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Whistleblowing Policy

Basic information about the document	
Document owner	Paulina Kaźmierczuk, Compliance Officer
Author(s)	Paulina Kaźmierczuk, Compliance Officer Dominika Tarnicka, Junior Compliance Specialist Dawid Szupelak, Data Privacy Team Leader Rozalia Bielińska, Junior In-House Lawyer
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1. OVERVIEW

1.1 Our Commitment

At RTB House (the “**Company**”) we are committed to conducting our business with fairness, integrity, and respect for the law and our values. We expect all associates, managers, directors, and board members to uphold the highest standards in line with applicable laws and internal regulations, particularly the [RTB House Compliance & Ethics Code](#).

To fulfil this responsibility and protect our Company, we must speak up when we observe conduct that is inconsistent with RTB House standards.

This Whistleblowing Policy (the “**Policy**”) is a key element in supporting a culture of ethical behaviour and ensuring effective compliance management at RTB House. It also promotes openness and accountability, which are crucial for preventing legal violations or ethical misconduct and addressing them promptly when they occur. By speaking up, you provide us with the opportunity to address your concerns. Raising a concern helps protect the Company, your workplace, and ultimately your colleagues and yourself.


Adopting this Policy is also intended to emphasize that raising concerns in good faith should not result in any negative consequences. RTB House enforces a strict zero-tolerance policy for retaliation and will ensure protection for those who speak up.

1.2. Purpose of This Policy

The purpose of this Whistleblowing Policy is to:

- Encourage and empower RTB House employees and contractors to report concerns about suspected violations of the law or internal regulations without fear of retaliation;
- Clarify when, where and how you can raise your concern;
- Explain what you can expect from RTB House when you raise your concern and what possible steps will be taken after you speak up;
- Ensure compliance with relevant whistleblowing legislation, including, but not limited to, the European Whistleblower Protection Directive and applicable local acts implementing that Directive.

This Whistleblowing Policy is a global document adopted by the parent company of RTB House Group, i.e. RTB House S.A. It outlines the general principles applicable to the entire organisation.

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Specific procedures or policies may be developed as required in certain jurisdictions where RTB House entities operate, and will apply to reports submitted within those regions. In such cases, the relevant procedures or policies will be communicated to associates working for those entities.

1.3. What is Whistleblowing?

Whistleblowing occurs when an individual raises a concern or discloses information about wrongdoing, illegal practices, or unethical conduct they have become aware of through their work. Under this Policy, every individual has the right to speak up - to raise concerns or disclose information - without fear of retaliation, discrimination or disadvantage. A person raising a concern under this Policy will be referred to as the “**Whistleblower**”.

We strongly encourage our associates to raise concerns internally through the available channels. By reporting internally, you give us the opportunity to address the matter and take appropriate action, thereby protecting and improving our organisation and its culture. However, this Policy is not intended to discourage or limit reporting alleged violations of policies or applicable laws to law enforcement or relevant government and regulatory authorities.

1.4. Who Can Blow a Whistle?

A concern under this Policy may be raised by:


- Any individual performing work for or on behalf of RTB House, including: employees (including managers and directors with employee status), workers supplied by employment agencies or other third-party employers, associates working under civil law contracts, self-employed individuals, board members, interns, or volunteers;
- Individuals or parties professionally associated with RTB House, including: former employees or associates, job applicants, individuals working for or on behalf of RTB House’s clients, suppliers, partners, agents, and shareholders.

The right to raise a concern under this Policy does not expire when an individual's or their employer's or principal's relationship with RTB House terminates.

1.5. What Types of Concern Can Be Reported Under This Policy?

Under this Policy, you can report:

- A crime or offence;
- A breach of local, federal or international law or regulation;

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- Serious harm to the public interest, to the interest of RTB House, or the threat thereof;
- Situations or conduct that violate provisions of RTB House Compliance & Ethics Code or any other internal regulation of RTB House Group or its companies;
- Abuse of law, which may not formally violate the law or internal regulations, but contradicts their object or purpose.


Any report made in this context will be referred to as the “**Report**”.

