



InPost Group

Policy for Reporting Breaches

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1 Our values

At InPost, we are guided by 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. Therefore, 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 document.

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 undetected breaches.

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

Please bear in mind that intentionally reporting false information with the aim of slandering someone or violating their personal interests can even result in criminal liability.

2 What does this Policy for Reporting Breaches address?

This Policy for Reporting Breaches, which you are about to read, outlines the rules for reporting breaches of the law that may occur at InPost. We will refer to it later in the document as the "Policy".

This Policy has been drawn up in reliance on the provisions of the Polish **Act on the Protection of Whistleblowers** - please find the text of the relevant statute [HERE](#). Please read it carefully to fully understand your rights and obligations.

This Policy describes a joint procedure for handling internal reports at Polish companies. The InPost Group also includes foreign companies, so we refer to Polish companies as **InPost Poland Group companies** for distinction. These are as follows:

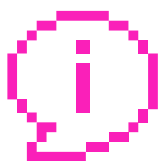
- InPost sp. z o.o.
- InPost Paczkomaty sp. z o.o.
- Integer Group Services sp. z o.o.
- Integer.pl SA
- InPost Technology s.a.r.l. Branch in Poland

Whenever we use terms such as "**we**" or "**our**" in this Policy, we mean the relevant InPost Poland group company.

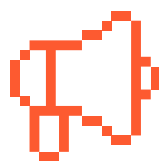
At these companies, we apply the same rules for handling breach reporting as we describe in this Policy. However, each company has its own reporting channels and conducts its own investigations with the support of designated persons. You can read more about this in Chapter 7 of this Policy.

3 What will I learn from this Policy?

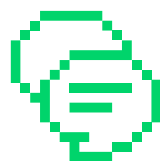
From this Policy you will learn, among others:



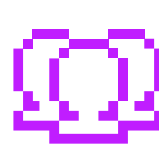
who can report breaches and whether every reporting person is considered a whistleblower



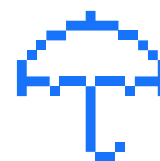
which breaches you can report under this Policy and which ones you can report in a different manner



what reporting channels you have at your disposal



who will handle the processing of your report and what the investigation will cover



whether as a reporting person you are eligible for protection and under what conditions

4 Who can report a breach?

Breaches can be reported by anyone who, **in connection with the work they do for us or the services they provide**, 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.

Other individuals (e.g., our clients or third parties) may also report breaches to us, in which case they will not enjoy the Whistleblower status. This does not mean, however, that we should refuse to consider such a report. 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?

The policy you are about to read has been prepared on the basis of the Polish [Act on the Protection of Whistleblowers](#). This law defines the breaches of the law that you can report as a Whistleblower - please find their complete list in Article 3 of this law.

These include, among others, breaches of the law concerning:

- corruption,
- public procurement,
- anti-money laundering and countering the financing of terrorism,
- consumer protection, and/or
- privacy and personal data protection.

Such breaches pose a very high risk to public interest.

You can also report breaches to us regarding our internal [POLICIES](#) (e.g. Code of Conduct, Anti-Fraud Policy).

Please note that labor and employment law breaches, such as incidents of harassment or discrimination, can be reported under a separate procedure, and our HR Team, which specializes in labor and employment issues, is assigned the task to investigate such reports. You are also eligible for protection when you make such reports, under the labor and employment law. You can read more about this in the [Anti-Harassment and Discrimination Policy](#).

Please note that this Policy does not apply to filing a complaint - if you are not satisfied with our services, you should contact the **Customer Service Department**. Upon receipt of your complaint, we will forward it to the appropriate Department for consideration.

6 How to prepare a report on breaches?

Describe what the situation is about, when it occurred, and who is affected. You can write the report in your own words, we do not require formal language. The more details you provide, the easier it will be for us to verify the case. You can also send us evidence or indicate 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 designated Compliance Officer in each of the InPost Poland Group Companies is responsible for receiving and processing reports on breaches.

