



Internal Reporting and Follow-up Procedure at Ensemble³ spółka z ograniczoną odpowiedzialnością adopted by order of the President of the Management Board on 4 December 2024

**§1
General provisions**

1. The Internal Reporting and Follow-up Procedure, hereinafter referred to as the "Procedure", sets out the procedure for receiving internal reports regarding information on breaches of the law or regulations and standards established at Ensemble³ spółka z ograniczoną odpowiedzialnością, as well as for following up on such reports.
2. The Procedure is intended to introduce transparent rules for disclosing cases of irregularities, taking appropriate corrective action for breaches that have occurred and protecting the whistleblower.
3. The procedure applies to a whistleblower who makes an internal report in a work-related context, irrespective of the legal relationship underpinning the provision of their work.
4. The whistleblower is subject to the protection set out in the Procedure from the time of filing an internal report, provided that the whistleblower had reasonable grounds to believe that the information that was the subject of the internal report was true at the time of the filing and that it constituted information on the breach of law.
5. The protection of the Procedure does not apply to a whistleblower who purposefully makes an internal report knowing that a breach has not occurred (bad faith).
6. The whistleblower may in any case make an external report without first making an internal report.
7. External reports shall be received by the Ombudsman or another public authority whose competence includes the appropriate follow-up to the subject of the report. Where appropriate, external reports shall also be made to institutions, bodies, offices or agencies of the European Union.
8. All information on how to make external reports, including links to the websites of public authorities receiving such reports, is provided on the E3 website under "External reports".
9. If the breach can be effectively addressed within the organisational structure of Ensemble³ spółka z ograniczoną odpowiedzialnością, an internal report is encouraged.

**§2
Definitions**

Whenever the Procedure refers to:

1. "person authorised to receive reports " - it means a person authorised by the President of the Company's Management Board whose tasks include receiving, recording and verifying internal reports, including requesting additional information from the whistleblower if necessary, as well as taking follow-up action;
2. "follow-up action" - it means an action to assess the veracity of the information contained in an internal report and to counteract a breach of the law, in particular by carrying out an investigation, initiating an inspection or other proceedings under the law or dismissing a report;



3. "retaliatory action" - it means a direct or indirect act or omission in a work-related context that is caused by an internal report and that breaches or is likely to breach the whistleblower's rights or causes or is likely to cause undue harm to the whistleblower, including the unwarranted initiation of proceedings against the whistleblower;
4. "information about a breach of the law" - it means information, including a reasonable suspicion, concerning an actual or potential breach of the law that has occurred or is likely to occur at Ensemble³ spółka z ograniczoną odpowiedzialnością, of which the whistleblower has become aware in a work-related context, or information concerning an attempt to conceal such a breach;
5. "feedback" - it means the provision of information to the whistleblower on the follow-up actions planned or taken and the reasons for such actions;
6. "work-related context" - it means past, present or future work-related activities in which information of a breach of the law has been obtained and the possibility of experiencing retaliatory action exists;
7. "whistleblower" - it means an individual who reports or publicly discloses information about a breach of the law, obtained in a context related to the work referred to in Article 4 of the Act, including:
 - a) employee and temporary employee of Ensemble³ spółka z ograniczoną odpowiedzialnością, also in cases where the employment relationship has already ended,
 - b) an applicant for employment with Ensemble³ spółka z ograniczoną odpowiedzialnością who becomes aware of a breach of the law during the recruitment process or pre-contract negotiations,
 - c) a person providing work for Ensemble³ spółka z ograniczoną odpowiedzialnością on a basis other than an employment relationship, including a civil law contract,
 - d) entrepreneur performing services for Ensemble³ spółka z ograniczoną odpowiedzialnością,
 - e) a proxy of Ensemble³ spółka z ograniczoną odpowiedzialnością,
 - f) a person performing work under the supervision and direction of a contractor, subcontractor or supplier of Ensemble³ spółka z ograniczoną odpowiedzialnością, including under a civil law contract,
 - g) member of the body of Ensemble³ spółka z ograniczoną odpowiedzialnością
 - h) trainee, intern and volunteer of Ensemble³ spółka z ograniczoną odpowiedzialnością; ;
8. "reported person" - it means a natural person, a legal person or an organisational unit without legal personality identified in an internal report as the infringer or as a person with whom the infringer is associated;
9. "whistleblower helper" - means an individual who assists a whistleblower with an internal report in a work-related context and whose assistance should not be disclosed;
10. "person associated with the whistleblower" - it means an individual who may experience retaliatory action, including a co-worker or a person close to the whistleblower within the meaning of Article 115 § 11 of the Act of 6 June 1997 - Penal Code (consolidated text: Journal of Laws of 2024, item 17);
11. "internal report" - it means an internal report submitted in accordance with the Procedure.
12. "public disclosure" - it means the making of information about a breach of the law available to the public;
13. „E³” - Ensemble³ spółka z ograniczoną odpowiedzialnością;



