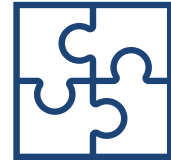


# Guide to the Green Line



## Why the Green Line?

The Green Line has been introduced to allow employees of RWE Gas Storage CZ, s.r.o. ("Gas Storage") and third parties who suspect any improper action within Gas Storage that is unethical or involves an unlawful act, fraud, or corruption to **report such actions or situation to officers responsible for investigating such actions so as to ensure that remedial measures are taken.** To maintain confidentiality and to ensure that the reporting person remains anonymous, the law firm DENEŠ & SALAMON, advokátní kancelář ("AK DS") has been hired to oversee this reporting channel.

The Green Line has been established exclusively for the purpose of reporting suspicions of inappropriate behavior against the interests of Gas Storage and various forms of misconduct, and illegal actions within Gas Storage. **The Green Line is not intended to serve as a regular customer services line for handling inquiries or other matters relating to services provided by Gas Storage.**

## Contacts:

### ■ Telephone

+420 222 292 530 (the line is open from 8:00 a.m. to 5:00 p.m. on working days)

### ■ E-mail

[zelenalinka@akdesa.cz](mailto:zelenalinka@akdesa.cz)

### ■ Regular mail

DENEŠ & SALAMON, advokátní kancelář

Dušní 8/11

110 00 Praha 1 – Josefov.

The letter must bear the visible words "Green Line (*Zelená linka*)" to ensure that the information it contains is handled appropriately.

## ■ In person

If you wish to discuss your complaint personally with a AK DS representative, you can call +420 222 292 530 to arrange an appointment at the office of AK DS. DENEŠ & SALAMON, advokátní kancelář, Dušní 8/11, 110 00 Praha 1 - Josefov.

### **Contact persons:**

Jana Zmijová

### **Person in charge:**

JUDr. Roman Deneš

## **What is the purpose of the Green Line?**

AK DS is the contact point for any Gas Storage employee or any third party who wants to report suspicions of an improper action against the interests of Gas Storage, unethical behavior, unlawful action concerning Gas Storage, breach of the Code of Conduct, or any other situation or action deemed to be in breach of the law, internal regulations of Gas Storage, and/or a direct threat to the interests of Gas Storage, such as fraud, health and safety violation, discrimination and corruption. The main reason for partnering with an independent law firm is to guarantee the anonymity and confidentiality of the reporting person vis-à-vis Gas Storage, which might be problematic in the case of direct contact with a Gas Storage official.

## **How to proceed?**

Have you come across a potentially improper action against the interests of Gas Storage, unethical or unlawful conduct, violation of the Code of Conduct, or any other breach of internal regulations or values observed by Gas Storage? If you have encountered such actions and prefer to discuss the matter discreetly rather than informing your line manager, contact AK DS. You will be able to report the issue discreetly, and to initiate investigations in order to protect the interests of Gas Storage.

## **What happens after a report is made to the Green Line?**

AK DS will prepare a report based on information provided by the reporting person. The report will describe in detail the reported misconduct or unlawful actions. AK DS

will deliver the report to the Compliance Officer. The reporting person can decide whether his/her identity will be disclosed to the Gas Storage Compliance Officer, or whether he/she will remain anonymous vis-à-vis Gas Storage, in which case AK DS's report will only contain information relating to the reported misconduct or unethical/unlawful action.

After the report is submitted, the Compliance Officer will initiate an investigation within Gas Storage. If the reporting person provides his/her contact details, AK DS might provide him/her with information on the outcome of the investigation and on adopted remedial measures, subject to a discretionary decision of the governing body of Gas Storage.

**Anonymity of the reporting person**

If the reporting person wishes to remain anonymous, AK DS will not forward his/her details to Gas Storage. However, Gas Storage strongly encourages everyone to submit non-anonymous (signed) reports. Anonymous reports are admissible and will be treated the same way as all other submissions. The advantage of a signed report is that the reporting person can more easily be informed of the progress and outcome of the report.

**What information should be provided in a report?**

When reporting a suspicion of an improper action against the interests of Gas Storage, unethical behavior, misconduct, or unlawful situation taking place within Gas Storage, a violation of the Code of Conduct or internal regulations of Gas Storage, or any other action deemed by the reporting person to be in breach of the law, the Code of Conduct, or internal regulations of Gas Storage, whether reported through the Green Line and AK DS, the line manager, or a higher-level manager, as much information as possible needs to be provided to allow the matter to be analysed and investigated.

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**The report must contain the following information:**

- ✓ The name and surname of all individuals referred to in the report.
- ✓ The company and the department where the individuals work.
- ✓ A description of the reported actions/situation, particularly the Gas Storage department concerned, the reason why the action/situation is deemed unethical, unlawful, violating the Code of Conduct or internal regulations of Gas Storage, the potential threat posed by such action/misconduct to Gas Storage, other persons involved or affected, and specific evidence for the objected actions or other specific information supporting the suspicions.
- ✓ Where applicable, request to ensure the anonymity of the reporting person and request for information on the outcome of investigation.

A report deemed substantiated will be forwarded to a special team that is responsible for investigating violations of actions contravening the law and the Code of Conduct or internal regulations of the Gas Storage. Gas Storage has an Incorrect Conduct Prevention Policy aimed at preventing improper actions/misconduct against the interests of Gas Storage that is used by the specialized team as a basis for investigation.

**False notification**

If a report of an improper action against the interests of Gas Storage or an improper or unlawful action/misconduct within Gas Storage is made in good faith, and the reporting person's sole intention is to protect the interests of Gas Storage and to prevent improper actions, Gas Storage will protect the identity of the reporting person even if the report is later found unsubstantiated.

However, if an employee submits a report with the intention to cause harm or damage to another worker, to Gas Storage, or to a third party, disciplinary proceedings against such an employee may be initiated. Gas Storage will tolerate no abuse of the Incorrect Conduct Prevention Policy aimed at preventing improper actions/misconduct against the interests of Gas Storage. Any such dishonest action will be handled with utmost seriousness.

**We value your contribution to protecting the interests of Gas Storage and to preserving it as a healthy and fair place for work and business.**