		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
Developed by :	Dana Havlickova	The following is responsible for the update:	HR manager	Approved by:	Jan Sklenar
COMPLIANCE MANAGEMENT					

COMPLIANCE MANAGEMENT

REPORTING UNETHICAL OR ILLEGAL ACTS

WHISTLEBLOWER PROTECTION

REGUTEC as

Company ID: 05613345, with registered office no. 92, 664 66 Němčičky, a company registered in the Commercial Register kept by the Regional Court in Brno under file number B 7620 (hereinafter referred to as the "**Company** ")

Date of approval of the internal regulation: 1.4.2026

Date of issue of internal regulation: 20.4.2026

The regulation was approved and issued by the Company's board of directors.

PREAMBLE


On April 1, 2026, the Company adopted a Code of Ethics (hereinafter referred to as the "**Code of Ethics** ") , which introduced a comprehensive system of internal corporate measures and methods for preventing, detecting and subsequently responding to unethical and potentially illegal actions, which was also adopted in order to maintain the good reputation and transparency of the Company.

This regulation is issued in connection with the Company's Code of Ethics, for the purpose of setting the functioning of so-called compliance management and setting rules for reporting and alerting to suspicions of unethical behavior or illegal activities that could occur within the Company.

This document serves as a guide for the Company's employees, as well as other persons, on how to act in the event of suspicion that unethical or illegal conduct is or has been occurring in the Company, and at the same time it introduces a feedback system.

1 DEFINITION


1.1 In this internal regulation, the following terms have the following meanings:

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
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COMPLIANCE MANAGEMENT					

Compliance Management	has the meaning given in Article 2.1of this internal regulation;
Code of Ethics	has the meaning given in Preambleto this internal regulation;
GDPR	has the meaning given in Article 8.2of this internal regulation.
Notification	have the meaning given in Article 2.3.1of this internal regulation;
Company	has the meaning given in the heading of this internal regulation;
ZOO	has the meaning given in Article 2.1of this internal regulation;


2 COMPLIANCE MANAGEMENT

- 2.1 In order to prevent unethical or illegal conduct, to monitor compliance with legal regulations, the Company's internal rules and its values, as well as to receive reports of potential violations of legal regulations, the Company's internal rules or other unethical conduct in violation of the Code of Ethics, to investigate such reports and to resolve them, the Company establishes this compliance management (hereinafter referred to as "**Compliance Management**"). The members of the Compliance Management also represent the relevant persons within the meaning of Section 10 of Act No. 171/2023 Coll., on the Protection of Whistleblowers, as amended (hereinafter referred to as "**ZOO**").
- 2.2 Compliance Management will consist of three (3) members, namely;
- 2.2.1 Mgr. Dana Havlíčková Lišková, tel.: 604 582 184, e-mail: dana.havlickova@regutec.com with the address for delivery of the notice: Němčičky 92, Němčičky 664 66;
- 2.2.2 Ing. Michaela Fialová, tel.: 727 834 325, e-mail: michaela.fialova@regutec.com with the address for delivery of notifications: Němčičky 92, Němčičky 664 66;
- 2.2.3 Ing. David Janeček, tel.: 603 280 585, e-mail: david.janecek@regutec.com with the address for delivery of notices: Němčičky 92, Němčičky 664 66.
- 2.3 Compliance Management is authorized in particular to:
- 2.3.1 receive and assess reports of suspected potentially illegal or unethical conduct (hereinafter referred to as "**Reports**");
- 2.3.2 investigate the facts that are the subject of the Notice, as well as facts potentially related to them;
- 2.3.3 assess the nature of the facts stated in the Notice or the facts identified as part of the Compliance Management investigation;
- 2.3.4 propose to the Company and its management solutions to the identified facts, in particular, but not exclusively, propose measures to correct the identified facts, mitigate their consequences, prevent their recurrence, as well as propose possible action against public authorities aimed at correcting, mitigating or preventing the consequences arising from the identified facts;
- 2.3.5 propose to the Company's management the adoption, modification or amendment of the Company's internal regulations or documentation, particularly in order to make the

