

## Implementation of EPPE Group Policy on Reporting of Serious Concerns

### 1. PURPOSE

The purpose of the document is to implement the EPPE Group Policy on Reporting of Serious Concerns at EPPE level. The terms defined by the EPPE Group Policy have the same meaning also for the purpose of this implementation.

### 2. DESIGNATED PERSONS

The Human Resources Department is accountable for receiving, initiating and investigating in accordance with the Policy procedure all reported concerns relating to employment rules and relationships. Compliance Department is consulted on legal issues as necessary.

Compliance Department is accountable for receiving, initiating and investigating in accordance with the Policy procedure all reported concerns other than those relating to employment rules and relationships.

Other departments or bodies might be included in the investigation process based on the relevance.

The results of the investigation together with possible recommendation on further steps are submitted to the EPPE Board.

### 3. CHANNELS

EPPE establishes the following internal channels for receiving concerns raised according to this Policy:

1) e-mail address:

[compliance@epholding.cz](mailto:compliance@epholding.cz)

[hr\\_concerns@epholding.cz](mailto:hr_concerns@epholding.cz)

2) post address:

COMPLIANCE – SERIOUS CONCERNS

Pařížská 130/26

110 00 Praha 1

These channels are operated in a manner that ensures the confidentiality (to the extent possible) of the identity of the Reporting Person and prevents access to non-authorised Employees.

#### 4. PROCEDURE

The point of contact to raise any serious concerns are the Human Resources Department and the Compliance Department.

Some concerns may be resolved by agreed action without the need for formal investigation. Any urgent action necessary shall be taken before any investigation is conducted. If it is deemed that an investigation is not warranted, then the Employee will be advised of this.

If the Designated Person, in conjunction with the relevant Director/Head of the business area, to which the concern relates, feels that an investigation is necessary they will appoint a person who will arrange for the matter to be progressed. The person identified as leading the investigation should first obtain full details and clarification of the concern ensuring that they have fully understood what the concern is.

They should then:

- i. consider the involvement of external bodies, e.g. the police;
- ii. fully investigate the concern with assistance as appropriate;
- iii. submit a detailed written report containing the findings of the investigation and any proposed actions to the EPPE Board.

The person identified as leading the investigation will ensure that the investigation is carried out as quickly as possible, without affecting the quality of the investigation. Where possible, they will also provide the Reporting Person with the following:

- i. written acknowledgement that an investigation is being conducted;
- ii. if the investigation is prolonged - written updates as the investigation progresses;
- iii. a written report when the investigation is complete, informing of the findings of the investigation and any action that is proposed. There may be some confidential or sensitive information that may not be given.

In some cases, it may be necessary for the Reporting Person having raised the concern, to attend meetings to allow information to be clarified. A fellow Employee can accompany the Reporting Person at these meetings. The chosen representative must not have any conflict of interest in relation to the concern that has been raised.

Due to the unknown nature of any potential concerns raised, it is not possible to say how long an investigation should take. If the concern is of a criminal or illegal nature the EPPE may notify the Police or other external regulatory agencies and will co-operate fully in any resultant investigation.

On receipt of the investigation report the EPPE Board will consider and decide, with advice from the Designated Person, what corrective actions are necessary. The EPPE Board will allocate responsibility for close out of the actions agreed to an appropriate senior manager.

If the Reporting Person is still not satisfied with the findings or proposed corrective actions following the investigation, he or she should advise the Designated Person about his or her dissatisfaction.

The EPPE's undertakings in respect of the confidentiality and protection of the source of the concern from victimisation will continue to apply during the initial as well as any review process.

On completion of any investigation, all records of the concern raised and all documentation gathered during the investigation, together with a copy of the final report, will be sent to the Designated Person.

These records will be kept for a period of 5 years for audit purposes and will then be destroyed in a confidential manner. No records will be held in personal files unless allegations are shown to be founded or unless malicious intent has been proved.

The Designated Person prepares a report on a yearly basis of any concerns reported, giving the details, reports made, corrective action planned, and corrective action completed. This report is made to the EPPE Board. If no concerns are raised, no report is submitted.

If, following investigation, the EPPE concludes that a Reporting person has made false allegations maliciously or with a view to personal gain, the Reporting person may be subject to disciplinary action.

*Approved by the EP Power Europe, a.s. Board of Directors on 9 April 2021*