



NOTIFICATION AND TREATMENT RULES SUSPECTED IRREGULARITIES

AT R.POWER S.A. AND THE R.POWER GROUP

CONTENTS:

I. General provisions

II. Basic principles

III. Notification of irregularities

IV. Anonymous submissions or submissions on condition of anonymity

V. Role of the Compliance Officer

VI. Investigation

VII. Protection of whistleblowers

VIII. Protection of the persons concerned

IX. Monitoring and reporting

X. Personal data

XI. Final provisions

CHAPTER I GENERAL PROVISIONS

§ 1

1. This Whistleblower Policy for R.Power S.A. and the R.Power Group's operational and/or financial activities, hereinafter referred to as the "**Policy**", governs the manner in which violations of the law and/or the Company's procedures and ethical standards, including in particular the Work Regulations, the *R.Power Code of Ethics and Business Conduct*, relating to the Company's activities, *are reported*, received, investigated and reported.
2. The rules do not apply to private life and employee conflicts - if they are not directly related to the irregularities referred to above.
3. This Policy is the Company's current standard and is the necessary minimum policy related to the whistleblowing referred to above, either openly, anonymously or on condition of anonymity.
4. If an application is received in public, the investigation shall be conducted in accordance with Chapter II of the Rules.

§ 2

The following terms are used in these Rules to mean:

- a) **Compliance Officer** - an independent position within the Company's organisational structure responsible for managing the compliance function;
- b) **Irregularity** - any violation of the law or the Company's procedures and ethical standards resulting from an act or omission of an employee of the Company or a person cooperating with the Company as well as third parties - the Company's clients and customers;
- c) **Investigation** - actions taken by the relevant authorities of the Company in connection with a report of a suspected Irregularity, i.e. securing evidence, making copies and printouts of documents, conducting interviews, seizing items and searching the Company's premises.
- d) **Employee** - a person employed by the Company under a contract of employment, or who co-operates with the Company under a relationship other than a contract of employment.
- e) **Company** - R.Power S.A. or a company of the R.Power S.A. Group, as appropriate;
- f) **Ethical standards** - ethical standards arising from the Company's internal regulations;

CHAPTER I BASIC PRINCIPLES

§ 3

1. Employees are expected to be loyal, to comply with the terms and conditions of their employment contracts, mandate contracts or other legal relationships relating to their performance of activities for the Company and to perform their duties with due diligence



and care. This includes the obligation to report reasonable suspicions of observed irregularities committed by other Employees.

2. Given that the Company strives to create and foster a corporate culture defined by honesty and openness, all Employees have the opportunity to report observed Irregularities to their immediate supervisor.
3. If, in the opinion of the reporter, reporting the Irregularity to his/her immediate superior is not possible or has not produced the expected results, it is possible to make a report through all available means of communication, by letter, business e-mail to the superior's address or by telephone as well as during a personal interview and to the dedicated e- mail address for reports: **compliance@rpower.solar** .
4. The person filing a report, the person accepting the report and the persons conducting the investigation are obliged to observe the laws and internal regulations of the Company, taking into account these Rules.
5. The detailed procedure for accepted notifications, subject to the provisions of these Rules, shall be determined in each case by the recipient of the notification, taking into account the subject of the notification submitted.
6. If the likelihood of a Misconduct is confirmed, the persons who may be considered responsible for the Misconduct will be held disciplinarily liable by the Company. Disciplinary liability notwithstanding, where there is probable evidence that the Misconduct may be tortious, the Company may notify the relevant state authorities of the Misconduct.
7. To ensure anonymity, private devices should be used for reporting. Making a report using a service device may allow the identity of the reporter to be established. In the case of reports made through service devices, these reports will be handled confidentially.

CHAPTER III NOTIFICATION OF IRREGULARITIES

§ 4

Persons accepting reports and persons conducting the Investigation on behalf of the Company shall:

1. enable Employees who have a reasonable suspicion that Irregularities have occurred or may have occurred to report their suspicions;
2. ensure that the application received is dealt with in a fair and substantive manner;
3. to competently and objectively examine and clarify the applications received as soon as possible (without undue delay);
4. guarantee to persons reporting Irregularities in good faith that they will not suffer any negative consequences as a result;

§ 5

If the Whistleblower concerns a Compliance Officer , the Chairman of the Board of Directors will promptly designate an organisational unit of the Company to conduct an investigation.

