

INTERNAL NOTIFICATION SYSTEM INFORMATION

The company **Kayaku Safety Systems Europe a.s.**, ID: 251 14 638, with its registered office at Vsetín, Bobrky 2271, Post Code 755 01, 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, and the Notifier may submit a Notification through this competent person, namely:

Jiří Kopecký

address: Kayaku Safety Systems Europe a.s., Bobrky 2271, Post Code 755 01 Vsetín

phone number: +420-605221073

e-mail: whistleblowing@kse-cz.com

(„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. during Mon-Fri from 8:00 a.m. to 2:00 p.m., excluding public holidays and company holidays;
3. in writing by mail sent to the address of the registered office of our company Vsetín, Bobrky 2271, Post Code 755 01, 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:

Jiří Kopecký

Kayaku Safety Systems Europe a.s.

Vsetín, Bobrky 2271, Post Code 755 01

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 Vsetín, Bobrky 2271, Post Code 755 01; at the same time, we request that this method of submission of Notification be used during normal working hours, i.e. during Mon-Fri from 8:00 a.m. to 2:00 p.m., excluding public holidays and company holidays 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 in the vestibule of the building at the address Vsetín, Bobrky 2271, Post Code 755 01.

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@kse-cz.com is secured and can only be accessed by one person (Competent Person).

Annex A: The “Privacy Information Notice” is below.

Privacy Information Notice

Pursuant to Articles 13 and 14 of EU Regulation No. 679/2016 (the "GDPR"), as well as the Act No. 110/2019 Coll., on the processing of personal data, the company Kayaku Safety Systems Europe a.s. ("**Company**") hereby informs you of the following regarding the processing of personal data relating to you and to persons close to you.

1. Data Controller

The company Kayaku Safety Systems Europe a.s., ID: 251 14 638, with its registered office at Vsetín, Bobrky 2271, Post Code 755 01, Czech Republic which can be contacted at the following address whistleblowing@kse-cz.com is the Data Controller in relation to the processing of personal data of its employees and collaborators in accordance with this information notice.

2. To whom does the Privacy Information Notice apply?

This Information notice applies to:

- (a) employees;
 - (b) terminated workers;
 - (c) interns (either paid or unpaid);
 - (d) individuals who perform coordinated and continuous services for the benefit of the Data Controller, para-subordinate or self-employed workers; and
 - (e) any other individual performing work in any capacity, regardless of the type of contract, for the benefit of the Data Controller;
 - (f) those who, while not yet having an employment relationship with the Data Controller, are in the phase of pre-contractual negotiations;
 - (g) persons with functions of administration, management, control, supervision or representation,
 - (h) in the cases referred to in this notice also persons close to the persons specified in (a) to (g) above.
- hereinafter jointly referred to as the "**Data Subjects**".

With this information notice, the Data Controller provides the Data Subjects with the necessary information on the processing of their personal data, as required by the applicable legislation. Therefore, in the event that the Data Subjects provide the Data Controller with information relating to persons close to him/her, the Data Subject is required to provide the latter with a copy of this Information notice.

3. Category of data processed

The processing described in this Information notice relates to the personal data of the Data Subjects collected in the context of any reports made by them with reference to violations of national or European Union regulatory provisions that harm the public interest or the integrity of the Company in accordance with the provisions of the Act. No. 171/2023 Sb., on the protection of whistleblowers ("Whistleblowing Act") through the channels specifically set up.

The categories of personal data processed include:

- a) identification data, including citizenship, and contact data (such as first name, surname, date of birth, private address, e-mail address, telephone number);
- b) any additional personal data relating to the Data Subjects, that may arise from the description of the fact as part of the reporting.

4. Purpose and method of processing

The Data Controller processes data for the following purposes:

(a) to comply with legal obligations in accordance with a notification received under the Whistleblowing Act on the basis of Article 6(c) of the GDPR

(hereinafter "**Legal Purposes**");

(b) to assert or defend a right of the Company, against the Data Subjects or third parties, in judicial or extrajudicial proceedings, including in administrative proceedings or in arbitration and conciliation procedures in cases provided for by laws, EU legislation, regulations or collective agreements, on the basis of Art. 6 lett. f) of the GDPR;

(hereinafter "**Legitimate Interest Purposes**").

