



PHILIP MORRIS ČR

Basic Information on Whistleblowing – Protection of Whistleblower and Internal Whistleblowing System

Philip Morris ČR a.s. (“PMCR”) has an internal disclosure (whistleblowing) system in place in accordance with Act No. 171/2023 Coll., on Protection of Whistleblowers (the Whistleblower Protection Act), for the submission of complaints about possible infringements (unlawful conduct) that directly affect(s) the Company. A whistleblower who fulfils the conditions for making a disclosure under the Whistleblower Protection Act is guaranteed protection.

The internal whistleblowing system can also be used to disclose conduct contrary to the Code of Conduct published under the title “Our Code of Conduct”. More information on the procedure for disclosing conduct contrary to our Code of Conduct can also be found at www.pmi.com/speak-up.

1. Who can make a disclosure?

A disclosure of an infringement may be made by an employee of PMCR, an intern or volunteer, an applicant for employment, internship or volunteer work with PMCR, a supplier under Section 2 (3) (j) of the Whistleblower Protection Act or the supplier’s representative, a trustee of a trust fund, a person exercising rights associated with participation in PMCR and a member of a PMCR body (the “whistleblower”), and anyone who becomes aware of a violation of our Code of Conduct.

The internal whistleblowing system is not used to deal with customer requirements, for which PMCR has established separate customer channels, in particular product orders, complaints and data protection.

II. How does the internal whistleblowing system work?

The whistleblower can make a disclosure through the internal whistleblowing system in the following forms:

- via the following e-mail address: pmiethicsandcompliance@pmi.com
- by telephone via the telephone number listed in the clause titled Contact the relevant (competent) person
- in person – verbally at the request of the whistleblower to the relevant person at the address indicated in the clause titled Contact the relevant person

The disclosure may be made verbally or in writing via the internal whistleblowing system. If the whistleblower so requests, the relevant person is obliged to accept the disclosure in person within a reasonable time limit, but in any case no later than 14 days from the date on which the whistleblower so requests.

III. What is to be disclosed?

By making a disclosure, a natural person – the whistleblower can use the internal whistleblowing system to disclose information about a possible infringement that has the characteristics of a criminal offense, or has the characteristics of a misdemeanour for which the law provides for a fine of at least CZK 100,000, or violates the

Whistleblower Protection Act or any other legal regulation or regulation of the European Union in the area referred to in Section 2 (1) (d) of the Whistleblower Protection Act, which the whistleblower has obtained in connection with work or other similar activity for PMCR.

IV. How is the whistleblower protected from potential retaliation?

The whistleblower may not be subject to retaliation for having made the disclosure. In relation to any whistleblower having made a disclosure, none of the following persons may be subject to retaliation either: (a) any person who has provided assistance in securing the information contained in the disclosure, in making the disclosure or in assessing the validity of the disclosure; (b) any person who is close to the whistleblower; (c) any person who is an employee or colleague of the whistleblower; (d) any person controlled by the whistleblower; (e) any legal entity in which the whistleblower has an interest, person controlling the whistleblower, person controlled by the whistleblower or person controlled by the same controlling entity; (f) any person for whom the whistleblower performs work or other similar activity; or (g) any trust of which the whistleblower or a legal entity referred to in points (e) and (f) is a founder or beneficiary or in relation to which the whistleblower or a legal entity referred to in points (e) and (f) is a person who has substantially increased the assets of the trust by contract or by leaving a disposition of property upon death (*disposition mortis causa*) (hereinafter referred to as a “close person”). The right to protection against retaliation cannot be waived.

Retaliation means any direct or indirect act or omission in connection with the whistleblower’s work or other similar activity which is triggered by the making of a disclosure and which may cause harm to the whistleblower or persons close to the whistleblower. This includes, in particular, the acts listed in Section 4 of the Whistleblower Protection Act.

By making a disclosure, the whistleblower does not acquire any immunity for possible violations or non-fulfillment of the whistleblower’s own obligations towards PMCR. Only such act as is triggered by a disclosure made as set out above is considered to be retaliation.

V. Limits of the whistleblower protection and instruction on making knowingly false disclosures.

No person who makes a knowingly false disclosure is entitled to protection from retaliation. A whistleblower commits an offense by knowingly making a false disclosure, which is punishable by a fine in accordance with applicable law.

