

INTERNAL GUIDELINE

of Pernod Ricard Czech Republic s.r.o., Id. No. 11879734,
with its registered office at Veletržní 1623/24, Holešovice, 170 00 Prague 7,
registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 355813
(hereinafter the “**Company**”)

ON WHISTLEBLOWER PROTECTION

I. Introduction

- 1.1. This internal guideline lays down the rights of the Company’s employees in reporting unlawful conduct in the Company and the Company’s obligations when receiving such reports. This Guideline provides for the Company’s obligations following from Act No. 171/2023 Coll., on the protection of whistleblowers (the “**Whistleblower Protection Act**”).
- 1.2. The Company wishes to build a transparent and safe working environment in which both the generally binding legal regulations and the ethical standards following from the Company’s internal regulations are complied with. The purpose of this Guideline is to create a platform for the Company’s employees to be able to report and notify or make any other statement on unethical and unlawful conduct in the Company, without the need to worry about any retaliation on the part of their superiors or the Company as such. For this purpose, an internal whistleblowing system (the “**Whistleblowing System**”) is being created under this Guideline in accordance with the Whistleblower Protection Act.

II. Definitions

2.1. What reports are covered by this Guideline?

For the purposes of this Guideline, a **report** means:

- 2.1.1. A report containing information on possible unlawful conduct that has occurred or is about to occur in the Company or in the context of the Company’s activities, and which
 - (a) has the features of a criminal offence;
 - (b) has the features of an infraction punishable by law with a fine with the upper limit of at least CZK 100,000;
 - (c) violates the Whistleblower Protection Act;
 - (d) breaches the duties following from the Company’s internal regulations;
 - (e) violates the general laws or EU legislation in the area of:
 - a. financial services, statutory audits and other verification services, financial products and financial markets;
 - b. corporate income tax;
 - c. measures against legalising the proceeds of crime and financing of terrorism;
 - d. consumer protection;
 - e. compliance with product requirements, including their safety;
 - f. transport safety, safety of shipments and of road traffic;
 - g. environmental protection;

- h. food and feed safety; animal protection and animal health;
- i. radiation protection and nuclear safety;
- j. competition, public auctions and public procurement;
- k. protection of internal order and safety, life and health;
- l. protection of personal data, privacy and security of electronic communications networks and information systems;
- m. protection of the European Union's financial interests; or
- n. functioning of the internal market, including the protection of competition and State aid under the European Union law;

2.1.2. A report contains information on the name, surname and date of birth, or other data from which the whistleblower can be identified. The report need not contain the information pursuant to the first sentence if filed by a person whose identity is known to the Competent Person pursuant to Article 3 below.

2.2. Who may submit reports under this Guideline?

2.2.1. The right to submit reports under this Guideline applies to employees and persons involved (hereinafter jointly the "**Whistleblowers**").

2.2.2. For the purposes of this Guideline, **Employees** shall mean the current and former employees of the Company, i.e. the persons with whom the Company entered into the relevant labour-law contract (an employment contract, agreement to complete a job, or agreement to perform work), as well as trainees/interns, job-seekers, members of the Company's bodies or, depending on the nature of the matter, persons engaged by the Company as independent entrepreneurs.

2.2.3. For the purposes of this Guideline, **Person Involved** means persons who have a legal interest in the Company's activities or who participate in the Company's economic activities (including, but not limited to, customers, contractual partners, suppliers, persons holding a share in the Company).

2.3. What is retaliation?

2.3.1. Retaliation means any act or omission aimed against the Whistleblower, capable of causing harm to the Whistleblower and caused by filing a report.

2.3.2. Retaliation includes, in particular:

- (a) termination of employment or non-renewal of a fixed-term employment;
- (b) termination of a legal relationship established by an agreement to complete a job or an agreement to perform work;
- (c) removal from a senior position;
- (d) reduction of salary, pay or remuneration or non-granting of a personal bonus;
- (e) transfer or reassignment to another job;
- (f) performance assessment;
- (g) not allowing professional development;
- (h) change in working time;
- (i) requesting a medical report or occupational medical check-up;
- (j) termination or withdrawal from a contract;
- (k) interference with the right to protection of personal rights.

