

Based on Article 4, paragraphs 6 and 7 of the Law on Whistle-blower Protection and Article 2 of the Regulations on directions for adopting internal acts managing the protected internal disclosure within the legal entities in the private sector, the Board of Directors of Prilepska Pivarnica AD Prilep at the meeting held on 18th October 2021 adopted the following:

REGULATIONS ON PROTECTED DISCLOSURE IN PRILEPSKA PIVARNICA AD PRILEP

Article 1

These Regulations govern the technical and organizational measures for protected disclosure, the rights of whistle-blowers, as well as the actions and duties of Prilepska Pivarnica AD Prilep regarding protected disclosure and ensuring protection of whistle-blowers in the Company.

Article 2

The provisions of these Regulations apply to:

- the rights of whistle-blowers
- protected disclosure and
- actions and duties of Prilepska Pivarnica AD Prilep.

Definitions

Article 3

Protected disclosure is the disclosure of a reasonable doubt or knowledge that a criminal, illegal or inadmissible act which threatens or endangers the public interest has been committed, is being committed or is likely to be committed.

A whistle-blower is a person who makes a protected disclosure in good faith.

The following category of people can be in the role of a whistle-blower:

- Temporary or permanent employee of Prilepska Pivarnica AD Prilep
- Employment candidate
- A person who is or was an intern at Prilepska Pivarnica AD Prilep
- A person who, on any basis, is or was hired to perform work by Prilepska Pivarnica AD Prilep
- A person who, on any basis, is or was in a business relationship or any other relationship of collaboration with Prilepska Pivarnica AD Prilep
- A person who uses or has used the services of Prilepska Pivarnica AD Prilep

Public interest implies:

- Protection of the basic freedoms and rights of individuals and citizens, as recognized by international law and defined in the Constitution of the Republic of Macedonia
- Prevention of risks to health, defense, and security
- Protection of the environment and nature
- Protection of property, freedom of the market, and entrepreneurship, ensuring the rule of law, and preventing crime and corruption .

Relatives of the whistle-blower, for whom protection may be requested, include the spouse and common-law partner, blood relatives in a direct line, relatives in the lateral line up to the third degree, relatives by matchmaking up to the second degree, stepchild, adoptive parent, and any other person whom the protected person considers a close individual.

Technical and organizational measures

Article 4

Prilepska Pivarnica AD Prilep implements the following measures for protected internal disclosure in relation to:

- Easy and simple access to a person or a place for protected internal disclosure and accessibility to the internal policy for all employees of Prilepska Pivarnica AD Prilep (including announcement on the notice board and announcement on the corporate website www.prilepskapivarnica.com.mk).
- Nullity of provisions in the policies of Prilepska Pivarnica AD Prilep and employment contracts or other engagement contracts if they prohibit protected disclosure that injures or threatens the public interest, or if such disclosure is defined as a violation of provisions for confidentiality, loyalty, and professionalism.
- Protection of the whistle-blower and individuals close to them in response to a disclosure made against any type of violation of rights, harmful action, or the risk of harmful actions.
- Prohibition of disclosing or enabling the disclosure of a whistle-blower's identity, except when required by a court order.
- Protection of the whistle-blower's personal data in accordance with the personal data protection policies of Prilepska Pivarnica AD Prilep.
- Protection of data, received reports, records, created or received documents, and other materials related to the protected disclosure.
- The whistle-blower's right to be informed, without delay, i.e., no later than within 15 days from the date of receipt of the report, about the measures taken in relation to the report and the protection measures.
- Reference to protected external disclosure, i.e. protected public disclosure.
- Collecting data on the introduced protected internal disclosure for self-assessment and improvement purposes.

Authorized person for protected internal disclosure

Article 5

Whistle-blowers will make protected internal disclosures to the authorized persons Aleksandar Mateski or Marina Jovanovska, employed in the General and Legal Sector of Prilepska Pivarnica AD Prilep.

The disclosure can be made in written form through personal delivery or via email, using the complaint and suggestion box, or orally documented in a record.

Article 6

The authorized persons are guaranteed independence and uninterrupted work.

