

INTERNAL REPORTING REGULATIONS

at Dr Irena Eris S.A. and companies belonging to the Hotele SPA Dr Irena Eris Group

**adopted by virtue of the Resolution of the Management Board no. 2024/10/04/01
dated 4 October 2024.**

1. The Internal Reporting Regulations (hereinafter referred to as the ‘Regulations’) set out the principles of the internal system of reporting, processing and follow-up of Breaches of law at Dr Irena Eris S.A. and the companies belonging to the Hotele SPA Dr Irena Eris Group (hereinafter referred to as the ‘Company’), as well as the obligations of the Company and its personnel to prevent retaliation against Whistleblowers (as defined in point 6 c)) or Persons assisting in the reporting. The term ‘the Company’ shall apply, mutatis mutandis, to entities that identify an Authorised Person or entities where a breach has occurred.
2. The Company shall ensure the proper functioning of the channels for making Breaches of law Notifications and shall take active monitoring measures to prevent and detect Breaches of law Notifications in accordance with these Regulations or other internal documents of the Company.
3. The making and handling of reports of actual or potential Breaches of law shall be free of any charge.
4. The Regulations shall apply to:
 - a) former and current employees of the Company (including temporary employees),
 - b) persons providing services on the basis of a contract for specific work, commission or any other civil law contract,
 - c) self-employed persons who have knowledge of infringements in a context related to the Company's business,
 - d) persons working under the supervision and direction of a contractor, subcontractor or supplier;
 - e) persons who are members of the Company's statutory bodies and proxies,
 - f) shareholders and stockholders,
 - g) trainees, volunteers and apprentices,- reporting information about the Breach of law obtained in a Work-related Context.
5. The provisions of the Regulations shall also apply to:
 - a) individuals whose employment relationship (or one of the other legal relationships indicated in point 4 above) is yet to be established, where the information about the Infringement was obtained during the recruitment process or other pre-contractual negotiations,
 - b) natural persons assisting in the reporting in a Work-Related Context or natural persons related to the Whistleblower who may experience Retaliatory Actions (e.g. a co-worker or a person closely related),

- c) legal persons or organization entities assisting the Whistleblower or related to the Whistleblower in particular, which are owned by the Whistleblower, or for which the Whistleblower works, or which are otherwise related to the Whistleblower in a Work Related Context.
6. For the purposes of these Regulations, the following definitions shall apply:
- a) 'Breaches of law' means acts or omissions that are contrary to, or intended to circumvent, common law relating to:
 - 1) corruption;
 - 2) public procurement;
 - 3) financial services, products and markets;
 - 4) anti-money laundering and anti-terrorist financing;
 - 5) product safety and compliance;
 - 6) transport safety;
 - 7) environmental protection;
 - 8) food and feed safety;
 - 9) animal health and welfare;
 - 10) public health;
 - 11) consumer protection;
 - 12) protection of privacy and personal data;
 - 13) security of information and communication networks and systems;
 - 14) financial interests of the State Treasury of the Republic of Poland, local government unit and the European Union;
 - 15) the internal market of the European Union, including public law principles of competition and state aid and corporate taxation;
 - 16) other acts and omissions relating to the Company's interests, in addition to events covered by the Labour Code.
 - b) 'Notification' means the transmission of information on Breaches of law, made by means of an information system;
 - c) 'Whistleblower' means an individual who reports or publicly discloses information on a Breach of law, as described in the Law on the Protection of Whistleblowers of 14 June 2024 (Journal of Laws of 2024, item 928, hereinafter referred to as the 'Law') obtained in a Work-related Context;
 - d) 'Person assisting in making a report' means an individual who assists a Whistleblower in this activity in a Work Related Context and whose assistance should not be disclosed;