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

- a central channel for reporting breaches of the law, common to all group companies: email address compliance@inpost.eu or compliance@inpost.pl,
- local channels for reporting breaches of the law for individual companies in the InPost Poland Group:

a) **SpeakUp** platform with an indication of which company the report concerns - read our **GUIDE** to using this platform,

b) Mailing addresses for written submissions:

Compliance Officer

InPost sp. z o.o.

Address: ul. 4 Pana Tadeusza St., 30-727 Kraków

Compliance Officer

InPost Paczkomaty sp. z o.o.

Address: ul. 4 Pana Tadeusza St., 30-727 Kraków

Compliance Officer

Integer Group Services sp. z o.o.

Address: ul. 4 Pana Tadeusza St., 30-727 Kraków

Compliance Officer

Integer.pl SA

Address: ul. 4 Pana Tadeusza St., 30-727 Kraków

Compliance Officer

InPost Technology Oddział w Polsce

Address: ul. 4 Pana Tadeusza St., 30-727 Kraków

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 Poland Group companies will be able to ensure that your written submission 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 Compliance Officer you should report it to the President of the Management Board of the company to which the reporting relates, and if the reporting concerns Integer.pl SA you should report it to the President of the Management Board of Integer.pl SA.

You can also report violations of personal data protection to the Compliance Officer - as to reports for all companies in the Polish InPost Poland Group.

If you prefer so, you can use the local written reporting channels indicated above.

Your report will be received by the Compliance Officer of the relevant InPost Poland Group company or a person authorized by him. We will notify you of the acceptance of your report within 7 days after receiving it, provided that you leave us your contact information.

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 report submissions in our register of submissions. We handle them in the same way as we handle submissions signed with your name. We will not try to determine your identity if you do not want to provide it.

9 How is my report processed?

Your report will be handed over to the Compliance Officer of the relevant Company indicated by you in your report (i.e., the company in which you work, for which you perform services, or with which you are professionally associated in some way). The report will then be reviewed by the Compliance Officer. 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 him 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 of the application will be handled by impartial persons authorized by the relevant company. These individuals have expert knowledge and receive regular training on how to conduct investigations. They are also aware of confidentiality obligations. They will conduct the investigation with due diligence.

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 verify whether there has indeed been a breach of the law. To help us with such verification, we may ask you to provide additional information and documents - gathering evidence is key to determining whether breaches have occurred and to taking remedial actions.

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 with the support of authorized persons.

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?

You can also report a breach externally - you don't have to use the internal reporting channel first, you can do it right away. Such reporting, however, can only apply to breaches of the law listed in Article 3 of [the Act on the Protection of Whistleblowers](#).

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 from occurring. External reporting may be made to the Ombudsman.

13 Is my personal data safe?

InPost Poland Group companies ensure the protection of privacy and confidentiality with respect to all matters contained in the Policy and comply with applicable laws including the General Data Protection Regulation (GDPR/RODO). 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.

Note: the protection of the identity of the Whistleblower does not apply to a person who intentionally or owing to gross negligence provided false information.

InPost Poland 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 privacy policy, which is attached to this Policy.

14 Am I afforded protection 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.

However, 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 the breach of the law.

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 occurred.

Similar protection is afforded to persons assisting the Whistleblower in making the report, as well as to persons related to the Whistleblower (their associates or next of kin, e.g., spouse, siblings).

15 What happens if I knowingly report false information?

Protection against retaliation does not apply to reports made in bad faith, resulting, for example, from a desire to harm another person. Intentionally false reports negatively affect the work environment, the person covered by the report, and unnecessarily involve our time and resources - so disciplinary consequences may be incurred by individuals making such false reports.

Both the Policy and the Act on the Protection of Whistleblowers aim to detect actual breaches. Therefore, protection extends not only to bona fide whistleblowers, but also to those individuals who have suffered harm due to false allegations.

Intentionally making a false report may involve violating another person's personal rights - therefore, a person who has suffered damage due to knowingly reporting false information is entitled to compensation or damages from the Whistleblower.

What's more, intentionally reporting false information can even result in criminal liability. According to the Act on the Protection of Whistleblowers, whoever makes a report or public disclosure knowing that a breach of the law has not occurred is subject to a fine, restriction of freedom or imprisonment for up to 2 years.

16 Who can I contact about breach reporting?

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