

## **Procedure for Reporting Legal Violations and Taking Follow-up Actions at Applandeo Sp. z o.o.**

Acting pursuant to Article 24(1) of the Whistleblower Protection Act of June 14, 2024 (Journal of Laws of 2024, item 928), and following consultations with representatives of individuals performing work, regardless of the legal basis of such work, the following procedure for reporting legal violations and taking follow-up actions at Applandeo Sp. z o.o. (hereinafter referred to as the "Procedure") is hereby adopted:

### **§ 1**

#### **Preliminary Provisions**

1. This Internal Reporting Procedure sets forth a collection of principles and standards aimed at establishing:
  - a. methods for reporting legal violations;
  - b. procedures for taking follow-up actions, including the review of reports;
  - c. the scope of violations that may be subject to reporting;
  - d. methods for ensuring whistleblower protection.
2. All employees and contractors of the Company, regardless of the legal form of their cooperation with the Company, are required to comply with these rules. All employees and contractors must sign a statement confirming their familiarity with this Procedure. A template of the statement is provided in Appendix No. 4 to this Procedure.
3. The Procedure is also made available to individuals seeking employment or cooperation with the Company. Access to the Procedure may be provided by publishing it on the Company's website.



4. In matters not regulated by this Procedure, the provisions of the Whistleblower Protection Act of June 14, 2024 (Journal of Laws of 2024, item 928), as well as other applicable legal provisions, shall apply.

## § 2

### Definitions

The following terms shall have the following meanings in this Procedure:

1. **Company** - Applandeo Sp. z o.o., based in Kraków, ul. Miłkowskiego 3/302, 30-349; KRS 0000513618, NIP: 6762477117;
2. **Act** – the Whistleblower Protection Act of June 14, 2024 (Journal of Laws of 2024, item 928);
3. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation) (Official Journal of the EU L 119, 04.05.2016, p. 1, as amended);
4. **Follow-up Action** – an action taken by the Company to assess the accuracy of the information provided in the report and to prevent the legal violation reported;
5. **Retaliatory Action** – any direct or indirect action or omission in a work-related context that is prompted by a report or public disclosure, which violates or may violate the Whistleblower's rights, or causes or may cause unjustified harm to the Whistleblower, including the unwarranted initiation of proceedings against the Whistleblower;
6. **Information on Legal Violation** – refers to information, including a reasonable suspicion, regarding an actual or potential violation of the law that has occurred or is likely to occur in a legal entity in which the Whistleblower participated in the recruitment process or other pre-contract negotiations, is currently employed or was employed, or in another legal entity with which the Whistleblower has or had work-related contact, or information regarding an attempt to conceal such a violation of the law;
7. **Work-Related Context** – refers to past, present, or future actions related to performing work under an employment relationship or other legal basis for providing work or services or

performing functions for or on behalf of a legal entity, or serving in a legal entity, in which information about a legal violation was obtained and where there is a potential for experiencing retaliatory actions;

