

# Procedure for Reporting and Follow-up Actions

## Vasco Electronics S.A.

Last updated on 29 December 2025

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### DEFINITIONS

Capitalised terms in this Procedure shall have the following meanings:

- 1) **Vasco Electronics** – Vasco Electronics S.A. with its registered office in Krakow, Al. 29 Listopada 20, 31-401 Krakow, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for Kraków-Śródmieście in Krakow, 11th Commercial Division of the National Court Register under KRS number: 0001191838, NIP (Tax ID): 6772369151, REGON (National Business Registry Number): 122581850;
- 2) **Management** – a group of persons responsible for managing and representing Vasco Electronics S.A. towards third parties;
- 3) **Violations Team** – persons authorised to take follow-up actions, including the verification of internal reports, further communication with the Whistleblower, requesting additional information and providing feedback to the Whistleblower;
- 4) **Procedure** – this document concerning the receipt of internal reports, the taking of follow-up actions and the protection of persons making reports;
- 5) **Retaliation** – this is understood to mean any direct or indirect action or omission that is caused by a Report or Public Disclosure and which infringes or may infringe the rights of the Whistleblower or causes or may cause them harm;
- 6) **Platform** – an information and communication technology (ICT) system available at: <https://vasco.peopleforce.io/speak/3leu6ajv> used for submitting internal Reports and conducting further correspondence with the Whistleblower. The platform guarantees confidentiality by protecting the content of the internal Report and the Whistleblower's personal data against access by unauthorised persons;
- 7) **Follow-up actions** – actions taken by Vasco Electronics to assess the validity of the allegations contained in the Internal Report and, where appropriate, to remedy the violation that is the subject of the Internal Report, including through such actions as conducting an investigation, bringing charges, taking action to recover funds, or closing the proceedings;
- 8) **Information on infringements** – evidence confirming actual infringements, as well as reasonable suspicions of potential infringements that have not yet been committed;
- 9) **Whistleblower** – a natural person who reports or publicly discloses information about a violation of law obtained in a work-related context;
- 10) **Act** – the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws 2024, item 928, as amended);

- 11) **Report** – Internal Report or External Report;
- 12) **Internal Report** – the communication of information regarding a breach of law to Vasco Electronics;
- 13) **External Report** – the communication of information regarding a breach of law to the Ombudsman or to a public authority;
- 14) **Public disclosure** – shall mean the making of information regarding a breach of law available to the public in accordance with the rules set out in the Act;
- 15) **Feedback** – the provision of information to the reporting person on the follow-up actions planned or taken and the reasons for such actions;
- 16) **Register of Internal Reports** – a register of internal reports maintained by Vasco Electronics, containing information regarding the report as well as the course and outcome of the proceedings concerning the breach of law.

## §2

### GENERAL PROVISIONS

1. The purpose of the Procedure is to create a transparent and secure system for reporting violations of the law, which promotes early detection of irregularities and minimises their effects.
2. Vasco Electronics guarantees Whistleblowers full protection against retaliation, ensuring their safety and confidentiality.
3. The procedure specifies in particular:
  - 1) the scope of violations of law covered by the Procedure,
  - 2) the scope of persons entitled to report breaches of law,
  - 3) the process of reviewing and managing reports of violations of the law,
  - 4) the rules of confidentiality, in particular the rules of keeping confidential the information provided in the Internal Report and the identity of the Whistleblower and the person assisting the Whistleblower in making the report.

## §3

### SCOPE OF APPLICATION OF THE PROCEDURE

1. The Procedure applies to individuals who have obtained information regarding a breach of law in a work-related context, including in particular:
  - 1) Vasco Electronics employees,
  - 2) persons performing work on a basis other than an employment relationship, including on the basis of civil law contracts (B2B, mandate contracts, contracts for specific work);
  - 3) job candidates who have obtained information about a violation during the recruitment process or other negotiations preceding the conclusion of a contract;

