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Whistleblowing Policy

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The procedure for receiving and reviewing reports of AE Partner (from now on – the Company) has been developed under the Whistleblowing Law (from now on – the Law).

Whistleblower

Whistleblower is a person (employee, trainee, outsourcer, guest) who provides information about a possible violation, that may be harmful to the public interest, if the person considers this information to be true and obtained in the course of employment or legal relations with the performance of work duties.

The aim

The internal Whistleblowing system has been developed under the requirements of the regulatory statutes of the Republic of Latvia, promoting the fair and open operation of the Company. Upon finding and informing about the violation of the Company or the Whistleblower's contact point, the Whistleblower has the right to receive specific protection measures, consequently being protected from unfavorable outcomes.

Violations, for which to whistleblow

Everyone has the right to bring an action for criminal offenses, administrative offenses or other breaches of Law, or breaches of binding ethical or professional rules detrimental to the general public interest, such as negligence on the part of officials, negligence or abuse of office, corruption, fraud, misappropriation of public funds. Or a waste of property, tax evasion, a threat to public health, threat to food safety, threat to construction safety, threat to environmental safety, a threat to occupational safety, threat to public order, violation of human rights, violation of public procurement, violation of financial and capital market sector, violation of the Law of Competition Infringement, provision of goods and services, including about safety and compliance, violations of transport security, violations of the internal market, violations of animal welfare, protection of consumer rights, protection of privacy and personal data, and security of network and information systems.

Before to whistleblow, it is necessary to make sure that the violation is a criminal offense, an administrative violation, or another violation of legal norms, as well as a violation of binding ethical or professional norms that is detrimental to the public interest. Consultations on the Law can be obtained at the Contact Point of whistleblowers at the State Chancellery.

Whistleblowing reporting channels

Submission of Whistleblowing report:

- at the beginning of the employment relationship, employees are informed about the Company's internal Whistleblowing mechanism;
- Whistleblowing policy guidelines are embedded in the Company's internal management system;
- by contacting the relevant competent authority;
- at the contact point of the Whistleblowing – at the State Chancellery.

Content of the Whistleblowing report

The Whistleblowing report shall contain information – addressee, description of the violation, mentioning specific facts, method of obtaining information (work-related), what damage may be caused by the alleged violation, or the violation

has already been reported in advance, name, surname, personal identification number, contact information, date of submission.

Infringement report procedure

1. Receipt, registration, and pseudonymization of the application.
2. Transfer of the application to responsible persons, who must examine it objectively.
3. Evaluation of the application under the checklist of the Whistleblowing signs:
 - 3.1. the requirements for submission of the report have been complied with;
 - 3.2. a person has submitted the report;
 - 3.3. information obtained while performing work duties;
 - 3.4. there are no reasonable and objective doubts about the applicant's good faith;
 - 3.5. a decision regarding the recognition of the submission as an Whistleblower report;
4. Within seven days, the compliance or non-compliance of the application with the requirements of the Law and the progress of the further report shall be assessed.

Within three days, the applicant shall be informed of the result of the evaluation.

5. The whistleblower shall be informed of the progress of the examination of the report of the alarm rapporteur not later than within two months from the day when the submission has been recognized as the report of the alarm rapporteur.

Obligations and rights of the Company

Upon receipt of the whistleblowers report form, AE Partner undertakes to comply with and comply in good faith with both the requirements of the Whistleblowing report and the requirements of the General Data Protection Regulation relating to the protection of personal data.

25.08.2022.