8. **Person Subject to the Report** – an individual, legal entity, or organizational unit without legal personality to which the Act grants legal capacity, identified in the report or public disclosure as having committed a legal violation, or as being associated with the person who committed the legal violation;
9. **Person Assisting in Making the Report** – an individual who aids the Whistleblower in making a report or public disclosure in a work-related context and whose assistance should remain confidential;
10. **Person Related to the Whistleblower** – an individual who may experience retaliatory actions, including a colleague or a close person to the Whistleblower, as defined in Article 115 § 11 of the Penal Code of June 6, 1997 (Journal of Laws of 2024, item 17);
11. **Report** – an internal or external report, submitted orally or in writing, in accordance with the requirements set forth in the Act;
12. **Internal Report** – the oral or written submission of information on a legal violation to the Company;
13. **External Report** – the oral or written submission of information on a legal violation to the Ombudsman or a public authority.
14. **Legal Violation** – any action or omission that is unlawful or aimed at circumventing the law, related to:
  - a. corruption;
  - b. public procurement;
  - c. financial services, products, and markets;
  - d. anti-money laundering and counter-terrorism financing;
  - e. product safety and compliance;
  - f. transportation 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 personal data protection;
  - n. security of networks and information systems;
  - o. financial interests of the State Treasury of the Republic of Poland, local government units, and the European Union;
  - p. the internal market of the European Union, including public competition rules, state aid, and corporate taxation.
15. **Whistleblower** – an individual who reports or publicly discloses information about a legal violation obtained in a work-related context, including cases where the information was obtained before entering into an employment relationship or other legal basis for performing work or services, holding a position in or providing services to a legal entity, or after such relationships have ended. This includes:
- a. employee;
  - b. temporary worker;
  - c. person performing work under a basis other than an employment relationship, including under a civil law contract;
  - d. entrepreneur;
  - e. proxy;
  - f. shareholder or partner;
  - g. member of the governing body of a legal entity or organizational unit without legal personality;
  - h. person working under the supervision and direction of a contractor, subcontractor, or supplier;
  - i. intern;

- j. volunteer;
- k. trainee;
- l. officer, as defined in Article 1(1) of the Act of February 18, 1994, on the Pensions of Officers of the Police, Internal Security Agency, Intelligence Agency, Military Counterintelligence Service, Military Intelligence Service, Central Anti-Corruption Bureau, Border Guard, Marshal's Guard, State Protection Service, State Fire Service, Customs and Tax Service, and Prison Service and their families (Journal of Laws of 2023, items 1280, 1429, and 1834);
- m. soldier, as defined in Article 2(39) of the Act of March 11, 2022, on the Defense of the Homeland (Journal of Laws of 2024, items 248 and 834).

### § 3

#### Method of Making Internal Reports

1. The individual authorized to make Internal Reports is the Whistleblower.
2. Reports may be submitted via a dedicated email address: [whistleblowing@applandeo.com](mailto:whistleblowing@applandeo.com).
3. The report may only concern violations specified in §2, item 14. The report should contain the following elements:
  - a. the date and location of the irregularity (precise or approximate);
  - b. a description of the irregularity, including specific circumstances, facts, and a detailed account of the situation;
  - c. identification of the entity to which the irregularity relates;
  - d. identification of all evidence and information available to the whistleblower that may be helpful in the process of investigating the irregularity, including the identification of witnesses to the irregularity.
4. A report template is provided in Appendix No. 2, but the use of the template is not mandatory.

5. The Company shall acknowledge receipt of the Report to the Whistleblower within 7 days of its receipt, unless the Whistleblower has not provided a contact address for the acknowledgment to be sent.
6. If the Report concerns a violation not listed in the catalog specified in §2, item 14, the Compliance Officer shall immediately forward it to the President of the Management Board, who will decide on any further steps related to the received Report.
7. Reports must be made in good faith and must contain truthful information. Submitting a false Report may result in legal liability, including criminal liability under Article 57 of the Act. In such cases, the reporting individual may also face civil liability. A person who suffers harm due to the deliberate submission or public disclosure of false information by a Whistleblower has the right to claim compensation or redress for the violation of personal rights from the Whistleblower responsible for such a report or public disclosure.

#### § 4

##### **Entity Authorized to Receive and Review Internal Reports**

1. The Management Board of the Company appoints a person authorized to receive and review internal reports from among its employees and associates. The appointed employee or associate is the Compliance Officer responsible for receiving and reviewing internal reports and taking follow-up actions. The details of the Compliance Officer are made known to employees and associates and are available on the Company's website. The Compliance Officer receives written authorization to act and is obligated to maintain confidentiality. The authorization form and confidentiality declaration are provided in Appendix No. 5 to the Procedure. In the event of the Compliance Officer's absence, the Management Board appoints a deputy.
2. If the internal report concerns, in any way, the individuals mentioned in paragraph 1, they are excluded from reviewing the internal reports. This applies particularly when the subject of the report involves the conduct or omission of that individual, or when there is a hierarchical

relationship between that individual and the Whistleblower, as well as when there is a familial or affinity relationship between that individual and the Whistleblower or the person concerned by the report. Additionally, any other circumstance that may objectively affect the impartiality of the individual would also apply. In such cases, the Management Board will appoint another person responsible for reviewing the report.