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
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COMPLIANCE MANAGEMENT					

Company's preventive procedures and mechanisms more effective in preventing illegal or unethical conduct;

- 2.3.6 conduct employee training aimed at preventing illegal or unethical behavior and participate in exit interviews with employees upon termination of their employment;
 - 2.3.7 to request proof of the identity of the persons concerned or persons involved in the investigation of the Notice, in a reasonable manner enabling the unambiguous identification of such person, but always only in accordance with the relevant legal regulations;
 - 2.3.8 obtain access to all records, documents and other materials of the Company necessary for a proper investigation of the Notice, including any audiovisual and similar recordings, if relevant to the investigation of the Notice, and make copies of the materials thus obtained;
 - 2.3.9 enter all Company premises that may be related to the Notice;
 - 2.3.10 request oral explanations from relevant persons, in which case Compliance Management will always inform the relevant person of their right to refuse to provide an explanation;
 - 2.3.11 to make, with the consent of the person concerned or a person participating in the investigation, an audio or video recording of their oral speech;
 - 2.3.12 request any opinions from relevant persons on professional or technical issues that may be relevant to the investigation of the Notice;
 - 2.3.13 to the acts and activities specified in the relevant provisions of the ZOO.
- 2.4 Compliance Management is obliged to:
- 2.4.1 maintain confidentiality regarding facts that he/she learned while performing his/her duties, in particular:
 - confidentiality of the identity of the whistleblower and other persons, as well as information that could lead to the disclosure of their identity;
 - the confidentiality of information, the disclosure of which could frustrate or jeopardise the purpose of the notification, in particular the proper investigation of the information contained in the notification and the prevention or correction of the unlawful situation;
 - confidentiality about procedures, strategies, prices or any other competitively relevant information concerning the Company or its business partners;
 - 2.4.2 to act impartially, objectively and always in accordance with the relevant legal regulations and the Company's internal regulations. If any conflict arises between the rights and obligations of Compliance Management under the Company's internal regulations and the mandatory provisions of the legal regulations, the relevant legal regulations shall prevail over the Company's internal regulations;
 - 2.4.3 comply with the deadlines for processing Notices as set out in applicable laws and the Company's internal regulations;

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
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COMPLIANCE MANAGEMENT					

- 2.4.4 actively supervise compliance with the Code of Ethics and legal regulations by the Company, its employees and other relevant persons;
 - 2.4.5 assess risks or areas of risk of unethical or illegal conduct by the Company, its employees or other relevant persons;
 - 2.4.6 ensure that all employees of the Company, as well as other relevant persons, are familiar with the Code of Ethics, this internal regulation and related documentation of the Company, including its updates, modifications or additions;
 - 2.4.7 Compliance report for the Company's management , which will contain at least the number of reports received on suspicion of unethical or illegal conduct, the number of reports resolved, proposed or accepted solutions to these reports, an evaluation of the functioning of the compliance program and, depending on the situation in the Company, also proposals for its modifications;
 - 2.4.8 When an employee or similar relationship is terminated, the person is obliged to write a report on the exit interview.
- 2.5 Members of Compliance Management are also obliged to:
- 2.5.1 to carry out their activities personally;
 - 2.5.2 immediately notify the Company that the member of Compliance Management has ceased to meet the conditions for performing the function of the relevant person within the meaning of the ZOO, in particular its provisions . Section 10.
- 2.6 Members of Compliance Management may not be penalized for performing their activities in accordance with applicable laws and the Company's internal regulations.


