

**PROCEDURE FOR REPORTING VIOLATIONS OF LAW
AND IRREGULARITIES
(WHISTLEBLOWING PROCEDURE)**

**BATO SP. Z O.O.
with its registered office in Tychy**

27 February 2026

§1. Introduction and Purpose of the Procedure

The purpose of this Procedure is to ensure that individuals employed by or cooperating with BATO SP. Z O.O. can safely and confidentially report violations of law or ethical principles, in accordance with Directive (EU) 2019/1937 and the Act on the Protection of Whistleblowers.

The rules set out in this Procedure do not affect or limit the obligation to notify competent public authorities in accordance with their powers, especially in the case of a justified suspicion of a criminal offence.

§2. Scope of Application

1. This Procedure applies to all individuals who, in connection with their work or cooperation, have obtained information about violations of law, including: employees (current and former), job applicants, collaborators, contractors, interns, trainees, business partners, and their employees.
2. The Procedure covers internal reports.

§3. Receiving Reports

1. A reporting person may submit an internal report if they have knowledge or reasonable suspicion of a violation of law.
2. The Company's Management Board ensures secure communication channels and protection for reporting persons.
3. Reports are received by the HR Manager.
4. If the report concerns the HR Director, it should be submitted to the President of the Management Board.
5. At the request of the reporting person, a meeting with the person receiving the report shall be arranged within 14 days from the date of the request.
6. The person receiving the report may contact the reporting person at any stage to obtain additional information.

§4. Internal Reporting Channels

1. Reports may be submitted in the following forms:

e-mail: signalisci@rrobotics.co

by post: BATO SP. Z O.O., ul. Fabryczna 5, 43-110 Tychy, with the note: “Confidential – for the attention of the HR Manager only”, in person – after arranging a meeting by phone at +48 32 214 63 78 or via e-mail as indicated above

2. Reports are accepted as identified submissions. Anonymous reports may be considered optionally if their content allows for follow-up actions.

3. In the absence of the HR Manager, the report will be reviewed on the first day after their return or by a person designated by them.

§5. Requirements for the Content of a Report

The report should include:

- details of the reporting person (name, surname, position, contact details)
- date and place of submission
- details of the persons concerned
- description of the violation (circumstances, date, place)
- description of the effects or consequences of the violation
- signature of the reporting person
- information whether the violation has previously been reported within the Company

§6. Acknowledgement and Review of the Report

Acknowledgement of receipt of the report shall be provided within 7 days of its receipt. The investigation is conducted confidentially, and feedback is provided within 3 months.

§7. Handling of Reports and Follow-up Actions

1. Verification may include consultations with independent experts.
2. Anonymous reports with insufficient information may be discontinued.
3. If justified – corrective actions or notification of authorities.
4. If unfounded – case closed with justification.
5. Feedback includes results and actions taken.

§8. Public Disclosures

A whistleblower may publicly disclose information if no action was taken or it is required for public interest.

§9. Protection of Reporting Persons

1. Protection shall be granted to persons making reports in good faith and consists of a prohibition of any retaliatory actions against the reporting person, persons assisting in making the report, and persons associated with them.
2. Retaliatory actions shall include, in particular: termination, dismissal or non-renewal of a contract, omission in promotions or training opportunities, reduction of remuneration, changes to employment conditions, mobbing, discrimination, unjustified negative performance evaluation, as well as actions adversely affecting the reporting person's reputation.
3. In the event of suspected retaliatory actions, the HR Manager (or the President of the Company, if the matter concerns the HR Manager) shall be obliged to immediately initiate an investigation and undertake remedial measures.

4. A reporting person acting in bad faith (i.e. knowingly providing false information) shall not be entitled to the protection provided for under this Procedure and may be subject to legal consequences arising from the Act on the Protection of Whistleblowers of 14 June 2024.

§10. Register of Reports

1. All internal reports shall be recorded in the Internal Reports Register maintained by the HR Manager.
2. The Register shall be maintained in accordance with the principles of confidentiality and personal data protection.
3. Data shall be retained for a period of 3 years from the end of the calendar year in which the follow-up actions were completed.
4. The template of the Register constitutes an appendix to this Procedure.

§11. Poufność i ochrona danych

1. Tożsamość sygnalisty oraz osób, których dotyczy zgłoszenie, objęta jest tajemnicą.
2. Dane mogą być udostępniane wyłącznie osobom upoważnionym lub właściwym organom.
3. Przetwarzanie danych odbywa się zgodnie z RODO i zasadą minimalizacji danych, a klauzula informacyjna RODO stanowi załącznik do niniejszej procedury.

§12. Consultation and Entry into Force

The Procedure has been consulted with employee representatives in accordance with statutory requirements and shall enter into force on 16 March 2026.

**Appendix 1 – to the Procedure for Reporting Violations of Law and Irregularities
in BATO SP. Z O.O. dated 27 February 2026**

GDPR Information Clause for Whistleblowers

Pursuant to Article 13 of the GDPR, we hereby inform that:

1. The controller of personal data is BATO SP. Z O.O., ul. Fabryczna 5, 43-110 Tychy.
2. Personal data are processed for the purpose of receiving and handling reports and ensuring the protection of whistleblowers.
3. The legal basis for processing is Article 6(1)(c) of the GDPR (legal obligation) and Article 9(2)(g) of the GDPR (substantial public interest).
4. Personal data may be disclosed to public authorities to the extent required by applicable law.
5. Personal data will be retained for no longer than 3 years from the end of the calendar year in which the follow-up actions were completed.
6. The data subject has the right to access their data, rectify it, request restriction of processing, and lodge a complaint with the President of the Personal Data Protection Office (UODO).
7. Providing personal data is voluntary; however, it is necessary for the handling of the report.

**Appendix 2 – to the Procedure for Reporting Violations of Law and Irregularities
in BATO SP. Z O.O. dated 27 February 2026**

Internal Reports Register

LP	NUMER ZGŁOSZENIA	DATA WPŁYWU	DANE KONTAKTOWE ZGŁASZAJĄCEGO	SPOSÓB PRZYJĘCIA	OPIS PRZEDMIOTU ZGŁOSZENIA	DATA POTWIERDZENIA	WYNIK/ DZIAŁANIA NASTĘPCZE	DATA ZAKOŃCZENIA SPRAWY	UWAGI