



Annex no. 1 to the Resolution of the Management Board of CVI No. 39/2024 of 25 September 2024

**PROCEDURE FOR REPORTING VIOLATIONS  
OF THE LAW AND THE ETHICAL STANDARDS  
AND PROCEDURES APPLICABLE AT CVI DOM  
MAKLEPSKI SP. Z O.O.**

<b>Document version</b>	<b>7</b>
Introductory act (no., date of resolution)	Resolution of the Management Board of CVI No. 23/2017 of 10 May 2017
Effective date	10 July 2017
Amending act (no., date of resolution)	Resolution of the Management Board of CVI No. 6/2019 of 10 January 2019
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Objective scope of amendments	Amendment to the Procedure, adoption of a uniform text. Amendment to the content of par. 1, par. 3 item 5, par. 7 item 1 of the Procedure
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Effective date	25 September 2024
Objective scope of amendments	Amendment to the Procedure, adoption of a uniform text.
Amending act (no., date of resolution)	Adaptation to the requirements of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024 item 928)
Related documents	Organisational Regulations at CVI Dom Maklerski sp. z o.o., Regulations on preventing money laundering and financing of terrorism at CVI Dom Maklerski sp. z o.o.



## I. GENERAL PROVISIONS

### § 1

1. This Procedure for reporting violations of the law and the ethical standards and procedures applicable at CVI DOM Maklerski sp. z o.o. specifies:
  - a) the rules and the course of accepting external Reports concerning information on violations of the law or the ethical standards and procedures applicable at CVI Dom Maklerski sp. z o.o.;
  - b) protection of persons submitting Violation Reports against any Retaliatory Measures;
  - c) and the principles of taking follow-up actions in connection with such Reports.
2. Based on provisions of the Act of 14 June 2024 on protection of whistleblowers, this Procedure serves simultaneously as:
  - a) a procedure for anonymous reporting to the appointed member of the management board, and in special cases - to the supervisory board, of violations of the law and the ethical standards and procedures applicable at CVI Dom Maklerski sp. z o.o., within the meaning of the Act of 29 July 2005 on trading in financial instruments and the Ordinance of the Minister of Finance of 24 September 2024 on detailed technical and organizational conditions for investment companies, state banks conducting brokerage activities, banks referred to in art. 70 section 2 of the Act on trading in financial instruments, and custodian banks;
  - b) an internal procedure for anonymous reporting by employees or other persons performing activities for the benefit of the obliged institution, of actual or potential violations of regulations on prevention of money laundering and financing of terrorism, within the meaning of the Act of 1 March 2018 on prevention of money laundering and financing of terrorism;
  - c) an internal procedure for reporting violations of the law and for taking follow-up actions within the meaning of the Act of 14 June 2024 on protection of whistleblowers.
3. The ethical standards and procedures applicable at CVI Dom Maklerski sp. z o.o., referred to in § 1 section 1 letter a) and § 1 section 2 letter a) above, shall be understood as internal acts, including codes of ethics, regulations, instructions, systems and solutions adopted at CVI Dom Maklerski sp. z o.o.
4. The Management Board of CVI DM is responsible for the adequacy and effectiveness of the Procedure.

## II. DEFINITIONS

### § 2

Whenever the Procedure refers to:

1. **CVI DM, Company** – it shall be understood as CVI Dom Maklerski sp. z o.o. with its registered office in Warsaw (00-844), Plac Europejski 2, bud. C, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the capital city of Warsaw in Warsaw, 12th Commercial Division of the National Court Register under KRS no.: 0000424707, REGON [statistical no.]: 242949739, NIP [tax ID no.]: 9542738238;



