

**Procedure  
for reporting  
irregularities,  
take follow-up actions  
and protect persons  
making reports  
in Vitrintec Sp. z o.o.**



**PROCEDURE  
FOR REPORTING IRREGULARITIES,  
TAKE FOLLOW-UP ACTIONS  
AND PROTECT PERSONS MAKING REPORTS  
IN VITRINTEC SP. Z O.O.**

developed on the basis of Directive (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2019 on the protection of persons reporting breaches of Union law.

DEFINITIONS

The terms used in the procedure shall be understood as:

1) Employer (head of unit) - Chief Executive Officer (CEO) of Vitrintec Sp. z o.o. - this should be understood as an employer within the meaning of Article 3 of the Act of 26 June 1974 - the Labour Code (Journal of Laws of 2020, item 1320, as amended);

2) Law Infringement Officer – an employee responsible for receiving reports and following up on irregularities;

3) Law Infringement Team – a team (committee) responsible for conducting proceedings concerning reporting irregularities (whistleblower reports), appointed ad hoc by a separate order of the Chief Executive Officer (CEO) to comprehensively explain the circumstances described in the report, operating according to the principles set out for explanatory proceedings;

4) Procedure – this document concerning receiving reports, taking follow-up actions and protecting persons making reports;

5) Anonymous – a report made by a person whose identity cannot be identified;

6) Retaliatory actions – a direct or indirect action or omission related to the reporting of irregularities, the purpose or effect of which is to worsen the situation of the person making the report;

7) Follow-up – actions taken by the recipient of the report to assess the veracity of the allegations contained in the report and, where appropriate, to address the breach that is the subject of the report, including through actions such as internal investigation, investigation, prosecution, actions taken to recover funds or closure of the procedure;

8) Information on breaches – evidence confirming actual breaches as well as reasonable suspicions of potential breaches that have not yet been committed;

9) Violation of the law – an act or omission that is unlawful;

10) Whistleblower (reporting person) – a natural or legal person who reports or publicly discloses information on breaches obtained in a work-related context;

11) Person assisting in making the report – a natural or legal person who assists the reporting person in this activity and whose assistance should not be disclosed;

12) Person concerned by the report – a natural or legal person who is indicated in the report or public disclosure as the person who committed the infringement or who is associated with it;

13) Whistleblower notification – providing information on a violation that has occurred or may occur in the organization where the reporting person works or has worked, or in another organization with which they maintain or have maintained contact in the context of their work; 14) Internal notification – providing information on a violation of the employer’s law;

15) External notification – providing information on a violation of the law to a public body or central body;

16) Public disclosure – providing information on a violation of the law to the public;

17) Feedback – providing the reporting person with information on planned or undertaken follow-up actions and the reasons for such actions;

18) Explanatory proceedings – proceedings conducted in connection with the submitted report; 19) Reporting channel – technical and organizational solutions enabling the reporting of a violation;

20) Register – register of whistleblower notifications containing information on the report and the course and resolution of the proceedings concerning the violation of the law.

GENERAL PROVISIONS

1. The strategy of Vitrintec Sp. z o.o. is based on responsibility, prevention of corruption and prevention of other irregularities both within the organization and among related and cooperating entities, taking into account a number of aspects, in particular social interests, environmental protection, relations with various groups of collaborators.

2. The Procedure is an element of the management control system, its primary objective is to prevent irregularities in Vitrintec Sp. z o.o.

3. Vitrintec Sp. z o.o. conducts its activities based on absolute respect for legal regulations, good practices and the highest ethical standards.

4. The primary objective of the Procedure is to create a system for reporting irregularities in Vitrintec Sp. z o.o. by creating safe reporting channels, preventing any retaliatory actions against the whistleblower.

5. The procedure specifies in particular:

- 1) the scope of irregularities covered by the procedure,
- 2) the scope of authorized persons,
- 3) the principles of reporting irregularities by persons authorized to make a report,
- 4) responsibility in the process of managing irregularities,
- 5) the process of considering and managing irregularities,
- 6) the principles of maintaining confidentiality, in particular the principles of maintaining the confidentiality of reports of irregularities made by whistleblowers and the identity of the persons making the reports.

