OTCF

Instructions for making reports of breaches of law at OTCF S.A. via the EY VCO platform and FAQ

The OTCF S.A. EY VCO platform aims to make reporting breaches confidential, easy and accessible to the public.

I. How to make a breach report?

Step 1:

Click on the "Add Report" button (available on the welcome page of otcfgroup.vco.ey.com).

The breach reporting system is optimized for both desktop operating systems and mobile devices (Android, iOS) and is accessible via a web browser.
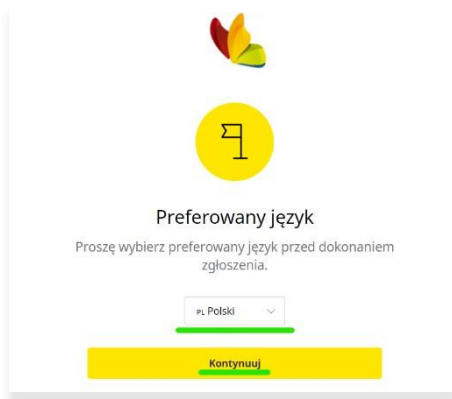
Step 2:

Select your preferred language and click on the "Continue" button to access the breach reporting questionnaire.

Answer the questions in the questionnaire in as much detail as possible. You also have the option of attaching files as documentation to support your report.

After reading and confirming that you have read the Regulations of Use and the Information Clause on Personal Data Protection of OTCF S.A.. You can submit a report by clicking on the "Approve" button.

Step 3:

After clicking on the "Approve" button, a unique token assigned to your report will be displayed, allowing you to check the status of your Report and communicate with those responsible for verifying Reports at OTCF S.A.
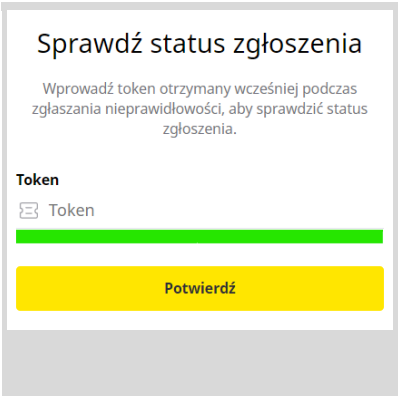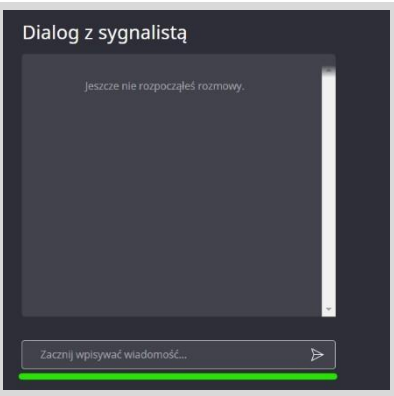
The token should be kept and stored in a safe place, as it will not be displayed again. If the applicant provides an e-mail address for contact, the token will be sent to that address.

II. How to check the status of a report?

Step 1: Click on the "Check the status of your Report" link (available on the welcome page otcfgroup.vco.ey.com):

Step 2: Enter the token you received when you made your report. If you provide your e-mail address, you will also find the token in the message, confirming the report.

Step 3: Enter your question in the chat window.

Step 1	Step 2	Step 3
EY Virtual Compliance Officer **Witaj!** Coś nie daje Ci spokoju, ale chciałbyś to poufnie zgłosić? **Zgłoś nieprawidłowość** **Sprawdź status swojego zgłoszenia** Language PL Polski	**Sprawdź status zgłoszenia** Wprowadź token otrzymany wcześniej podczas zgłaszania nieprawidłowości, aby sprawdzić status zgłoszenia. **Token** ✉ Token **Potwierdź**	**Dialog z sygnalistą** Jeszcze nie rozpocząłeś rozmowy. Zacznij wpisywać wiadomość...

III. Frequently Asked Questions (FAQ)

1. Who can make a report?

The system is available to the public both to people inside OTCF S.A., e.g. employees and co-workers, as well as to third parties, e.g. business Partners.

The submitter may be: an employee, a temporary employee, a person providing work on a basis other than employment (order contract, specific task contract), an entrepreneur, a proxy, a shareholder or partner, a member of the Management Board or Supervisory Board, a person providing work under the supervision and direction of a contractor, subcontractor or supplier (including under a civil law agreement), an intern, a volunteer, an apprentice, a candidate for employment or for a corporate body, a former: employee, co-worker, member of a body.

As a result of making a report that meets the requirements described below, you become a whistleblower.