14. "Act" - it means the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws 2024, item 928);
15. "public authority" - it means supreme and central government administration authorities, local government administration authorities, self-government territorial units, other state authorities and other entities performing public administration tasks by operation of law, competent to take follow-up actions in the areas indicated in Article 3(1) of the Act;
16. "external report" - it means an oral or written communication to the Ombudsman or a public authority of a breach of the law,
17. "breach of the law" - it means an act or omission that is unlawful or intended to circumvent the law, concerning:
 - (a) corruption,
 - (b) public procurement,
 - (c) financial services, products and markets,
 - (d) the prevention of money laundering and terrorist financing,
 - (e) product safety and compliance,
 - (f) transport safety,
 - (g) environmental protection,
 - (h) radiological protection and nuclear safety,
 - (i) food and feed safety,
 - (j) animal health and welfare,
 - (k) public health,
 - (l) consumer protection,
 - (m) privacy and data protection,
 - (n) security of ICT networks and systems,
 - (o) financial interests of the State Treasury of the Republic of Poland, of the local government unit and of the European Union,
 - (p) the internal market of the European Union, including public-law competition and state aid rules as well as corporate taxation,
 - (r) constitutional freedoms and human and citizen rights occurring in the relations of an individual with public authorities, other than related to the areas indicated in letters a) - p).

§3

Subject of report

The subject of an internal report may be acts or omissions relating to a breach of the law.

§ 4

Application of the Procedure

The procedure applies to whistleblowers reporting breaches of the law.

§ 5

Anonymous reports

1. This procedure does not apply to anonymous reports.



2. Anonymous reports are left unprocessed and not registered.

§ 6 Exclusions

The procedure shall not apply to the information referred to in Article 5(1)-(3) of the Act.

§ 7 Confidentiality

1. The confidentiality of the identity of the whistleblower, the reported person and the third party named in the whistleblowing report shall be ensured. The protection of confidentiality applies to information from which the identity of such persons can be directly or indirectly established.
2. Only the person authorised to receive reports shall have access to the whistleblowing information included in the report and to the personal data of the persons referred to in the whistleblowing report.
3. The storage system for material produced in accordance with the Procedure shall be designed, established and operated in such a way as to protect the confidentiality of the identity of the reporting person and other persons named in the report and to prevent unauthorised persons from gaining access to it.
4. Authorised employees are required to maintain the confidentiality of all information obtained in the course of their tasks and to take steps to ensure that unauthorised persons do not have access to documents and other materials received or produced in the course of those tasks.
5. Pursuant to Article 27(2) of the Act, authorised employees are bound to maintain secrecy regarding the personal information and personal data they have obtained in the course of receiving and verifying internal reports, as well as the follow-up actions taken, even after the termination of the employment relationship or other legal relationship under which they performed those tasks.
6. The person authorised to receive reports is obliged to inform the President of the Management Board of E³ of any circumstances that may call into question their impartiality in carrying out the tasks set out in the Procedure. In this case, the President of the Management Board of E³, after reviewing the information presented, may appoint another person to carry out these tasks.