SCOPE OF APPLICATION OF THE PROCEDURE

1. The procedure and its provisions apply to the following groups of persons authorized to make a report:

- 1) employees and associates and former employees and associates of Vitrintec Sp. z o.o.,
- 2) persons acting on behalf of and for the benefit of Vitrintec Sp. z o.o.,
- 3) any other persons in any way associated with Vitrintec Sp. z o.o., in particular: persons assisting in reporting irregularities, interns, trainees or candidates for employment, if they obtained information regarding irregularities during the recruitment process or other processes preceding the establishment of an employment relationship.

2. Reporting irregularities may concern in particular:

- 1) entities affiliated with Vitrintec Sp. z o.o.,
- 2) a natural person authorized to represent Vitrintec Sp. z o.o.,
- 3) employees and associates of Vitrintec Sp. z o.o. in connection with the provision of work for the company,
- 4) a subcontractor or other entrepreneur who is a natural person, if their prohibited act was related to the performance of the contract concluded with Vitrintec Sp. z o.o.,
- 5) an employee or associate or a person authorized to act in the interest or on behalf of an entrepreneur who is not a natural person, if their act was related to the performance of the contract concluded by that entrepreneur with Vitrintec Sp. z o.o.

3. Irregularities shall be understood as information held by persons authorized to make a report, in particular information that may indicate:

- 1) suspicion of preparation, attempt or commission of a prohibited act by entities referred to in par. 2,
- 2) failure to fulfill obligations or abuse of authority by entities indicated in par. 2,
- 3) failure to exercise due diligence required in the circumstances in the actions of entities referred to in par. 2,
- 4) irregularities in the organization of Vitrintec Sp. z o.o.’s activities that could lead to the commission of a prohibited act or damage,
- 5) violation of generally applicable provisions of law on the basis of which Vitrintec Sp. z o.o. operates.
- 6) violation of internal procedures and ethical standards adopted in Vitrintec Sp. z o.o.

4. The list of matters within which irregularities can be reported includes, among others:

- 1) corruption;
- 2) public procurement;
- 3) services, products and financial markets;
- 4) counteracting money laundering and terrorism financing;
- 5) product safety and compliance with requirements;
- 6) transport safety;
- 7) environmental protection;
- 8) consumer protection;

- 9) protection of privacy and personal data;
- 10) security of networks and IT systems;
- 11) financial interests of the State Treasury of the Republic of Poland, local government units and the European Union;
- 12) the internal market of the European Union, including public law principles of competition and state aid and taxation of legal persons;
- 13) constitutional freedoms and rights of man and citizen.
- 14) violations of ethical standards applicable in Vitrintec Sp. z o.o., which were established on the basis of generally applicable law.

§4

PERSONS RESPONSIBLE FOR MANAGING REPORTS

- 1. The person responsible for receiving and considering reports of irregularities in Vitrintec Sp. z o.o. and exercising overall supervision over the receipt and consideration of reports of irregularities in Vitrintec Sp. z o.o. is the Proxy for Violations of Law, appointed by the Chief Executive Officer (CEO).
- 2. Reports cannot be analyzed by persons for whom the content of the report of irregularities indicates that they may be in any way negatively involved in the action or omission constituting the irregularity.
- 3. If the report of irregularities concerns the person indicated in par. 1, the CEO shall designate another responsible person.