VI. Exceptions to the whistleblower’s breach of the duty of confidentiality.

If the whistleblower had legitimate reasons to believe that the disclosure was necessary for the detection of an infringement under the Whistleblower Protection Act, the disclosure will not be deemed to be a breach of bank secrecy, contractual confidentiality obligations, the duty of confidentiality under the Tax Code or the duty of confidentiality under any other legal regulations governing work or other similar activity of the whistleblower, with the exception of the obligations set out in Section 3 of the Whistleblower Protection Act. The whistleblower always has the obligation to maintain the protection of classified information pursuant to special legislation and information the disclosure of which could obviously jeopardise ongoing criminal proceedings or the protection of special facts pursuant to the law governing crisis management. By making a disclosure that undermines this protection, the whistleblower is in breach of the law. The same applies if a criminal offence has been committed by gathering information for the disclosure.

VII. Who will be in charge of the disclosure?

The Compliance Officer who has been designated as the relevant person under the Whistleblower Protection Act in the PMCR. In particular, the Compliance Officer: 1) assesses the validity of a disclosure made

through the internal whistleblowing system; 2) proposes to PMCR measures to remedy or prevent any unlawful situation further to the disclosure made, unless this procedure could lead to the disclosure of the identity of the whistleblower or persons close to the whistleblower; 3) maintains confidentiality of the facts of which the Compliance Officer has become aware in the course of the Compliance Officer's activities in connection with the assessment of the disclosure.

The Compliance Officer will ensure that data and information associated with the disclosure is not made available to any other person unless it is needed to investigate the disclosure. The Compliance Officer will not disclose information that could frustrate or compromise the purpose of the disclosure made. Information about the identity of the whistleblower and any person close to the whistleblower may only be disclosed with their written consent, unless the Compliance Officer is obliged to disclose such information to the relevant public authorities under applicable law. The whistleblower must be notified in advance of any transfer of information to public authorities, including the reasons for it, and may comment on the transfer.

VIII. Contact the relevant person – the Compliance Officer

Whistleblowers can contact the relevant person – the Compliance Officer: Pavlína Fůšková

Email address: pmiethicsandcompliance@pmi.com

Telephone:

+420 266 702 111, always on working days between 10 a.m. and 4 p.m.

Delivery address: Vítězná 1, 284 03 Kutná Hora, for the attention of the relevant person: Pavlína Fůšková

IX. Procedure of the relevant person – the Compliance Officer and notification of investigation of the disclosure

The whistleblower has the right to be notified in writing of:

1. the receipt of the disclosure within 7 days from the date of the receipt, unless the whistleblower has expressly requested not to be notified of the receipt of the disclosure, or it is clear that notification of the receipt of the disclosure would reveal the identity of the whistleblower;
2. the results of assessment of the validity of the disclosure within 30 days from the date of the receipt of the disclosure, although in cases of factual or legal complexity this period may be extended by up to 30 days, but not more than twice. The relevant person – the Compliance Officer is obliged to notify the whistleblower in writing about the extension of the time limit and the reasons for its extension before its expiry, unless the whistleblower has expressly requested that the relevant person – the Compliance Officer not notify the whistleblower of the extension of the time limit and the reasons for its extension;
3. the fact that the disclosure is not a disclosure under the Whistleblower Protection Act, of which the whistleblower is to be notified without undue delay;
4. any action taken, of which the whistleblower is to be notified immediately, unless the whistleblower has expressly requested that the relevant person – the Compliance Officer not notify the whistleblower of the action taken;
5. the assessed lack of validity of the disclosure made, after the relevant person – the Compliance Officer, on the basis of the facts stated in the disclosure and the circumstances known to the Compliance Officer, finds that no infringement has been suspected or finds that the disclosure is based on false information; then the relevant person – the Compliance Officer instructs the whistleblower on the right to make a disclosure with a public authority (see below).

If the whistleblower has provided the whistleblower's contact details, the whistleblower may be contacted by the relevant person – the Compliance Officer – during the investigation of the disclosure and asked to supplement the disclosure if the disclosure is not clear or lacks sufficient specific information to allow verification of the claims made.

Records of information on the disclosures received are maintained in electronic form to the extent provided for by the Whistleblower Protection Act for a period of 5 years from the date of receipt of the relevant disclosure.

X. Can disclosures be made in another way?

For more information on how to make a disclosure and on whistleblower protection, please visit the website of the Ministry of Justice: [Oznamovatel – Ministerstvo spravedlnosti \(justice.cz\)](https://www.oznamovatel.cz). In addition to the Ministry of Justice, a disclosure can be made with a public authority competent under other legislation or directly applicable EU legislation.