§8 Reporting procedure

1. A whistleblower can make an internal report:
 - a) electronically - by message sent by e-mail to: sygnalista@ensemble3.eu
 - b) in writing - in a sealed envelope delivered by internal or external mail, marked "report of a breach, confidential", placed in another sealed envelope, addressed to : Ensemble³ sp. z o.o., 01-919 Warszawa, ul. Wólczyńska 133
2. The channels for the receipt of reports referred to in paragraph 1 shall be designed, established and operated in such a way as to protect the confidentiality of the identity of the reporting person and of other persons named in the report, and to prevent any person other than authorised personnel from gaining access to them.



3. For reliable verification of the report and effective follow-up action, the report should include at least:
 - a) personal data of the whistleblower and the reported person,
 - b) whistleblower contact address,
 - c) as precise a description as possible of the subject matter of the breach (the factual situation which raises the whistleblower's concerns),
 - d) a description of the work-related context that allowed the detection of the reported breach,
 - e) an indication of reasonable grounds for claiming that the information about the breach is true.
4. Within 7 days of receipt of an internal report, the person authorised to receive reports shall provide the whistleblower with an acknowledgement of the report, unless the whistleblower has not provided a contact address to which the acknowledgement should be forwarded.

§9

Procedure for processing reports

1. Internal reports are received and registered by a designated person authorised to receive reports, who carries out an initial verification of the report by determining whether the report meets the conditions set out in the Procedure. If there is a need to supplement or clarify the information contained in the internal report, the person authorised to receive reports shall contact the whistleblower where possible.
2. The person authorised to receive reports may refrain from considering a report that is the subject of an earlier report by the same or a different whistleblower if no significant new information on breaches is contained compared to the earlier report. The person authorised to receive reports shall inform the whistleblower that an internal report has been left unprocessed, stating the reasons, and, in the event of a subsequent internal report, shall leave it unprocessed and shall not inform the whistleblower.
3. If an internal report meets the conditions referred to in the Procedure and the content of the internal report justifies the initiation of an investigation, the person authorised to receive reports shall take steps to clarify all the circumstances contained in the report.
4. When necessary, the person authorised to receive reports may summon any person performing work for E³ to give explanations. Persons summoned are obliged to appear and produce all information and documents in their possession which may enable the establishment of the circumstances of the breach specified in the internal report.
5. The person authorised to receive reports may also seek the assistance or opinion of representatives of other organisational units of E³ or of an entity providing professional services, insofar as the knowledge and experience of such persons are necessary to clarify all the circumstances of the breach contained in the report.
6. Once the totality of the circumstances contained in the report has been clarified, the person authorised to receive reports decides on the validity of the report and makes recommendations for possible follow-up action.
7. The person authorised to receive reports shall provide feedback to the whistleblower within a period not exceeding 3 months from the date of acknowledgement of the internal report or, if no acknowledgement is provided, 3 months from the expiry of 7 days from the date of the internal report.



8. The person authorised to receive reports shall not provide the whistleblower with feedback if the whistleblower has not provided a contact address to which such information should be forwarded.

§ 10

Procedure to be followed by an unauthorised employee in the event of receipt of a report of a breach of the law

If a report of a breach goes to an unauthorised E³ employee, that employee is obliged to:

- 1) maintain confidentiality as to the fact of the report and its content, including information that may reveal the identity of the whistleblower or the reported person;
- 2) immediately forward the report to the person authorised to receive reports, in the manner referred to in § 8 (1), without amending the report.

§ 11

Conditions for whistleblower protection when reporting a breach of the law

The Whistleblower is subject to the protection set out in the provisions of the Chapter 2 of the Act from the time of filing a report or public disclosure, provided that the Whistleblower had reasonable grounds to believe that the information that was the subject of the report or public disclosure was true at the time of filing the report or public disclosure and that it constituted information about a breach of the law.