2. **Member of the Management Board** - it shall be understood as a member of the Management Board of CVI DM, who within the scope of the internal division of competences, is responsible for the current functioning of the Procedure and to whom Violations are reported;
3. **Retaliatory Measure** - it shall be understood as a direct or indirect action or omission in the work-related context, caused by a report or a public Disclosure, which violates or could violate the Whistleblower's rights or causes or could cause unjustified harm to the Whistleblower, including groundless initiation of proceedings against the Whistleblower, among others those referred to in art. 12 of the Act on whistleblowers and art. 53a of the AML Act;
4. **Work-related Context** - it shall be understood as past, present or future actions related to the performance of work based on an employment relationship or other legal relationship which is the basis for the performance of work or services or a function at CVI DM or for the benefit of CV DM, within the framework of which information about a Violation has been received and there is a possibility of experiencing Retaliatory Measures;
5. **Whistleblower** - it shall be understood as a natural person reporting or publicly disclosing information about a Violation obtained in a Work-related Context, including prior to establishment of an employment relationship or other legal relationship which is the basis for the performance of work or services or a function at CVI DM or for the benefit of CV DM, or after their cessation, including:
  - a) a current or former employee,
  - b) a temporary employee,
  - c) a person providing work on a basis other than employment relationship, including based on a civil law contract,
  - d) an entrepreneur,
  - e) a proxy,
  - f) a shareholder or a partner,
  - g) a member of a body of a legal person or an organizational unit without legal personality,
  - h) a person performing work under the supervision and direction of a contractor, subcontractor or supplier,
  - i) an intern,
  - j) a volunteer,
  - k) a trainee.
6. **Employee** - it shall be understood as an employee within the meaning of the Organisational Regulations at CVI DM;
7. **Sygnanet Platform, Platform** - it shall be understood as the Sygnanet platform ([https://app.sygnanet.pl/cvi\\_zgloszenia/pl](https://app.sygnanet.pl/cvi_zgloszenia/pl)), which is a special, independent and autonomous communication channel dedicated to CVI DM, used to provide to CVI DM information on identified Violations, using the Intranet, ensuring securing of a Report, including its anonymity (if applicable) and confidentiality;
8. **Violation** - it shall be understood as an action or omission which is unlawful or aimed at circumvention of the law, concerning:
  - a) corruption,
  - b) public procurement,
  - c) services, products and financial markets,
  - d) prevention of money laundering and financing of terrorism,
  - e) safety of products and their conformity with the requirements,
  - f) transport safety,
  - g) environment protection,
  - h) radiation protection and nuclear safety,



- i) safety of food and feed,
  - j) animal health and welfare,
  - k) public health,
  - l) consumer protection,
  - m) protection of privacy and personal data,
  - n) security of the network and ICT systems,
  - o) financial interests of the State Treasury of the Republic of Poland, a local government unit and the European Union,
  - p) internal market of the European Union, including rules of competition, state aid and taxation of legal persons under the public law,
  - q) constitutional freedoms and the human and civil rights - in the relations of an individual with public authorities and not related to the areas indicated in items a) – p),
  - r) Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC,
  - s) Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012,
  - t) ethical standards and procedures applicable at CVI DM.
9. **Procedure** - it shall be understood as this Procedure for reporting violations of the law and the ethical standards and procedures applicable at CVI DOM Maklerski sp. z o.o.;
10. **Supervisory Board** - it shall be understood as any member/all members of the Supervisory Board of CVI DM;
11. **AML Act** - it shall be understood as the Act of 1 March 2018 on prevention of money laundering and financing of terrorism;
12. **Act on Whistleblowers** - it shall be understood as the Act of 14 June 2024 on protection of whistleblowers;
13. **Public Disclosure** - it shall be understood as making information on violation of the law available to the public;
14. **Internal Report** - it shall be understood as oral or written communication of information about a Violation to CVI DM;
15. **External Report** - it shall be understood as oral or written communication of information about a Violation to the ombudsman or a public authority;
16. **Report** - it shall be understood as an oral or a written Internal Report or External Report;
17. **Report Processing Team, Team** - it shall be understood as persons authorized by a Member of the Management Board or the Supervisory Board, responsible for verification of a Violation Report and for taking or coordinating of follow-up actions, including conducting of preliminary and investigation proceedings.
18. **Management Board of CVI DM** - it shall be understood as any member/all members of the Management Board of CVI DM.

### III. RULES AND THE COURSE OF MAKING AND ACCEPTING REPORTS

#### § 3

- 1. A Whistleblower can make an Internal Report or an External Report.
- 2. Exclusions concerning the possibility of making and processing of Reports are specified in art. 5 section 1-3 of the Act on Whistleblowers.