3 REPORTING ILLEGAL OR UNETHICAL BEHAVIOR

- 3.1 If an employee or other person required to do so under the Code of Ethics witnesses illegal or unethical conduct (as understood by the Code of Ethics or the ZOO) by another person or if he learns of such conduct, he is obliged to make a Report and at the same time do everything that can be fairly required of him to remedy or mitigate the consequences of such conduct.
- 3.2 If an employee or other person obliged to do so under the Code of Ethics learns that another person may be engaging in unlawful or unethical conduct (as understood by the Code of Ethics or the ZOO), they are obliged to make a Notification and at the same time do everything that can be fairly required of them to prevent such conduct or mitigate its consequences.
- 3.3 Notification can be made:
 - 3.3.1 orally to any member of Compliance Management;
 - 3.3.2 in writing to the email address of one of the members of the Compliance Management Team:

dana.havlickova@regutec.com ,

michaela.fialova@regutec.com ,

david.janecek@regutec.com

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
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COMPLIANCE MANAGEMENT					

3.3.3 in writing to any member of Compliance Management at the address specified in Article 2.2.

If the Notice concerns any member of the Compliance Management, the Notice may be made to the other members of the Compliance Management. If there are no members of the Compliance Management to whom the Notice could be made, the Notice may be made orally or in writing to Jan Sklenář, tel.: 739 571 080 , e-mail: sklenar@jetinvestment.cz with the address for delivery of notifications: Jet Investment , as

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3.4 In particular, if it is not possible to make the Notification in the manner specified in Articles 3.3 and 0 external methods of Notification may also be used, namely:

3.4.1 through the notification system of the Ministry of Justice in the manner specified at: <https://oznamovatel.justice.cz/chci-podat-oznameni/>;

3.4.2 in case of compliance with the conditions pursuant to the provisions of Section 7, paragraph 1, letter c) of the ZOO, by means of publication.

3.5 If the subject of the Notification is a potential breach of the Company's obligations in the area of measures against the legalization of proceeds from crime and the financing of terrorism, within the meaning of Act No. 253/2008 Coll., Act on Certain Measures Against the Legalization of Proceeds from Crime and the Financing of Terrorism, as amended, the Notification may be made exclusively through the Financial Analytical Office, whose contact details are available at: <https://www.fau.gov.cz/cs/kontakty>

3.6 If the Reporting Person wishes to make the Notification orally, he/she shall request this from a member of Compliance Management, who shall be obliged to accept the Reporting Person's Notification within fourteen (14) days of receipt of such request. The same applies in the case of the procedure pursuant to Article 0.

4 FACTS THAT MAY BE THE SUBJECT OF A NOTICE

4.1 In accordance with this internal regulation, it is possible to make a Notification of facts that have occurred or may occur in the Company, in particular:

4.1.1 facts constituting a violation of the Code of Ethics;


4.1.2 facts having the characteristics of a crime;

4.1.3 facts having the characteristics of an offence for which the law stipulates a fine, the upper limit of which is at least CZK 100,000;

4.1.4 facts constituting a violation of the ZOO; or

4.1.5 facts constituting a violation of another legal regulation or a regulation of the European Union, in the area of:

- financial services, statutory audit and other assurance services, financial products and financial markets;
- corporate income taxes;

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
Developed by :	Dana Havlickova	The following is responsible for the update:	HR manager	Approved by:	Jan Sklenar
COMPLIANCE MANAGEMENT					

- preventing money laundering and terrorist financing;
- consumer protection;
- compliance with product requirements, including their safety;
- safety of traffic, transportation and road traffic;
- environmental protection;
- food and feed safety and animal protection and health;
- radiation protection and nuclear safety ;
- competition, public auctions and public procurement;
- protection of internal order and security, life and health;
- protection of personal data, privacy and security of electronic communications networks and information systems;
- the protection of the financial interests of the European Union; or
- the functioning of the internal market, including the protection of competition and state aid under European Union law.


4.2 Annex No. 1 of this internal regulation contains, in connection with the identification of the Company's risks, an overview of criminal offenses with which the Company's employees or other persons designated by the code of ethics are obliged to become familiar.