3. The Compliance Officer and their deputy are required to maintain confidentiality in relation to their duties. Before assuming responsibilities for receiving and reviewing reports, each of the aforementioned individuals must sign a written confidentiality declaration regarding information obtained in connection with their role.

## § 5

### Procedure for Reviewing Internal Reports

1. The initial verification of the Report is conducted by the Compliance Officer, who assesses whether the Report qualifies for review under this procedure.
2. If it is determined that the Compliance Officer is not authorized to review the report due to the circumstances outlined in § 4, item 2, they may be excluded from participation by a decision of the Company's Management Board. This decision can be made upon the request of the Compliance Officer or initiated by the Management Board itself. In such a case, the Management Board will appoint another individual responsible for reviewing the Report.
3. The Compliance Officer may decide to establish a Team that serves in an advisory capacity to assist in investigating the violation.
4. The Compliance Officer is required to take all necessary actions to investigate the Report, and is specifically authorized to:
  - a. request the Whistleblower to provide further explanations;
  - b. review documents submitted by the Whistleblower and obtain additional documents within the Company's operations;
  - c. interview potential witnesses of the violation;

- d. seek opinions from external specialists;
  - e. hold discussions within the Team to gather its input on the Report.
5. For each action taken, the Compliance Officer must prepare a protocol or memo, which must be signed by the Compliance Officer.

## § 6

### Rules for Taking Follow-Up Actions

1. The Compliance Officer is responsible for carrying out follow-up actions.
2. All follow-up actions must be conducted with due diligence, impartiality, and objectivity.
3. The Compliance Officer undertakes the following follow-up actions:
  - a. conducts an investigation as outlined in § 5;
  - b. adopts a resolution based on feedback regarding the violation;
  - c. issues recommendations and guidelines concerning the violation, directed to the Management Board or specific organizational units/persons involved in the Report. These recommendations may include both internal actions and external measures (e.g., recommendation to notify state authorities).
4. Feedback must be provided to the Whistleblower within 3 months from the date of confirmation of receipt of the internal report, or—if no confirmation was given—within 3 months from the expiration of 7 days from the submission of the internal report, unless the Whistleblower has not provided a contact address for feedback to be delivered.
5. Feedback on the verification of the Report is also communicated to the Company's Management Board, particularly in the event of a positive verification of the Report. The Management Board will then make decisions regarding the recommended follow-up actions (e.g., disciplinary measures against an employee, initiation of an anti-bullying procedure, and other actions).



## § 7

### Anonymous Internal Reports

The Company does not permit the acceptance of anonymous internal reports

## § 8

### Whistleblower Protection Measures

1. The Whistleblower is protected under the terms specified in the Act. In particular, no retaliatory actions, attempts, or threats of such actions may be taken against the Whistleblower.
2. If work was, is, or is to be performed under an employment relationship, the following retaliatory actions (or attempts or threats thereof) are prohibited against the Whistleblower, including but not limited to:
  - a. refusal to establish an employment relationship;
  - b. termination of employment, with or without notice;
  - c. failure to enter into a fixed-term or indefinite-term employment contract after the probationary contract, or failure to renew a fixed-term contract when the Whistleblower had a reasonable expectation of such a contract;
  - d. reduction of salary;
  - e. withholding promotion or exclusion from promotion opportunities;
  - f. exclusion from receiving non-salary-related benefits or reduction of those benefits;
  - g. transfer to a lower position;
  - h. suspension from employee or service duties;
  - i. reassignment of the Whistleblower's responsibilities to another employee;
  - j. unfavorable changes in workplace location or working hours;
  - k. negative performance evaluations or adverse work reviews;