## § 4 INTERNAL REPORTS

1. An internal report is received by CVI DM.
2. An internal report can be made orally or in writing.
3. An internal report can be made at a direct meeting organized at the Whistleblower's request, within 14 days of receiving such a request. A request should be submitted in writing to the Member of the Management Board of CVI DM or the Member of the Supervisory Board of CVI DM - if the Report concerns a Violation committed by the Management Board.
4. The receipt of an oral Report, at the meeting referred to in § 4 section 3, shall be documented - with the prior consent of the Whistleblower - in the form of minutes of the meeting. The Whistleblower has the right to verify the contents of the meeting and to possibly make corrections before signing the minutes.
5. An oral report should include in particular:
  - a) particulars of the Whistleblower (name and surname) and their contact data (correspondence address, e-mail address or another channel allowing to contact the Whistleblower);
  - b) date and place of making the report;
  - c) information allowing to determine that the knowledge of the Violation has been obtained in a Work-related Context or in connection with the performance of other legal or actual activities for the benefit of CVI DM;
  - d) particulars of the person/persons who committed the Violation which is the subject of the Report (e.g. name, surname, position);
  - e) description of the Violation together with the circumstances of its occurrence and the dates and place of its commitment;
  - f) description of the actual and potential consequences of the Violation;
  - g) possible actions taken by the Whistleblower to eliminate the Violation or its consequences (e.g. informing the supervisors), if any;
  - h) evidence collected by the Whistleblower to confirm the factual status, e.g. documents, witnesses, etc.
6. A written report can be made:
  - a) electronically using the Sygnanet platform by completing the form available at: [https://app.sygnanet.pl/cvi\\_zgloszenia/pl](https://app.sygnanet.pl/cvi_zgloszenia/pl);
  - b) in writing, by post:
    - i) directly to the Member of the Management Board of CVI DM at the address of the registered office of the Company, that is CVI Dom Maklerski sp. z o.o., Plac Europejski 2, 00-844 Warszawa, with the note "CONFIDENTIAL - VIOLATION REPORT, PERSONALLY TO THE ADDRESSEE";
    - ii) directly to the Member of the Supervisory Board of CVI DM ( if the Report concerns a Violation committed by the Management Board of CVI DM) to the address of the registered office of the Company, that is CVI Dom Maklerski sp. z o.o., Plac Europejski 2, 00-844 Warszawa, with the note "CONFIDENTIAL - VIOLATION REPORT, PERSONALLY TO THE ADDRESSEE".
7. The Whistleblower has the right to make an internal Report openly or anonymously.



8. CVI DM hereby informs that making of an internal Report anonymously may impede a diligent and effective investigation proceedings, introduction of adequate follow-up actions as well as proper protection against Retaliatory Measures towards the Whistleblower.
9. Anonymous internal Reports shall be considered with equal diligence and seriousness as named Reports. If the identity of the Whistleblower is disclosed or discovered within the framework of the investigation proceedings, CVI DM shall ensure confidentiality of the Whistleblower's identity and grant them proper protection.
10. A written Report should include in particular:
  - a) particulars of the Whistleblower (name and surname) and their contact data (correspondence address, e-mail address or another channel allowing to contact the Informant) - with the exception of anonymous Reports;
  - b) date and place of making the report - with the exception of anonymous Reports;
  - c) information allowing to determine that the knowledge of the Violation has been obtained in a Work-related Context or in connection with the performance of other legal or actual activities for the benefit of CVI DM - in the case of anonymous Reports only such information which does not allow to identify the Whistleblower;
  - d) particulars of the person/persons who committed the Violation which is the subject of the Report (e.g. name, surname, position);
  - e) description of the Violation together with the circumstances of its occurrence and the dates and place of its commitment;
  - f) description of the actual and potential consequences of the Violation;
  - g) possible actions taken by the Whistleblower to eliminate the Violation or its consequences (e.g. informing the supervisors), if any - in the case of anonymous Reports only such information which does not allow to identify the Whistleblower;
  - h) evidence collected by the Whistleblower to confirm the factual status, e.g. documents, witnesses, etc.
11. In the case of a written report provided to CVI DM in the manner specified in § 4 section 6, CVI DM recommends signing it and providing an address for contact (by post or e-mail) for the purpose of conducting diligent, effective proceedings and confirming the receipt of the report to the Whistleblower, as well as informing them about further steps and completion of the proceedings.
12. If the Whistleblower makes an internal Report using other channels than those indicated in the Procedure, provisions of the Procedure shall apply respectively.

#### **§ 4**

#### **EXTERNAL REPORTS**

1. A Whistleblower can make an external Report without a prior internal Report.
2. An external report is received by the Ombudsman or a public authority. Detailed information on how to submit external Reports is available on the website of the Public Information Bulletin of the Ombudsman (<https://bip.brpo.gov.pl/pl>) or the given public authority.