§5

WHISPLITTER

- 1. In accordance with the **principle of good faith**, each person authorized to make a report should report an irregularity if there are reasonable grounds on their side to believe that the information provided is true.
- 2. A person reporting in bad faith is acting **for a purpose contrary to the law or the principles of social coexistence**.
- 3. The decision to grant the status of a whistleblower is made by the person responsible for handling reports.
- 4. Any reporting person may obtain the status of a whistleblower, unless the initial analysis of the report provides grounds to assume that the reporting person clearly acted in bad faith (presumption of good faith).
- 5. If the reporting person did not submit the report anonymously, the person responsible for handling reports shall confirm receipt of the report within **7 days** of its receipt.
- 6. Exceeding the deadline referred to above is justified only if it is necessary to take additional steps as part of the initial analysis of the report (e.g. the need to supplement the report, collect additional evidence). The initial analysis of the report may not last longer than **14 days**.
- 7. If it turns out during the explanatory proceedings that the reporting person who previously received the status of a whistleblower acted in bad faith, they shall be deprived of the protection provided for a whistleblower.
- 8. A deliberate report submitted in bad faith – containing false information – is unlawful.
- 9. A person harmed as a result of a deliberate Report or disclosure of false information has the right to seek compensation or redress directly from the Reporting Party.

§6

WHISTLEBLOWER PROTECTION

- 1. An absolute ban on taking retaliatory action against a whistleblower is introduced, also in a situation where the report of irregularities was made in good faith and the explanatory proceedings conducted showed that the reported irregularity did not take place.
- 2. The whistleblower is entitled to full protection against repressive actions, discrimination, mobbing and other types of unfair treatment. In connection with the Reporting, any action (preparation, attempts, threats) towards the Reporting Person is prohibited, including in particular:
  - refusal to enter into an employment relationship,
  - termination or termination without notice of an employment relationship,

- reduction of remuneration,
- failure to conclude a fixed-term employment contract after termination of an employment contract for a trial period, failure to conclude another fixed-term employment contract or failure to conclude an employment contract for an indefinite period after termination of an employment contract for a fixed term - in a situation where the employee had a reasonable expectation that such a contract would be concluded with him,
- suspension of promotion or omission in promotion,
- omission in the awarding of work-related benefits other than remuneration or reduction of the amount of such benefits,
- transfer of the employee to a lower job position,
- suspension from performing work duties,
- transferring the previous work duties to another employee,
- unfavourable change of the place of work or work schedule,
- negative assessment of work results or negative opinion on work,
- imposition or application of a disciplinary measure, including a financial penalty or a measure of a similar nature,
- intimidation or exclusion, mobbing, discrimination, unfavourable or unfair treatment,
- withholding participation or omission when selecting for participation in training to improve professional qualifications,
- unjustified referral for a medical examination, including psychiatric examinations, if separate provisions provide for the possibility of referring an employee for such an examination,
- action aimed at making it difficult to find employment in a given sector or industry in the future on the basis of an informal or formal sectoral or industry agreement,
- causing financial loss, including economic loss or loss of income,
- causing other non-material damage, including infringement of personal rights.

3. All Reporting Persons are protected under generally applicable provisions of law.

4. It is inadmissible to terminate an employment relationship or a mutual agreement with a whistleblower solely in connection with the whistleblower’s reporting of irregularities.

5. The protection does not apply to a whistleblower who is also the perpetrator/co-perpetrator/assistant of the irregularity.

6. Detailed principles of whistleblower data protection are specified in § 7 of this Procedure.

§7

DETAILED RULES FOR WHISPLITTER DATA PROTECTION

- 1. In the Procedure, a whistleblower is understood as a person reporting irregularities in matters in which they are not a party or participant, on behalf of the parties or participants of these proceedings.
- 2. A whistleblower is any person who reports irregularities and does not do so because of their own legal interest.
- 3. A whistleblower is not a witness in the proceedings that will be initiated as a result of their reporting, nor is they a participant or party to the proceedings initiated.
- 4. A whistleblower shall not become a party to administrative proceedings within the meaning of the provisions of Article 28 of the Code of Administrative Procedure, in a case pending as a result of the report received from him/her.
- 5. The personal data of a person who has been granted the status of a whistleblower shall be subject to special protection in order to limit the personal risk of the person reporting irregularities, including negative consequences from persons and entities to whom the report referred.
- 6. The whistleblower’s data should remain confidential and may not be disclosed during the proceedings to the parties and participants of these proceedings, without the express and unambiguous consent of the whistleblower.
- 7. A separate register of cases shall be created for cases reported by a person who has been granted the status of a whistleblower.
- 8. The person receiving the report shall register the application as a separate case, with a reference number appropriate for whistleblower reports, in order to minimize the risk of disclosing the whistleblower’s data at later stages of the proceedings.
- 9. The whistleblower shall not be requested to provide additional personal data than those indicated by him/her in the report submitted, even if they do not allow for unambiguous identification.
- 10. The whistleblower’s data is not disclosed in any documents related to the proceedings.
- 11. The whistleblower’s data is not disclosed at the request of the parties or participants in the proceedings.

