Whistleblower protection policy

Objective

This policy sets out to inform reporting persons of the options available to them when reporting suspected illegal activity, which relates to **PRECIOSA ORNELA, a.s.** operations. This policy contains information about the types of suspicions that should be reported, the rights of reporting persons, procedures for investigating reports and the notifying of reporting persons of the outcomes of such investigations.

Contents

1. Introduction 2

2. Who can file a report? 2

3. What should be reported? 3

4. Filing a report 3

5. Right to protection of reporting persons 4

6. Protection of persons affected by report 5

7. Process of report evaluation 5

8. Conclusion of report evaluation 6

Whistleblower protection policy

1. Introduction

The term "whistleblowing" is used to describe a disclosure by an employee or another person of suspected wrongdoing within an organisation. It is essential that reporting persons, or whistleblowers, feel safe and report their suspicions in early stages of the suspect activity.

PRECIOSA ORNELA, a.s. supports its employees and other persons in reporting matters that are deemed to contravene the rules and/or values upheld by PRECIOSA ORNELA, a.s.. By implementing its Ethics Line, PRECIOSA ORNELA, a.s. makes available various reporting channels that ensure the protection of the reporting person's identity. Where the identity of the reporting person is known, it is never disclosed without the explicit consent of the reporting person. Similarly, no other information is disclosed that could be used to infer a reporting person's identity (unless required by law).

Timely reporting of suspected wrongdoings is beneficial as it facilitates the speedy investigation of the reported matter and reduces the chances of any negative impacts.

2. Who can file a report?

A report can be filed by any natural person who performs work or any other similar expert activity based on an employment relationship, voluntary activities or expert work experience or internships for PRECIOSA ORNELA, a.s., as well as any individuals applying for said positions or any other similar activities (all of these individuals are both hereafter and formerly simply referred to as "employees"). These individuals include:

- employees of PRECIOSA ORNELA, a.s. who are in employment relations, individuals performing work for PRECIOSA ORNELA, a.s. outside employment relations on the basis of a work agreement or interns active within the framework of PRECIOSA ORNELA, a.s. (and those applying for said activities);

PRECIOSA ORNELA, a.s. hereby excludes the option of reports being filed using its internal reporting system by those individuals who are not engaged in any work on the basis of an employment relationship, voluntary activities or expert work experience or internships for PRECIOSA ORNELA, a.s. (and who are not applying for said work or any other similar activities).

Persons whose legal relationship with PRECIOSA ORNELA, a.s. is yet to commence shall be subject to this policy only to the extent to which the reported information was obtained as part of pre-relationship negotiations, e. g. during the recruitment and selection of potential employees.

Whistleblower protection policy

3. What should be reported?

The Ethics Line can be used to report suspicions especially of the following types of wrongdoing:

- criminal offences (including theft and fraud) or misdemeanours, for which the law stipulates a fine with an upper limit of at least 100,000 CZK
- breaches of the legal regulations in the areas of:
    - privacy and personal data protection, network security and information systems;
    - corporate income tax;
    - environmental protection;
    - occupational health and safety and other statutorily designated areas

This policy is not concerned with grievances related to employment and/or relationships in the workplace. Solutions to work-related matters or any other issues not covered by this policy fall under the auspices of the Code of Ethics for the Companies in the Preciosa Group and can be reported using the email address eticky.kodex@preciosa.com. This policy also does not apply to any service-related complaints or complaints about unsatisfactory quality.

Reporting persons must have reasonable grounds for believing that the matter to be reported is concerned with one or more of the areas covered by this policy. It is possible to report past, current or likely future matters. There is no requirement for definitive supporting evidence to be included with the report. Disclosures need only be made in good faith given the circumstances at the time of the disclosure.

If there is doubt as to whether a suspicion should be reported, it is advisable to discuss the matter with a superior or another person in a managing position who can be trusted and is not involved in the matter in any way. It is important not to share any information about possible suspicions with anyone involved in the matter or any third party other than the person from whom confidential advice is sought
Anyone reporting a matter falling outside the scope of whistleblower protection legislation will be notified of the fact without undue delay.

4. Filing a report

It is recommended that all relevant suspicions be reported using the Ethics Line in the manner described below. This approach ensures a timely response and investigation.

Whistleblower protection policy

It is best to use the Ethics Line portal for the reporting process. The Ethics Line is available on this link: ***https://ethicshotline.eu/cs/home/?client=28712226***

The acceptance, administration and impartial investigation of the reports is conducted by Mgr. Michal Rameš, a cooperating solicitor acting within the framework of the companies of the PRECIOSA Group, who has been authorised by PRECIOSA ORNELA, a. s. to act as the "competent person" as per whistleblower protection legislation. Additional information is available on the Ethics Line portal https://ethicshotline.eu/cs/about/.

