Reporting illegal or unethical behavior

The company OP papírna, s.r.o. (“OPP”) is established on compliance with the legal requirements and high ethical and moral values. Illegal or unethical behavior is unacceptable to us. To help prevent it, OPP is ready to listen to any concerns you may have.

Therefore, in accordance with Act No. 171/2002 Coll. on the Protection of Whistleblowers (“Whistleblower Protection Act”), we have established an internal reporting system based on confidentiality and impartiality in the assessment of each report. The reporting channels of the internal reporting system are described below.

In addition to the internal reporting system, the OPP has a long-established group reporting system in which reported matters and complaints are dealt with at the level of the delfortgroup, of which the OPP is a member. Please note that submissions to the group reporting channels will not be processed under the laws of the Czech Republic and may provide you with a different regime of protection than that provided under the Whistleblower Protection Act.

**Who can submit a report through the internal reporting channel?**A report of a suspected violation of law under the Whistleblower Protection Act may be submitted by OPP workers through the internal reporting system.

In accordance with the Whistleblower Protection Act, the OPP has excluded persons who do not perform work or other similar activities for the OPP as defined in Section 2 (3) (a), (b), (h) or (i) of the Whistleblower Protection Act from using the internal reporting channels.

**What is the purpose of the internal reporting channels?**Reports and whistleblowers have guaranteed rights under the Whistleblower Protection Act, in particular protection of their identity and protection from retaliation. All reports will be treated confidentially and impartially, and the whistleblower will be informed of the outcome of the investigation if he or she remains in contact with us.

**How to report through the internal reporting channels?**

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| **Internal reporting system** |
| **Online reporting** | Submit reports by sending an e-mail to the following address: OPPcompliance@delfortgroup.com.  |
| **Voice messaging system** | Call the following phone number: + 420 583 384 446.  |
| **Personal reporting** | You can contact the whistleblowing officers by phone: + 420 583 384 446 or by e-mail: OPPcompliance@delfortgroup.com to arrange a personal meeting for a personal report. The names of the whistleblowing officers are listed here: Mr. Daniel Šulc. |
| **Other ways to report** |
| **External reporting channel** | Reports defined in the Whistleblower Protection Act may also be submitted via the external reporting channel established by the Ministry of Justice of the Czech Republic, at: <https://oznamovatel.justice.cz>. |

 **How is personal data processed?**Personal data will be processed in accordance with the provisions of the relevant data protection legislation. We will keep a record of the reports received, including: (a) the date of receipt of the report; (b) the name, surname, date of birth and contact address of the whistleblower, if known; (c) a summary of the content of the report and the identification of the person against whom the report is made, if known; (d) the date on which the assessment of the validity of the report or the assessment of the report by the whistleblowing officers was completed and the outcome of the assessment. Received reports will be kept for a period of 5 years from the date of their submission.

In the case of reports made through the internal reporting channels, only the whistleblowing officers will have access to the records.