- e) 'Work-Related Context' means past, present or future activities related to the performance of work under an employment or other legal relationship underlying the provision of work or services, or the performance of functions in or for a legal entity, in the course of which information about the Breach has been obtained and the possibility of experiencing Retaliation exists;
- f) 'Ethics Committee' - the Committee established in each of the Companies (except for Hotele SPA Dr Irena Eris Sp. z o.o.). to resolve disputes between employees.
- g) 'Person concerned by the Notification' means a natural person, a legal person or an organization unit without legal personality, to which the Act confers legal capacity, indicated in the Notification as the person who committed the Infringement, or as the person with whom the person committed the Infringement is associated;
- h) 'Person accepting the Notification' is a person who is a member of the Ethics Committees operating in each of the Companies (with the exception of Hotele Spa Dr Irena Eris Sp. z o.o.), who has been authorised to receive the Notifications specified in these Regulations and to communicate with the Whistleblower, including the transmission of the Feedback, indicated in each of the Companies to accept the Notification; the Person accepting the Notification informs the Board of the accepted Notification, without providing the details of the Whistleblower. If necessary, the details of the Whistleblower shall be provided to the Authorised Person if this is necessary for the due clarification of the report of a breach.
- i) 'Authorised Person' is the person designated from among the members of the Board of Directors of the company concerned, who appoints the Report Receiver, decides on the appointment and composition of the Committee, and is authorised to take follow-up action, including verification of the Internal Report, including requesting additional information. In case the subject of the investigation is the action of a Member of the Management Board of the Company Dr Irena Eris S.A. The Authorised Person will always be the Supervisory Committee. The Authorised Person may not be the Member of the Management Board to whom the Notification relates. The Authorised Person will be able to obtain the data of the Signatory from the Person accepting the Notification only if such data are necessary for the clarification of the given Notification.
- (j) 'Related Person of the Whistleblower' means a natural person who may experience Retaliatory Actions, including a co-worker or next of kin of the Whistleblower within the meaning of [Article 115 § 11 of the Act of 6 June 1997. - Criminal Code \(Journal of Laws 2024, item 17\)](#);
- k) 'Follow-up Action' is an action taken by the Company in order to assess the veracity of the information contained in the Notification and to counteract the Infringement that is the subject of the Notification, in particular through an investigation, the initiation of an audit, the filing of a charge, an action taken to recover funds or the closure of a procedure carried out as part of the internal procedure for making Notifications of Infringements and taking Follow-up Actions;
- l) 'Retaliatory Action' means a direct or indirect action or omission in a Work-related Context that is caused by a Reporting or public disclosure and that violates or is

likely to violate the rights of the Signatory or causes or is likely to cause undue harm to the Signatory, including the unjustified initiation of proceedings against the Signatory, consisting in particular of:

- 1) refusing to establish an employment relationship;
- 2) termination or termination without notice of the employment relationship;
- 3) failure to conclude a fixed-term employment contract or an indefinite-term employment contract after the termination of a probationary employment contract, failure to conclude another fixed-term employment contract or failure to conclude an indefinite-term employment contract after the termination of a fixed-term employment contract - in the event that the Whistleblower had a justified expectation that such an agreement would be concluded with him/her;
- 4) reduction of the amount of remuneration for work;
- 5) withholding of promotion or omission from promotion;
- 6) omission from or reduction in the amount of work-related benefits other than salary;
- 7) transfer to a lower job position;
- 8) suspension from employment or official duties;
- 9) transfer to another employee of the Whistleblower's existing duties;
- 10) unfavourable change of the place of work or work time schedule;
- 11) negative evaluation of work performance or negative opinion of work;
- 12) the imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature;
- 13) coercion, intimidation or exclusion;
- 14) mobbing;
- 15) discrimination;
- 16) unfavourable or unjust treatment;
- 17) withholding of participation or omission in selection for participation in training courses to improve professional qualifications;
- 18) unjustified referral for medical examination, including psychiatric examination, unless separate provisions provide for the possibility to refer an employee for such examination;
- 19) action aimed at making it more difficult to find a future job in a given sector or industry on the basis of an informal or formal sectoral or industry agreement;
- 20) causing financial loss, including economic loss or loss of income;