When filing a report using the Ethics Line, reporting persons will be asked to specify in particular the following:

- Relationship to PRECIOSA ORNELA, a. s. (employee, intern, etc.),
- description of the reported matter including specification of time and place of occurrence,
- names of persons who may have witnessed the matter or may possess additional information related to the reported matter (any of the named persons may be contacted during the investigation stage),
- any other information and evidence that may be of use in the investigation of the report.

It is also possible to provide name and contact information. Such information may speed up the investigation considerably, but its inclusion is voluntary. If a report is to be made by other means instead of the Ethics Line portal, the reporting person will be asked to provide at least the information specified above.

Reports may also be filed by telephone on the following number **+420 488 115 385** between 9:00 and 16:00 **on workdays** according to the Czech calendar. Reports can also be filed by email to the address: ***whistleblowing@preciosa-ornela.com***

In addition to the aforementioned options, it is also possible to file reports using the portal of the Ministry of Justice of the Czech Republic accessible at https://oznamovatel.justice.cz/.

5. Right to protection of reporting persons

It is understandable that potential reporting persons may be apprehensive about reporting their suspicions and possible consequences befalling them. PRECIOSA ORNELA, a.s. has developed this policy to implement a framework which ensures that PRECIOSA ORNELA, a. s. employees and third

parties are listened to and can share their justified suspicions of wrongdoing without fear of retaliation. PRECIOSA ORNELA, a. s. thus ensures the protection of persons reporting their suspicions in good faith even if the suspicions subsequently prove to be unjustified. Reports made with the intention to provide knowingly false information and damage PRECIOSA ORNELA, a. s. do not enjoy such protections and may be penalised in compliance with whistleblower protection legislation. Reporting persons may decide to file their reports anonymously. Where the reporting person shares their identity, PRECIOSA ORNELA, a. s. will not disclose any personal information without the explicit consent of the reporting person to any persons other than the competent person authorised to investigate reports. The same applies to any other information from which the identity of reporting persons could be inferred (unless required by law, such as in connection with investigation by law enforcement authorities or as part of judicial proceedings).

6. Protection of persons affected by report

Persons affected by the investigation of a report are entitled to fair treatment during the course of the investigation. This includes the unbiased and objective assessment of relevant facts, the prohibition of discrimination and the protection of personal data as stipulated by applicable legal regulations.

7. Process of report evaluation

The receipt of a report will be confirmed by the competent person within seven days. The competent person will also notify the designated persons within PRECIOSA ORNELA, a. s. about the receipt of a report, together with information regarding the nature of the report.

Next, the competent person evaluates whether a breach was committed as specified by whistleblower protection legislation and/or associated national legislation for the purposes of the subsequent confirming or disproving of the reported suspicion.

The competent person is not authorised to share any specific information with the reporting person regarding the course of the investigation. Where possible, the reporting person will be informed as to whether the report is to be investigated or is subject to an ongoing or concluded investigation.

The competent person may use a system of confidential communication with the reporting person to obtain additional information as necessary. BDO may also request a meeting with the reporting person as an opportunity for the latter to explain their suspicions in detail and provide any available evidence. The reporting person is not obliged to agree to such a meeting.

The competent person may also request cooperation from any person to whom the report is related and/or other PRECIOSA ORNELA, a. s. employees who may assist in the investigation. Any information so obtained remains confidential. Any notes created will form part of the file maintained by competent persons during the investigation.

Information regarding received reports will be retained for at least five years from the date of receipt.

8. Conclusion of report evaluation

Based on the information acquired, the competent person determines whether an evaluated report is justified. The conclusions of the evaluation will be described and included in the file. Anonymised conclusions will be submitted to designated persons within PRECIOSA ORNELA, a. s. along with any recommendations for the rectification of identified shortcomings and/or mitigation of identified risks.

The reporting person will be notified of the conclusion regarding the justification of their report within 30 days from the receipt of the report. This period may be extended in complicated cases by up to 30 days, no more than twice. The reporting person will be notified of any extension of the notification period.

Where measures are introduced as a result of the report evaluation with the aim of rectifying identified shortcomings or mitigating identified risks, the competent person will inform the reporting person of the fact. Neither the measures introduced nor the information provided may encroach and/or jeopardise any interest protected by law, including objectives of criminal proceedings, misdemeanour proceedings or any other proceedings regarding an activity that bears the characteristics of a misdemeanour.

Any other details pertaining to the process of filing reports have been designated in the company's internal "Whistleblowing – internal rules" document.