2. What can be reported?

The subject of the report may be:

a) breach information related to work, i.e. an act or omission that is unlawful or intended to circumvent the law that you experience at work or observe at work in or with OTCF S.A.
b) information on actions or omissions inconsistent with OTCF S.A. policies. (ethics rules, industry standards, procedures) or designed to circumvent them.

You can report breach information regarding:

a) corruption;
b) public procurement;
c) preventing money laundering and countering the financing of terrorism;
d) product safety and compliance;
e) transportation security;
f) environmental protection;

g) animal health and welfare;
h) consumer protection;
i) privacy and data protection;
j) ICT network and system security;
k) financial interests of the Treasury of the Republic of Poland, the local government unit and the European Union;
l) internal market of the European Union, including public law competition and state aid rules, and corporate taxation
m) theft / misappropriation of assets,
n) Financial statement fraud / data falsification.

3. Do I need proof of breach to report it?

No - it is sufficient that you have reasonable grounds to believe that the information being reported is true at the time of the report.

4. Can I make a report anonymously?

Yes, the system allows reports to be made anonymously (without revealing the submitter's identity in the report).

All reports, that is, both those made openly and anonymously, will be treated confidentially and handled with due diligence.

5. Can I withdraw or delete a report I made?

Withdrawal or deletion of the report made is not possible. If you wish to correct or complete your data or details of your report, please contact OTCF S.A. Compliance Department: compliance@otcf.pl (contact also possible anonymously).

6. I lost my token - how can I access my report in the system?

For security reasons, it is not possible to recreate or create a new token for an existing report in the system. This means that if you lose your token, you will lose the ability to check the status of your report and contact the people responsible for verifying your report

Report can then be made again. It is recommended to provide information that a report on the same issue has already taken place, with the date of the original report (if possible).

7. What happens after I make my report?

Your report will be entered into the Register of Applications and verified.

Within:
a) 7 days after the report is made, you will receive confirmation of acceptance of the report,
b) a maximum of 3 months from the confirmation of acceptance of the applicant or, if no confirmation of acceptance of the applicant is provided, from the expiration of 7 days from the date of the internal report, you will receive feedback, i.e. information on the planned or undertaken follow-up of the report and the reasons for such actions.

In the course of verifying your report, those responsible for verifying it may contact you to gather additional information. You can find any questions in the chat available on the platform after logging in with your token. If you provide your e-mail address, you will also receive a notification of a pending message on the platform by this means.

Detailed rules for handling reports are governed by the Procedure for Internal Breach Reports.

8. Is my report confidential?

All reports, that is, both those made openly and anonymously, will be treated confidentially and handled with due diligence.

Measures to protect confidentiality include the use of appropriate technical solutions such as providing a secure channel for reports in the form of the EY VCO platform, as well as organizational solutions such as identifying a small group of people responsible for receiving and verifying reports. OTCF S.A. also ensures that each of these persons has the appropriate authorization and is obliged to maintain the confidentiality of all information obtained in connection with the acceptance and verification of internal reports, follow-up and processing of personal data of the persons indicated in the report under pain of disciplinary and criminal liability.

Detailed rules for identity protection and protection against retaliation are contained in a separate document available on the whistleblower form.

9. How am I protected from retaliation?

OTCF S.A. prohibits any retaliation against submitters, facilitators and persons related to the submitter. In particular, such persons shall not be harassed in any way by both In particular, such persons shall not be harassed in any way by both superiors and other employees of OTCF S.A. or held liable for disciplinary or financial action in connection with the report.

Detailed rules for identity protection and protection against retaliation are contained in a separate document available on the whistleblower form.

10. What happens if a false report is intentionally filed?

A false report is information that the submitter knew was not true. In such a situation, the person making a false report is not protected from retaliation, and is additionally liable to criminal prosecution (fine, restriction of liberty or imprisonment for up to 2 years). OTCF may also apply disciplinary measures to employees, including disciplinary dismissal for gross misconduct.

11. How is my personal information stored?

Personal data will be stored on the technology platform of the EY VCO system provider, i.e. Ernst & Young spółka z ograniczoną odpowiedzialnością Consulting sp. k., headquartered in Warsaw, located in the European Economic Area.

OTCF S.A. protects the confidentiality and security of the data it receives in the course of its operations. Access to such data is limited, and data policies and procedures are designed to protect data from loss, misuse, or disclosure.

12. Where can I find detailed information about the operation of the system and the processing of my personal data?

Detailed information on the operation of the system is contained in the Regulations of Use available on the whistleblower form. The form is also accompanied by a Information Clause on Personal Data Protection of OTCF S.A. in connection with the report.