- 21) causing other non-material damage, including damage to personal rights, in particular to the reputation of the Whistleblower;
- 22) Retaliation shall also be deemed to be an attempt or threat of the measure set out in the points above because of the making of a report or public disclosure;
- m) 'Commission' shall mean an internal commission that may be appointed ad hoc by the Authorised Person in accordance with the procedure for the appointment of the Commission set out in Annex no. 6 to these Regulations in the event that the Company receives a Notification and the Authorised Person considers that the appointment of such Commission is warranted. The Commission is intended to assist the Authorised Person in taking the appropriate Follow-up Action, the details of the Whistleblower shall not be disclosed to the members of the Commission;
- n) 'Supervisory Committee' means the committee, appointed on an ad hoc basis by the Chairman of the Supervisory Board, to clarify the circumstances contained in the Notifications of Breaches of law concerning Members of the Management Board of Dr Irena Eris S.A.; and empowered collectively to take appropriate follow-up actions. The provisions of the Regulations concerning the Authorised Person shall apply to the Supervisory Committee accordingly;
- o) 'Feedback' means the information provided to the Whistleblower on the follow-up actions planned or taken and the reasons for such actions;
7. Persons to whom these Regulations apply shall be afforded protection by the Company from Retaliation from the time of the reporting by the Whistleblower where they had reasonable grounds to believe that the information that was the subject of an internal or external report was true at the time of the reporting and constituted information of a Breach of law;
8. The Company shall ensure that Notifications of Breaches of law can be made through secure channels that ensure the confidentiality of the identity of the Whistleblower, as well as the protection of the personal data of the persons to whom the Notification relates. A specimen confidentiality declaration is attached as Annex no. 8.
9. Notifications of Breaches of law can be made through a dedicated channel to e-mail addresses assigned to specific companies
- Dr Irena Eris: zgloszenianaruszen@drirenaeris.com
- Dr Irena Eris SPA Hotels: zgloszenianaruszen@drirenaerisspa.com
- Hotel SPA Dr Irena Eris Krynica Zdrój: zgloszenianaruszenKZ@drirenaerisspa.com
- Hotel SPA Dr Irena Eris Polanica Zdrój zgloszenianaruszenPZ@drirenaerisspa.com
- Hotel SPA Dr Irena Eris Dylewskie Hills: zgloszenianaruszenWD@drirenaerisspa.com
- handled by the Person accepting the Notification.
10. The Notification submitted by e-mail should include a completed form (Annex no. 4) available at <http://portal.drirenaeris.com/> and if the form is not used, it should contain the following information:

- a) Identification of the person submitting the Notification (the Whistleblower) including: name and surname, position (if applicable), email address, telephone number, type of relationship with the Company,
 - b) Date and place of the Breach of law;
 - c) Indication of the Person to whom the Notification relates (i.e. the person who, in the opinion of the Whistleblower, committed the Breach of law) and the entity in which the person works;
 - d) A precise description of the situation in relation to which the Whistleblower believes that a Breach of law has occurred, with information on what the Breach of law, in the opinion of the Whistleblower, consisted of;
 - e) Details of the persons affected by the Breach of law (if applicable);
 - f) Indication of the evidence available to the Whistleblower (if any);
 - g) Information as to whether the Breaches of law indicated in the Notification have already been reported previously (if so - indicating the date and form of submission and the Follow-up actions taken);
11. Anonymous Notifications will not be accepted. In the case in which a Notification does not contain all the elements referred to in point 10 of these Regulations, the Whistleblower will be requested to complete the missing information within a period of 7 days under pain of refusal to consider the Notification, provided that, as a result of the missing information, it is not possible to consider the Notification.
 12. The Whistleblower undertakes to treat the evidence and information obtained as a business secret under criminal liability. A written record of the interview with the Whistleblower shall be drawn up and placed in the case file. The Whistleblower shall have the right to verify the contents of the report and to amend it.
 13. The Company's Management Board implements technical and organisational solutions ensuring the confidentiality of the identity of the Whistleblower and the persons to whom the Whistleblowing concerns, in particular by:
 - a) protecting the personal data and information to which the Notification relates from access by unauthorised persons,
 - b) granting access to the personal data and information to which the Notification relates only to necessary persons who have been authorised to do so,
 14. Each Notification shall be entered in the register of internal Notifications (hereinafter: Register of Internal Notifications), the specimen of which is attached as Annex no. 2 to the Regulations. The Register of Internal Notifications shall be maintained at the respective company by an Authorised Person.
 15. The Register of Internal Notifications may be maintained in paper form, electronically, including by means of an IT system, with access to the Register being granted only to the Persons accepting the Notification and the Authorised Person.