12. The whistleblower’s data is not included in the distribution lists of documents related to the proceedings.

13. The whistleblower is informed about the course and outcome of the proceedings that were initiated as a result of his/her report, to the extent that the information constitutes public information within the case registered in connection with the report he/she submitted.

§8

REPORTING IRREGULARITIES

1. In the event of knowledge of an Irregularity, the potential Reporting Person should – before taking action under this procedure and if the situation allows it – take action to make the person committing the violations aware of the fact that their actions violate the law and of the possible consequences.

2. Reports of irregularities can be submitted in the following form:

- 1) via a mobile application for smartphones, called WhatsApp, tel. no.: +48 575 003 255.
- 2) by filling in the irregularity report form, available on the website www.c.pl – the template of the report form constitutes Annex No. 1 to this procedure,
- 3) in person to the authorized representative for violations of law,
- 4) by phone at +48 575 003 255,
- 5) by mail to the address of Vitrintec Sp. z o.o., with the note „Whistleblower”,
- 6) via the mailbox located in the corridor leading to the employees’ cloakroom in the hall at 23 Olszewskiego St. (space not covered by video monitoring),
- 7) if the Report concerns the Representative for Violations of Law, the report should be sent to the CEO of the Company, to the following address: Vitrintec Sp. z o.o., 23 Olszewskiego St. with the note „To the Chief Executive Officer own hands”.

3. The report of irregularities should indicate a clear and exhaustive explanation of the subject of the report and include in particular:

- 1) the date and place of the irregularity or the date and place of obtaining information about the irregularity,
- 2) a description of the specific situation or circumstances creating the possibility of the irregularity,
- 3) an indication of the persons who have knowledge of the Irregularity: perpetrators, witnesses, injured parties, other persons with relevant information,

4) an indication of all evidence and information available to the reporting party, which may prove helpful in the process of examining the irregularity.

4. The reporting person is obliged to treat the information they possess concerning suspected irregularities as a secret and refrain from public discussions about the reported suspected irregularities, unless the person is obliged to do so by law.

§9

INFORMATION ON EXTERNAL REPORTING

1. In any case, the report may also be made to a public body or a central body without following the procedure provided for in this Procedure, in particular when:

- 1) the Employer does not take follow-up action or does not provide feedback within the deadline for providing feedback set out in the Procedure;
- 2) the whistleblower has reasonable grounds to believe that the violation of the law may constitute a direct or obvious threat to the public interest, in particular there is a risk of irreversible damage;
- 3) the whistleblower has reasonable grounds to believe that making an internal report will expose them to retaliatory actions;
- 4) in the event of an internal report, there is a low probability of effective counteracting of the violation of the law by the Employer due to the special circumstances of the case. Special circumstances of the case may be, for example, the possibility of concealing or destroying evidence or the possibility of collusion between the employer and the perpetrator of the violation of the law or the employer’s participation in the violation of the law.

2. A report made to a public body or a central body without an internal report does not result in depriving the whistleblower of protection guaranteed by the provisions of the Act on the protection of persons reporting violations of the law.

3. An external report may be made without prior notification.

4. External reports are made in accordance with separate procedures provided for by individual public bodies.

§10

ANONYMOUS REPORTS

1. Anonymous reporting of irregularities via WhatsApp is permissible, phone number: +48 575 003 255.

2. Each anonymous report is subject to entry in the register. In the event that an anonymous report is left without action, the person responsible for handling reports is obliged to indicate the reasons justifying such a decision.

