

information for whistleblowers

in relation to **oncomed manufacturing a.s.**, company registration number: 247 11 667, registered office in Brno, Karásek 2229/1b, 621 00, registered in the commercial register maintained by the Regional Court in Brno, file no. B 6266 (hereinafter referred to as the **“Company”**).

1. what is the subject of this information?

1.1 The company hereby informs that, in accordance with Act No. 171/2023 Coll., on the Protection of Whistleblowers, as amended (hereinafter referred to as the **“Whistleblower Protection Act”**), it operates an internal reporting system and ensures the protection of whistleblowers who use this reporting system to report.

1.2 In this information for whistleblowers (hereinafter referred to as **“Information”**) you will find basic information:

- a) on the ways persons can report,
- b) about the competent person, including all contact details,
- c) on the rights and obligations of the reporting person, as well as the Company towards the reporting person, and
- d) on the rules for keeping records and information about the reports.

2. who can report?

2.1 The report can be made by (hereinafter referred to as the **“whistleblower”**):

- a) a current employee of the Company,
- b) a self-employed person who cooperates with the Company,
- c) a person exercising rights associated with participation in the Company,
- d) a person belonging to the administrative, management or control body of the Company,
- e) a person performing tasks within the scope activities of the Company, in its interest, on its behalf or on its account,
- f) a volunteer performing voluntary work for the Company,
- g) paid or unpaid intern of the Company,
- h) any person who works for a contractor, supplier or subcontractor or similar contractual partner of the Company,
- i) a former employee of the Company who reports a possible illegal act and whose employment relationship with the Company has already ended,

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- j) a future employee of the Company, whose employment relationship with the Company is yet to be established, if a possible illegal act arose during the recruitment process.

3. what is a report?

3.1 A report is a communication that contains information about a possible illegal act in accordance with Article 4 of this Information, committed/to be committed by the Company, by any employee of the Company, or by a person representing the Company or performing the activities of a control body of the Company about whom the whistleblower learned in connection with work or other similar activities in the Company or for the Company.

3.2 The report must contain information about the possible illegal act. For the purposes of proper assessment and investigation of the report, it is also appropriate to include at least the following information in the report:

- a) identification of persons suspected of unlawful conduct and all other persons involved,
- b) a detailed description of the illegal act,
- c) specific evidence of illegal conduct or any specific knowledge that supports the suspicion of illegal conduct,
- d) contact information (address, e-mail address, etc.) to which confirmation of receipt of the report and notification of the results of the assessment of the received report can be sent. If the whistleblower does not wish to receive the confirmation and/or notification of the results of the assessment of the report, it must be stated explicitly when submitting the report.

3.3 The report should also include data on the name, surname and date of birth of the whistleblower or other data from which it is possible to recognize the identity of the whistleblower. If this information is not known to the competent person of the Company, until the identity of the whistleblower is revealed, it is not possible to confirm the receipt of the report of the whistleblower, or otherwise proceed in accordance with this Information, the Code and the Whistleblower Protection Act, or provide with any protection against retaliatory measures of the Company.

what can be reported?

4.1 The subject of the report can be an illegal act that:

- a) has characteristics of a criminal offence,
- b) has the characteristics of an offence for which a fine of at least CZK 100,000 can be imposed,
- c) violates the whistleblower protection rules,

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- d) violates another legal regulation of the Czech Republic or a regulation of the European Union in the areas listed in Article 4.2 of this Information.

4.2 Reported breach by the Company may relate in particular to the following areas:

- a) breaches of quality requirements and reporting obligations relating to our products,
- b) breaches of our policies concerning dealing with patients and patient organisations,
- c) breaches of our policy concerning cooperation with healthcare professionals,
- d) corporate income taxes,
- e) prevention of money laundering and financing of terrorism,
- f) bribery,
- g) consumer protection and safety and compliance with regulatory requirements for the manufacture of medicines,
- h) breaches of occupational health and safety regulations,
- i) transport, carriage, traffic and road safety,
- j) environmental protection, drug safety,
- k) public procurement and competition,
- l) protection of internal order, safety, life and health,
- m) protection of personal data, privacy and security of electronic communications networks and information systems,
- n) violation of commercial confidentiality,
- o) discrimination, harassment.

5. to whom and how to report

5.1. The report can be made to any of the following persons ("**Competent Person**"):

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**Mgr. Hana Kučerová, HR Business
Partner**

e-mail: oznameni@oncomed.cz

telephone: + 420 602 670 875

correspondence address: Brno,
Karásek 2229/1b, zip code: 621 00

office: building 04, office no. 234

**JUDr. Renata Horáková, Chief
Administrative Officer, Member of
the Board**

e-mail: oznameni@oncomed.cz

telephone: + 420 724 432 500

correspondence address: Brno,
Karásek 2229/1b, zip code: 621 00

office: building 04, office no. 236

5.2 The report can be made through the internal reporting system of the Company as an internal report or through reporting system of the Ministry of Justice of the Czech Republic as an external report (see Article 8 of this Information).