16. The Register of Internal Notifications should be maintained in a reliable, systematic manner and reflect the actual course of actions taken in relation to the receipt of Notification.
17. Within 7 days of receipt of a Notification, the Whistleblower should be informed of the fact that a Notification has been accepted and registered or, in the case of an Notification's deficiencies, the Whistleblower should be invited to supplement it.
18. Within no longer than 90 days from the date of receipt of the Notification, the Authorised Person shall undertake, with due diligence, Follow-up actions consisting, in particular, in carrying out actions verifying the information contained in the Notification, explanatory actions aimed at establishing the circumstances related to the breach of law indicated in the Notification and - in the case of establishing the occurrence of a Breach of law - undertake relevant actions to counteract the Breach of law being the subject of the Notification. The activities carried out are subject to documentation. In the event that it is necessary to clarify the Notification, the Authorised Person will be entitled to request the Persons receiving the Notification to disclose the data of the Whistleblower.
19. Upon receipt of a notification, the Company shall process personal data to the extent necessary to accept the report or to take possible follow-up action. Personal data that is not relevant for the processing of the notification shall not be collected and, if accidentally collected, shall be deleted immediately. The deletion of such personal data shall take place within 14 days of the determination that it is not relevant to the case.
20. Feedback shall be provided to the Whistleblower no later than 3 months from the date of confirmation to the Whistleblower of acceptance of the Notification (or, in the absence of such confirmation, from the expiry of 7 days from the filing of the Notification).
21. The Company shall undertake Follow-up actions to prevent the occurrence of Breaches of law in the future, as well as to provide the Whistleblower, Persons assisting in the submission of a Notification, Persons related to the Whistleblower and legal persons or other organisational units assisting the Whistleblower or related to the Whistleblower with protection against Retaliatory Actions.
22. It is prohibited to disclose to unauthorised persons any personal data of the Whistleblower and the persons to whom the Notification relates, unless otherwise provided by law. **Whoever discloses the identity of a Whistleblower in contravention of the provisions of the Law shall be subject to criminal liability as provided for in the Law.**
23. Disclosure of the Whistleblower's data may take place only with the express consent of the Whistleblower. The above provision shall not apply if disclosure is a necessary and proportionate obligation under the law in connection with investigations conducted by public authorities or pre-trial or judicial proceedings conducted by courts, including in order to guarantee the right of defence of the reported person.
24. Retaliation against the persons indicated in point 22 above shall be subject to disciplinary proceedings initiated by the Company against the perpetrator(s) of such actions.
25. **In the event that a Notification is made in bad faith, in particular a Notification that is false or defamatory of another natural or legal person referred to in the Notification, the person making the Notification shall not enjoy the protection**

provided for in these Regulations, unless otherwise provided by law. The Company may take disciplinary action against a person making a Notification in bad faith or use available legal instruments in the event of a reasonable suspicion that the person making the Notification is committing a crime.

26. External reporting can be done through the Ombudsman, on the website indicated at www.brpo.gov.pl.
27. Confidentiality is the responsibility of each person involved in the proceedings covered by these Regulations (including parties to the proceedings and witnesses), which shall be informed by the Authorised Person in each case.

Annexes:

- 1) Procedure for handling notifications of internal violations
- 2) Register of Internal Notifications
- 3) Authorisation to receive notifications
- 4) Report of receipt of a Notification
- 5) Declaration of acquaintance with Internal Reporting Regulations at Dr Irena Eris S.A. and Companies Belonging to the Hotele SPA Dr Irena Eris Group
- 6) Procedure on appointment of a Commission to clarify the circumstances contained in Notifications of Breach of the law in Dr Irena Eris S.A. or companies belonging to the Group Hotele SPA Dr Irena Eris
- 7) Procedure on appointment of the Supervisory Committee to clarify the circumstances contained in Notifications of Breaches of the law concerning members of the Management Board in Dr Irena Eris S.A.
- 8) Employee Declaration of confidentiality.

Procedure for handling notifications of internal violations

- 1) Acceptance of a report of a Breach by the Person Accepting the Notification
 - Anonymisation of the personal data of the Whistleblower and those assisting him/her
 - Implementation of the information obligations under Articles 13 and 14 of the GDPR
 - Transmission of the anonymised Notification to the Authorised Person
- 2) Actions of the Authorised Person:
 - Preliminary verification of the Breach of law
 - Is the Notification correct (does it contain all necessary elements)?
 - If the Notification is incorrect - indicate why the Notification is considered incorrect and if necessary request completion of the Notification.
 - Registration of the Notification - Register of Notifications.
 - Acknowledgement of receipt of Notification or information that a Notification is not correct, together with a request for completion - system, e-mail, postal mail - maximum 7 days from the date of Notification.
 - Decision by the Authorised Person on the appointment of the Commission.
 - Substantive examination of the case
 - Decision taken
 - Follow-up Actions
 - Feedback to the Whistleblower – within maximum 3 months
 - Archiving of documents
 - Deletion of data relating to the Notification - 3 years after the end of the calendar year in which the Follow-up Actions were completed or after the proceedings initiated by the Follow-up Actions were terminated.

