

## WHAT IS THE LEGAL BASIS OF CZECH POST'S COMPLIANCE LINE?

The Compliance Line of the Czech Post is an internal whistleblowing system established and operated pursuant to the Act No. 171/2023 Coll. of 2 June 2023, on the protection of whistleblowers (hereinafter referred to as "the Act").

## WHAT IS THE PURPOSE OF CZECH POST'S COMPLIANCE LINE?

The purpose of Czech Post's Compliance Line is to enable the submission of a report of a possible unlawful act, as well as a report of other unfair conduct in the Czech Post, to enable the investigation, review and remedy of the matter, while ensuring the protection of the whistleblower.

## WHAT IS CONSIDERED AN UNLAWFUL ACT?

For the purposes of whistleblower protection, a possible unlawful act under the Act is an act that has the characteristics of a criminal offence; has the characteristics of a misdemeanour for which the Act provides for a fine with an upper limit of at least CZK 100,000; violates the Whistleblower Protection Act; or violates another piece of legislation or regulation of the European Union in the area of:

- a) financial services, statutory audit and other assurance services, financial products and financial markets;
- b) corporate income tax;
- c) prevention of money laundering and terrorist financing;
- d) consumer protection;
- e) compliance with product requirements, including product safety;
- f) road transport and traffic safety;
- g) environmental protection;
- h) food and feed safety and animal protection and health;
- i) radiation protection and nuclear safety;
- j) competition, public auctions and public procurement;
- k) protection of internal order and security, life and health;
- l) protection of personal data, privacy and security of electronic communications networks and information systems, protection of privacy and personal data, and security of networks and information systems;
- m) protection of the financial interests of the European Union, or

- n) functioning of the internal market including the protection of competition and state aid under European Union law.

#### WHAT IS UNFAIR CONDUCT?

Unfair conduct is any unlawful act or violation of the Code of Ethics, any conduct or other action contrary to the internal regulations of the Czech Post committed by Czech Post's employees or representatives acting on behalf of the Czech Post, which could lead to criminal prosecution and possible conviction of the Czech Post or otherwise damage the reputation of the company and/or which meets the definition of an unlawful act pursuant to the Act No. 171/2023 Coll., on the protection of whistleblowers.

#### WHO RECEIVES AND PROCESSES THE REPORT?

Reports submitted through any of the Compliance Line channels are received and investigated by the Compliance Officer and designated members of Czech Post's Compliance Team as the relevant persons under the Whistleblower Protection Act. This also applies to the use of the BDO Czech Republic s.r.o. web application provided to the Czech Post through BDO Audit s.r.o.

#### WILL I BE INFORMED ABOUT THE OUTCOME OF MY REPORT?

If you have included your contact details, such as your postal address, email address, or phone number, in your report, you will receive an acknowledgement of receipt of the report as well as information on how the report will be dealt with and what action, if any, will be taken following its investigation.

If you have not included any contact details in your report, you voluntarily waived your right to receive acknowledgement of receipt of the report and subsequent notification of the outcome of the investigation and any action taken.

If you have submitted your report via the web application, you will receive a unique access code. It gives you access to information about the progress and outcome of the investigation of your report and any action taken.

#### HOW IS THE CONFIDENTIALITY OF THE REPORT ENSURED?

Czech Post's Compliance Line allows you to submit a report completely anonymously without providing any contact details such as the sender's address in the case of a letter, by using a non-personal email address to send an email message, the hidden phone number function to make a mobile phone call, or preferably by using our web application to submit your report.

However, we prefer to be given at least one contact detail of the whistleblower. If necessary, contacting the whistleblower will allow us to obtain additional information on the report, which may facilitate and speed up the investigation. We can also subsequently inform the whistleblower of the outcome of the investigation.

The Compliance Officer and designated members of the Compliance Team are bound by the Act and, in the case of reported suspicions that not subject to the Act, by a written undertaking to keep the identity of the whistleblower confidential from all employees, including senior employees and the governing body (director general) of the Czech Post.

#### WHAT ARE THE PRINCIPLES OF CZECH POST'S CODE OF ETHICS?

The Code of Ethics of the Czech Post and the principles contained therein can be found on our website, in the "About us/Our profile/Compliance in CP" section.

#### HOW DO WE HANDLE THE PERSONAL DATA OF THE WHISTLEBLOWER AND OTHER PERSONS?

The operation of the Compliance Line and the related handling of received reports may involve the processing of the personal data of the whistleblower (if provided by the whistleblower) and the personal data of third parties. The personal data will be processed to the extent to which it is provided by the whistleblower in the report.

The controller of this personal data within the meaning of the [EU General Data Protection Regulation \(GDPR\)](#) is Česká pošta, s.p.

The personal data will be processed for the purpose of detecting unlawful acts and/or unfair conduct and ensuring an adequate response to such acts or conduct.

The legal basis for the processing of reports concerning unlawful acts that meet the criteria of the Whistleblower Protection Act is the fulfilment of a legal obligation under the Act. The legal basis for the processing of reports concerning other unfair conduct is the protection of the legitimate interests of the Czech Post (in particular, defence against financial loss, damage to reputation or possible criminal liability) and the protection of the life, health, and dignity of those against whom the unfair conduct is directed.

Personal data obtained through Czech Post's Compliance Line and the related investigation of submitted reports is strictly protected by organisational and technical measures. Access to personal data is limited to the Compliance Officer and other designated Compliance Team members who are responsible for investigating and handling of unlawful and unfair practices. The Data Protection Officer may only gain access to such personal data if the whistleblower, as the data subject, has given his or her prior consent in connection with the exercise of rights under the GDPR. Exceptionally, personal data may be shared with other entities in cases

provided for by law (e.g. competent public authorities in the case of compulsorily notifiable offences).

The collected personal data is processed and stored only within the territory of the Czech Republic. Personal data is retained for at least five years from the end of the investigation, unless a possible follow-up procedure by the competent state authorities requires a longer period (e.g. in the case of conduct constituting a criminal offence, the retention period may be determined in accordance with the statutory limitation period set for the offence), or with regard to ongoing litigation or administrative/court proceedings. Once the purpose for which the personal data was processed and stored ceases to exist, the data will be deleted, shredded or anonymised.

Further information regarding the processing of personal data, the rights associated with the processing of personal data and the possibilities of exercising them, including information on the Czech Post's Data Protection Officer, can be found [here](#).