3. If the identity of the reporting person is established during the consideration of an anonymous report, the person responsible for handling reports shall immediately grant them the status of a whistleblower.

§11

FALSE REPORT

1. Reporting irregularities may only be made in good faith.

2. It is prohibited to knowingly submit false reports of irregularities.

3. If it is determined as a result of the initial analysis of the report or during the explanatory proceedings that the irregularity report deliberately contained untruth or concealed the truth, the reporting person who is an employee may be held liable for disciplinary action specified in the provisions of the Labor Code. Such conduct may also be classified as a serious breach of basic employee duties and as such result in the termination of the employment contract without notice.

4. In the case of a reporting person providing services to Vitrintec Sp. z o.o. services based on a civil law contract, the finding of false reporting of irregularities may result in the termination of said contract and the definitive termination of cooperation between the parties.

5. Regardless of the consequences indicated above, the reporting party who knowingly makes a false report of irregularities may be held liable for damages in the event of damage to Vitrintec Sp. z o.o. related to the false report.

§12

EXPLORATORY PROCEEDINGS

1. Only the person responsible for the report has access to the channels for reporting irregularities.

2. After the report of irregularities is received, the person responsible for handling the reports shall immediately, but no later than within 7 business days from the date of receipt:  
a) issue a confirmation of the report of irregularities on the form, the template of which is specified in Annex No. 2 to this Procedure (possible only in the case of a report in which the whistleblower is not anonymous), b) perform a preliminary analysis of the report, c) grant or not grant the reporting person the status of a whistleblower.

3. If the report is suitable for consideration, the person responsible for handling reports shall initiate explanatory proceedings, which are conducted before the Violations of Law Team, on the principles specified in this Procedure.

4. Supervision over the explanatory proceedings conducted by the Violations of Law Team is exercised by the person responsible for handling reports.

5. Exceeding the deadline indicated above is justified only in the event of the need to take additional actions as part of the initial analysis of the report (e.g. the need to supplement the report, collect additional evidence). The initial analysis of the report may not last longer than 14 days.

6. The irregularity report shall be considered without undue delay, within a period not longer than 30 days from the date of initiation of the explanatory proceedings, provided that the entity examining the report is able to collect the necessary documents and evidence during that time.

7. In particularly complex cases, the irregularity report may be considered within a period not longer than 90 days from the date of initiation of the explanatory proceedings.

8. The Violations of Law Team prepares a report from the conducted explanatory proceedings, which also includes the Team’s recommendations regarding the handling of the case, and submits it to the Chief Executive Officer (CEO).

9. The person responsible for handling reports is obliged to inform the whistleblower about the method of handling the case within 30 days of the completion of the report’s consideration.



TEAM FOR LAW VIOLATIONS

- 1. The explanatory proceedings are conducted by the Team for Law Violations, consisting of at least 3 members, ensuring independence, objectivity and competence.
- 2. Members of the Team for Law Violations are appointed ad hoc by order of the Chief Executive Officer (CEO) of Vitrintec Sp. z o.o. and conduct the proceedings based on ad hoc authorizations issued by the Chief Executive Officer.
- 3. The composition of the Team conducting the proceedings is proposed by the Proxy (he may also appoint himself to the team). If necessary, persons who are not employees of the unit may be appointed to the Team.
- 4. To perform specific specialist activities during the proceedings, the Proxy may additionally appoint experts who are or are not employees of the unit.
- 5. The following persons may not be members of the Team or experts:
  - 1) the whistleblower who submitted the report that is the subject of the explanation;
  - 2) the person to whom the report relates;
  - 3) a person who is a direct subordinate or superior of the person who is the subject of the report;
  - 4) a person close to the person who is the subject of the report (within the meaning of the provisions of the Penal Code);
  - 5) a person performing activities or handling matters whose correctness will be the subject of the investigation;
  - 6) a person whose participation in the proceedings would raise justified doubts as to their impartiality for other reasons.
- 6. During the explanatory proceedings, members of the Team have the right to:
  - 1) access the unit's documents and data;
  - 2) obtain processed and unprocessed information from employees of individual organizational units;
  - 3) obtain oral and written explanations from employees and contractors of the unit;
  - 4) access the unit's premises in order to conduct a site inspection or secure evidence;
  - 5) use the assistance of the Personal Data Inspector;
  - 6) consult, to the extent necessary, the information and data obtained with the whistleblower.
- 7. The Team shall prepare a report on the findings made during the explanatory proceedings and submit it to the Chief Executive Officer (CEO) of Vitrintec Sp. z o.o.
- 8. The report from the explanatory proceedings contains a description of the established factual situation, including the established irregularities and their causes, scope and effects, and the persons responsible for them.