Register of Internal Notifications*

- 1) Notification number.
- 2) Date of receipt of the Notification.
- 3) Contact details of the Whistleblower.
- 4) Personal details of the Person to whom the Notification relates.
- 5) Information about the person or persons assisting.
- 6) Concise description of the subject of the Notification - categorisation.
- 7) Person accepting the Notification.
- 8) Authorised Person.
- 9) Description of the attached documents (number).
- 10) Date on which the Whistleblower was informed of the acceptance of the Notification.
- 11) Whether a Committee was appointed to examine the Notification (what composition?) and whether external bodies were used in the examination of the Notification (which)?
- 12) How was the notification processed?
- 13) Description of the Follow-up Actions taken.
- 14) Date of closure of the Notification.
- 15) Date of communication to the Whistleblower on how and when the Notification was closed (Feedback).
- 16) Whether the case is continued in other proceedings (which).

* The personal data and other information in the Register of Internal Notifications are retained for a period of 3 years after the end of the calendar year in which the Follow-up Action was completed or the proceedings initiated by the Follow-up Action are terminated.

Annex no. 3

Authorisation to receive notifications

I hereby authorise Ms/Mr to receive notifications on the breaches of law, and to process personal data in accordance with the Internal Reporting Regulations in force in the Company pursuant to the Act of 24 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928).

The authorisation is granted for a fixed period until/for an indefinite period.

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Report of receipt of a Notification

1. Person submitting the Notification (Whistleblower) If the Notification is submitted by a pair of persons, please enter all of them.

Name and surname:

Contact details: (email, telephone number)

- I am an employee
- I am a former employee
- I am a contractor/service provider
- I am a partner, shareholder
- I am a member of a body/proxy
- I am an applicant for employment
- I am an apprentice/trainee/volunteer
- I work in a contractor/subcontractor/supplier organisation,
- other:

Official position (if applicable):

2. Person harmed by the Breach of law (if applicable)

Name and surname:

Official position:

3. Person affected by the Notification. If more than one person is affected by the Notification, please enter all persons.

Name and surname:

Official Position:

4. What does the Notification concern?
5. What are or have been the subject of the Breaches of law which you are reporting?
6. When and where did the reported Breaches of law occur?
7. Do you have evidence of the Breaches of law, if so, please write it down?
8. Have you reported these Breaches of law before? If yes, indicate when, to whom, in what form.
Do you know what action was taken?
9. Do you have anything else you would like to add regarding this Notification?

Signature of the notifying Person

Annex no 5

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name and surname of employee

.....

place and date

.....

position

**DECLARATION OF ACQUAINTANCE WITH THE INTERNAL REPORTING
REGULATIONS AT DR IRENA ERIS S.A.
AND COMPANIES BELONGING TO THE HOTELE SPA DR IRENA ERIS GROUP**

I hereby confirm that I am familiar with the Internal Reporting Regulations at
Dr Irena Eris S.A. and Companies Belonging to the Hotele SPA Dr Irena Eris Group
applicable at

(signature of employee)

PROCEDURE
ON APPOINTMENT OF A COMMISSION TO CLARIFY THE CIRCUMSTANCES
CONTAINED IN NOTIFICATIONS OF BREACH OF THE LAW IN
DR IRENA ERIS S.A.
OR COMPANIES BELONGING TO THE GROUP HOTELE SPA DR IRENA ERIS

§ 1

Acting on the basis of the Internal Reporting Regulations at Dr Irena Eris S.A. and Companies Belonging to the Hotele SPA Dr Irena Eris Group dated in connection with the Act of 14 June 2024 on protection of whistleblowers (Journal of Laws of 2024, item 928), a Commission is appointed to clarify the circumstances contained in an Internal Notification, hereinafter referred to as the Commission.

§ 2

The Commission is appointed on an ad hoc basis by the Authorised Person each time there is a need to carry out more clarifying activities.