All Reports must be made carefully and in good faith, meaning the Whistleblower must reasonably believe that the alleged facts are true.

For example, the following conduct can be the subject of a Report. This list is non-exhaustive:

- Corruption or bribery, including violations of the Anti-Corruption Policy of RTB House Group or gifts policy;
- Discrimination, harassment/bullying, or sexual harassment in the workplace;
- Human rights violations;
- Data privacy violations;
- Maladministration or mismanagement, consisting of improper use of company resources;
- Misuse of data or disclosure of confidential information;
- Fraud and fraudulent (financial or non-financial) reporting;
- Money laundering or terrorism-financing violations;
- Competition law violations;
- Environmental, health, and safety issues;
- Retaliation against anyone for reporting a concern in good faith.

In the EU jurisdictions a category of “**Statutory Irregularity**” has been introduced, defined as a violation of specific regulations outlined in the local whistleblowing law (e.g., regulations related to environmental protection, privacy, personal data, and the security of network and information systems). A Report related to such Statutory Irregularity will be referred to as the “**Statutory Concern**”. For each RTB House entity operating in such jurisdictions with 50 or more associates, an additional internal regulation named “**Statutory Concerns Procedure**”, will be introduced.

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In other jurisdictions an additional internal regulation may be introduced, named “**Protected Disclosures Procedure**”, if the local law provides for specific rules or requirements for reporting certain concerns (referred to as the “**Protected Disclosure**”).

If a Statutory Concerns Procedure or Protected Disclosures Procedure is adopted for your country, it constitutes a schedule to this Policy and includes specific rules related to the reporting of Statutory Concerns or making Protected Disclosures, which take precedence over the rules described in this Policy. Statutory Irregularity should be reported in accordance with the Statutory Concerns Procedure and Protected Disclosure should be made in accordance with the Protected Disclosures Procedure for a relevant country, in particular using the reporting channels specified therein.


Furthermore, certain local laws may also require a separate internal process for reporting and investigating specific types of violations, e.g., sexual harassment. In such cases, the respective RTB House company will implement this process, communicate it to the affected associates, and it will take precedence over the general rules described herein.

Additionally, some countries may impose further requirements, safeguards, or guidelines within the processes described above. Where these requirements differ by jurisdiction, they will be outlined in a separate document called a 'Country-Specific Supplement,' tailored to meet the legal obligations of each jurisdiction and communicated accordingly to the relevant associates.

1.6. What Types of Concerns Should Not Be Raised Under This Policy?

This Policy should, in principle, **not** be used to report:

- **Immediate threats to life or property:** If you need emergency assistance, contact your local authorities or call your country’s emergency phone number. If possible, inform your direct manager about the emergency situation, and if it relates to the RTB House office area, also inform the Administration Assistant or relevant person indicated in the local Office Crisis Management Procedure.
- **With malicious intent:** Do not make accusations you know are false or cannot be substantiated. Doing so may lead to disciplinary measures.
- **Concerns or grievances related to HR matters:** This could include issues concerning your terms of employment, performance, or interpersonal conflicts. For such HR-related matters, contact your direct manager and/or HR Business Partner. However, this exclusion does not apply to violations of law or internal regulations, such as conduct likely to constitute discrimination or any type of harassment - for such cases **do** use this Policy. If an HR-related matter constitutes a Statutory Concern, it should be reported in accordance with the Statutory Concerns Procedure for a relevant country.

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- **Conflicts of interest:** If you need to report an actual or potential conflict of interest, whether related to you or known to you, do so in accordance with the RTB House Compliance & Ethics Code and any relevant internal policy regulating conflicts of interest. However, if an actual conflict of interest has already led or is very likely to lead to a violation or abuse of law or our internal regulations, you **should** report it under this Policy.
- **Questions or comments on RTB House policies or procedures:** For policy- or procedure-related questions, contact the relevant internal owner. If you have questions about this Policy, contact compliance@rtbhouse.com.