- persons acting for and on behalf of Vasco Electronics (e.g. holders of a commercial power of attorney, proxies);
- 4) trainees/interns/volunteers;
  - 5) persons assisting in making a Report and to third parties connected to the reporting person who may experience retaliation.
2. A report of irregularities may concern, in particular:
- 1) Vasco Electronics as an organisation;
  - 2) natural persons authorised to represent Vasco Electronics;
  - 3) employees and associates of Vasco Electronics, provided that the breach is related to the work or official duties they perform;
  - 4) contractors, subcontractors, and other external entities, insofar as their acts or omissions are directly related to the performance of contracts concluded with Vasco Electronics.
3. A breach of law should be understood as an act or omission that violates the provisions of law concerning:
- 1) corruption;
  - 2) public procurement;
  - 3) financial services, products and markets;
  - 4) anti-money laundering and countering the financing of terrorism;
  - 5) product safety and compliance with requirements;
  - 6) transport safety;
  - 7) environmental protection;
  - 8) radiological protection and nuclear safety;
  - 9) food and feed safety;
  - 10) animal health and welfare;
  - 11) public health;
  - 12) consumer protection;
  - 13) protection of privacy and personal data;
  - 14) security of networks and information systems;
  - 15) financial interests of the State Treasury of the Republic of Poland, local government units and the European Union;
  - 16) the internal market of the European Union, including public law rules on competition and state aid, and taxation of legal persons;
  - 17) constitutional freedoms and human and civil rights – occurring in relations between individuals and public authorities and not related to the areas indicated in points 1–16.

## §4

### **WHISTLEBLOWER PROTECTION**

1. The Whistleblower is subject to the protection provided for in the Procedure from the moment the Report is made, provided that he or she had reasonable grounds to believe that the information covered by the Report was true at the time it was made and that it constitutes information on a breach of law.
2. No retaliatory measures or attempts or threats to take such measures may be taken against the Whistleblower.
3. Examples of prohibited retaliatory measures include, in particular: termination of employment, reduction of remuneration or termination of a mutual agreement with the Whistleblower solely in connection with the Whistleblower's report of irregularities, mobbing, discrimination, suspension of promotion or omission from promotion.
4. The prohibition of retaliatory measures also applies to a person assisting in making a report, referred to in Article 2(8) of the Act, a person associated with the reporting person referred to in Article 2(9) of the Act, as well as a legal person or other organisational unit assisting the Whistleblower or associated with them, in particular one owned by or employing the Whistleblower.
5. Protection does not apply to a Whistleblower who is also a perpetrator, co-perpetrator, or an accomplice to the breach of law.

## §5

### **PROCEDURE FOR REPORTING IRREGULARITIES**

1. Internal reports may be submitted electronically via the Platform.
2. Reporting via the Platform is the primary channel for making internal reports.
3. In order to make an internal report via the Platform, the Whistleblower fills in a dedicated breach report form.
4. The Whistleblower may submit a report in the following manner:
  - 1) openly – by providing their identification details in the content of the internal report;
  - 2) anonymously – without providing their identification details in the content of the internal report. The Platform provides technical measures to prevent the Whistleblower from being identified by unauthorised persons, including connection encryption.
5. The Whistleblower may attach evidence in the form of files (documents, photos, recordings) to the breach report form.
6. After sending the breach report form, the Platform generates an access password for the case. The Whistleblower is required to keep the access password in order to receive feedback and continue communication with the Violations Team without the need for alternative means of contact.
7. In order to ensure maximum security, confidentiality and data integrity, all communication between the Whistleblower and the Violations Team is conducted via the Platform.