§ 6

All reports of suspected Irregularities must be made in good faith, i.e. with an appropriate level of objectivity, and with the principles of comradeship and employee loyalty. It is unacceptable to use the procedures covered by this Policy for any other purpose - unfounded slander of individuals for Misconduct may be treated by the Company as a serious breach of employee or professional duty.

§ 7

1. In order to ensure the smooth and fair conduct of the Investigation, notifiers should include the following information in the notification, as far as possible:
 - a) identification data, i.e. name, position, organisational unit and official contact details of the notifier;
 - b) a brief description of the event giving rise to or likely to give rise to the Irregularity with an indication of the relevant facts such as: the place of the event, the organisational unit of the Company concerned, the participants in the event and the attendant circumstances;
 - c) an indication of whether the effects of the Irregularity have already materialised;
 - d) an indication of the circumstances under which the notifier became aware of the incident;
 - e) identification of persons involved in the incident or possible witnesses;
 - f) possible inclusion of additional information;
 - g) identification of persons, if any, contacted by the reporting person regarding the reported incident.
2. An investigation will also be carried out if a notification is submitted without the full information referred to in paragraph 1 above, provided that the extent of the information provided makes it possible to carry out the investigation.

CHAPTER IV ANONYMOUS SUBMISSIONS OR SUBMISSIONS ON CONDITION OF ANONYMITY

§ 8

1. The Company, with a view to ensuring a fair and conscientious investigation, recommends that submissions be made in public. Nonetheless, the Company allows reporting:
 - a) anonymously,
 - b) subject to anonymity by the reporting person.
2. Anonymity is ensured by the person accepting the report by not disclosing the reporting person's data to third parties. The reservation of anonymity may be subject to the limitations indicated in § 10 point 1 and § 14 point 4.
3. A person who chooses to make a submission anonymously or under the condition of anonymity may submit it in accordance with the provisions of § 3.3 above.
4. The procedure for the investigation of reports submitted anonymously or with the reservation of anonymity is carried out in accordance with the further provisions of the Rules, taking into account the provisions of § 4 and Chapter III.

CHAPTER V ROLA COMPLIANCE OFFICER

§ 9

The Compliance Officer is required to:



1. to receive reports on irregularities in the functioning of the Company;
2. to carry out an investigation of the notifications received;
3. collect information on notifications of irregularities;
4. reporting within the scope of Chapter IX of these Principles.
5. analyse, at least once a year, the adequacy and effectiveness of the whistleblowing system adopted.

CHAPTER VI INVESTIGATION

§ 10

As part of the Investigation, the Receiver and/or Investigator is obliged in particular to:

1. ensure the protection of the reporting person's personal data, in the absence of his/her consent to the disclosure of data (reservation of anonymity), ensuring the anonymity of reporting persons, except if the reporting person consents to the disclosure of his/her data or if this is absolutely required by the relevant legislation. The above does not release the reporting person from the obligation to provide an adequate explanation in relation to the irregularity he/she has reported,
2. verify the information obtained for its veracity and the likelihood of irregularity,
3. secure evidence, make copies and printouts of documents, conduct interviews, seize items and search the Company's premises in order to confirm or exclude the possibility of irregularities,
4. in the event of the probable occurrence of irregularities, to forward the information to the President of the Management Board in order to decide whether to initiate disciplinary proceedings as well as to notify external institutions and authorities,
5. safeguarding and respecting the rights of those affected by the notification,
6. in the event that the investigation does not confirm the irregularity, terminate the investigation and attach to the notification received an official note stating that there are no grounds for further action in the case, together with a description of the actions taken and the findings made. All documentation (including electronic documentation) pertaining to such report will be destroyed within 3 months from the date of completion of such investigation,
7. upon completion of the investigation, inform the notifier, upon request, of the manner in which the notification has been handled.

§ 11

1. Investigators shall act in accordance with the Company's ethical standards, in particular with regard to confidentiality, discretion, prudence and restraint. In the course of the investigation they are entitled to:
 - a) access to the premises and documentation necessary for the proper conduct of the proceedings,
 - b) interviewing employees and associates of the Company and taking statements from them,
 - c) access to information systems containing data relevant to the proceedings,
 - d) to inspect the personnel files of the Company's employees.