§12

Follow-up action

1. Where:
 - (a) the breach of the law can be effectively remedied within the organisational structure of E³- the person authorised to receive reports takes the remedial action specified in the recommendations,
 - (b) the breach of the law cannot be effectively remedied within the organisational structure of E³ - the person authorised to receive reports shall notify the law enforcement authorities or initiate other proceedings prescribed by law,
 - (c) the report of a breach proves to be unfounded, the person authorised to receive reports shall reject the report and close the proceeding set out in the Procedure.
2. If the feedback provided in accordance with § 9 point 7 did not include the information indicated in § 2 point 5, the person authorised to receive reports shall provide the whistleblower with supplementary feedback including such information.
3. The person authorised to receive reports shall follow up with due diligence and with full confidentiality of the whistleblower's identity.
4. The person authorised to receive reports may be excluded by the President of the Management Board, at their request, from following up on the report when the report under consideration



concerns circumstances that may cast doubt on the impartiality of the person authorised to receive reports.

§13

Whistleblower protection

1. No retaliatory action or attempt or threat of such action may be taken against the whistleblower.
2. Prohibited retaliatory action includes, in particular:
 - (a) refusal to establish an employment relationship;
 - (b) termination of the employment relationship or termination without notice;
 - (c) failure to conclude a fixed-term employment contract or an indefinite-term employment contract after termination of the probationary contract;
 - (d) failure to conclude another fixed-term employment contract;
 - (e) failure to conclude an indefinite-term employment contract after the termination of a fixed-term employment contract - where the whistleblower had a legitimate expectation that such a contract would be concluded with them;
 - (f) reducing the amount of remuneration for work;
 - (g) withholding of promotion or omission in promotion;
 - (h) omission or reduction of work-related benefits other than wages;
 - (i) transfer to a lower position;
 - (j) suspension in the performance of employee or official duties;
 - (k) assignment of the whistleblower's former duties to another employee;
 - (l) unfavourable change in the place of performing work or working time schedule;
 - (m) negative performance appraisal or negative job opinion;
 - (n) imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature;
 - (o) coercion, intimidation or exclusion;
 - (p) bullying,
 - (r) discrimination,
 - (s) unfavourable or inequitable treatment;
 - (t) withholding participation in or omission from designation for professional qualification training;
 - (u) unjustified referral for medical examination, including psychiatric examination;
 - (w) action aimed at hampering future job placement in a particular sector or industry on the basis of an informal or formal sectoral or industry agreement;
 - (x) causing financial loss, including economic loss, or loss of income;
 - (y) infliction of other intangible damage, including damage to the whistleblower's personal rights, in particular the whistleblower's reputation.
3. Prohibited retaliatory action also includes termination of a contract to which the whistleblower is a party, in particular relating to the sale or supply of goods or the provision of services, the withdrawal from such a contract or its termination without notice.
4. The prohibition on retaliatory action also extends to a person assisting in making a report, a person associated with the whistleblower, and a legal person or other organisational entity



assisting or associated with the whistleblower, in particular one owned by or employing the whistleblower.

§14 Register of reports

1. Each internal report shall be registered directly by the person authorised to receive reports.
2. The register of internal reports includes:
 - a) report number;
 - b) subject of breach;
 - c) personal data of the whistleblower and the reported person necessary to identify them;
 - d) whistleblower contact address;
 - e) date of report;
 - f) information on follow-up action taken;
 - g) date of conclusion of the case.
3. Information relating to a report shall be retained in the register of internal reports for a period of 3 years after the end of the calendar year in which the follow-up action was completed, or after the completion of other proceedings initiated by this action.
4. The register shall be designed, established and operated in such a way as to protect the confidentiality of the information contained therein, including personal data, and to prevent access to it by persons other than authorised personnel.

§15 Rules for making and receiving external reports by whistleblowers

1. The whistleblower can make an external report without first making an internal report.
2. External reports are received by the Ombudsman or the public authority with jurisdiction to follow up.
3. External reports can be anonymous or contain the personal data of the whistleblower.
4. The controller of the data contained in the report is the authority that receives it.
5. External report may be made orally or in writing.
6. External report in documentary form may be made:
 - 1) in paper form, to the postal address indicated by the Ombudsman or the public authority receiving the report;
 - 2) in electronic form 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 by means of a dedicated web form or application designated by the public authority as the correct application for electronic reports.
7. The authority receiving the report shall acknowledge its receipt without delay, but no later than 7 days from the date of receipt of the report, if the reporting person has provided contact details.