#### **§ 5**

#### **SYGNANET PLATFORM**

1. The Sygnanet Platform allows Whistleblowers to make Reports anonymously (without providing the Whistleblower's personal data).



2. The Sygnanet Platform does not register any Whistleblower's data which would allow to determine their identity or location, unless the Whistleblower themselves provides such data in the contents of the Report.
3. Whistleblowers can make Reports through the Platform free of charge.
4. As part of a Report, the Whistleblower may create a text message and enclose attachments to it.
5. The Whistleblower's report is encrypted on their computer and sent to the Platform's server.
6. The Platform assigns an individual ID no. and an access password to the Report.
7. CVI DM receives a notification from the Platform about a new Report at the address [compliance@cvi.pl](mailto:compliance@cvi.pl).
8. After sending a Report, the Whistleblower receives a document confirming the sending of the Report and the receipt of the Report by CVI DM.
9. A CVI DM's reply is linked to the same individual ID no. assigned to the Report.
10. The Whistleblower may read the message from CVI DM on the website [https://app.sygnanet.pl/cvi\\_zgloszenia/pl/inbox](https://app.sygnanet.pl/cvi_zgloszenia/pl/inbox) after entering the individual ID no. and the password assigned to the Report.
11. The Whistleblower must independently check whether a reply to the Report has been posted on the website specified in section 9 above.
12. A report is subject to anonymisation - all data which could be used to determine the identity or location of the Whistleblower are permanently removed from the Sygnanet Platform server, and CVI DM has access only to the anonymised Report, without any personal data of the Whistleblower (unless the Whistleblower provides such data in the contents of the Report or the enclosed documents).
13. The Sygnanet Platform ensures integrity of the data concerning the reported Violations by preventing removal of the Report or correspondence concerning the Report.
14. A Report is encrypted and decrypted using asymmetric encryption on the computer of the Whistleblower or the person designated to process Reports at CVI DM. It is not possible for the Platform provider to decrypt reports stored on the Platform server.
15. Information on encryption keys and their handling policy can be found in the Privacy Policy made available by the Platform provider on the website: <https://sygnanet.pl/pl/polityka-prywatnosci>.
16. The Whistleblower is obliged to ensure confidentiality of their access data to the Platform, that is the password and the individual ID no. of the report.
17. The Whistleblower is obliged not to submit unlawful content through the Platform.
18. The Platform is made available through the Internet, therefore, it is subject to all restrictions related to the use of that network.
19. The Platform provider does not ensure full correctness of operation of the Platform in all available versions of the operating systems and Internet browsers. To use the Platform, at least the following technical requirements must be met: a) having Windows XP operating system or a later one and b) operation of Explorer, Chrome, Safari, Operat or FireFox Internet browser.
20. The access service to the Sygnanet Platform is regulated by the regulations available at: <https://sygnanet.pl/pl/regulations>.
21. Amendments to the regulations referred to in section 19 above enter into force on the day of its publication on the Platform in a manner allowing Whistleblowers to familiarize themselves with the amendments. By accepting the regulations, the Whistleblower grants consent to unilateral introduction of amendments to the regulations by the Platform provider.