The authorized persons are guaranteed space and working equipment:

- The offices of the General and Legal Sector or another eligible office should serve as a workspace suitable for the reception of persons (whistle-blowers).
- The employees in the Information Technology Sector of Prilepska Pivarnica AD Prilep should provide them with computers secured with a unique password known only to the authorized persons, along with an internet connection and a separate electronic mailbox secured with a unique password known only to the authorized person.
- Acceptance stamp.
- Ledger.
- Complaint and suggestion box.

- Phone line (mobile phone numbers).
- A document cabinet for secure storage (safe) of received reports, records, received and created documents, and other materials related to the protected internal and external disclosure, along with the separate ledger and the acceptance stamp.

To ensure the secrecy and protection of personal data received and processed by the authorized person, the managing person, in accordance with the regulations for the protection of personal data, provides and applies appropriate technical and organizational measures. These measures aim to protect against accidental or illegal destruction of personal data, accidental loss, falsification, unauthorized disclosure, or access. This is particularly crucial when the processing involves the transmission of data over a network and protection against any unlawful forms of processing.

Article 7

The authorized person will undergo professional training and continuously improve through training sessions designed for individuals authorized to receive reports submitted for the purpose of protected internal and protected external disclosures.

Procedure after a report is received from a whistle-blower

Article 8

Upon the request of a whistle-blower, the authorized person is obliged to supplement, modify, delete, or cease the use of personal data if the data is incomplete, incorrect, or not updated, and if their processing is not in accordance with the law.

In the content of the request from paragraph (1) of this article, the whistle-blower states which data need to be supplemented, modified, deleted or ceased with usage, and if supplementation or modification is requested, the data which need to be supplemented or modified should be stated.

If it is determined that the personal data are incomplete, incorrect, or not updated, the authorized person takes measures to supplement, modify, or delete them, regardless of whether the whistle-blower has submitted a request for the supplementation or modification of personal data.

If personal data are supplemented, modified, or deleted in accordance with paragraph (3) of this article, the authorized person is obliged to notify the whistle-blower, the users of those personal data, or the third parties whose data is disclosed in accordance with the law in writing, no later than within 15 days from the date of receipt of the request.

Article 9

The authorized person is obliged to store the received reports, records, data, created or received documents, and other materials related to the protected disclosure, the separate ledger and the acceptance stamp separately from other documents and records in a way that will keep them safe and reliable.

Article 10

If the report was received orally, the authorized person is obliged to compile a record that must contain the following data:

a) Whistle-blower's data:

- Name and last name.
- The category of the person who, according to the Law on Whistle-blower Protection, is eligible to appear as a whistle-blower.
- The request of the whistle-blower to remain confidential and the extent to which confidentiality is requested.

- b) Data on the person or the subject disclosed by the whistle-blower.
- c) Description of the criminal or other illegal and inadmissible act which threatens or endangers the public interest.
- d) Data on the execution status of the protected internal disclosure.
- e) Method and form of communication between the authorized person and the whistle-blower suggested by the whistle-blower.
- f) Attachments.
- g) Date and time when the report was received.

The matching of the data from the oral report with the content of the record is confirmed by the personal signature of both the whistle-blower and the authorized person responsible for receiving reports submitted for the purpose of protected internal disclosure. The record from paragraph (1) of this article is recorded as a received report.

Article 11

If the report is submitted electronically, the authorized person is obliged to print the record corresponding to the report's content and document the printout, along with listed attachments received in the form of electronic records, as a received report.

If the printing of the attachments from paragraph (1) of this article is uneconomical, the authorized person is obliged to save them in electronic form on the special computer provided with a password known only to them.

Article 12

The authorized person is obliged to document the report with all attachments attached to it on the same day after receiving it, promptly review its content, study it, and act on it in accordance with the law and their competences

If the authorized person determines that the received document or record does not represent or does not pertain to a report from a whistle-blower, they are obliged to immediately make a note in the case, record it in the special ledger, keep a copy of the case, and deliver the case with the original attached documents to the whistle-blower along with a cover letter. If the whistle-blower's identity is known, the authorized person shall promptly notify them of the actions taken under this article.

Article 13

After receiving and documenting the report, the authorized person is obliged to promptly evaluate its content to determine its logical and reasonable nature, whether it qualifies as a report from a whistle-blower in accordance with the Law on Whistle-blower Protection, and whether it contains sufficient elements to be forwarded for further action.