8. At the request of the whistleblower, the public authority competent to take follow-up action shall issue, no later than one month from the date of receipt of the request, a certificate confirming that the whistleblower is subject to the protection set out in Chapter 2 of the Act.
9. The detailed procedure and rules for making external reports are set out in Chapter 4 of the Act.

§ 16

Rules on the protection and processing of personal data in connection with whistleblower reports

1. Personal data processed in connection with the receipt of a report shall be protected in accordance with the principles set out in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter "GDPR"), as well as in E³'s internal data protection regulations.
2. Personal data that is not relevant for the processing of the report shall not be collected and, if accidentally collected, shall be deleted immediately in accordance with the internal regulations in force at E³ in this regard.
3. Where documents or other media containing personal data as indicated in paragraph 1 are relevant for the processing of a report, technical measures shall be taken to ensure that the personal data indicated in paragraph 1 contained therein are rendered irreversibly anonymous.
4. E³ is the controller of the personal data processed in connection with the receipt of a report within the meaning of the provisions of the GDPR.
5. The obligations set out in Articles 13 and 14 of the GDPR shall be implemented by E³ separately in relation to each person whose personal data it processes in connection with the receipt of a report.
6. Only E³ staff with authorisation to process personal data processed in connection with the receipt of a report, issued in accordance with the applicable internal E³ data protection regulations, shall have access to the personal data processed in connection with the receipt of the report.
7. Personal data processed in connection with the receipt of a report and the follow-up action shall be retained for a period of 3 years after the end of the calendar year in which the follow-up action is completed or the proceedings initiated by the follow-up action are terminated.
8. In matters concerning the protection of personal data not regulated in the Procedure, the other E³ internal regulations on the protection of personal data and the provisions of the GDPR shall apply.

§ 17

Rules for sharing personal data with external entities in connection with whistleblowing reports

1. The sharing of personal data processed in connection with the acceptance of a whistleblowing report with external parties may only take place if this is directly necessary for:
 - 1) the performance of a legal obligation incumbent on E³, insofar as this obligation is clearly based on generally applicable law;



- 2) the proper performance of the obligations under the Procedure, insofar as the data recipient has a legal basis for processing such data or E³ has entered into an agreement with the data recipient for the entrustment of the processing of personal data in this regard;
 - 3) the fulfilment of E³'s legitimate interests, including but not limited to the defence, investigation and establishment of claims.
2. Prior to the release of personal data referred to in paragraph 1, E³ shall notify the whistleblower by sending an explanation in paper or electronic form of the reasons for the release of the personal data, unless such notification would jeopardise the investigation or legal proceedings.
 3. The transmission and transfer by any means of originals or copies of documents containing personal data processed in connection with the receipt of a whistleblowing report is permissible:
 - 1) electronically, after the document files have been secured by encryption,
 - 2) on paper, in the case of the transmission of documents to external entities by:
 - registered mail sent through the Polish Post Office,
 - courier service sent via a courier company with which E³ has entered into an agreement for the entrustment of the processing of personal data.

§ 18

Information obligation of the Management Board with regard to whistleblower protection and reporting procedures

The E³ Management Board shall post on the E³ website comprehensible, easily accessible and continuously updated information on the Act and the Procedure, including with regard to:

- 1) the formal requirements for a whistleblowing report;
- 2) conditions for protecting whistleblowers reporting or publicly disclosing information about a breach of the law;
- 3) protection measures for whistleblowers reporting or publicly disclosing information about a breach of the law;
- 4) the procedure to be followed in the event of a whistleblowing report;
- 5) confidentiality rules applicable to whistleblowing reports;
- 6) the principles for processing the whistleblower's personal data;
- 7) follow-up action to the whistleblowing report;
- 8) remedies and procedures to protect against retaliatory action;
- 9) conditions under which the whistleblower is protected from liability for breach of confidentiality;
- 10) the manner of making external reports to the Ombudsman or to public authorities and, where appropriate, to European Union institutions, bodies or agencies.