The members of the Commission do not obtain information on the details of the Whistleblower.

§ 3

1. The composition and number of members of the Commission is each time decided by the Authorised Person.
2. The Commission is always composed of the Authorised Person, who is also the Chairman of the Commission.
3. The composition of the Commission shall be selected ad hoc by the Authorised Person from among the Company's employees or persons specialised in the field relevant to the notification under consideration.

§ 4

The tasks of the Commission are:

1. verification of Notifications of Breaches of law made by the Whistleblowers;
2. conduct of the explanatory proceedings;
3. advising on follow-up actions;

§ 5

1. The meetings of the Commission shall be held during the working hours of its members.
2. The meetings of the Commission shall be convened by the Chairman of the Commission.
3. For the time not worked in connection with participation in the meetings and work of the Commission, the employees of Dr Irena Eris S.A. or Dr Irena Eris Hotele SPA Group shall retain the right to remuneration to which they are entitled under their contract with the company concerned.
4. Non-employees shall receive appropriate remuneration for their participation in the Commission.

PROCEDURE

ON APPOINTMENT OF THE SUPERVISORY COMMITTEE TO CLARIFY THE CIRCUMSTANCES CONTAINED IN NOTIFICATIONS OF BREACHES OF THE LAW CONCERNING MEMBERS OF THE MANAGEMENT BOARD IN DR IRENA ERIS S.A.

§ 1

Acting on the basis of the Internal Reporting Regulations at Dr Irena Eris S.A. and Companies Belonging to the Hotele SPA Dr Irena Eris Group ('Regulations') dated, in connection with the Act on protection of whistleblowers dated 14 June 2024 (Journal of Laws of 2024, item 928), the Supervisory Committee for clarifying circumstances contained in reports of violations of law concerning the Members of the Management Board at Dr Irena Eris S.A., hereinafter referred to as the Supervisory Committee, is appointed.

The Supervisory Committee shall perform the functions of an Authorised Person to whom the provisions of the Regulations shall apply accordingly.

§ 2

1. The Supervisory Committee is appointed each time by the Chairman of the Supervisory Board.

§ 3

1. The Supervisory Committee shall consist of 3 Members of the Supervisory Board. The composition of the Supervisory Committee shall each time be decided by the Chairman of the Supervisory Board.
2. The Supervisory Committee may be assisted by persons specialised in the field of the application under consideration, who shall not, however, be members of the Supervisory Committee.

§ 4

The tasks of the Supervisory Committee are:

1. verifying the Notifications of Breaches of Law made by the Whistleblowers;
2. carrying out the explanatory proceedings;
3. taking follow-up action;

§ 5

1. Meetings of the Supervisory Committee shall be held on dates determined by the members of the Committee, with the first meeting of the Supervisory Committee to take place within 30 days of the receipt of the Notification.
2. The meetings of the Supervisory Committee shall be convened by the Chairman of the Supervisory Board.
3. Minutes shall be taken of the meetings of the Supervisory Committee. The members of the Supervisory Committee may pass a resolution to exclude from the minutes of a given

meeting due to the good of the Company or the persons subject to the proceedings of the Supervisory Committee.

4. The members of the Supervisory Committee shall be obliged to keep confidential all information related to the work of the Supervisory Committee.
5. Documentation related to the work of the Supervisory Committee will be kept in the office of the Chairman of the Committee.
6. The members of the Supervisory Committee shall not be entitled to remuneration for the time worked in connection with participation in the meetings and work of the Supervisory Committee.

EMPLOYEE DECLARATION

I, the undersigned..... (name and surname, data of the employer) declare that I have familiarised myself with the Internal Reporting Regulations at Dr Irena Eris S.A. and Companies Belonging to the Hotele SPA Dr Irena Eris Group and I undertake to comply with the rules described therein.

I acknowledge that all information, in particular personal data, which I will obtain in connection with my participation in the process of handling whistleblower notifications at Dr Irena Eris Group, may be used by me only for the purpose directly related to the handling of such notifications and that such information is subject to the obligation of confidentiality both during the term of my employment and after its termination.

I acknowledge that I have read the above and undertake to comply with it.

I am aware that I am criminally liable for disclosing data that could lead to the identification of the whistleblower, the person assisting in making the report, the person to whom the report relates or the person associated with the whistleblower.

Date and legible signature