#### IV PROTECTION OF WHISTLEBLOWERS



## § 6

1. Protection provided for in the Procedure is granted to the Whistleblower and persons related to them, legal persons or organizational units supporting the Whistleblower or related to them, from the moment of making the Report, provided that there are justified grounds to consider the information being the subject of the internal Report to be true at the moment of making the Report and constituting information on a violation of the law or the internal regulations and ethical standards applicable at CVI DM. Such protection does not apply to a person who makes an internal Report knowing that such a violation has not occurred (i.e. in bad faith).
2. Personal data of the Whistleblower allowing to identify them shall not be disclosed to unauthorized persons unless the Whistleblower grants their express consent.
3. Having received a Report, CVI DM shall process personal data of the Whistleblower within the scope necessary to accept the Report or to take possible follow-up actions. Personal data which is not relevant for the consideration of the report shall not be collected, and if collected by coincidence, shall be removed immediately. Such personal data shall be removed within 14 days after determining that it is not relevant for the case.
4. Authorized persons are obliged to protect the Whistleblower's identity if they have disclosed their identity or can be identified as well as other details of the Violation and concerning the internal investigation proceedings, including the identity of the person accused of committing the Violation, by sharing the information on the Violation and the internal investigation proceedings with other authorized persons and only strictly to the extent concerning the given case.
5. CVI DM ensures confidentiality and anonymity of identity of persons making Violation Reports, including proper protection of personal data, as well as protection of Whistleblowers against Retaliatory Measures.
6. CVI DM shall not tolerate actions of a repressive nature, discrimination or other types of unfair treatment towards Whistleblowers or towards persons cooperating during internal investigation proceedings.
7. Retaliatory Measures related to reporting a Violation or making a Public Disclosure shall also be considered attempted measures or a threat to take such measures.
8. CVI DM shall take suitable disciplinary actions towards persons using Retaliatory Measures towards the Whistleblower and persons cooperating in internal investigation proceedings, as well as those not observing the rules of protecting the identity of such persons.
9. The burden of proof that the actions referred to in sections 6-8 are not Retaliatory Measures lies with the Management Board of CVI DM.
10. A Whistleblower who has experienced retaliatory actions, discrimination or other types of unfair treatment, or suspects that they may become the target of such actions, should report that fact to the Member of the Management Board or, if the Violation Report concerns the Management Board, directly to the Supervisory Board.
11. CVI DM shall conduct initial and regular training for Employees on reporting of Violations, in particular within the scope of the applicable Procedure.

## V INTERNAL INVESTIGATION PROCEEDINGS





## § 7

1. Having received a Violation Report, the Member of the Management Board or the Supervisory Board (if the Report concerns a Violation committed by the Management Board) shall appoint a Report Processing Team. The Team shall be composed of at least the Supervision Inspector and, depending on the needs, representatives of other organizational units at CVI DM (e.g. a person responsible for HR matters, a person responsible for legal matters).
2. If a Report concerns Violations committed by the Supervision Inspector, they shall not be part of the Team, and the internal investigation proceedings shall be conducted by the Management Board of CVI DM.
3. If a Report concerns a Member of the Management Board of CVI DM, the internal investigation proceedings shall be conducted by the Supervisory Board.
4. Members of the Team can be only persons who have a written authorization from the Management Board of CVI DM, including an authorization to process personal data obtained within the scope of the conducted investigation proceedings.
5. The report processing team shall perform its duties as provided for in the Procedure, including taking steps within the scope of the investigation proceedings, in a manner ensuring impartiality, objectivity and reliability, with respect for the rights of the Whistleblower and the person being the subject of the Report or other persons indicated therein, acting based on proven facts. The above provision shall apply to all persons taking actions within the scope of the Procedure.
6. The report processing team is obliged to confirm to the Whistleblower the receipt of the Report within 7 days of its receipt.
7. The team shall conduct internal investigation proceedings, that is verification of the Report, as well as take and coordinate follow-up actions with due diligence.
8. The maximum time for providing feedback to the Whistleblower, if possible, may not exceed 3 months of the confirmation date of the receipt of the Report. Depending on the complexity of the case, the aforementioned period may be extended, but by no more than further 6 months.
9. Internal investigation proceedings consist of two stages:
  - a) **preliminary proceedings** to verify the grounds for reporting the Violation, including the grounds to take steps within the scope of the proper proceedings;
  - b) **proper proceedings**, consisting in detailed verification whether the Violations have been committed and determination of the persons committing the subject-matter Violations.
10. Preliminary proceedings shall be initiated within a period of no more than 14 business days after the date of receipt of the Violation Report.
11. In the case of **negative** verification of the grounds for reporting the Violation within the scope of the preliminary proceedings and dismissal of suspicions expressed in the report:
  - a) immediately, not later than within 3 business days of completion of the preliminary proceedings - CVI DM shall inform the person accused of committing the Violation about the fact of reporting the Violation and the conducted procedure to verify the grounds for reporting the given Violation,
  - b) immediately, not later than within 14 business days of completion of the preliminary proceedings - CVI DM shall delete personal data provided in the Report from its systems.
12. The Team may refrain from consideration of a report which was subject of an earlier Report made by the same or another Whistleblower if no new information on the Violation has been provided in comparison with the previous Report. The Team shall inform the Whistleblower that the Report has not been considered, stating the reasons, and in the case of another report, it shall leave it unrecognized without informing the Whistleblower thereof.