- l. imposition or application of disciplinary measures, including financial penalties, or other similar actions;
  - m. coercion, intimidation, or ostracism;
  - n. mobbing
  - o. discrimination;
  - p. unfavorable or unfair treatment;
  - q. exclusion from or omission in being selected for career advancement training;
  - r. unjustified referral for medical examinations, including psychiatric evaluations, unless other laws permit such referrals;
  - s. actions aimed at hindering future employment in a specific sector or industry through formal or informal sectoral or industry agreements;
  - t. causing financial or economic losses or loss of income;
  - u. inflicting other non-material harm, including damage to the Whistleblower's personal rights, especially their reputation.
3. If work or services were, are, or are expected to be provided under a legal relationship other than an employment contract, forming the basis for the provision of work or services, or for holding a function or performing a service, the provisions of point 2 shall apply accordingly, unless the nature of the work, services, function, or service excludes the possibility of applying such measures to the Whistleblower.
4. In cases where work or services were, are, or will be performed under a legal relationship other than an employment contract, the act of reporting or making a public disclosure cannot serve as grounds for retaliatory actions, attempts, or threats, including but not limited to:
- a. termination of an agreement involving the Whistleblower, particularly agreements concerning the sale or supply of goods or the provision of services, withdrawal from such an agreement, or termination without notice;
  - b. imposition of obligations, refusal to grant, limitation, or revocation of rights, particularly licenses, permits, or tax reliefs.



5. A Whistleblower who has been subjected to retaliatory actions has the right to compensation in an amount no less than the average monthly salary in the national economy for the previous year, as announced for pension purposes by the President of the Central Statistical Office of Poland in the Official Gazette of the Republic of Poland "Monitor Polski," or the right to receive compensation for damages.
6. Making a report or public disclosure cannot serve as grounds for liability, including disciplinary liability or liability for damages due to the violation of others' rights or obligations specified in legal regulations, particularly concerning defamation, violation of personal rights, copyright, data protection, and confidentiality obligations, including trade secrets, in accordance with Article 5 of the Act, provided that the Whistleblower had reasonable grounds to believe that the report or public disclosure was necessary to uncover a legal violation in accordance with the Act. In the event of legal proceedings related to such liability, the Whistleblower may request the dismissal of such proceedings.
7. Obtaining information that is the subject of a report or public disclosure or access to such information cannot serve as grounds for liability, provided that such obtaining or access does not constitute an illegal act.
8. One cannot waive the rights specified in Chapter 2 of the Act or assume liability for damages resulting from making a report or public disclosure. This does not apply to assuming responsibility for damages resulting from the intentional reporting or public disclosure of false information.
9. The provisions of legal acts referred to in Article 9 § 2 of the Act of June 26, 1974 - Labour Code (Journal of Laws of 2023, item 1465 and 2024, item 878), to the extent that they directly or indirectly exclude or limit the right to make a report or public disclosure or provide for the application of retaliatory measures, do not apply.
10. The above provisions also apply accordingly to a person assisting in making a report and to a person associated with the Whistleblower, as well as to a legal entity or other organizational unit assisting the Whistleblower or associated with them, particularly those owned by the Whistleblower or employing them.

