

## ***BALTIC POWER SP. Z O.O. Offshore Wind Project***

### **Whistleblower Policy**

BLP-CRP-HRS-PLC-00004			Whistleblower Procedure			
<b>Document number</b>			<b>Document name</b>			
1	Final	19.05.10	To acknowledge	BKM	MC	SB
<b>Rev.</b>	<b>Doc Status</b>	<b>Date</b>	<b>Purpose of Issue / Changes to Previous</b>	<b>Prepared by</b>	<b>Checked by</b>	<b>Approved by</b>

# Contents

- Message from the Board ..... 3
- 1 Introduction ..... 4
  - 1.1 General ..... 4
  - 1.2 Reporting Concerns..... 4
- 2 Procedure ..... 5
  - 2.1 Handling of Concerns Raised..... 5
  - 2.2 Investigation..... 5
  - 2.3 Anonymity and Confidentiality ..... 5
  - 2.4 Records..... 5
  - 2.5 Employee Protection..... 6
- 3 Questions about this Policy..... 6

## Message from the Board

BALTIC POWER SP. Z O.O. ('COMPANY') expects its Board, all its employees and other individuals assigned to COMPANY to provide services to uphold the highest standards of ethical behaviour and integrity. It is incumbent upon management to guide the behaviour of employees and other individuals assigned to COMPANY to provide services by setting a good example for others, offering points of reference and guidelines relevant to the business environment. The focus on ethics and integrity has an important influence on the identity and the image of COMPANY.

The integrity of COMPANY is dependent on every member of its organisation. Mistakes of individuals bring the integrity of COMPANY as a whole into doubt. Is it a one-time incident, or does it point to a weakness in the organisation? Dealing with the incident alone is insufficient. We encourage all employees and other individuals assigned to COMPANY to provide services to look into selected practices to achieve lasting results to maintain integrity.

Profitability is essential for staying in business. However, the pursuit of this objective can never justify compromising our commitments to integrity or safety. The Board of COMPANY invites all employees, individuals assigned to COMPANY to provide services and contractors to raise any concerns directly with the executives, and if felt necessary, directly with any Board members of the company.

Please do your part by studying this procedure and act in accordance with it.

# 1 Introduction

## 1.1 General

This document outlines the procedure which COMPANY is establishing for the confidential, anonymous submission by employees of COMPANY and other individuals assigned to COMPANY to provide services of any concerns which they may have regarding questionable matters.

It is important that all employees, individuals assigned to COMPANY to provide services and Stakeholders are able to report their concerns without fear of reprisal or victimization and are aware of the means to do so. You are encouraged to submit all good faith concerns and complaints in respect of accuracy and integrity of COMPANY, without fear of retaliation of any kind.

If you have any concerns about matters which you consider to be questionable, incorrect, misleading or fraudulent, you are urged to come forward with any such information, complaints or concerns, without regard to the position of the person or persons responsible for the subject matter of your complaint or concern.

All information received by the one addressed will be registered, to the extent permitted by the law, and treated as confidential and will not be disclosed or discussed with anyone other than those who have a need to know.

All reports will be taken seriously and when required, investigated. Any investigation will be carried out in an independent, open minded and professional manner with the aim of protecting the interests of COMPANY, the suspected individuals and the person raising the concern.

The term "COMPANY" shall refer to all companies that are part of the COMPANY.

## 1.2 Reporting Concerns

You should describe your concern in writing and should include sufficient information to allow the Board to understand and review your concern.

All concerns or complaints should be reported to the Chairman of the COMPANY Board.

=

The communication channel dedicated to notification is <https://balticpower.notibox.pl/> where you can submit a notification either anonymously or you can submit your contact details.

## **2 Procedure**

### **2.1 Handling of Concerns Raised**

Promptly following the receipt of any complaints submitted to it, the Board will investigate each complaint and take appropriate correction actions.

### **2.2 Investigation**

The Board has the authority to:

- a) conduct any investigation which it considers appropriate, and has direct access to the external auditor of COMPANY, as well as officers and employees of the Corporation and any Entities, as applicable; and
- b) retain, at COMPANY's expense, special legal, accounting or other advisors, consultants or experts it deems necessary in the performance of its duties.

### **2.3 Anonymity and Confidentiality**

All complaints will be handled in a confidential manner by the Board. Information concerning a complaint, including the names of the parties involved, will only be released to the extent permitted by law and necessary to conduct an appropriate investigation and, where necessary, to take action following an investigation, or as required by law.

Unless the Board concludes that the complaint was initiated in bad faith, no record of the complaint will be maintained in the written record kept by the Board as specified in 2.4 below.

If you wish to remain anonymous, your written communication to the Board should clearly indicate this wish for anonymity. In conducting any investigation, the Board will use reasonable efforts to protect your anonymity. You should be aware, however, that the Board will investigate the situation, which will require some disclosure of information depending on the circumstances. Alternatively, it is acceptable to submit an anonymous concern to the Board, although this may limit the Board's ability to investigate.

### **2.4 Records**

The Board will retain as part of its records, any complaints or concerns for a period of no less than seven years. The Board will keep a written record of all such reports or inquiries and make quarterly reports on any ongoing investigation which will include steps taken to satisfactorily address each complaint.

## **2.5 Employee Protection**

All employees of COMPANY and other individuals assigned to COMPANY to provide services are assured that no retaliation of any kind is permitted against you for complaints or concerns made in good faith. No employee or other individual assigned to COMPANY to provide services will be adversely affected because the employee and other individual assigned to COMPANY to provide services refuses to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of binding law.

All employees and other individuals assigned to COMPANY to provide services reporting such concerns in good faith shall be protected in their employment or other legal relationship with COMPANY.

## **3 Questions about this Policy**

If you have any questions, contact <https://balticpower.notibox.pl/>.