13. If within the framework of the preliminary verification of a Report the Team finds that due to the nature or importance of the violation of the law reported in its contents, investigation of the violation within the scope of the Procedure may negatively affect correct examination of the case (*"the good of the investigation"*) and that it shall be reported directly to state authorities competent for prosecution of crimes (e.g. Police, Prosecutor's Office), it shall immediately inform the Whistleblower thereof, indicating the steps necessary to make an external report.
14. In the case of **potential positive** verification of the grounds for reporting a Violation within the scope of the preliminary proceedings, a member of the Team shall immediately, not later than within 3 business days of completion of the preliminary proceedings inform the person accused of committing the Violation about the fact of reporting the Violation and the conducted procedure to verify the grounds for the report.
15. The information referred to in § 7 section 11a) and 14 of the Procedure is provided in a manner which guarantees confidentiality of the identity of the person who reports the Violation.
16. Within the scope of the **proper proceedings**, members of the Team investigate and explain the circumstances indicated in the Report and the fact of occurrence of the Violation, talk to persons suspected of committing the Violations, witnesses of potential Violations and, if possible, to the Whistleblower.
17. The **proper proceedings** should be completed within a period of no more than 60 days after the day of completion of the preliminary proceedings. In particularly complex cases, the period provided for conducting the proper proceedings may be extended, but may not exceed a period of 3 months after the date of confirmation to the Whistleblower of the receipt of the Report, or, if it was not possible to confirm the receipt, 3 months after the date of making the Report.
18. In order to conduct investigation proceedings, the Team is authorized to:
  - a) request additional explanations from the Whistleblower or presentation of relevant documents;
  - b) request any person performing work or cooperating with CVI DM to provide explanations or present relevant documents. The requested persons are obliged to appear and to truthfully present all information and documents in their possession which could allow to determine the circumstances of the Violation described in the Report, and to keep secret all information and personal data obtained within the scope of or in connection with the conducted investigation proceedings;
  - c) request explanations from persons responsible for or supervising the activities referred to in the Report or from superiors of such persons; at the request of the Team or the person requested to provide explanations (according to the decision of the Team), explanations may be provided without the presence of third parties, including supervisors, if the good of the investigation proceedings so requires;
  - d) appoint an employee or collaborator of CVI DM as well as an external expert or advisor to the team;
  - e) perform other factual and legal acts necessary to investigate the case.
19. After completion of the proper proceedings, a member of the Team responsible for receipt and consideration of reports shall inform the Management Board about the results of the proceedings.
20. Having received the information referred to in § 7 section 19, the Management Board shall decide on taking follow-up actions, in particular on:
  - a) giving specific instructions to the person who has committed the Violation (if they are an Employee),
  - b) taking disciplinary actions towards the person who has committed the Violation (if they are not an Employee),



- c) reporting a suspected offence to competent prosecution authorities.

If the Violation has been committed by the Management Board, the actions referred to in § 7 section 20 shall be taken by the Supervisory Board.

## **VI KEEPING OF DOCUMENTATION COLLECTED IN CONNECTION WITH VIOLATION REPORTS**

### **§ 8**

1. CVI DM shall keep a Register of violation reports.
2. The Register of violation reports includes in particular:
  - a) report number;
  - b) subject-matter of the violation of the law;
  - c) personal data of the Whistleblower and the person whom the report concerns, necessary to identify those persons;
  - d) contact address of the Informant;
  - e) date of the report;
  - f) information on the follow-up actions taken;
  - g) date of closing of the case.
3. In the case of anonymous Reports, in the fields indicated in section 3 letter c-d - a note "Anonymous Report" shall be entered.
4. In addition, CVI DM shall keep full documentation related to reported Violations, that is records, notifications, correspondence with the Whistleblowers, minutes of talks and other documents collected during preliminary and proper proceedings.
5. All documents collected in connection with a reported Violation, the preliminary proceedings or the proper proceedings must be classified and considered confidential.
6. Personal data shall be kept in the Register of violation reports for the period of 3 years after the end of the calendar year in which the follow-up actions were completed or after the completion of proceedings initiated by such actions.

## **VII SUPERVISION BY THE SUPERVISORY BOARD**

### **§ 9**

1. The Supervisory Board shall be informed on a regular basis, at least once every 6 months, about the Reports received.
2. The information referred to in section 1 as well as information on the results of internal investigation proceedings shall be included in a written report of the Supervision Inspector on the functioning of the supervision system of compliance of operations with the law.
3. Depending on the needs, the Supervisory Board shall, at least once a year, evaluate the effectiveness of this Procedure.