

INTERNAL REPORTING SYSTEM/WHISTLEBLOWING

The company Finbricks, s.r.o. is part of the Société Générale Group (hereinafter as the "Group"), which is committed to a higher level of transparency, a higher level of ethical standards of conduct and a broader dialogue within the framework of its Group Code of Conduct. For this purpose, Finbricks, s.r.o. has set up a possibility of submitting a notification ("whistleblowing").

Finbricks, s.r.o., with the registered seat at Václavské náměstí 796/42, 110 00 Prague 1 is not demanded to implement internal notification system or subject to the statutory duties imposed on certain subjects pursuant to the Act No. 171/2023 Coll., on the protection of whistleblowers ("Act on protection of whistleblowers"). However, notification system has been implemented in accordance with the highest standards of the Group and follows statutory requirements related to the internal notification system, protection against retaliation and rules for the notification processing and assessment.

METHOD OF NOTIFICATION

If you wish to report whistleblowing, you may do so by the following methods:

- By the message to the specific email address: whistleblowing@finbricks.com.
- In writing, forwarded to the address of the company registered seat. It is inevitable to indicate on the envelop there is whistleblowing notice inside to preserve confidentiality.
- By the phone call +420 777 343 515 during the working days 9:30 a.m. to 16:00 p.m. CES/CEST. The phone call is not recorded, hence it is necessary to indicate to the responsible person by the brief phone call notification the intention to deliver whistleblowing disclosure in this manner, so the responsible person may take down appropriately key aspects of the notification.
- Personally, in the company registered seat after setting up the meeting via phone call.
- Besides other possibilities referred to, you may also forward your notification to the Ministry of Justice of the Czech Republic (further information available at www.oznamovatel.justice.cz).

For an efficient and proper resolution of the notification by Finbricks, s.r.o. or the Group, please read the following instructions.

COULD YOU BE A WHISTLEBLOWER?

The whistleblower may be any employee, external or part-time collaborator and, within the scope of a duty of care, any service provider with whom an established commercial relationship is maintained (subcontractors or suppliers).

In order to benefit from the protective status of whistleblower, the person making the report must:

- Be a natural person and
- Act impartially and
- Act in good faith.

YOU HAVE A RIGHT TO REPORT

The right to report is a basic right afforded to everyone to express themselves when they believe that they have good reason to consider that an instruction they have received, an operation under investigation or, more generally, a particular situation does not appear to comply with the rules governing our Company's business conduct.

As such, you are able to report any situation of sufficient gravity, including the detection of a crime or offence, a violation of an international treaty, a violation of a law or regulation, or any serious threat to the public interest.

This system for collating reports makes it possible, on the one hand, to protect the person who – acting in good faith and in a non-abusive manner – made the report, and, on the other hand, to detect a serious situation in order to limit the Finbricks's exposure to the related risks.

YOU CAN EXERCISE YOUR RIGHT TO REPORT UNDER THE CONDITIONS PROVIDED FOR THIS PURPOSE

In order for a report to be eligible under this mechanism, specific legal conditions must be met that are both applicable to the whistleblower and the reported facts.

The whistleblower may report anonymously, although as a general matter the whistleblower should, if possible, identify himself/herself and the firm will protect his/her identity. In both cases:

Checks will be initiated to determine the veracity and seriousness of the reported facts. For this purpose, the factual elements must be sufficiently precise and corroborated, and may therefore require knowledge of the whistleblower's identity.

- Specific precautions will be taken in dealing with this report, such as a preliminary examination and the possible use of experts to establish the legal status and investigate the facts.

The strict confidentiality of information is guaranteed throughout the process, in accordance with applicable regulations. The right to 'blow the whistle' will have to be carried out in compliance with Group and local provisions, for example those relating to professional secrecy, the protection of personal data or location of data.

WHAT FACTS CAN BE REPORTED?

The reports covered by the whistleblower scheme cover, in particular:

- Crimes or misdemeanours (including corruption),
- Violation of an international treaty,
- Violation of a law or regulation (including international sanctions violations, bribery and corruption, money laundering or other financial crime-related matters...),
- Any serious threat to the public interest,
- Violation of human rights and fundamental freedoms, the health and safety of persons and the environment,
- Conduct or situation contrary to the Finbricks's code of conduct, resp. Group's.

Reports may not relate to information covered by national defence secrecy, medical confidentiality, lawyer-client privilege.

WHO RECEIVES THE REPORTS?

The use of this mechanism is not the only possible reporting channel.

The right to report of Finbricks collaborators can be exercised at several levels:

- Firstly, by using a direct or indirect reporting line or by reporting directly to the risk & compliance department manager.
- Secondly, if these methods of communication are not appropriate, by reporting to the Group

Compliance Director directly via the group reporting tool <https://report.whistleb.com/cs/societegenerale>, which is based on a secure platform guaranteeing the protection of personal data and strict confidentiality. Access to the whistleblowing report is on a need-to-know basis and is restricted to the Group Compliance Director, to authorized internal experts, and possibly mandated external experts. Confidentiality requirements also apply to external experts who may receive the report to provide guidance or conduct investigations.

In the company a member of the compliance and risk department who is an impartial person pursuant to the Act on protection of whistleblowers, shall receive whistleblowing notice and perform appropriate assessment.

YOU BENEFIT FROM SPECIFIC LEGAL PROTECTION

All reports will be treated securely, and the confidentiality of your identity will be ensured, both at an information system level and at organizational level.

In order to keep your identity confidential, the notification process is subject to the security policy.

If you are eligible for the status of whistleblower provided for by applicable law, you will be protected from any retaliation, discriminatory measures, sanctions or dismissal with regards to you personally.

WHAT RISKS COULD YOU BE EXPOSED TO?

If the above-mentioned legal conditions are not met, you will not, in accordance with the law, be able to benefit from the status of whistleblower or the appropriate protection regime. However, good faith reports will not result in any disciplinary action even if you do not fall within the legal meaning of whistle-blower under applicable law.

In addition, any report must be made in a responsible, non-defamatory and non-abusive manner. Should this not be the case, the author of the report is exposed to (i) penalties, potentially of a criminal nature, for false allegations or defamation, and (ii) potential disciplinary proceedings.