§19

Final Provisions

1. The Management Board of E³ is responsible for the correct and effective functioning of the Procedure.



3. E³ shall inform all persons performing work under an employment or other legal relationship giving rise to the provision of work or services or the performance of functions for E³ of the adoption and content of the Procedure, as well as any amendments thereto.
4. To a person applying for a job on the basis of an employment or other legal relationship giving rise to the provision of work or services or the performance of functions, E³ shall provide information on the Procedure at the commencement of recruitment or negotiations preceding the conclusion of a contract other than an employment contract.
5. The Procedure comes into force 7 days after it has been communicated to all E³ employees.
6. The Procedure will be made available on the E3 website under the tab - "Internal reports".

Annexes:

1. Model information on the internal reporting procedure
2. Model authorisation to process personal data for the person designated to handle whistleblower reports
3. Model information clause on the principles for processing the personal data of the reported person
4. Model statement by the Employee that they have read the Regulations
5. Model Whistleblowing Report Form
6. Model authorisation to receive and verify reports/follow up/investigate internal whistleblowing reports



.....
(place and date)

Mr/Ms

.....
(name and surname)

.....
(contact details)

Information on the internal reporting procedure

Pursuant to Article 24(6) of the Act of 14 June 2024 on the protection of whistleblowers (OJ of 2024, item 928), in connection with the process initiated on(date) (to be selected):

- (a) recruitment for (name of post)
- (b) negotiations concerning (name of service)
- (c) discussions/negotiations concerning the exercise of functions (definition of functions)

I would like to inform you that Ensemble³ sp. z o.o. has an **Internal Reporting Procedure** dated(hereinafter the "**Procedure**").

You may report a possible breach of the law in the area indicated in §2.17 of the Procedure, in the manner described in §8 of the Procedure, which you became aware of in connection with the process of (indicate one of the processes above).

The procedure is available at <https://ensemble3.eu/pl>



AUTHORISATION TO PROCESS PERSONAL DATA
for the person designated to handle whistleblower reports

Authorised person:
(name of authorised person)

Position:

Scope of authorisation: processing of personal data, in connection with reception, verification of internal reports and follow-up action to the extent necessary to carry out these activities.

Processing activities:

collecting, capturing, organising, ordering, storing, adapting or modifying, downloading, viewing, using, disclosing by transmission, disseminating or otherwise making available, matching or combining, restricting, erasing or destroying.

Categories of personal data:

The authorised person is entitled to process personal data of the following categories:

1. normal personal data, including contact details provided by the whistleblower, relating to the whistleblower, the reported person or the third party named in the report,
2. other personal data provided by the whistleblower, including data relating to the reported person or a third party named in the report, including ordinary personal data or special categories of personal data or criminal data,

provided, in particular, in the whistleblower report, additional or supporting documents, consent form for disclosure of the whistleblower's identity.

Duration of authorisation:

The authorisation shall expire upon cessation of the tasks related to the handling of whistleblower reports, unless revoked earlier.

Issued by:
(signature of the controller or the person representing the controller)

Date of authorisation:

Statements by the authorised person:

- I declare that I have familiarised myself with the personal data protection regulations, as well as with the Controller's internal regulations in this regard, and I undertake to comply with them.
- I undertake to maintain the confidentiality of the personal data I have obtained or will obtain in the course of receiving and verifying internal reports and following up on them, even after the termination of the employment or other legal relationship under which I perform or will perform these tasks.
- I undertake to protect the confidentiality of the identity of the whistleblower, the reported person and the third party named in the report.
- I undertake to keep confidential the means of securing the personal data processed on the basis of the authorisation granted.



I understand that the authorisation to process personal data I have been granted will automatically expire when I cease to perform my personal data processing function (unless the authorisation is revoked earlier).