2. WHISTLEBLOWER PROTECTIONS


2.1. Prohibition of Retaliation and Victimisation

RTB House is committed to ensuring the protection of the Whistleblower from any related detrimental treatment. We will not tolerate any form of retaliation, victimisation, or any other detriment against our associates or third parties who raise a concern in good faith or participate in an internal investigation following a Report. Remedial action will be taken in such cases.

Whistleblower retaliation constitutes adverse actions intended to dissuade an individual, particularly an employee, from raising a concern about wrongdoing. It can manifest in various forms, including, but not limited to:

- Bullying or harassment;
- Demotion, withholding of promotion, or alteration of job duties;
- Dismissal;
- Blacklisting;
- Disciplinary charges or suspension;
- Unfair performance evaluation;
- Denial of benefits, reduction of salary, or alteration of working hours or other conditions;
- Refusal to provide a reference or providing an adverse reference.

If you believe that you have experienced such treatment, you should immediately disclose this within the ongoing investigation process, conducted as a follow-up action to your initial Report (e.g., to the Compliance Officer, Global Head of People, or to any member of the investigation team) or report it as a separate concern in accordance with this Policy.

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Retaliation and/or victimisation represent serious violations of the RTB House Compliance & Ethics Code. Any individual found to have retaliated against a Whistleblower or been involved in such conduct will be subject to disciplinary action, which may include termination of employment or other contractual agreements with RTB House. Additionally, the individual may face criminal or civil liability for breaching relevant legislation.

2.2. Confidentiality

When you make a Report under this Policy, your concerns are treated with full confidentiality. This means that any information received from you, including your personal data, will be kept secure and shared with a limited number of individuals on a strict need-to-know basis. Information will only be disclosed outside RTB House if required by law or if an important public interest is at stake, in accordance with applicable laws.

All individuals contributing information to an investigation are instructed to maintain confidentiality and refrain from sharing or discussing information related to any case with others. This measure is taken to protect and respect all individuals involved in the process. If a Report concerns the conduct of a specific person, the matters raised in the Report may be discussed with them to gain an understanding of their perspective. They will also be instructed to maintain confidentiality.


2.3. Anonymity

Where permitted by applicable local laws, RTB House allows Reports to be made anonymously (other rules may apply to Statutory Concerns). If you prefer to remain anonymous, we encourage you to use the dedicated online platform, [RTB House Integrity Line](#), which facilitates communication between an anonymous Whistleblower and the recipient of the Report.

Whilst RTB House will endeavour to investigate anonymous Reports, you should be aware that restricting information to maintain anonymity may pose challenges to thoroughly and effectively investigating the Report. Additionally, it could make it more difficult to assess the credibility of the allegations included in such Reports.

2.4. Data Privacy

RTB House complies with applicable privacy and data protection rules and regulations concerning the protection of personal data. We take necessary measures to ensure that personal data is processed in an ethical, fair, and lawful manner. Any personal data acquired through the whistleblowing process will be processed following the privacy rules and regulations applicable to the relevant RTB House entity, as well as the appropriate [Privacy Notice](#) attached to this Policy.

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The controller of personal data processed in the whistleblowing procedure is the RTB House entity where the irregularity has occurred.

We process the personal data of individuals reporting irregularities, individuals to whom the Report pertains, and other individuals participating in the investigation for the following purposes: **a)** handling and investigating the irregularities reported; **b)** taking further actions in the event the irregularities are confirmed based on the Report; **c)** preventing acts of retaliation against the person who reported the irregularities.

If you belong to one of the above categories of individuals, you have the right to **i)** access your personal data, **ii)** to rectify or delete it, as well as **iii)** to request the restriction of processing or **iv)** to object to processing, and **v)** to data portability.

To the extent that your data is processed based on consent, you have the right to withdraw your consent to the processing of your personal data at any time. Withdrawal of consent does not affect the lawfulness of processing that was carried out based on your consent before its withdrawal.


In some cases, the exercise of the above rights by the person against whom an allegation has been made or by third parties, such as at an early stage of the investigation, may be detrimental to the case. In such instances, it may be necessary to limit the provision of detailed information regarding the right of access to personal data or the exercise of other rights. The decision to withhold information or otherwise suspend your rights will be made on a case-by-case basis and duly documented.