2. Each Employee is required to cooperate to the extent necessary to clarify the matter under Investigation.
3. If, in the course of the Investigation, an Employee is found to have acted in breach of the terms and conditions of his/her employment contracts, mandate contracts, other legal relationships related to their performance for the Company, the Company's anti-bribery regulations or other actions that expose the Company to damage, including, above all, those of a criminal nature, the Personnel Manager must also be informed immediately.
4. In justified cases, such as the possibility of a conflict of interest or compromising the objectivity of the investigator, the case may be forwarded to an organisational unit of the Company other than the investigator in charge of the investigation with regard to the subject of the report for further consideration, but with the exclusion of information concerning the identity of the reporter.

CHAPTER VII PROTECTION OF WHISTLEBLOWERS

§ 12

1. The Company warrants to the whistleblower that he or she will not suffer adverse consequences, including, but not limited to, retaliation, discrimination or other unfair treatment, from his or her superiors as a result of disclosing in good faith in accordance with this Policy information about the Whistleblowing. In addition, the Company will take all necessary measures to ensure that the whistleblower is not subjected to such consequences by Employees and Associates of the Company.
2. The identity of the reporting person is covered by confidentiality, subject to the exceptions set out in § 10 para. 1, § 14 para. 4.
3. In the event of any of the events referred to in paragraph 1 above, the Whistleblower shall notify the Employee Manager directly in order to obtain appropriate protection from the Company.
4. Any internal rules prohibiting an employee from disclosing information about the Irregularity are not acceptable.
5. Any action by Employees or Associates of the Company involving acts of reprisal, discrimination or other unfair treatment of the person reporting the Misconduct will be treated by the Company as a serious breach of employee duties and work discipline.

CHAPTER VIII PROTECTION OF REPORTED PERSONS

§ 13

1. The Company guarantees that the rights of the reported person will be preserved at every stage of the investigation.
2. The person to whom the whistleblower relates shall be informed immediately in writing by the Compliance Officer of the receipt of the report, subject to the provisions of § 14. If it is not possible to inform such whistleblower of the receipt of the report, the Compliance Officer shall make an appropriate note of the circumstances preventing such notification.

3. The reported person has the right to request full information from the Compliance Officer about:
 - a) the organisational unit responsible for the investigation,
 - b) the subject matter of the case,
 - c) the persons to whom the notification was forwarded,
 - d) persons to whom information from the investigation will be submitted,as well as the right to make his or her own corrections and additions where the information about himself or herself is incorrect or incomplete.
4. The person concerned should be informed by the Compliance Officer after the investigation of the outcome of the investigation, as well as of the entities and persons who will receive the information and the outcome of the investigation.

§ 14

1. If, in the opinion of the Compliance Officer, there is a risk that the communication referred to in § 13.2 will prevent an effective investigation or the gathering of the necessary evidence, it may be delayed until such a risk has ceased to exist. In any such case, the decision to delay the provision of information will be communicated to the CEO. The exercise of the other above-mentioned rights may be postponed in the interest of the investigation being conducted or may be limited by the need to ensure the protection of the rights of other persons subject to the Investigation, with the proviso that corrections or additions concerning personal data must be taken into account without undue delay.
2. Decisions on the above limitation of rights are taken on a case-by-case basis and taking into account the interests of all parties.
3. In each case and at each stage of the investigation, for the good of the case, the confidentiality of documents and activities must be maintained and the anonymity of whistleblowers guaranteed in accordance with the provisions of these Rules.

CHAPTER IX MONITORING AND REPORTING

§ 15

1. The Compliance Officer shall, at least once a year, submit information to the Company's Board of Directors on:
 - a. the number of reports of irregularities received, specifying the number of reports of irregularities submitted anonymously or with reservation of anonymity and the results of the investigations carried out,
 - b. the degree of implementation and operation of the Principles with regard to the protection of persons reporting anonymously or with reservation of anonymity perceived irregularities.
2. The Compliance Officer is responsible for monitoring the operation of these Principles within the Company.
3. The Board is responsible for the implementation and execution of the Principles by all business units of the Company.

CHAPTER X PERSONAL DATA



§ 16

1. R.Power S.A., with its registered office in Warsaw, ul. Puławska 2, is the controller of the personal data processed for the purpose of investigating incoming notifications of Irregularities in accordance with the provisions of these Rules.
2. In the event that it is necessary to transfer personal data to courts of law or law enforcement agencies, these entities will be the recipients.
3. Notifiers, as well as those affected, have the right to access and correct their data.