## § 9

### Protection Measures for Whistleblowers in Cases of Public Disclosure

1. A Whistleblower making a public disclosure is protected if they:
  - a. Make an internal report, followed by an external report, and if the legal entity, and subsequently the public authority, within the timeframe for providing feedback established in the internal procedure and then in the external procedure of the public authority, fail to take any appropriate follow-up actions or provide feedback to the Whistleblower; or
  - b. Make an external report immediately, and if the public authority within the timeframe for providing feedback established in its external procedure fails to take any appropriate follow-up actions or provide feedback to the Whistleblower—unless the Whistleblower has not provided a contact address for such feedback.
2. A Whistleblower making a public disclosure is also protected if they have reasonable grounds to believe that:
  - a. The violation poses a direct or obvious threat to the public interest, particularly if there is a risk of irreversible harm; or
  - b. Making an external report would expose the Whistleblower to retaliatory actions; or
  - c. There is a low probability of effective action being taken against the violation due to special circumstances of the case, such as the possibility of hiding or destroying evidence, collusion between the public authority and the perpetrator, or the involvement of the public authority in the violation.

## § 10

### Register of Reports

1. The Company shall maintain a Register of Reports, recording all internal reports made pursuant to this Procedure, regardless of the subsequent handling of the report.
2. The Representative for Violations is responsible for maintaining the Register.



3. The Register of Internal Reports includes:
  - a. report number;
  - b. subject of the legal violation;
  - c. personal data of the Whistleblower and the person the report concerns, necessary for identifying these individuals;
  - d. contact address of the Whistleblower;
  - e. date of the report;
  - f. information about the follow-up actions taken;
  - g. date of case closure.
4. Personal data and other information in the Register of Internal Reports shall be stored for a period of 3 years after the end of the calendar year in which the follow-up actions were completed or after the completion of proceedings initiated by such actions. The template for the Register of Internal Reports is attached as Annex No. 2 to this Procedure.

## § 11

### Data Protection

1. The personal data of the Whistleblower, which allows their identity to be determined, shall not be disclosed to unauthorized persons unless with the explicit consent of the Whistleblower.
2. Upon receiving a report, the Company processes personal data only to the extent necessary for accepting the report or taking any subsequent actions. Personal data that is not relevant to the handling of the report is not collected and, if accidentally collected, is promptly deleted. Such data shall be deleted within 14 days of determining its irrelevance to the case.
3. Article 14(2)(f) of the GDPR does not apply, unless the Whistleblower does not meet the conditions specified in Article 6 of the Act or has explicitly consented to the disclosure of their identity.

4. Article 15(1)(g) of the GDPR regarding the provision of information about the source of personal data does not apply, unless the Whistleblower does not meet the conditions specified in Article 6 or has explicitly consented to such disclosure.
5. Personal data processed in connection with the receipt of a report or follow-up actions, and documents related to such reports, shall be stored by the Company for a period of 3 years after the end of the calendar year in which the external report was submitted to the relevant public authority for further action or after the completion of follow-up actions or proceedings initiated by such actions. This provision does not apply if the documents related to the report are part of preparatory proceedings or judicial or administrative court proceedings.
6. The information clause for the Whistleblower is contained in Annex No. 1 to this Procedure.

## § 12

### Information on External Reports

1. The Whistleblower may make an external report without prior internal reporting.
2. External reports are accepted by the Ombudsman or a public authority.
3. The Ombudsman and the public authority are separate data controllers with respect to the personal data provided in the external report received by these bodies.
4. The manner and procedure for making and processing external reports are defined in Chapter 4 of the Act and the internal procedures of the respective public authorities.

## § 13

### Final Provisions

1. This Procedure is communicated to the employees and collaborators of the Company via email and comes into effect 7 days from the date of notification.
2. For matters not regulated by this Procedure, the provisions of the Act shall apply.
3. The following appendices constitute an integral part of this Procedure:

Appendix 1: Information Clause

Appendix 2: Report Form

Appendix 3: Internal Report Register Form

Appendix 4: Declaration of Familiarity with the Procedure

Appendix 5: Authorization for the Representative with Confidentiality Statement



Applandeo Sp. z o.o.  
NIP 6762477117



ul. Miłkowskiego 3/302  
30-349 Kraków

## Appendix 1: Information Clause

<b>INFORMATION ON THE PROCESSING OF PERSONAL DATA</b>	
Personal Data Controller	<p>Your personal data will be processed by Us, i.e. Applandeo Sp. z o.o., based in Kraków, Miłkowskiego 3/302, 30-349; KRS 0000513618, NIP: 6762477117.</p> <p>You can contact us as follows: e-mail: <a href="mailto:whistleblowing@applandeo.com">whistleblowing@applandeo.com</a></p>
Purposes of Processing Personal Data and Legal Basis for Processing	Your personal data will be processed to fulfill a legal obligation imposed on us, under which we are required to accept and address an internal report and take subsequent actions related to that report, as well as for later archiving of the report (Article 6(1)(c) of the GDPR).
Recipients of Data	Your personal data may be shared with entities authorized under the law, as well as with our trusted external service providers who assist us in receiving and addressing internal reports (particularly IT solution providers used during the internal reporting process, external consultants such as law and tax firms).
Transfer of Data to Third Countries	Your personal data will not be processed outside the European Economic Area.
Retention Periods for Personal Data	Your personal data will be processed for a period of 3 years following the end of the calendar year in which the external report was submitted to the relevant public authority for follow-up actions or the follow-up actions were completed, or after the conclusion of proceedings initiated by these actions. This provision does not apply if the documents related to the report are part of preparatory proceedings or court or administrative court cases.
Rights Related to the Processing of Personal Data	Your rights are as follows: <ul style="list-style-type: none"> <li>· access to your personal data,</li> </ul>



	<ul style="list-style-type: none"> <li>· rectification of personal data,</li> <li>· the right to lodge a complaint with a supervisory authority if you have concerns about the lawful processing of your personal data. The supervisory authority is the President of the Personal Data Protection Office in Warsaw,</li> <li>· the right to withdraw consent where the processing of your personal data was based on such consent.</li> </ul> <p>Withdrawal of consent does not affect the lawfulness of processing carried out based on consent before its withdrawal.</p> <p>You also have the right to:</p> <ul style="list-style-type: none"> <li>· erasure of personal data,</li> <li>· restriction of the processing of personal data,</li> <li>· object to the processing of personal data,</li> <li>· data portability – subject to the rules and limitations provided by GDPR.</li> </ul>
Provision of Data	<p>Providing personal data necessary for making and processing a report is voluntary. However, failure to provide this data may result in the inability to process the report.</p>



## Appendix 2: Report Form

<b>Date of Report</b>	
<b>Whistleblower Information</b>	Name and Surname: Position: Workplace/Department: Contact Details:
<b>Date of Occurrence of the Irregularity:</b>	
<b>Date of Becoming Aware of the Irregularity:</b>	
<b>The report concerns:</b>	<ul style="list-style-type: none"> <li>· corruption;</li> <li>· public procurement;</li> <li>· financial services, products, and markets;</li> <li>· anti-money laundering and counter-terrorism financing;</li> <li>· product safety and compliance with requirements;</li> <li>· transport safety;</li> <li>· environmental protection;</li> <li>· radiological protection and nuclear safety;</li> <li>· food and feed safety;</li> <li>· animal health and welfare;</li> <li>· public health;</li> <li>· consumer protection;</li> <li>· privacy and personal data protection;</li> <li>· network and information systems security;</li> <li>· financial interests of the State Treasury of the Republic of Poland, local government units, and the European Union;</li> <li>· internal market of the European Union, including public law competition rules and state aid, as well as corporate taxation.</li> </ul>
<b>Description of the irregularity - facts,</b>	