Date and signature of authorised person:



Information clause on the principles for processing of personal data of the reported person

1. The controller of the personal data is ENSEMBLE³ spółka z ograniczoną odpowiedzialnością, ul. Wólczyńska 133, 01-919 Warsaw, hereinafter: the Controller.
2. The Controller has appointed a Data Protection Officer. Contact details of the Data Protection Officer: iod@ensemble3.eu
3. Your personal data will be processed pursuant to Article 6(1)(c) of the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ EU L of 2016, No. 119, p. 1 as amended) - hereinafter GDPR - the Controller's duty, in connection with the provisions of the Act of 14 June 2024 on the protection of whistleblowers (OJ item 928), in order to carry out tasks related to the handling of internal reports.
4. The Controller will process the following personal data, as indicated in the whistleblower's report:,
(to be completed in accordance with the facts)
- as *personal data relating to the reported person*, defined as the natural person identified in the report or public disclosure as the infringer or as a person with whom the infringer is associated.
5. Your personal data was provided by the whistleblower, i.e.....
(provide details of the whistleblower if the whistleblower has consented to the disclosure of identity or if the whistleblower has not complied with the requirements set out in Article 6 of the Act on the protection of whistleblowers)
6. Personal data will only be made available to entities authorised to process them under the law. Personal data will be made available to entities providing, on the basis of contracts concluded by the Controller, the support of the Controller's activities (e.g. IT service providers). Personal data may be shared with external entities supporting the Controller in receiving internal reports. Personal data will be shared with separate controllers, i.e. competent authorities, in case of follow-up action.
7. Personal data will be 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 these actions have been concluded.
8. You have the right of access to the content of your data, with the reservation that the provision of Article 15(1)(g) of the GDPR regarding the communication of information about the source of the personal data does not apply unless the whistleblower does not meet the conditions indicated in Article 6 or has expressly consented to such communication.
You have the right to rectification of your personal data, erasure in cases provided for by law and restriction of processing.
9. You have the right to lodge a complaint with a supervisory authority - the President of the Office for Personal Data Protection if you believe that processing of your personal data violates the provisions of the GDPR;
10. The provision of your personal data is voluntary (in the whistleblower report).
11. Personal data will not be subject to profiling nor will any decisions be taken by automated means on the basis of such data.



....., on

Employee's statement that they are familiar with the Internal Reporting and Follow-up Procedure at Ensemble³ spółka z ograniczoną odpowiedzialnością

I declare that I have familiarised myself with the contents of the **Internal Reporting and Follow-up Procedure at Ensemble³ spółka z ograniczoną odpowiedzialnością**, I understand its contents, I have accepted its application and I undertake to comply with the principles contained therein, which I confirm with my own signature.

.....

Signature of Employee



Model Whistleblowing Report Form

The form is used to report violations of the law in Ensemble3 sp. z o.o. The information provided in the form is subject to the confidentiality principle in accordance with the Internal Reporting Procedure in force at Ensemble3 sp. z o.o. The rules for handling reports and the rules for communicating with the whistleblower are set out in the Internal Reporting Procedure.

STATEMENT

1. Fill out the form as described below.
2. A report may be about an act or omission that is illegal or intended to circumvent the law.
3. You should learn about the violation of the law in the context related to work (these are past, present or future activities related to the performance of work (on the basis of an employment relationship or other legal relationship or the performance of a function) in a legal entity or for the benefit of a legal entity

1) electronically via email to: sygnalista@ensemble3.eu;

2) in writing by sending the report in a sealed envelope delivered by internal or external mail, marked "whistleblowing report, confidential", placed in another sealed envelope, addressed to: Ensemble³ sp. z o.o., 01-919 Warszawa, ul. Wólczyńska 133.

Contact with the person authorised to receive your Report is confidential, which means that your personal data and the content of your Report will not be made available to unauthorised persons.

1. Date of Report

2. Details of the person making the Report:

Full name

Place of employment.....

Affiliation with an entity (e.g. employee, contractor, job candidate)
or other legal relationship or the performance of a function in a legal entity or for the benefit of a legal entity

Position/Function

Contact details (e-mail, number tel)
.....
.....