END OF PROCEEDINGS

- 1. The Proxy shall attach proposals for further actions to the report on the explanatory proceedings. Depending on the findings, these actions may include actions against persons guilty of violations, actions to prevent violations and strengthening the internal control system in the entity.
- 2. Such measures may include in particular:
  - 1) closing the procedure without taking further action (in the event of the report not being confirmed);
  - 2) conducting a conversation, drawing the employee's attention;
  - 3) admonishing the employee;
  - 4) changes or rotations in positions;
  - 5) changes in internal procedures;
  - 6) taking civil law actions, concerning, for example, concluded contracts, redressing damages, paying compensation;
  - 7) submitting a motion to initiate disciplinary proceedings;
  - 8) submitting a motion to initiate proceedings regarding a violation of public finance discipline;
  - 9) submitting a notification of a justified suspicion of a crime (in the event of collecting evidence);
  - 10) informing the appropriate services (in the event of collecting circumstantial evidence).
- 3. The Chief Executive Officer (CEO) of Vitrintec Sp. z o.o. determines further actions and the persons responsible for their implementation.
- 4. The Representative monitors the implementation of these actions and provides assistance to the persons responsible for them.
- 5. The Representative informs the whistleblower about the findings made and the approved measures immediately after the applications are approved by the Chief Executive Officer (CEO) of Vitrintec Sp. z o.o., no later than 30 days from the end of the consideration of the report.
- 6. The findings made, the approved measures and their implementation are registered in the Report Register.

REGISTER OF REPORTS OF IRREGULARITIES

- 1. Each report of irregularities is registered in the Register of irregularities, regardless of the further course of the explanatory proceedings.
- 2. The person responsible for receiving and considering reports is responsible for maintaining the Register of irregularities in Vitrintec Sp. z o.o.
- 3. The Register of irregularities includes in particular:
  - 1) the whistleblower's contact details, unless the irregularity report was anonymous,
  - 2) all detailed information held about the report,
  - 3) the course of analysis and consideration of the irregularity report,
  - 4) persons and bodies participating in the process of analysis and consideration of the report,
  - 5) all decisions and escalations (if any).
- 4. The template of the Register of irregularity reports constitutes Annex No. 3 to this Procedure.
- 5. In addition to maintaining the Register, the person responsible for handling reports, while maintaining the principles of confidentiality, is obliged to store all evidence, documents and information collected during the analysis and information regarding the consideration of the report for a period of 5 years from the completion of the explanatory proceedings.

FINAL PROVISIONS

- 1. Familiarity with the rules set out in this procedure is the obligation of all employees.
  - 2. Familiarization with the provisions of the procedure should take place before the employee is hired: at the stage of starting recruitment or negotiations preceding the conclusion of the contract.
  - 3. In matters not regulated by this procedure, the provisions of the Act shall apply.
  - 4. The procedure shall enter into force two weeks after the date of its notification to employees in the manner adopted by the Employer.
- Annexes to this Procedure:
- 1) Annex No. 1 – Form for reporting irregularities (template)
  - 2) Annex No. 2 – Confirmation of reporting irregularities (template)
  - 3) Annex No. 3 – Register of reporting irregularities (template)