To learn more about your rights regarding the processing of personal data and how to exercise them, please contact our Data Protection Officer at: dpo@rtbhouse.com.

For more information about how we process personal data, please refer to the [Privacy Notice](#) attached to this Policy or contact the Legal Data Privacy Team.

2.5. Untrue Allegations

If you raise a genuine allegation in good faith, no action will be taken against you, even if the allegation is not confirmed by the subsequent investigation. However, you should be aware that any follow-up actions, such as internal investigations, require significant time and effort from the teams involved, and we take this process very seriously. Therefore, if you knowingly make malicious, vexatious or false allegations, especially if you persist with them, you must be aware that it can cause significant inconvenience and unnecessary costs for the organisation. In such cases, you should be prepared for potential consequences, including disciplinary action.

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3. REPORTING A CONCERN

3.1. Reporting Channels

RTB House offers several reporting channels for raising concerns:


- (a) **RTB House Integrity Line:** A dedicated online whistleblowing platform **accessible at** <https://rtbhouse.eqs-integrity.org/>;
- (b) **Email:** Send your concern to: whistleblowing@rtbhouse.com;
- (c) **Personal notification:** You can notify the **Head of Legal & Compliance**, the **Global Head of People**, or the **Compliance Officer** in person;
- (d) **Personal notification to the Data Protection Officer or Anti-Bribery and Anti-Corruption Officer:** For violations related to personal data protection or anti-bribery and anti-corruption, including gift exchange rules, respectively, unless such violation constitutes a Statutory Irregularity according to a local Statutory Concerns Procedure;
- (e) **Written notification:** Send a written notification to the individuals specified in items (c) or (d), at the registered address of RTB House S.A. with the note “personally to the addressee”;
- (f) **Individual email notification:** Send an email notification to the individuals specified in items (c) or (d), at the provided email addresses from the contact list attached as [Schedule 1](#) to this Policy.

When submitting a Report, ensure to include a detailed description of your concern (who, what, when, how) and provide any supporting evidence, such as copies of documents or names of witnesses, to corroborate your Report.

3.2. Who Will Receive the Report?

If you choose to use the RTB House Integrity Line or the email address whistleblowing@rtbhouse.com to raise your concern, the Report will be received by the relevant Concerns Reporting Unit. These units comprise members of the Legal & Compliance, HR, and Finance teams and are authorised by RTB House companies to receive and process Reports.

If you prefer to make a Report by directly contacting the Head of Legal & Compliance, the Global Head of People, the Compliance Officer, the Data Protection Officer, or the Anti-Bribery and Anti-Corruption Officer, your notification will reach the intended recipient, regardless of the form of your communication. However, it is important to note that, as a general rule, members of the relevant Concerns Reporting Unit may also have access to your Report, as authorised individuals to receive and process Reports. Additionally, individuals authorised to conduct internal investigations (basically limited to members of the HR Team and the Legal &

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Compliance Team) will have access to all information provided by you if an investigation is required as a result of your Report.

If your concerns pertain to any member of the Concerns Reporting Unit, you should address them directly to any other individual mentioned in section 3.1. to ensure that your Report does not reach the person concerned.

In cases of conflicts of interest where a Report relates to any member of the Concerns Reporting Unit or another individual authorised to receive Reports or conduct investigations, RTB House will ensure that such an individual does not participate in or take any action in relation to the receipt of the report and the handling of the case.

4. WHAT HAPPENS AFTER THE REPORT IS SUBMITTED?

4.1. Acknowledgement


Upon receipt of your concern, we will acknowledge the Report within seven days. If your concern is submitted anonymously through the RTB House Integrity Line, a safe inbox will be created for you. You will receive a Case ID and choose a password, which you can use to log in to the inbox to access your Report and communicate with the person handling the case.

If you choose to report your concern verbally during a meeting with one of the designated recipients, the meeting will be documented. This documentation may include recording the conversation (if permitted) or drafting minutes or a summary of the conversation. In such cases, you may be asked to review and confirm the accuracy of the minutes or summary.