3. What area(s) does your Report relate to? You can choose several answers:

- (a) corruption,
- (b) public procurement,
- (c) financial services, products and markets,

Full name

Place of employment

Affiliation with an entity (e.g. employee, contractor, job candidate)
or other legal relationship or the performance of a function in a legal entity or for the benefit of a legal entity

Position/Function



- (d) the prevention of money laundering and terrorist financing,
- (e) product safety and compliance,
- (f) transport safety,
- (g) environmental protection,
- (h) radiological protection and nuclear safety,
- (i) food and feed safety,
- (j) animal health and welfare,
- (k) public health,
- (l) consumer protection,
- (m) privacy and data protection,
- (n) security of ICT networks and systems,
- (o) financial interests of the State Treasury of the Republic of Poland, of the local government unit and of the European Union,
- (p) the internal market of the European Union, including public-law competition and state aid rules as well as corporate taxation,
- (r) constitutional freedoms and human and citizen rights occurring in the relations of an individual with public authorities, other than related to the areas indicated in letters a) - p).

Content of Report

1. What violations of the law do you report?/ What was the violation of the law?/How did the violation occur (describe as precisely as possible what you know and what happened):

.....
.....
.....

2. When did the violation of the law take place? (indicate dates, time period)

.....
.....
.....

3. Where did the violation of the law take place?

.....
.....
.....

4. Who witnessed the violation you describe? (indicate the names or describe these people in a way that will allow their identification, e.g. head of department X)



.....
.....
5. What would you like to add to your application?

.....
.....
.....
6. Evidence

What evidence do you submit (attach to the report)? Replace and attach all

What kind of witnesses do you report? List and indicate (if possible) contact details

.....
.....
.....
6. Statement of the Whistleblower

I declare that by making the Report:

- (a) I am acting in good faith;
- (b) I have a reasonable belief that the information disclosed and each allegation contained therein is substantially true;
- (c) I am not making a Report for the purpose of making a profit;
- (d) I consider that, as regards all the circumstances of the case, the findings I have made are justified;
- (e) all the information contained by me is correct to the best of my knowledge;
- (f) in making the Report, I have disclosed all facts and circumstances known to me concerning the subject of the Report;
- (g) I am aware of the contents of the Internal Reporting and Follow-up Procedure at Ensemble³ spółka z ograniczoną odpowiedzialnością, in particular the scope of the protection to which I am entitled and the consequences of making a false Report (Article 57 of the Act - Whoever makes a report or public disclosure knowing that a breach of the law has not occurred is subject to a fine, restriction of freedom or imprisonment for up to 2 years).

Additional statement:

I declare that I consent/do not consent* to the disclosure of my personal data.

* delete as appropriate

Handwritten signature of the Whistleblower

.....



....., on

AUTHORISATION

TO RECEIVE AND VERIFY REPORTS/FOLLOW UP/INVESTIGATE INTERNAL WHISTLEBLOWING REPORTS

Name and surname of authorised person:

Date of authorisation:

SCOPE OF THE AUTHORISATION:

I authorise you to receive and verify reports, follow up and process personal data for which **Ensemble³ spółka z ograniczoną odpowiedzialnością** is the controller, in connection with internal whistleblowing reports received by **Ensemble³ spółka z ograniczoną odpowiedzialnością** from whistleblowers. The indicated activities will be carried out using equipment and tools provided by the President of the Management Board of **Ensemble³ spółka z ograniczoną odpowiedzialnością**. The authorisation covers data collection, access to data, copying, transmission, application of pseudo-anonymisation, destruction upon termination of usefulness and other activities if necessary for the proper handling of reports in accordance with the Act of 14 June 2024 on the protection of whistleblowers (OJ 2024, item 928) and in accordance with „**theInternal Reporting and Follow-up Procedure at Ensemble³ spółka z ograniczoną odpowiedzialnością**”.

STATEMENT BY THE AUTHORISED PERSON:

I declare that I have familiarised myself with the data protection policies and procedures, as well as the „**Internal Reporting and Follow-up Procedure at Ensemble³ spółka z ograniczoną odpowiedzialnością**” and undertake to comply with the principles contained therein, including criminal provisions. I also undertake to keep secret any confidential and protected information to which I am given access, as well as the methods of keeping it confidential, even after the termination of the authorisation. I declare that in the performance of my duties I will ensure due confidentiality of the whistleblower's data and of the data contained in the reports.

.....

Date and signature of the person granting the authorisation Date and signature of the person receiving the authorisation