<b>circumstances, and description of the situation to which the report pertains:</b>	
<b>Identification of the entity (e.g., individual, organizational unit) to which the report pertains:</b>	Name or designation: ..... Position (if applicable): ..... Contact details: .....
<b>Identification of evidence supporting the breach, e.g.:</b> - documents, including electronic ones; - photos, files, videos; - witnesses to the breach, etc.	
<b>I declare that I am making this Report in good faith, remaining reasonably convinced, given the circumstances of the case, that a breach has occurred.</b>	<b>YES/NO*</b> *Delete as appropriate
<b>Does the Whistleblower consent to the disclosure of their identity?</b>	<b>YES/NO*</b> *Delete as appropriate
<b>Signature of the Whistleblower:</b>	

**Appendix 3: Internal Report Register Form**

No.	Submission Number	Subject of Legal Violation	Personal Data of the Whistleblower	Personal Data of the Person Concerned by the Submission	Contact Address of the Whistleblower	Date of Submission	Information on Follow-Up Actions	Date of Case Closure

**Appendix 4: Declaration of Familiarity with the Procedure**

Kraków, date .....

**Declaration of Familiarity with the Procedure for Reporting Legal Violations**

I hereby declare that I have read the Procedure for Reporting Legal Violations and Taking Follow-Up Actions in force at Applandeo Sp. z o.o.

.....  
(Signature of the person making the declaration)

Receipt Confirmation:

.....  
(Signature of the person acting on behalf of the Company)

## Appendix 5: Authorization for the Representative with Confidentiality Statement

### Authorization for Processing Personal Data

Acting on behalf of Applandeo Sp. z o.o., with its registered office at Miłkowskiego 3/302, 30-349 Kraków, KRS 0000513618, NIP: 6762477117, based on the applicable regulations regarding the protection of personal data, specifically pursuant to Article 29 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, and based on Article 27(2) of the Act on the Protection of Whistleblowers of June 14, 2024, hereby:

I hereby authorize [Name of Authorized Person]\*: .....

to receive and verify internal reports, take subsequent actions, and process the personal data of the whistleblower, the person concerned by the report, and any third parties mentioned in the report, including sensitive personal data, solely to the extent necessary for the performance of their duties as the Representative for Violations, based on the Procedure for Reporting Violations of Law and Taking Subsequent Actions in force within the Company.

As part of this authorization, you are authorized to perform operations on personal data only to the extent necessary for fulfilling your duties.

The authorization remains valid until the termination of the legal relationship binding you with Applandeo Sp. z o.o. or until this authorization is revoked.

.....  
(Data and signature of the authorizing person)

Receipt Confirmation:

.....

(Date and signature of the authorized person)



Applandeo Sp. z o.o.  
NIP 6762477117



ul. Miłkowskiego 3/302  
30-349 Kraków

### Confidentiality Statement

In connection with my appointment as the Whistleblowing Officer, I hereby declare that I commit to fulfilling my duties as outlined in the Company's Procedure for Whistleblowing and Taking Follow-Up Actions, including the obligation to maintain the confidentiality of all information and data, including personal data, obtained in connection with the role.

I commit to ensuring the security of personal data processing by protecting it from unauthorized access, unjustified modification or destruction, illegal disclosure, or acquisition through organizational, technical, and physical measures guaranteed and implemented by the Company.

I undertake to keep confidential all information, personal data, and methods of their protection to which I gain access, even after the termination of the legal relationship with the Company, with particular emphasis on the confidentiality of special categories of data (sensitive data).

In particular, I commit to maintaining the confidentiality of the identity of the whistleblower, the person concerned by the report, and any third parties mentioned in the report, including all information that could indirectly or directly lead to the disclosure of their identity, unless the whistleblower has consented to the disclosure of their identity. I am aware that the unauthorized disclosure of the whistleblower's identity, the identity of persons assisting in the report, or persons connected to the whistleblower, in violation of the law, is subject to criminal liability as specified in Article 56 of the Whistleblowers Protection Act.

.....  
(Signature of the person making the statement)



Receipt Confirmation:

.....

(Date and Signature of the Person Receiving the Statement)



Applandeo Sp. z o.o.  
NIP 6762477117



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