensuring protection from potential retaliation.

§ 4

Preliminary analysis of the Notification

1. Once a Notification has been received, it is examined in accordance with the rules set out in the Regulations and in the Act, unless, in the opinion of the Committee, the nature and subject matter of the Notification justify its examination in accordance with the procedure provided for by separate regulations or generally applicable laws.
2. Within 7 days of receipt of the Notification, the Committee will acknowledge its receipt to the Whistleblower, unless the Whistleblower has not provided an address to which the acknowledgement should be forwarded.
3. The Company undertakes all activities with due diligence.
4. Upon receipt of a Notification, the Committee makes an initial analysis of the Notification to determine whether the information contained therein enables it to consider the merits of the Notification and, where necessary, contacts the Whistleblower.
5. The Committee may decide not to carry out an investigation if:
 - a. the notification is clearly not credible;
 - b. the notification concerns information exempted under Article 5 of the Act;
 - c. it is impossible to gather the information necessary for the investigation.
6. If the Notification makes it possible to verify its validity and, moreover, according to the description of the Notification, there is a likelihood of irregularity, an investigation is initiated.
7. The Committee may consider involving representatives of other organisational units of the Company or an independent consultant in the investigation if, in the opinion of the Committee, the knowledge and experience of such persons may be indispensable in the processing of the Notification.
8. A member of the Committee may not be the person to whom the Notification relates, a person who is the immediate superior of the Whistleblower to whom the Notification relates or a person who is directly subordinate to the Whistleblower to whom the Notification relates.
9. If, in the opinion of a member of the Committee, there are circumstances that may impinge on his/her impartiality in the assessment of an Notification, he/she may request the HR Director to exclude him/her from the work of the Committee in the ongoing investigation.

10. Where the circumstances referred to in sections 8 or 9 above arise, the HR Director may appoint another employee of the Company to be a member of the Committee. In addition, in circumstances where the HR Director cannot be a member of the Committee, the Management Board Member of the Company appoints another Director to serve in that capacity for the purpose of considering a particular Notification.

§ 5

Examination of the Notification

1. In examining the Notification, the Committee undertakes to follow up and provide feedback without undue delay, but no later than 3 months from the acknowledgement of receipt of the Notification or, if no acknowledgement has been provided to the Notifier, 3 months from the expiry of 7 days from the Notification, unless the Whistleblower has not provided a contact address.
2. The Committee verifies the legitimacy of the Notification in the investigation based on the Company's internal regulations in force and on information obtained from the Company's organisational units, taking into account the type and nature of the Notification and subject to confidentiality rules. The investigation is conducted in a fair and impartial manner.
3. Where necessary, the Committee may summon to the meeting employees or associates who may have a connection with or any knowledge of the Notification or the Whistleblower for explanations. If requested to do so by the Committee, all employees are required to attend the meeting and to make available documents and provide the necessary information to establish all the circumstances of the legitimacy of the Notification.
4. The Committee's meetings are always recorded in the form of a note. The explanations given by the persons called are recorded in the form of minutes. The findings of the Committee's meeting may be validated by business mail.
5. Having established the totality of the facts, the Committee decides on the merits of the Notification and, in the case of a Legitimate Notification, also recommends appropriate corrective or disciplinary action against the offending employee or associate, as well as possible preventive actions to eliminate future violations similar to those described in the Notification.
6. In the absence of unanimity, the Committee's final conclusion is adopted by a simple majority and, in the event of a tie, the vote of the Committee's chairman, who votes last, is decisive.

7. The final conclusions agreed by the Committee include, in particular, a description of the facts, a decision on the merits of the Notification and, where the Notification is found to be well founded, a recommendation for appropriate follow-up and preventive action.
8. In the event of a positive verification of the validity of the Notification the Chairperson of the Committee:
 - a. forwards information on the outcome of the investigation to the head of the Company's organisational unit within which the employee or Whistleblower named in the Notification performs his or her duties, or to the Management Board in a situation where the employee notifies directly to the Management Board, in order to take appropriate, follow-up disciplinary or corrective action contained in the Committee's minutes with respect to such person, as provided for in the work regulations applicable to a given employee or resulting from an individual cooperation agreement or generally applicable laws;
 - b. informs within 7 working days of providing the information referred to in point a. above, the employee alleged to have committed the infringement of the Notification and the verification of the Notification carried out.
9. In the event that the validity of the Notification is negatively verified and the suspicions contained therein are dismissed, the Chairperson of the Committee immediately communicates to the Whistleblower and the employee alleged to have committed the infringement the Notification made and the verification of the Notification carried out.

§ 6

Prohibition of retaliation

1. No retaliatory action or attempted or threatened action may be taken against the Whistleblower, in particular the actions described in Article 12 of the Act.
2. Any measure of reprisal, discrimination or any other type of unfair treatment against a Whistleblower making a Notification, acting in good faith, will be treated as a serious breach of the Regulations, which may give rise to disciplinary liability or termination of the employee's or collaborator's contract with the Company or of their cooperation, as well as to material liability, in accordance with the applicable legislation.

3. The protection of the person making the Notification, particularly if there has been a disclosure of his or her identity, is the responsibility of the Chairperson of the Committee, who is obliged to respond to any signs of potential retaliation related to the Whistleblower and the Notification made.
4. A Whistleblower who has made a Notification and whose personal data has been unauthorisedly disclosed, has experienced any retaliation, discrimination or other unfair treatment, should immediately notify the Committee of the situation. If the analysis of the information confirms the allegations of the notification, the Committee takes appropriate action, in accordance with section 1 above, to protect the Whistleblower.

§ 7

Maintenance of the Register of Notifications

1. Each accepted Notification is subject to registration in the Register of Notifications.
2. The HR Department is responsible for keeping the Register of Notifications.
3. The Register of Notifications should include at least:
 - a. the contact and personal details of the Whistleblower;
 - b. the notification number;
 - c. the subject of the infringement;
 - d. the personal data of the person to whom the notification relates;
 - e. the date on which the Notification was made and completed;
 - f. all information and documents relating to the Notification;
 - g. the course of the process of analysis and examination of the Notification, recorded in the form of appropriate minutes;
 - h. persons involved in the process of analysing and processing the Notification;
 - i. information on the decisions taken and the follow-up and preventive measures applied.
4. The Company is the controller of the personal data collected in the Register of Notifications.
5. The Register of Notifications is maintained under confidentiality rules and the information and documents contained therein are retained for a period of 3 years after the end of the calendar year in which the follow-up actions have been completed or the proceedings initiated by those actions have

been terminated.

§ 8

Final provisions

1. The Company's Management Board is responsible for the adequacy and effectiveness of the Regulations.
2. The HR Department, together with the Legal Department or another organisational unit of the Company, conducts initial and regular ethics training in which the Regulations are compulsorily discussed.
3. The Regulations may not be adopted without prior consultation with the representatives of persons working for the Company, selected in accordance with the procedure laid down by the Company. The consultation lasts no less than 5 days and not more than 10 days.
4. The HR Department informs the Company's employees of the entry into force of the Regulations and any amendments thereto at least 7 days before the Regulations come into force. The Director of each organisational unit of the Company is obliged to acquaint all subordinate employees with the provisions of the Regulations.
5. Reviews of the Regulations are carried out systematically, but at least once a year.
6. The Whistleblower may make an External Notification under Chapter 4 of the Act without first making an Internal Notification as described in the Regulations.

It comes into force on 25 September 2024.