

Internal whistleblowing system

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approval

Owner: Staff structural unit

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Introduction and scope

The internal whistleblowing system of LSEZ "Jensen Metal" SIA is created in accordance with the Whistleblowing Law (hereinafter – the Law) adopted on 11.10.2018 and it gives all employees of the Company to facilitate lawful, honest, open, and transparent work of the Company.

The purpose of the Law is to promote whistleblowing on violations in public interests and ensure the establishment and operation of whistleblowing mechanisms, and due protection of whistle-blowers.

The whistleblowing system of the Company allows any employee of the Company to inform on any violations in Company's activity affecting material public interests to prevent them timely, before the reputation of the Company is put under danger before it has incurred losses or competent state authorities are involved.

Role of whistleblowing

We ask to inform of violations if you have suspicion that an employee of the Company violates the normative acts or Company's internal regulations.

The Law outlines particularly the following violations regarding which whistleblowing is anticipated:

1. failure to act and negligence of officials, or abuse of the official position by them.
2. corruption, fraud.
3. squandering of financial resources or property of a public person.
4. tax avoidance;
5. public health threat;
6. food safety threat;
7. construction safety threat;
8. environmental or labour safety threat.
9. public order threat, infringement of human rights.
10. violation in the field of public procurement.
11. violation in the financial and capital market sector.
12. violation of competition law.

At the same time, we emphasize, the deliberate provision of false information, disclosure of information containing the state or company's secret and reporting only on infringements of personal interests shall not be regarded to be whistleblowing.

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Reporting on violations

We ask to report any information on violation in open manner to the head of HR who ensures that the report arrives to the right persons or is negotiated with the right persons and supervises the solving of situation.

Please send your reports to the electronic mail sab@jensenmetal.eu .

We have chosen the submission of reports through e-mails only because the use of e-mails ensures preparation and reading of reports in peace and quiet.

It's important to provide the information as detailed as possible and state facts and names of persons. It's also important to attach copies of documents that are at your disposal. You can attach also other evidence (e.g., photos, copies of e-mail correspondence) if such are at your disposal and if this can help to react on the violation.

Report shall contain at least the following elements:

1. Clear identification that it is a whistle-blower's report.
2. Clear list of violations, naming particular facts.
3. Specific information on natural or legal persons which are suspected of involving in this violation.

In the whistle-blower's report it must be stated additionally whether:

4. Information on violation is obtained when performing the work duties or establishing legal labour relations related with performance of work duties.
5. It is reported on this violation previously. In case it is reported previously, attach the previous answer received (if any).

Please do not report anonymously about the violations of regulations. You can trust that we treat the received report with due caution and we protect your interests as a whistle-blower. It's equally important for us to also protect the interests of the person accused in violation. Anonymous reports encumber the investigation. We shall investigate anonymous reports only if they are clearly justified.

Receipt and examination of the received reports

After receipt of a report, head Company's HR shall process it and examine whether the report conforms to the whistleblowing signs laid down in the Law, is relates with an actual violation and whether it must be examined within the framework of Whistleblowing system. Depending on the type of report, the head of Company's HR shall involve an expert:

1. colleague from Finance Department if the report is related with finances.
2. Procurist if the report is related with management issues, legal issues or conformity to normative acts.
3. colleague from HR if the report is related with staff issues or other issues.

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Investigation of reports and solving of situation

The most important thing in the work with reports is accuracy and confidentiality. The report is investigated, and situation solved at management level that is at least one level higher than the level where the problem is established.

The operation of whistleblowing system is based on trust, so the head of Company's HR shall involve as less persons as possible in investigation and solving the case described in the report – only those persons who must really be informed of the relevant case. Persons who could be part of the problem, are never not involved in the process, of course.

Procedure

Head of Company's HR accepts the report, register it, approves the fact of receipt to the person who has submitted the report and gives the evaluation on the time required for investigation and solving the case.

If it is highly credible that the report is justified and within the competence of the Whistleblowing system, head of Company's HR decides on persons to be involved in the investigation who are provided the information required for the investigation.

Data of the whistle-blower are pseudonymised and they and the report itself and the attached information shall have the status of restricted access information.

We shall submit the decision on the persons involved in the investigation to the whistle-blower and after that we shall start solving the situation. The identity of the whistle-blower will be disclosed only to those persons who need it to review the whistle-blower's report and protect the whistle-blower. Corrective measures are taken in the result of whistle-blower's report which eliminate the violation if the fact of violation is confirmed.

Protection of whistle-blower

We attribute great importance to the reporting on violations and analysis of violations of regulations. All reports are important in our endeavour to ensure the integrity of business. You can rely on that we review your report with due accuracy, and we protect your rights as a whistle-blower; you can also rely thereon that we do everything that is possible for your as a whistle-blower protection.