4.2. Triage

Any Report received under this Policy will be directed to the Compliance Officer (unless it concerns the Compliance Officer; see the last paragraph of section 3.2. above).

The Compliance Officer will assess whether the concern falls under the Statutory Concerns Procedure for a relevant country and whether its specific provisions must be applied. If confirmed, the Compliance Officer will forward the case to the relevant Concerns Reporting Unit, and the Statutory Concerns Procedure for that country will be followed.

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4.3. Preliminary Analysis

The Compliance Officer will conduct an initial assessment to determine the necessary actions to address the matter. This may involve clarifying certain details, resolving misunderstandings, or reaching a resolution through agreed-upon actions without a formal investigation. During the preliminary analysis, you may be asked to meet and clarify specific points.

If the Compliance Officer determines, following the preliminary analysis, that your concerns fall outside the scope of this Policy, particularly if there are no grounds to suspect a violation has been committed, no further action will be taken, or the matter will be referred to another relevant RTB House team. You will be notified of the decision to take no further action, as appropriate. If an investigation is deemed necessary, it will be conducted internally or referred to an external body.

4.4. Investigation

If, following the preliminary analysis, the Compliance Officer determines that there are valid concerns that cannot be addressed immediately, a thorough investigation will be conducted to ensure fairness and objectivity. The form and scope of the investigation will depend on the nature of the disclosure.

The task of investigating the matter will be assigned based on the nature of the issue raised and the expertise required. If deemed appropriate, RTB House may engage a third party to assist with the investigation process. Any RTB House associates and third parties involved will be bound by strict confidentiality obligations.


4.5. Informing the Whistleblower

The Whistleblower will be regularly updated on the progress of the investigation, where feasible and appropriate. The frequency and timing of these updates may vary depending on the nature of the disclosed matter. However, it is crucial to treat any information about the investigation as confidential. Please note that in certain instances, confidentiality and legal considerations may prevent the disclosure of specific details about the investigation or any resulting disciplinary actions.

4.6. Final Decision and Remedial Measures

RTB House strives to conclude investigations within a reasonable timeframe following receipt of the disclosure, although the duration may vary depending on the nature and circumstances of the matter.

The investigation may be concluded with an investigation report, outlining the findings, conclusions, and potential recommendations for remedial measures proposed by the investigation team. These recommendations may include disciplinary actions, reporting the violation to competent authorities, or

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suggesting changes to certain processes to mitigate the risk of future wrongdoing. Records of the investigation will be retained for a reasonable period, taking into account the legal requirements of each jurisdiction.

If a concern is raised in good faith in accordance with this Policy, but the investigation does not substantiate the allegation, no action will be taken against the Whistleblower, and they will be protected from any form of penalisation. However, if an unfounded allegation is determined to have been made with malicious intent, disciplinary action may be taken.

5. COMMUNICATION, MONITORING AND REVIEW

This Policy will take effect on **25 September 2024**, globally superseding the Procedure for Whistleblowing and Protection of Whistleblowers within the RTB House Corporate Group.


It will be communicated appropriately and subjected to regular monitoring and review in consultation with RTB House stakeholders.

6. ATTACHMENTS

- [RTB House Schedule 1](#), containing Relevant RTB House Personnel Contact Details;
- **RTB House Schedule 2**, containing Statutory Concerns Procedure, Protected Disclosures Procedure, or Country-Specific Supplement, outlining tailored rules for reports related to particular situations as defined by local regulations (**if required in the respective jurisdiction**);
- [RTB House Privacy Notice](#).

7. REVISION HISTORY

Version	Creation date	Author(s)	Description of change	Reviewed & approved by	Date approved
1.0	10/06/2024	Paulina Kaźmierczuk	Document creation	Przemysław Szymański	10/06/2024
1.1	11/09/2024	Dawid Szupelak Rozalia Bielińska	Data privacy amendments	Przemysław Szymański	16/09/2024

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1.2.	16/09/2024	Dominika Tarnicka	Stylistic revisions and content adaptation to ensure compliance with regulations across all RTB House markets	Przemysław Szymański	16/09/2024
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