

InPost Group

# Whistleblower Policy

<b>Owner of the Policy</b>	Compliance Officer
<b>Approval Authority</b>	Management Board
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**1. OUR VALUES**

At InPost, we follow the principles of integrity, respect and legal compliance. We openly communicate our values - we have included them in our policies, which you can find [HERE](#). We use our best efforts to ensure that all of our colleagues and business partners are aware of these policies and act in accordance with them.

However, the scale of our business operations makes us vulnerable to the risk of various breaches. For this reason, you may experience situations that cause you concern due to their non-compliance with the law or our internal regulations. You can report such cases to us. You will learn how to do so from this Policy.

We promote an open approach and give a voice to our employees, co-workers, customers and anyone who wants to inform us in good faith about such breaches.

Your support is key to creating a safe workplace and conducting business ethically.

**2. WHAT DOES THIS WHISTLEBLOWER POLICY ADDRESS?**

This Policy explains the rules for reporting breaches that may happen within InPost Group companies.

Please remember that each company has its own reporting channels and conducts its own investigations with the support of designated persons. You can read more about this in Chapter 7 of this Policy.

### **3. WHAT WILL I LEARN FROM THIS POLICY?**

From this Policy you will learn, among others:

- who can report breaches and whether every reporting person is considered a whistleblower
- which breaches you can report
- what reporting channels we have
- who will handle the processing of your report and what the investigation will look like
- whether you qualify for protection as a whistleblower and under what conditions.

### **4. WHO CAN REPORT A BREACH?**

Breaches can be reported by anyone who becomes aware of a breach of the law. Such a person is referred to as a **Whistleblower**.

A Whistleblower could be, for example, our employee, a co-worker, an intern, a job seeker, a temporary employee, an entrepreneur who cooperates with the Company, or a person employed by our subcontractor.

**Please remember that the InPost Group consists of many companies in different countries, and legal regulations may vary – for example, regarding who qualifies as a whistleblower. Read your local whistleblower policy to find out how this works in each country.**

This does not mean, however, that we will not accept or verify a report from someone who does not formally have whistleblower status. Rest assured we will investigate every case of possible breach of the law or our policies.

### **5. WHAT BREACHES OF THE LAW CAN I REPORT?**

You can report breaches of the law and our policies, such as:

- fraud
- corruption,
- money laundering,
- breaches against consumer protection,
- conflicts of interest,
- misuse of company assets,
- harassment or discrimination\*

**\* Please note that in some InPost Group companies, employment law breaches, such as harassment or discrimination, can be reported under a separate procedure and are investigated by HR Team. You can read more about this in the local Whistleblower policies.**

**Please remember that this Policy does not apply to filing complaints** – if you are not satisfied with our services, you should contact the Customer Service Department. As soon as we receive your complaint, we will forward it to the appropriate Department.

## **6. HOW TO PREPARE A REPORT ON BREACHES?**

Describe what the situation is about, when it happened, and who is affected. You can write the report in your own words, we do not require formal language. The more details you give, the easier it will be for us to verify the case. You can also send us evidence or inform where we can get it from. If there are other witnesses in the case, you can give us their details - we will contact them as part of the investigation.

## **7. WHO ACCEPTS REPORTS ON BREACHES?**

A local Compliance Officer in each of the InPost Group Companies is responsible for receiving and processing reports on breaches.

At InPost Group companies, we have the following notification channels:

- group email address [compliance@inpost.eu](mailto:compliance@inpost.eu) or [compliance@inpost.pl](mailto:compliance@inpost.pl),
- local channels for reporting breaches of the law for individual companies in the InPost Group – you can find them in the local Whistleblower policies,
- SpeakUp platform - read our guide to using this platform,
- mailing addresses of each InPost Group company for reports sent via traditional post – you can find them in the local Whistleblower policies.

For written reports, please make it clear that the package is confidential, e.g. by writing "confidential" or "whistleblower report" or "to the Compliance Officer" on the envelope. In this way, InPost Group companies will be able to ensure that your report will go directly to a properly authorized person and will not be opened by other people e.g. administrative staff who are tasked with standard mail handling. In this way, you will avoid the risk that your letter will be read by outsiders.

If the report concerns the local or Group Compliance Officer you should report it to the President of the Supervisory Board of InPost SA.

## **8. CAN I REPORT BREACHES ANONYMOUSLY?**

If it is more convenient for you, you can also report breaches anonymously. However, we encourage you to leave some contact information (for example, an email address, set up specifically for the report) – this will make it easier for us to verify the case, allow us to contact you with additional questions and inform you of the outcome of the investigation.

We also include anonymous reports in our whistleblower registers. We handle them in the same way as we handle reports signed with your name. We will not try to find out who you are if you choose not to share your identity.

#### 9. HOW IS MY REPORT PROCESSED?

Your report will be handed over to the local Compliance Officer and reviewed by them. We will confirm that we have received your report within 7 days if you leave us your contact details.

The Compliance Officer will conduct the investigation, using, if necessary, the support of other persons he has authorized to do so. The persons designated by the Compliance Officer are required to assist them in the investigation.