5. On what basis are data processed?

The processing of data is compulsory with reference to the Legal Purposes, since the refusal to provide data for these purposes will make it impossible to proceed with the management of the notifications.

Processing for the Legitimate Interest Purposes is carried out pursuant to Article 6(f) of the GDPR, for the pursuit of the legitimate interests of the Data Controller - as identified above - which are fairly balanced with the legitimate interests of the Data Subjects, as the data processing activity is limited to what is strictly necessary. Processing for the Legitimate Interest Purposes is not compulsory, and the Data Subjects may object to such processing in the manner indicated in paragraph 9 of this notice. Should the Data Subject object to said processing, his/her data may not be used for the aforesaid Purposes of Legitimate Interest, unless the Data Controller proves the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of a legal claim.

6. How are data processed?

The Data Controller processes the data through the support of IT tools suitable for ensuring the security and the confidentiality as well as on the basis of logics and procedures that are functional to the purposes indicated above. In particular, the Data Controller adopts appropriate organizational and technical measures to protect the data in its possession against loss, theft, and unauthorized use, disclosure or modification of the data.

7. Personal Data Disclosure

For the purposes set out in paragraph 4, the Company may disclose - in whole or in part - the personal data of the Data Subjects to the following categories of subjects:

- a) the law enforcement authorities;
- b) administrative authorities and other public authorities and institutions,
- c) companies and consultants whose services we use to administer whistleblowing systems as required.

8. Data Retention

The personal data will be processed for the time necessary to handle the notification and in any case no longer than five years from the date of receipt of the notification. At the end of the retention period, the data will be deleted.

9. Privacy Rights

We inform you that, in relation to the aforementioned processing, you may exercise the rights provided for in Articles 15 et seq. of the GDPR.

In particular, the Data Subject may at any time and free of charge:

- a) obtain from the Data Controller information as to whether or not processing operations concerning him/her have been carried out,
- b) be informed on the origin of the data, the purposes and modalities of the processing, as well as

- the logic applied to the processing carried out by electronic means;
- c) request the updating, rectification or - if he/she is interested - integration of the data concerning him/her;
 - d) obtain the erasure, transformation into anonymous form or blocking of any data processed in violation of the law;
 - e) withdraw their consent, where previously given;
 - f) request from the Data Controller the restriction of the processing of data relating to the Data Subject in the event that (i) the Data Subject challenges the accuracy of the data, for the period necessary for the Data Controller to verify the accuracy of such data; (ii) the processing is unlawful and the Data Subject objects to the deletion of the data and requests instead that its use be restricted (iii) although the Data Controller no longer needs the data for the purposes of the processing, the data are necessary for the Data Subject to establish, to exercise or defend legal claims in court or in the extrajudicial proceedings; (iv) the Data Subject has objected to the processing pursuant to Article 21(1) of the GDPR pending verification as to whether the Data Controller's legitimate interests prevail over those of the Data Subject;
 - g) object at any time to the processing of his/her data for Legitimate Interest Purposes; and
 - h) obtain the portability of data concerning him/her.

If the Data Subject considers that the Data Controller processes his/her data unlawfully, the Data Subject also has the right to lodge a complaint with the Czech Data Protection Authority using the contact details available at https://www.uouu.cz/en/vismo/o_utvar.asp?id_org=200156&id_u=10.

To exercise these rights, please send a written request, indicating in the object: "Privacy- exercise your privacy rights", to the following e-mail address whistleblowing@kse-cz.com.

10. Changes and updates

THIS POLICY IS VALID AS OF THE EFFECTIVE DATE. HOWEVER, THE DATA CONTROLLER MAY MAKE CHANGES AND/OR ADDITIONS TO THIS POLICY, ALSO AS A CONSEQUENCE OF ANY SUBSEQUENT REGULATORY CHANGES AND/OR ADDITIONS. IN ANY CASE, THE DATA CONTROLLER SHALL TAKE CARE TO DELIVER OR MAKE AVAILABLE TO THE DATA SUBJECTS THE UPDATED VERSION OF THIS POLICY.