8. The Whistleblower is obliged to regularly check the status of the report on the Platform in order to receive confirmation of receipt of the report, provide additional information or receive feedback.
9. Vasco Electronics permits communication outside the Platform only in the following justified cases:
  - 1) technical failure of the Platform lasting longer than 72 hours;
  - 2) an explicit and justified request from the Whistleblower, provided that the Violations Team considers that an alternative form of contact (e.g. face-to-face meeting, email or telephone) ensures a sufficient level of confidentiality.
10. The exceptions referred to in paragraph 9 above apply only if the Internal Report is not anonymous. In the case of anonymous reports, communication with the Whistleblower takes place exclusively via the Platform's communication panel.
11. Whistleblowers who decide to communicate outside the Platform acknowledge that such channels may not provide the standards of confidentiality and security offered by the Platform.
12. Upon the Whistleblower's request, Vasco Electronics allows for the possibility of an oral internal Report. An oral report shall be made in the presence of at least two members of the Violations Team.
13. A request for a meeting can be submitted via the Platform. The meeting is organised within 14 days of receiving the request.
14. With the consent of the Whistleblower, the meeting is documented in the form of minutes, which the Whistleblower has the right to review, correct and sign.
15. An internal report should provide a clear and comprehensive explanation of the subject of the breach of the law and should include, in particular:
  - 1) a description of the work-related context that will enable the reported violation to be identified;
  - 2) the date and place of the violation or the date and place where the information about the violation was obtained;
  - 3) a description of the situation or circumstances of the breach of the law or creating the possibility of a violation of the law;
  - 4) an indication of the entity concerned by the report of the breach;
  - 5) an indication of all evidence and information available to the Whistleblower that may be helpful in the process of investigating the violation.
16. In order to ensure the effectiveness of the investigation and to protect the privacy of third parties, it is recommended that the Whistleblower keep the fact of making an Internal Report and any information that could identify the persons concerned by the Internal Report confidential until the follow-up actions have been completed. The above does not limit the Whistleblower's right to make a public disclosure in accordance with the provisions of the Act.
17. Reports are accepted in Polish or English only.

## **§6**

### **INFORMATION ON EXTERNAL REPORTS**

1. A Whistleblower may make an External Report without first making an Internal Report.
2. An External Report is accepted by the Ombudsman or a public authority designated for this purpose.
3. The Ombudsman and the public authority are separate controllers with regard to the personal data provided in the external report accepted by these authorities.

## **§7**

### **FALSE REPORTS**

1. It is prohibited to knowingly submit false reports of irregularities. Each report should be made in good faith, based on a reasonable belief that the information possessed is true at the time of reporting.
2. A person who has suffered damage as a result of a deliberate report or public disclosure of false information by a Whistleblower is entitled to compensation or redress for the violation of their personal rights from the Whistleblower who made such a report or public disclosure.
3. A person making a false report is not subject to the protection granted to Whistleblowers by the Act.

## **§8**

### **INVESTIGATION PROCEDURE**

1. Each Internal Report submitted via the Platform is immediately registered in the system.
2. Within 7 days of receiving the Internal Report, the Violations Team sends the Whistleblower confirmation of receipt of the Internal Report via the Platform.
3. The Violations Team conducts a preliminary verification of the Internal Report, assessing:
  - 1) whether the information contained in the Internal Report falls within the scope of violations of law covered by the Procedure;
  - 2) whether the information provided allows for an investigation to be conducted.
4. If the Internal Report is clearly unfounded or does not contain the information necessary for its verification, the Violations Team first calls on the Whistleblower to supplement the missing information within a specified time limit. If, despite the request, the Internal Report still does not allow for an investigation to be conducted or its unfounded nature is beyond doubt, the Violations Team shall decide to terminate the proceedings without consideration, and shall inform the Whistleblower thereof in each case.
5. If the Internal Report is deemed justified, the Violations Team shall initiate an investigation. The investigation shall be conducted in an impartial manner, maintaining the confidentiality of the

personal data of the Whistleblower, the person concerned by the report, and third parties indicated in the Internal Report.

6. During the investigation, the Violations Team is authorised, in particular, to:
  - 1) interview the Whistleblower as well as employees and associates of Vasco Electronics (orally and in writing);
  - 2) request explanations from persons concerned by the internal report;
  - 3) access internal documentation, data carriers and business correspondence to the extent necessary to clarify the case.
7. Employees and associates of Vasco Electronics are required to cooperate fully with the Violations Team and provide reliable explanations during the investigation.
8. After completing the investigation, the Violations Team prepares a final report, which includes:
  - 1) a description of the verification measures taken;
  - 2) factual findings regarding the veracity of the allegations;
  - 3) a final assessment of the validity of the Internal Report;
  - 4) recommendations for corrective measures.
9. The final report is presented to the Management for a decision on the implementation of corrective measures.
10. If it is found that the breach constitutes a prohibited act, the Management shall decide whether to notify the competent law enforcement authorities.
11. The Violations Team provides feedback to the Whistleblower within 3 months of confirming receipt of the Internal Report.
12. The feedback shall include, in particular:
  - 1) information on the finding or absence of a finding of a breach of law;
  - 2) information on follow-up actions taken or planned;
13. All documentation collected in the course of the investigation shall be stored in such a way as to prevent access by unauthorised persons.