5 HANDLING OF THE NOTICE

5.1 If a member of Compliance Management or a person authorized to receive a Notice pursuant to Article 0 receives a Notice orally, he/she shall either make an audio recording of the Notice or write down the Notice, at the option of the Notifier. The Notifier has the right to review the audio recording or the written version of the Notice and, if applicable, comment on it. The person receiving the Notice shall write down a record of the receipt of the Notice, and shall attach any further comments of the Notifier to this record.

5.2 If a member of Compliance Management or a person authorized to receive a Notice pursuant to Article 0a Notice in writing, he/she shall notify the whistleblower of the receipt of the Notice no later than seven (7) days from the day following the date of delivery of the Notice, unless the whistleblower expressly requests not to be notified of the receipt of the Notice or if notifying the whistleblower of the receipt of the Notice could lead to the disclosure of the whistleblower's identity to another person.

5.3 The competent person shall assess the validity of the Notification and shall notify the Notifier in writing of the results of the assessment, no later than thirty (30) days from the date of receipt of the Notification. In cases of factual or legal complexity, this period may be extended by up to another thirty (30) days, but not more than twice. The notifier shall be notified in writing of the extension of the period and the reasons for its extension before its expiry, unless the notifier expressly requests not to be notified of the extension of the period or if notifying the notifier of the extension of the period could lead to the disclosure of the notifier's identity to another person.

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
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COMPLIANCE MANAGEMENT					


- 5.4 If the Notification is not found to be justified, the relevant person will notify the Notifier without undue delay and, together with this notification, will inform him of the options for further action.
- 5.5 If the Notification is found to be justified, the relevant person shall submit the conclusions of his investigation to the other members of the Compliance Management and the Company's management, unless the results of the investigation concern other members of the Compliance Management or the Company's management. In such a case, the relevant person shall submit the conclusions of his investigation to the highest body of the Company. Together with the conclusions of his investigation, the relevant person shall also submit proposals for measures for correction, future prevention or streamlining of the Company's compliance system.
- 5.6 In the event of a proceeding pursuant to Article 5.5 the Company's management and/or its highest authority shall review the findings of the investigation and the proposed measures and take the necessary steps to remedy the situation, improve prevention and streamline the Company's compliance system. The Reporting Party shall be notified of this no later than seven (7) days from the date of adoption of the appropriate measures.
- 5.7 When handling a Report, the relevant persons are obliged to always act in a way that preserves the anonymity of the reporter.

6 RECORDS AND RETENTION OF NOTICES


- 6.1 Compliance Management will keep records of data on notifications received, to the extent of:
- 6.1.1 date of receipt of notification
 - 6.1.2 the name, surname, date of birth and contact address of the notifier, if this information is known;
 - 6.1.3 a summary of the content of the notification and the identification of the person against whom it was directed, if known;
 - 6.1.4 the date of assessment of the validity of the notification and its outcome;
 - 6.1.5 preventive or corrective measures proposed and taken.
- 6.2 Compliance Management is required to retain reports of suspected unethical or illegal conduct for five (5) years from its receipt.

7 PROHIBITION OF RETALIATION

- 7.1 Any form of retaliation for reporting unethical or illegal conduct within the Company or potential conduct is prohibited.
- 7.2 Retaliatory action means an action or omission in connection with the work or other similar activity of the whistleblower pursuant to Section 2, Paragraphs 3 and 4 of the ZOO, which was caused by the making of the Report and which may cause harm to the whistleblower or a person pursuant to Section 4, Paragraph 2, Letters a) to h) of the ZOO; provided these conditions are met, a retaliatory action is in particular:
- 7.2.1 termination of employment or non-renewal of fixed-term employment;
 - 7.2.2 termination of a legal relationship established by an agreement to perform work or an agreement to perform work;

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
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COMPLIANCE MANAGEMENT					

