

## COUNTRY SPECIFIC ADDENDUM TO THE CCHBC WHISTLEBLOWING POLICY FOR CCHBC CZECHIA AND SLOVAKIA

This Addendum to the CCHBC Whistleblowing Policy (“Policy”) (“Addendum”) contains the whistleblowing reporting rules that apply to CCHBC Czechia and Slovakia due to the specific Czech and Slovak legal requirements in this respect.

In the event of a difference between this Addendum and the Policy, the provisions of this Addendum shall apply to CCHBC Czechia and Slovakia. This Addendum applies to both Czechia and Slovakia unless expressly stated that specific section shall apply to only one country.

### Legal regulations reflected by the document:

- Act No. 171/2023 Coll., on the Protection of Whistleblowers
- Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activities and on Amendments to Certain Acts

This Addendum together with the Policy aim to provide clear information on the rules laid down by the legislation.

### Scope

The Policy shall apply to all employees of the Company as described in more detail in point Definition of Whistleblower.

### Definition of whistleblower

A whistleblower is defined as a person who performed or is performing work or other similar activity for the Company (even indirectly), including, for example, job applicants, service providers or volunteers.

Whistleblowers and other persons listed in the relevant legislation are protected from retaliation, including, for example, persons who have provided assistance in ascertaining the information contained in the report, persons who are related to the whistleblower (in particular close persons).

### What to report

A report within the meaning of the relevant legislation is a report of a possible unlawful act that has the characteristics of a criminal offence, misdemeanour, violation of the relevant whistleblower protection legislation or regulations in the areas provided for by the relevant legislation.

### How to report

Reporting potential wrongdoing under this Policy may be made through the relevant person – the Ethics and Compliance Officer – Barbora Frková, by e-mail at [whistleblowing.czsk@cchellenic.com](mailto:whistleblowing.czsk@cchellenic.com), by phone at +420 601 559 616 or in person. It is also possible to use Speak Up! line at <https://secure.ethicspoint.eu/domain/media/en/gui/102336/index.html> or telephone number 800 144 182 in the case of Czechia or 0800 000 101 in the case of Slovakia.

Concerns can be expressed **in writing or orally** (by telephone or via the voicemail system) and, at the request of the person making the report, by **means of a physical meeting** within a reasonable period of time (no later than 14 days).



The Ethics and Compliance Officer is responsible for keeping a record of reports made and actions taken through the system to deal with such situations.

### **Procedures of Investigation**

The Company has designated an Ethics and Compliance Officer as the appropriate person to investigate the report.

Receipt of all notifications that fall under this policy will be acknowledged to the whistleblower no later than 7 days after receipt. Reports will be investigated promptly, impartially and appropriately in accordance with the Company's approved investigation guidelines and legislation.

The Company will inform the whistleblower who has raised the concern of its assessment of the validity of the report and other circumstances (including referral of the matter under relevant legislation - e.g. the Criminal Procedure Code) within 30 days of receipt of the report. This time limit may be extended by 30 days in the case of complex cases, up to a maximum of twice. The Company will inform the individual of the extension. The Company will inform the whistleblower of the outcome of the investigation. As the Company seeks to maintain the confidentiality of all investigations, there can be no guarantee that the Company will be able to inform the whistleblower of the specific details of the investigation and any disciplinary action taken as a result. You should treat all information about an investigation as confidential.

The Ethics and Compliance Officer shall have the authority to request, to the extent necessary, the cooperation of the whistleblower, the person to whom the report relates, or any other person who is believed to have information necessary to investigate the report, within a reasonable time. Such persons shall be obliged to provide the Ethics and Compliance Officer with their cooperation.

The Ethics and Compliance Officer shall keep the identity of the whistleblower and the identity of the persons concerned confidential during the investigation.

### **Records**

The Ethics and Compliance Officer shall make a written record of the investigation of the report, summarising and commenting on the facts contained in the report in terms of their relevance, the outcome of the investigation and the action taken (hereinafter referred to as the 'written record'). The Ethics and Compliance Officer shall keep a record of the reports and written records submitted.

The records shall include: the date of receipt of the notification, the name and address of the whistleblower (unless it is an anonymous notification), the subject of the notification, the outcome of the investigation of the notification and the date on which the investigation of the notification was completed.

### **Protection**

Notices must be made in accordance with applicable law, this policy, and in good faith.

Protected Persons will not be exposed to the threat of dismissal, dismissal, loss of benefits, threats, harassment or discrimination, or any other form of retaliation in accordance with applicable law.

Local law may classify the act of knowingly making a false report as an offense and provide for sanctions. Where required by local law, the Company takes measures against obstruction of whistleblowing – in particular, taking action by the Company as an employer against an employee who prevents the filing of a report or keeping a record of a report.

*Special regulation for Slovakia:*



In the case of Slovakia, the legislation provides protection for whistleblowers in the context of criminal proceedings when reporting serious antisocial activity that is a criminal offence and in the context of administrative offence proceedings when reporting serious antisocial activity that is an administrative offence. In addition, if the whistleblower believes that an employment action has been taken against him or her in connection with the notification with which he or she disagrees, the whistleblower may request the Office for the Protection of Whistleblowers (contact details can be found on the Company's intranet Oddělení → Legal and Security → Ethics & Compliance, under Whistleblowing) to suspend the effectiveness of the employment action within 15 days of becoming aware of the employment action.

### **Feedback**

The deadlines specified in point 8 of the Principles (specific to the Czech Republic and Slovakia) will apply.

### **Information on the procedure**

Information about the Company's whistleblowing procedures is available in the Investigation Procedures section of this Addendum, on the Company's intranet (at <https://cchellenic.sharepoint.com/sites/intranet-cz/Pages/Ethics%20&%20Compliance/Ethics-&-Compliance.aspx>), the Company's website (at <https://cz.coca-colahellenic.com/cz/kontakt>) and at COBC (available on the intranet at [https://cchellenic.sharepoint.com/sites/intranet-cz/Documents/Legal/CocaCola\\_CodeOfBusinessConduct\\_14\\_CES\\_web\\_July2022.pdf](https://cchellenic.sharepoint.com/sites/intranet-cz/Documents/Legal/CocaCola_CodeOfBusinessConduct_14_CES_web_July2022.pdf)).

### **Processing of personal data contained in the notification**

For the purpose of recording notifications, the personal data of the natural person - the whistleblower - are processed in the scope of the name, surname and address of the whistleblower.

The personal data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("GDPR") and in accordance with local data protection regulations, for the purpose of fulfilling the Company's legal obligations under Article 6(1)(c) of the GDPR.

Special categories of personal data pursuant to Art. 9 Sect. 1 GDPR may be processed in relation to a notification on the basis of Art. 9 Sect. 2 lit. (e), (f) or (g) of the GDPR.

The information obligation under Articles 13 and 14 of the GDPR must be fulfilled while maintaining confidentiality in accordance with this internal regulation.

In accordance with Article 23 of the GDPR, the exercise of the right of access to personal data under Article 15 of the GDPR may only be allowed to the data subject provided that the confidentiality of the identity of the whistleblower and the other persons named in the report is preserved. A request for access to personal data relating to a notification shall be forwarded to the appropriate person by the person entrusted with the execution of the personal data protection agenda.