## **§9**

### **VIOLATIONS TEAM**

1. The Violations Team is the body responsible for receiving internal reports and conducting investigations and follow-up actions.
2. The members of the Violations Team are appointed and dismissed by the Management by way of a written authorisation.
3. The Violations Team consists of no fewer than two and no more than six persons. Members of the Violations Team are recruited from departments that have knowledge and experience in resolving legal violations and employee disputes.
4. The tasks of the Violations Team include, in particular:
  - 1) operating the Platform and monitoring incoming Internal Reports;

- 2) confirming to the Whistleblower that the Internal Report has been accepted within the statutory time limit;
  - 3) conducting a preliminary verification of Internal Reports and deciding whether to initiate an investigation or to leave the Internal Report unexamined;
  - 4) conducting impartial investigations, including gathering evidence and interviewing persons;
  - 5) ensuring the confidentiality of the identity of the Whistleblower and the persons concerned by the Internal Report;
  - 6) preparing final reports with recommendations for Management;
  - 7) providing the Whistleblower with feedback on the outcome of the investigation.
5. Members of the Violations Team are independent in assessing the validity of Internal Reports and may not accept instructions from their superiors on how to resolve a specific case.
  6. A member of the Violations Team shall be excluded from working on a given Internal Report if:
    - 1) the Internal Report concerns him or her directly;
    - 2) they are subordinate to the person to whom the Internal Report relates;
    - 3) there are other circumstances that could affect the objectivity of the assessment (e.g. kinship, close personal relationship).
  7. To carry out specific expert activities during the investigation process, a member of the Violations Team may additionally appoint experts, regardless of whether they are employees of Vasco Electronics or not. When engaging the support of experts, the personal data of the Whistleblower must not be disclosed. Neither a member of Management nor an expert may be a member of the Violations Team.

## **§10**

### **PERSONAL DATA**

1. Vasco Electronics is the controller of personal data processed as part of the internal Report handling process.
2. The Controller shall designate members of the Violations Team as persons authorised to process data under the Procedure. Each member of the Violations Team shall hold a written authorisation and is obliged to maintain confidentiality.
3. The Whistleblower's personal data and any information that could identify the Whistleblower are strictly protected and may not be disclosed to third parties without the Whistleblower's express consent, unless such disclosure is a necessary and proportionate obligation under the law.
4. Personal data and documentation collected in connection with the Report 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 the proceedings initiated by those actions were concluded.
5. Personal data that is not relevant to the investigation of the Report shall not be collected and, if accidentally collected, shall be deleted immediately. Such data shall be deleted within 14 days of

it being determined that it is not relevant to the case.

## **§11**

### **REGISTER OF NOTIFICATIONS**

1. Vasco Electronics keeps a register of internal notifications.
2. The internal reporting register contains:
  - 1) the report number;
  - 2) the subject of the breach;
  - 3) the personal data of the Whistleblower and of the person concerned by the report, necessary to identify these persons;
  - 4) the Whistleblower's contact address;
  - 5) the date of the report;
  - 6) information on follow-up actions taken;
  - 7) the date of closure of the case.
3. The register of internal Reports also includes reports made anonymously. If the Whistleblower has not provided their personal data or contact address, such a report shall be marked as anonymous in the register.

## **§12**

### **FINAL PROVISIONS**

1. The Management shall be responsible for the correctness and effectiveness of the Procedure.
2. At least once a year, the Violations Team provides Management with summary information on internal reports and follow-up actions taken in connection with these reports.
3. Vasco Electronics informs all persons performing work for Vasco Electronics of the adoption and content of the Procedure, as well as any amendments thereto.
4. A person applying for work under an employment relationship or other legal relationship constituting the basis for the provision of work or services or the holding of a position shall be provided with information about the Procedure at the start of the recruitment process or negotiations preceding the conclusion of a contract other than an employment contract.
5. The Procedure shall enter into force 7 days from the date it is made known to employees and associates of Vasco Electronics.
6. In matters not regulated by the Procedure, the provisions of the Whistleblower Protection Act and the Labour Code shall apply.