FORM FOR REPORTING IRREGULARITIES

DATE AND PLACE OF PREPARATION OF THE NOTIFICATION:	
NAME AND SURNAME OF THE REGISTERING PERSON:	
WORK POSITION:	
CONTACT DETAILS:	
CONTENT OF THE SUBMISSION:	
Data of the Person/Persons who committed the violations of law that are the subject of your Report or contributed to their occurrence or further, uninterrupted activity may lead to their occurrence:	
NAME AND SURNAME:	
EMPLOYMENT POSITION:	
Data of the Person/Persons who are victims of the violations of law that are the subject of your Report or who may become victims:	
NAME AND SURNAME:	
EMPLOYMENT POSITION:	
LAW VIOLATIONS SUBJECT TO REPORT:	
EVIDENCE:	

DECLARATIONS OF THE PERSON MAKING THE REPORT:
I declare that by submitting this Application: <ul style="list-style-type: none"><li>▪ I am acting in good faith,</li><li>▪ I have a reasonable belief that the allegations contained in the disclosed information are true,</li><li>▪ I am not making the report in order to gain profit,</li><li>▪ the disclosed information is consistent with the state of my knowledge and I have disclosed all known facts and circumstances concerning the subject of the report.</li><li>▪ The report is made in the interest of the Company or the public interest.</li></ul>
DATE AND SIGNATURE:

INFORMATION

1. If it is established during the explanatory proceedings that the irregularity report deliberately contained false information or concealed the truth, the reporting person who is an employee may be held liable for disciplinary action specified in the provisions of the Labor Code. Such conduct may also be classified as a serious breach of basic employee duties and as such result in termination of the employment contract without notice.
2. In the case of a reporting person providing services or goods to Vitrintec Sp. z o.o. or employed on the basis of a civil law contract, the finding that a false irregularity report was made may result in the termination of that contract and the definitive termination of cooperation between the parties.
3. Regardless of the effects indicated above, a reporting person who deliberately makes a false report may be held liable for damages in the event of damage to Vitrintec Sp. z o.o. in connection with the false report.

GDPR information clause

- Pursuant to art. 13 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 (General Data Protection Regulation), hereinafter referred to as GDPR, we inform you that:
1. Personal data administrator: The administrator of the data collected and processed is Vitrintec Sp. z o.o., 23 Olszewskiego St. 25-663 Kielce, e-mail: [biuro@vitrintec.pl](mailto:biuro@vitrintec.pl);
2. Purpose of processing: Your personal data will be processed for purposes related to reporting irregularities, in accordance with art. 6 sec. 1 let. c GDPR.
3. Rights of data subjects: You have the right to request from the administrator access to your personal data, its rectification, deletion or restriction of processing, the right to object to processing and the right to lodge a complaint with the supervisory authority (President of the Personal Data Protection Office).
4. Retention period: Your personal data contained in the notification will be processed for a period of 10 years from the receipt of the notification.
5. Recipients of data: Your personal data may be disclosed by the Administrator to authorized entities if such a need arises in connection with the verification of the notification, in the manner specified by mandatory provisions of law.
6. Profiling: Your data will not be processed in an automated manner.
7. Voluntary provision of data: Providing personal data is voluntary.

## CONFIRMATION OF REPORTING IRREGULARITIES

Acting as the authorized representative for violations of law, I confirm receipt of the report of irregularities, which was made by ..... on ..... and concerns the irregularity consisting of .....  
.....  
.....

I declare that the reporting person has been granted/refused to be granted the status of a Whistleblower. The refusal to grant the reporting person the status of a whistleblower results from the following reasons: .....  
.....  
.....

.....  
signature of the person responsible for reporting



## REGISTER OF REPORTING IRREGULARITIES (TEMPLATE)

[illegible]



PROCEDURE  
FOR REPORTING IRREGULARITIES,  
TAKE FOLLOW-UP ACTIONS  
AND PROTECT PERSONS MAKING REPORTS  
IN VITRINTEC SP. Z O.O.

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