5.3 The report via the internal reporting system can be made:

- a) in person after prior arrangement at the office of the Competent Person,
- b) in writing in paper form sent to the correspondence address of the Competent Person, always to the hands of the Competent Person with the envelope marked "Notice – do not open - exclusively to the hands of the Competent Person",
- c) electronically via intranet of the Company,
- d) in writing in paper form via the "communication box" designated for this purpose at the registered address of the Company,
- e) in a form of an e-mail message sent to the e-mail address of the Competent Person,
- f) through a telephone call to the telephone number of the Competent Person.

6. how is the protection of the whistleblower ensured?

6.1 Only the Competent Person has access to the reports made and, if applicable, to any identification and contact data, and is bound by confidentiality in relation to them.

6.2 A whistleblower who has made a report in good faith that the information in the report is true is protected from retaliatory measures of the Company related to the report, or rather with the facts stated in the report.

6.3 A whistleblower who has knowingly given false information in a report or made a report without having a legitimate reason to believe that the report is based on true information is not protected. If any information provided by the whistleblower in the report or access to it was obtained through a criminal act or an offence, the responsibility of the whistleblower for such actions remains unaffected. The Company is entitled to exercise all possible claims arising from

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all relevant legal regulations to a whistleblower who knowingly damages the Company, its employees, or persons representing the Company or performing the activities of a control body of the Company.

7. security of personal data

7.1 The Company is obliged to ensure the protection of personal data of whistleblowers, as well as the personal data of any third parties mentioned in the report in an appropriate manner. For this purpose, the Company has implemented the following technical and organizational measures that serve to secure personal data against impermissible processing, destruction or loss:

- a) only the Competent Person has access to the personal data of whistleblowers, as well as to the personal data of any third parties mentioned in the report, with the exception of situations where the disclosure of personal data is required by relevant legal regulations in connection with investigations and proceedings ongoing on the basis of the report of the whistleblower,
- b) personal data in electronic form will be stored in an electronic system secured by access passwords and anti-virus and other protection tools against unauthorized access by third parties,
- c) personal data in physical form will be kept in designated locations in lockable storages without access of persons other than the Competent Persons,
- d) after the necessary period of personal data processing has expired, personal data will not be stored or processed in any other way.

7.2 More detailed information on the processing of personal data is attached in the Annex to this Information.

8. external report through the Ministry of Justice of the Czech Republic

8.1 A whistleblower who, for any reason, does not want to make a report via the internal reporting system of the Company according to the above rules, is entitled to make a report via an external notification channel established by the Ministry of Justice of the Czech Republic via the following link: <https://oznamovatel.justice.cz/chci-podat-oznameni/>.

9. reporting through the group system

9.1 A whistleblower who, for any reason, does not want to make a report through the internal reporting system of the Company according to the above rules or through the external reporting channel established by the Ministry of Justice, is entitled to make a report through the corporate reporting channel of the Company. This corporate reporting channel is operated at the corporate level outside the regime of the Whistleblower Protection Act and is not governed by this Act. This channel is available at the following link: www.bkms-system.com.

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annex to information for whistleblowers

1. introduction

The Company oncomed manufacturing a.s., company registration number: 247 11 667, with registered office in Brno, Karásek 2229/1b, ZIP code 621 00, registered in the commercial register maintained by the Regional Court in Brno, sp. B 6266 (hereinafter referred to as the “**Company**”), as the administrator of personal data, hereby informs you of the basic principles of personal data processing in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the “**General Data Protection Regulation**”) and Act No. 110/2019 Coll., on the processing of personal data, as amended, on the basis of which the Company handles your personal data (hereinafter referred to as the “**data subject**”) in connection with the report of an illegal act.

2. purpose of personal data processing

The Company processes the personal data of the data subject for the purpose of verifying a report of a possible illegal act made by the data subject and conducting related investigations and proceedings following this report, as well as for the purpose of fulfilling obligations of the Company arising from the relevant legal regulations and for the purpose of protecting the legitimate interests of the Company.

3. legal basis of personal data processing

The legal basis for the processing of personal data of the data subject is (are):

- a) fulfilment of legal obligations that apply to the Company in connection with legal regulations on the protection of whistleblowers, as defined in Article 6 paragraph 1 letter c) of the General Data Protection Regulation, and
- b) legitimate interests of the Company as defined in Article 6 paragraph 1 letter f) of the General Data Protection Regulation in the form of measures taken on the basis of a report of a possible illegal act.