III. Competent Person and Whistleblowing System

3.

3.1. By virtue of this Guideline, the **Company** appoints a person responsible for receiving and handling reports for the Company (the "**Competent Person**").

- 3.2. The Competent Person
 - 3.2.1. receives reports submitted through the Whistleblowing System and assesses the justification thereof;
 - 3.2.2. proposes to the Company measures to remedy or prevent the unlawful state of affairs following a report unless this could result in disclosure of the Whistleblower's identity;
 - 3.2.3. carries out the Company's instructions unless they threaten or frustrate the performance of his/her activities pursuant to the Whistleblower Protection Act;
 - 3.2.4. proceeds impartially in the performance of his/her activities;
 - 3.2.5. maintains confidentiality of the facts he/she learns in the performance of his/her activities, even after termination of the performance thereof.
- 3.3. The Company's Competent Person is JUDr. Jana Nováková, T: +420 602 102 148, email: Jana.Novakova@pernod-ricard.com. The Competent Person has an office in the Company in the Stromovka Centre at Veletržní 1623/24, 170 00 Prague 7 – Holešovice.
- 3.4. Whistleblowers may submit reports to the Competent Person by email or telephone using the contact details pursuant to Article 3.3 above. If the Whistleblower so requests, the Competent Person must see the Whistleblower in person, not later than within 14 days of his/her request, at the address specified in Article 3.3 above. Furthermore, Whistleblowers may submit reports by filling in an online form at: <https://secure.ethicspoint.eu/domain/media/en/gui/104594/report.html>
- 3.5. The Competent Person must notify the Whistleblower in writing of the receipt of the report within 7 days of the date of its receipt, unless
 - 3.5.1. the Whistleblower has expressly asked the Competent Person not to inform him/her of the receipt of the report; or
 - 3.5.2. it is clear that the notification of receipt of the report would disclose the Whistleblower's identity to another person.
- 3.6. The Competent Person must assess the justification of the report and notify the Whistleblower in writing of the results of the assessment within 30 days of the date of receipt of the report. If the facts or legal aspects of the case are complex, this deadline may be extended by up to 30 days, but not more than twice. The Competent Person must notify the Whistleblower of the extension of the deadline and the reasons for its extension in writing before its expiry. Article 3.5 above shall apply *mutatis mutandis* in such cases.
- 3.7. If, in assessing justification of the report, the Competent Person finds that the report is not a report pursuant to Article 2.1 above, the Competent Person shall notify the Whistleblower of the fact in writing without undue delay.
- 3.8. If the report has been assessed as justified, the Competent Person shall propose to the Company measures to prevent or remedy the unlawful state of affairs. If the Company does not adopt the measure proposed by the Competent Person, the Company shall adopt some other suitable measure to prevent or remedy the unlawful state of affairs; the Company shall notify the Competent Person of the measure taken without delay and the Competent Person shall notify the Whistleblower of the measure in writing without undue delay.
- 3.9. If the report has been assessed as unjustified, the Competent Person shall, without undue delay, notify the Whistleblower in writing that, on the basis of the facts disclosed in the report and the facts known to the Competent Person, no suspicion of an unlawful conduct was discovered, or that the Competent Person believes the report to be based on untrue information, and shall advise the Whistleblower of the right to file a report with a public authority.

IV. Other Obligations of the Competent Person

4.

4.1. The Competent Person's obligations in case of an oral report

4.1.1. An audio recording or a written record which faithfully captures the substance of the oral report shall be made of the oral report. An audio recording of the oral report may only be made with the Whistleblower's consent. The Competent Person or a designated Employee shall allow the Whistleblower to comment on the recording or transcript of the audio recording, if made, and the Whistleblower's statement shall be enclosed with the recording or transcript.

