

INTERNAL NOTIFICATION SYSTEM INFORMATION

The company **STROJFERR, s.r.o.**, ID: 252 81 593, with its registered office at Revoluční 270, Frýdlant, 739 11 Frýdlant nad Ostravicí, informs you of the following:

INTERNAL NOTIFICATION SYSTEM

I. ESTABLISHMENT OF THE INTERNAL NOTIFICATION SYSTEM

Our company has established an internal notification system ("Internal Notification System") for the purpose of reporting possible illegal acts in the areas defined by Act No. 171/2023 Coll., on the protection of whistleblowers, or Directive of the European Parliament and Council (EU) 2019/1937 of October 23, 2019 on the protection of persons who report violations of Union law pursuant to point II. ("Notification") by the natural persons listed in point III. ("Notifier").

II. DEFINED AREAS OF LAW FOR SUBMITTING NOTIFICATIONS

Our Internal Notification System is intended to report our wrongdoings:

1. having features of a criminal offense
2. having signs of an offense for which the law stipulates a fine with an upper limit of CZK 100,000 or more
3. violators of Act No. 171/2023 Coll., on the protection of whistleblowers
4. violating another legal regulation or a regulation of the European Union falling into any of the following areas:

- financial services, statutory audit and other verification services, financial products and financial markets,
- on corporate income tax,
- on preventing the legalization of proceeds from criminal activity and the financing of terrorism,
- on consumer protection,
- on compliance with product requirements, including their safety,
- on the safety of transport, transport and traffic on roads,
- on environmental protection,
- on food and feed safety and the protection of animals and their health,
- on radiation protection and nuclear safety,
- on economic competition, public auctions and public procurement,
- on the protection of internal order and security, life and health,
- on the protection of personal data, privacy and security of electronic communications networks and information systems,
- on the protection of the financial interests of the European Union,
- on the functioning of the internal market, including the protection of economic competition and state aid according to European Union law.

III. NOTIFIER

Notifier who can use our Internal Notification System to submit a Notification is a natural person who, for us in particular:

- performs a job, professional practice, or internship.
- performs a function in the bodies of our company;
- provides services for our company;
- performs activities under the supervision or according to the instructions of our contractors and suppliers, and their subcontractors,

and which has received information about our possible illegal conduct according to point II. in connection with this work or the performance of a similar activity. Work or a similar activity also means applying for any of the above-mentioned activities. We do not exclude any persons who perform work or similar activities for us from submitting a Notification.

IV. COMPETENT PERSON AND WAY OF SUBMITTING OF NOTIFICATIONS

The competent person is the person who receives and processes the Notification within the Internal Notification System of the company.

In order to ensure the independent, impartial and trouble-free functioning of the Internal Notification System, our company has designated a competent person, whereby the Notifier can submit a Notification through this person:

Pavλίna Platzerová
adresa: Revoluční 270, 739 11 Frýdlant nad Ostravicí
telefon: +420 731 505 852
e-mail: whistleblowing@strojferr.cz

(„Competent Person“).

The Notification can be submitted:

1. by e-mail, which must be sent to the above-mentioned e-mail address of the Competent Person, which we set up exclusively for receiving Notifications, and to which only the Competent Person has access;
2. by telephone through the telephone line of the Competent Person; at the same time, we request that this method of submission of the Notification be used during normal working hours, i.e. between 6:00 to 14:00 hours;
3. in writing by mail sent to the address of the registered office of our company Hlavní 1605, Frýdlant, 739 11 Frýdlant nad Ostravicí, directly to the hands of the Competent Person; at the same time, in order to maintain confidentiality, we hereby request that this shipment be addressed directly to the Competent Person for delivery through a legal entity, in such a way that the addressee of the shipment is listed as follows:
„name and surname of the Competent Person“
STROJFERR, s.r.o.
Revoluční 270, Frýdlant, 739 11 Frýdlant nad Ostravicí
and "WHISTLEBLOWING" will be clearly marked on the shipment. For these purposes, prefer to send the shipment in such a way that its sender is not obvious from the shipment. You will be notified that the Notification has been delivered to us through the contact details included in the Notification;
4. in person at the Competent Person's office in the building located at Revoluční 270, 739 11 Frýdlant nad Ostravicí; at the same time, we request that this method of submission of Notification be used during normal working hours, i.e. between 6:00 to 14:00 hours and if possible after prior agreement by e-mail according to point 1. or telephone agreement according to point 2.;
5. for the purpose of submitting written notifications, we have also set up a physical mailbox, which is located on our premises, marked with our company logo and the name "WHISTLEBLOWING". Said mailbox is located on the ground floor of the office building.

Please ensure that the Notification contains the following information: Your name, surname and date of birth or other information from which your identity can be deduced. For you to be informed about the receipt and the method of processing your Notification, please also include your contact details. Only Competent Person bound by confidentiality will be informed about your identity. However, without your proper identification, it may not be possible to properly investigate the Notification and take corrective measures. Anonymous notifications will therefore be accepted, but until the identity of the person who made the notification comes to light, such person is not entitled to protection under Act No. 171/2023 Coll., on the protection of whistleblowers and other legal provisions.

V. PROTECTION OF THE NOTIFIER

We will ensure that, if the Notification has been submitted through our Internal Notification System,

- protection of the Notifier's identity;
- protection against possible retaliatory measures taken against the Notifier and other persons to whom this protection belongs according to legal regulations (such as relatives, loved ones, etc.).

VI. WARNING

We assess the reasonableness and veracity of each Notification. If the Notification is reasonable and true, we will take corrective action.

We will defend ourselves if the Notifier knowingly provides false information in the Notification and/or does so in order to harm our business.

VII. INFORMATION ABOUT THE OPPORTUNITY TO SUBMIT A NOTIFICATION TO THE MINISTRY OF JUSTICE

Notifiers can also submit the Notification orally or in writing to the Ministry of Justice. You can use the website to submit a written notification to the Ministry of Justice <https://oznamovatel.justice.cz/chci-podat-oznameni/>

VIII. PROCESSING OF PERSONAL DATA

The processing of personal data collected in connection with the handling of the Notification will be carried out in compliance with the act No. 110/2019 Coll., on the processing of personal data, and Regulation (EU) 2016/679 (GDPR), as well as any other legislation on the processing of personal data applicable therein and in accordance with the privacy information notice attached hereto (Annex A).

We are obliged to keep the Notification submitted through the Internal Notification System and documents related to the Notification for 5 years from the date of receipt of the Notification, in accordance with the obligation to respect the protection of personal data set forth in the European and Czech legislation on the protection of personal data.

The confidentiality of information is ensured by the implementation of an Internal Notification System, where Notifications are handled exclusively by one person (Competent Person). Paper documents related to this agenda are secured against intrusion by mechanical means. Electronic communication via the e-mail address of whistleblowing@strojferr.cz is secured and can only be accessed by one person (Competent Person).

Annex A: Privacy Notice

[https://www.strojferr.cz/media/Privacy Information Notice.pdf](https://www.strojferr.cz/media/Privacy%20Information%20Notice.pdf)