

WHISTLEBLOWING POLICY

Version 2.0

Date: February 2025

1. POLICY STATEMENT AND OBJECTIVE

- 1.1 Creditinfo is committed to conducting business on a daily basis with fairness, integrity and respect for the law and our values. In spite of this commitment, you may one day observe conduct that seems to violate the law, our Creditinfo Code of Conduct, and/or our Compliance Policies. If you observe or suspect such misconduct, you are encouraged to speak up and blow the whistle. By doing so, you give Creditinfo the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust. Speaking up is encouraged and employees who speak up are protected. You will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for speaking up. After all: whistleblowing is essential for us to sustain our reputation, success and ability to operate – both now and in the future.
- 1.2 Creditinfo implemented this Whistleblowing Policy (“**Policy**”) to set out rules and provide information on reports made under an internal reporting system that applies to all companies of Creditinfo Group (“**Creditinfo Group**”) for any complaints, comments, breaches of law and policies of Creditinfo Group – so called “**Complaint reporting system**”.
- 1.3 A separate policy applies to the internal reporting system that applies to Creditinfo CEE a.s., ID No.: 27600297, with its registered office at Rohanské nábřeží 670/19, Karlín, 186 00 Prague 8, Czech Republic (“**Creditinfo CEE**”), in accordance with Act No. 171/2023 Coll., on Whistle-blower Protection, and separate policies may apply and build on this Policy at a local level in Creditinfo offices globally. This Policy should be read in conjunction with any other compliance policies and procedures applicable in your local Creditinfo office.

COMPLAINT REPORTING SYSTEM (ALL CREDITINFO GROUP COMPANIES)

This Policy is applicable to Complaint reporting system which may be used by the whistleblower defined below in the whole Creditinfo Group. If employees want to request a comprehensive list of the Compliance Policies, they may request it via e-mail at compliance@creditinfo.com.

The Creditinfo Group truly values the help of employees who identify and speak up about potential concerns that need to be addressed. Speaking up is encouraged and employees who speak up are protected.

1. WHAT CAN BE REPORTED?

- 1.1 **Scope of reporting.** Complaint reporting system can be used to raise concerns about suspected (in good faith) misconduct within Creditinfo Group, that is:
 - 1.1.1 fraud;
 - 1.1.2 discrimination or harassment;
 - 1.1.3 violations of competition laws and rules;
 - 1.1.4 inadequate financial or non-financial recordkeeping;
 - 1.1.5 conflicts of interest;
 - 1.1.6 bribery;
 - 1.1.7 environmental, health and safety issues;

- 1.1.8 improper use of company resources;
 - 1.1.9 insider trading;
 - 1.1.10 disclosure of confidential information;
 - 1.1.11 violations of policies of the Creditinfo Group on gifts, entertainment and hospitality;
 - 1.1.12 any other violation of policies or Compliance Policies of the Creditinfo Group.
- 1.2 **Reminder.** If there is an event presenting an immediate threat to life or property, there is personal dispute, employment terms issue, it should be dealt by local authorities or internally by representatives in each company within Creditinfo Group.
- 2. WHO CAN REPORT?**
- 2.1 The following persons who are related to Creditinfo Group (including Czech company Creditinfo CEE a.s.) can report through the Complaint reporting system:
- 2.1.1 everyone working for or on behalf of a Creditinfo Group company (especially employees);
 - 2.1.2 any party with whom the Creditinfo Group has or has had some type of business relationship (business partners, suppliers, shareholders, agents, distributors, representatives and customers).
- 3. REPORTING CHANNELS FOR COMPLAINTS**
- 3.1 **Reporting channels.** All persons stipulated in Section 2.1. of the Policy may report any breach stipulated in Section 1.1 of the Policy via these reporting channels:
- 3.1.1 **Via NNTB** (www.nntb.cz) platform that is used by the Creditinfo Group for the purpose of receiving **anonymous written and oral reports**. The URL link for this type of reports is available here: <https://nntb.cz/c/ebo09ebv>.
 - 3.1.2 **Via managers/supervisors** – employees are expected to report any concerns about suspected misconduct within the Creditinfo Group and the first person shall be manager/supervisor.
 - 3.1.3 **Via compliance e-mail** – it is also possible to send complaint or any other concern via e-mail compliance@creditinfo.com.
- 3.2 **What should be provided.** When filing a report through the Complaint reporting system, the reporting person shall provide as much detailed information as they have to enable the Creditinfo Group to assess and investigate concerns (without such information, the Creditinfo Group may not assess the complaint), such as:
- 3.2.1 background, history and reasons for report;
 - 3.2.2 names, dates, places and other relevant information;
 - 3.2.3 documents that may support report.
- 4. FOLLOW-UP PROCEDURES**

- 4.1 **Way of handling.** All reports, however communicated, or to whomever made at the Creditinfo Group, are treated seriously, with strict confidentiality and be immediately acted upon.
- 4.2 **Designated person.** The competent person designated to diligent follow-up and handling the reports is the local Compliance Officer or in its absence (or in case of escalation), the General Counsel of Creditinfo Group. Access to the reports may also have external competent person that helps Creditinfo with maintenance of NNTB.
- 4.3 **Time range.** Receipt of the report is acknowledged by the Creditinfo Group to the reporting person within 5 to 7 business days of its receipt with an estimate of how long it will take to handle and assess concern. The Creditinfo Group will make every effort to investigate and solve report within 1 to 3 months and inform reporting person about overall findings.
- 4.4 **Escalation of actions.** If the reported matter is considered serious enough to require escalation, the designated person takes appropriate further action, including potentially informing external legal counsel and/or relevant third parties and authorities.
- 4.5 **Informing the reporting person.** The Creditinfo Group provides feedback to the reporting person within 1 to 3 months of acknowledgement of receipt of the report, including information on any action envisaged or taken as follow-up and the reasons for taking that action.

Contact Information

Group Compliance Department

compliance@creditinfo.com

Group Executive team

ci.group.directors@creditinfo.com