4. scope of processed personal data

Personal data of a data subject are processed to the extent of the personal data specified by the data subject in the report of a possible illegal act, or in the scope of identification and contact data of the data subject.

5. duration of personal data processing

Personal data will be processed for a period of 5 years from the date of receipt of the report in accordance with the obligation to store reports and related documents and keep records of received reports established by the Whistleblower Protection Act.

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Personal data processed on the basis of legitimate interests of the Company will be processed for a maximum of 10 years from the date of termination of all possible claims arising from follow-up measures taken on the basis of a report of a possible illegal act. In the event of the initiation and duration of judicial, administrative or other proceedings concerning the rights and/or obligations of the Company in relation to the relevant measure taken on the basis of a report of a possible illegal act, the period of personal data processing will not end before the end of such proceedings.

6. company contact information

The company can be contacted:

- a) at the address of its registered office,
- b) via e-mail address: kucerova@oncomed.cz,
- c) by phone at phone number: + 420 515 919 972.

7. information on potential recipients of personal data and intent to provide personal data to third parties

The personal data of a data subject and the personal data contained in a report of a possible illegal act may be transferred to the relevant courts, administrative authorities, police authorities or other relevant public authorities, as well as to expert advisers of the Company (e.g. lawyers, etc.) under the conditions set by the relevant legal regulations.

The Company does not intend to transfer personal data to a third country or an international organization, except in the case where the report relates to an illegal act in relation to the legal regulations of the European Union and if the identification of the data subject is required by competent authorities.

8. further information about the processing of personal data

Personal data is processed manually in physical or electronic form.

Personal data will not be processed by any personal data processors. Personal data will be processed only by persons expressly authorized to do so.

9. data subject rights

The Company is obliged to provide data subjects with information regarding the processing of their personal data (in particular, the purpose of processing, categories of personal data, time of their processing and source of personal data) at their request. A data subject is also entitled to request a copy of the processed personal data. However, for its repeated provision, the Company is entitled to demand a reasonable fee corresponding to the incurred administrative costs associated with its provision from the data subject.

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In the event that the Company processes inaccurate or incomplete personal data, data subjects are entitled to request their correction and completion.

Data subjects are entitled to request that the Company delete personal data relating to a data subject if one of the following reasons is given:

- a) personal data are no longer needed for the purposes for which they were collected or otherwise processed, or
- b) the processing of personal data is illegal, or
- c) the data subject objects to the processing of personal data and there are no overriding legitimate reasons for the processing of personal data, or
- d) personal data must be deleted to comply with a legal obligation set out in the law of the European Union or a member state, or
- e) any given consent to the processing of personal data is revoked.

On the other hand, the data subjects do not have the right to delete personal data if the processing of personal data is necessary for the fulfilment of legal obligations of the Company or for the determination, exercise or defence of legal claims of the Company or for archiving purposes.

The data subjects are entitled to object at any time to the processing of personal data, which is carried out on the basis of the legitimate interest of the Company. When raising such an objection, the Company assesses whether the interest of the given data subject in protecting the personal data outweighs the legitimate interest of the Company for which the personal data is processed by the Company. If the Company comes to the conclusion that the interest in protecting the personal data of the data subject prevails, it stops processing the personal data of the employee for this purpose.

The right to restrict the processing of personal data of the data subject applies only in the case of:

- a) when the data subject raised an objection to the processing of personal data, which is carried out on the basis of the legitimate interest of the Company,
- b) questioning the accuracy of processed personal data, or
- c) illegal processing of personal data by the Company and simultaneous refusal of their deletion by the data subject, or
- d) when the Company does not need personal data for the given purpose of processing, but the data subject still requires personal data for the determination, exercise or defence of his legal claims.

In the event that any of the above conditions are met, the Company temporarily disables access to the personal data of the data subject and does not process it for a certain period of time.

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The data subjects have the right to obtain personal data concerning them and which they have provided to the Company in a structured, commonly used and machine-readable format, and the right to transfer these data to another personal data administrator without the Company preventing it, or rather the data subjects are entitled to request that personal data be transferred directly by the Company to another personal data administrator, if technically feasible. This right belongs to the data subject only in the case of personal data processing on the basis of possibly granted consent to the processing of personal data.

The data subject is entitled to contact the supervisory authority at any time – it is the Office for the Protection of Personal Data, with headquarters in Prague, Plk. Sochora 27, zip code 170 00, website: www.uoou.cz.

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