4.2. Confidentiality

4.2.1. The Competent Person shall not provide information that could frustrate or threaten the purpose of the report.

4.2.2. Information on the Whistleblower's identity may be provided only with his/her written consent unless the Competent Person is obliged to provide such information to the relevant public authorities.

4.2.3. If the Competent Person provides information on the Whistleblower's identity to a public authority, he/she must notify the Whistleblower in advance, together with the reasons for which he/she must provide the information, and allow the Whistleblower to comment on the provision of the information.

4.3. Record Keeping and Storing of Reports

4.3.1. The Competent Person must keep electronic records of the reports received, including:

- (a) receipt date of the report;
- (b) the Whistleblower's name, surname, date of birth and contact address or other data from which the Whistleblower can be identified, if known to the Competent Person;
- (c) summary of the report and identification of the person whose conduct is the subject of the report, if known;
- (d) date of completion of the assessment of justification of the report by the Competent Person and the outcome of the assessment.

4.3.2. The Competent Person must keep the reports submitted through the Whistleblowing System and the related documents for a period of 5 years from the receipt date of the report.

4.3.3. Only the Competent Person has access to the records pursuant to Article 4.3.1, to the related documents and to the archived reports pursuant to Article 4.3.2 above.

V. Obligations of Whistleblowers and Other Employees of the Company

5.

5.1. A **Whistleblower** must not submit knowingly untrue reports.

5.2. The Company's **Employees** must not:

5.2.1. prevent another person from filing a report;

5.2.2. expose the Whistleblower to retaliation or allow that the Whistleblower be exposed to retaliation.

5.3. **Employees** are obliged to provide the Competent Person with the necessary co-operation in proper discharge of his/her office.

- 5.4. When investigating a report, the **Competent Person** may, in particular:
 - 5.4.1. request the disclosure of data and the submission or making available of documents, audiovisual and digital recordings and other items that may be related to the report;
 - 5.4.2. make copies of documents, audiovisual and digital recordings submitted or made available;
 - 5.4.3. enter any premises that may be related to the report;
 - 5.4.4. request explanations from Employees. The Competent Person must draw up a record of the course and contents of the explanation; the record must be signed by the Competent Person and the Employee who provided the explanation.

VI. Personal Data Protection

6.
 - 6.1. The personal data of the Whistleblower and, where applicable, of other persons mentioned in the report shall be processed and stored in accordance with the Company's internal personal data protection guideline, as well as with the generally binding legal regulations, in particular the applicable provisions of Act No. 262/2006 Coll., the Labour Code, as amended, and Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation.
 - 6.2. Whistleblowers may direct any questions regarding personal data protection to the Company's Lawyer (the local Privacy Champion) or to the Group's Data Protection Officer at groupdpo@pernod-ricard.com.

VII. Final Provisions

7.
 - 7.1. In case of doubt as to the extent of the rights and obligations in the areas regulated by this Guideline, each Employee shall first approach his/her direct supervisor.
 - 7.2. Each Employee of the Company shall fulfil the obligations following from this Guideline and report any breach of this Guideline to his/her direct supervisor without delay. This Guideline is available on the Company's intranet.
 - 7.3. Breach of any obligation laid down by this Guideline shall be deemed a breach of discipline at work and, under the conditions provided by law, may lead to termination of a labour-law relationship with the breaching party.
 - 7.4. Matters of Whistleblower protection not regulated by this Guideline shall be governed by the generally binding legal regulations, in particular by the applicable provisions of the Whistleblower Protection Act and the Labour Code.
 - 7.5. This Guideline enters into force and effect on the date of its issue.
 - 7.6. This Guideline is issued for an indefinite term and may be subsequently modified or supplemented. Any amendments to this Guideline shall be published on the Company's intranet.
 - 7.7. All senior Employees are obliged to acquaint their subordinates with this Guideline and its amendments, if any, without delay.

In Prague, on 1 April 2024