As part of the initial verification, it may turn out that the company you have chosen is not competent to handle the breach, or that you should use another reporting channel. We will inform you of this.

In the case of fraud reports (e.g., corruption or fraud), the **Ethics Team** will be competent to handle the case - you can read more about this in the [Anti-Fraud Policy](#).

The investigation will be carried out carefully by impartial, authorized experts from the relevant company. They have specialist knowledge, receive regular training, and understand confidentiality obligations.

If the nature of the case requires the support of an external expert, we will inform you of this. Such an expert is also obligated to maintain confidentiality.

As part of the investigation, we will check if there has been a breach of the law or our policies. To do this, we may ask you for more information and documents. Collecting evidence is essential to confirm any breaches and take corrective action.

#### 10. WHAT IF THE REPORT CONCERNS ME?

If someone else has filed a **report that concerns your behaviour**, we will inform you of the alleged breach and your rights as soon as possible, taking into account the interests of the proceedings. However, you will not find out who made the report.

#### 11. WHAT HAPPENS AFTER THE INVESTIGATION HAS BEEN COMPLETED?

If information about breaches of the law has been confirmed, we will apply remedial measures appropriate to the breaches found. We will also hold accountable those responsible for the breaches.

We will inform you of the outcome of the investigation within **3 months** of confirming that we have received your report. Unfortunately, we will not always be able to provide you with a full report - this could involve a confidentiality breach concerning your information and the privacy of others. You will definitely find out whether the breaches you reported have been confirmed and what remedial measures we will take.

We will enter the details of your breach notification in the breach report register, maintained by the Compliance Officer.

We provide information about reported breaches to the Audit Committee of the Supervisory Board of InPost SA in quarterly reports. However, we do not disclose the personal data of the Whistleblowers or the persons affected by the breach reports.

## **12. CAN I REPORT EXTERNALLY?**

If local law allows, you can also report a breach externally – you don't have to use the internal reporting channel first; you can do it right away.

However, we encourage you to use InPost's internal whistleblowing channels - the sooner we learn of the breaches, the sooner we can respond - take remedial actions and prevent more damage.

You can find more about external reporting in local whistleblower policies.

## **13. IS MY PERSONAL DATA SAFE?**

InPost Group companies ensure the protection of privacy and confidentiality with respect to all matters contained in the Policy and comply with applicable laws. We take all measures to protect the identity of the persons reporting or covered by a report. The personal data of these individuals are treated as strictly confidential, and only a small group of authorized persons have access to them. We also limit the scope of data processing to information and activities that are necessary for the acceptance and processing of reports. After the completion of activities relating to the report, your data will not be kept longer than necessary and required by law.

InPost Group companies process your personal data based on legal obligation and legitimate interest based on the need to eliminate inappropriate behaviour and practices.

Information about the processing of your personal data can be found in the local privacy policies.

## **14. AM I PROTECTED WHEN REPORTING BREACHES?**

We are committed to detecting any breaches at an early stage, so we want you to be able to inform us of breaches without fear of retaliation.

As a Whistleblower, you are protected from retaliation (i.e., negative actions caused by your reporting) from the moment you report – this means that you will not face negative consequences such as your contract termination, refusal to enter into a contractual relationship, being overlooked for promotion, reduction in pay, unfavourable change in work location or work schedule, or other unfair treatment because of your reporting.

**Please note that you are only protected if you acted in good faith, i.e. that at the time of reporting you had reasonable grounds to believe that the reported information was true and that it constituted information on breach of the law or our policies.**

This does not mean that you are only eligible for protection if the allegations are confirmed – it is important to have a reasonable belief that the breach actually happened.

Similar protection is afforded to persons assisting the Whistleblower in making the report, as well as to persons related to the Whistleblower (e.g., their spouses, siblings).

#### 15. WHAT HAPPENS IF I KNOWINGLY REPORT FALSE INFORMATION?

Protection against retaliation does not apply to reports made in bad faith, such as those intended to harm someone. False reports damage the work environment, harm individuals, and waste resources – so they may lead to disciplinary action.

This policy is designed to detect real breaches. Protection applies to whistleblowers acting in good faith and to individuals harmed by false allegations.

**Knowingly making a false report may violate someone's personal rights. If a person suffers harm because of a false report, they have the right to seek compensation or damages from the whistleblower.** In some countries, it can even result in criminal liability.

#### 16. WHO CAN I CONTACT ABOUT BREACH REPORTING?

If you want to know what is happening with your report, you can contact the local Compliance Officer at any stage using the reporting channels indicated in Chapter 7 of the Policy. You can also contact the local Compliance Officer if the report concerns your behaviour.

#### 17. FINAL PROVISIONS

This Policy will be reviewed and updated regularly to ensure it remains effective and compliant with applicable laws and best practices.

InPost Group companies may have their own Whistleblower policies. This may result from local legislation. Such policies will be appendices to this Policy. It is your responsibility to comply with the policy adopted by the company where you are employed.