- 7.2.3 dismissal from the position of a senior employee;
 - 7.2.4 imposition of disciplinary action;
 - 7.2.5 reduction of wages, salary or remuneration or failure to grant a personal allowance;
 - 7.2.6 transfer or reassignment to another job or position;
 - 7.2.7 performance appraisal or work report;
 - 7.2.8 failure to provide professional development;
 - 7.2.9 change of working hours;
 - 7.2.10 requiring a medical report or occupational medical examination;
 - 7.2.11 termination or withdrawal from the contract; or
 - 7.2.12 interference with the right to the protection of personality.
- 7.3 A whistleblower may not be subject to retaliation even if:
- 7.3.1 a person who provided assistance in identifying information that is the content of the notification, submitting the notification or assessing its validity;
 - 7.3.2 a person who is a close relative of the whistleblower;
 - 7.3.3 a person who is an employee or colleague of the whistleblower;
 - 7.3.4 person controlled by the whistleblower;
 - 7.3.5 a legal entity in which the notifier has a stake, a person controlling it, a person controlled by it or a person who is controlled by the same controlling person as this legal entity;
 - 7.3.6 a legal entity of whose elected body the notifier is a member, a controlling person, a controlled person or a person controlled by the same controlling person;
 - 7.3.7 a person for whom the whistleblower performs work or other similar activity pursuant to Section 2, paragraphs 3 and 4 of the Act; or
 - 7.3.8 a trust of which the notifier or the legal entity referred to in letter e) or f) is the founder or beneficiary or in relation to which the notifier or the legal entity referred to in letter e) or f) is a person who substantially increases the assets of the trust by contract or acquisition in the event of death.
- ## 8 PROCESSING OF PERSONAL DATA
- 8.1 The processing of personal data in connection with the notification is not subject to the obligation to assess the impact of the processing of personal data on the protection of personal data.
 - 8.2 Personal data in relation to the notification are processed on the basis of Article 6(1)(c) of the General Data Protection Regulation (hereinafter referred to as the “**GDPR**”).
 - 8.3 Special categories of personal data pursuant to Article 9(1) of the GDPR may be processed in relation to the notification on the basis of Article 9(2)(e), (f) or (g) of the GDPR.

		Document number: SM-HR- 014	REV 0	Release date: 13.4.2026	Number of attachments: 0
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COMPLIANCE MANAGEMENT					

- 8.4 The information obligation pursuant to Articles 13 and 14 of the GDPR must be fulfilled while maintaining confidentiality in accordance with this internal regulation.
- 8.5 The exercise of the right of access to personal data pursuant to Article 15 of the GDPR may be granted to the data subject in accordance with Article 23 of the GDPR only on condition that the confidentiality of the identity of the reporting person and other persons mentioned in the report is maintained.
- 8.6 The request for access to personal data related to the notification will be forwarded by the person responsible for the personal data protection agenda to the members of Compliance Management (relevant persons) for processing.
- 8.7 The obligation to notify a breach of the security of the data subject's personal data, while maintaining confidentiality according to this internal regulation, also applies to Compliance Management (relevant persons).

9 FINAL PROVISIONS

- 9.1 All employees of the Company, as well as any other persons affected by the Code of Ethics and this internal regulation, are obliged to provide Compliance Management with all cooperation that Compliance Management requests in fulfilling its obligations under this internal regulation.
- 9.2 In the event of submitting a knowingly false report, the reporter may commit an offense for which a fine of up to CZK 50,000 may be imposed or a criminal offense may be committed.
- 9.3 This internal regulation comes into effect on April 20, 2026.
- 9.4 This internal regulation includes:
- 9.4.1 Annex No. 1 – Overview of Criminal Offences, and
- 9.4.2 Appendix No. 2 – Sample exit interview report.

Approved by:

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Jan Sklenář
Chairman of the Board of Directors

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Michaela Fialová
Member of the Board of Directors