While conducting the evaluation outlined in paragraph (1) of this article, the authorized person may request additional information from the whistle-blower if their identity is known. They may also consult other persons, ensuring that the whistle-blower's identity is not disclosed.

After conducting the evaluation outlined in paragraph (1) of this article, the authorized person draws conclusions for further action on the report to determine whether the relevant institution has the competence to act on the report and decides on the necessary measures for action.

Article 14

After a received report, which has been determined to be logical, reasonable, and containing sufficient elements for further action according to the evaluation in Article 13 of these regulations, has been sent to a relevant institution, the authorized person is obliged to take measures within their

competence to act on the report. This includes forwarding the report to an official in the institution responsible for acting in the area of the report after previously removing any personal data and data from the report that could reveal the whistle-blower's identity if they requested confidentiality.

At the whistle-blower's request, the authorized person is obliged to notify them of the progress and actions taken in the proceedings following the report. Additionally, they must enable the whistle-blower to inspect the files of the case opened based on their report in accordance with the law.

If enabling the inspection as outlined in paragraph (2) of this article, i.e., providing access to information related to the proceedings following the report, may have harmful consequences for the course of the procedure, the authorized person is obliged to separate that information and notify the whistle-blower. Additionally, they must allow the whistle-blower to access the remaining content of the report, that is, the rest of the files of the case.

The authorized person is obliged to inform the whistle-blower about the outcome of the procedure based on their report if their identity is known. Additionally, if the report was submitted by an authorized person from another institution, that person is also notified of the same.

Nullification of provisions within policies and contracts that prohibit protected disclosures

Article 15

The internal policies of Prilepska Pivarnica AD Prilep, along with employment contracts and engagement agreements, are prohibited from containing clauses that forbid the disclosure of suspicions or knowledge regarding criminal, illegal, or otherwise impermissible actions that jeopardize public interest, safety, and defense.

The contracts governing employment rights and engagement agreements must not include provisions that classify protected disclosures as violations of confidentiality, loyalty, and professionalism clauses.

If in the future, policies and contracts of employment or work engagement are formulated to prohibit protected disclosure or are deemed to contravene provisions for confidentiality, loyalty, and professionalism, those specific provisions will be considered void, as if they did not exist in the policies and contracts.

Protection of the whistle-blower and individuals close to them

Article 16

Prilepska Pivarnica AD Prilep has the obligation to protect the whistle-blower from any type of violation of rights, harmful action, or the risk of harmful actions due to the act of disclosure, especially in accordance with the regulations for the protection of personal data:

- To protect the whistle-blower's personal data.
- To protect data that may reveal the identity of the whistle-blower who requests to remain anonymous or discloses information confidentially.

Prilepska Pivarnica AD Prilep has the same obligation to protect the whistle-blower's family or a person close to them.

Disclosure of whistle-blower's identity

Article 17

The identity of a whistle-blower can only be disclosed when required by a court decision. In all other cases, it is prohibited to disclose or enable the disclosure of the whistle-blower's identity.

The authorized person responsible for receiving reports from whistle-blowers has the obligation to inform the whistle-blower:

- That their identity can be revealed to the competent authority if it is not possible to take action before those authorities without disclosing their identity.
- About the measures for protection of a participant in the criminal procedure.
- Before their identity is disclosed if it becomes necessary to do so during the procedure.

In particular, the identity of the whistle-blower may not be revealed to the individual mentioned in the report.

Protection of the personal data of the whistle-blower

Article 18

Prilepska Pivarnica AD Prilep protects the personal data of whistle-blowers in accordance with the provisions of the Law on Personal Data Protection.

Protection of written and any other materials related to the protected disclosure

Article 19

Prilepska Pivarnica AD Prilep ensures the protection of data and the received reports, the records, the created or received documents, and the other materials related to the protected disclosure.

These written and any other materials related to protected disclosures, along with the special ledger, are securely stored in a document cabinet (safe).

The right of the whistle-blower to be informed about the course of the procedure Article 20

Prilepska Pivarnica AD Prilep, through the authorized person, is obliged to inform the whistle-blower, whose identity is known, without delay, about the measures taken in relation to the report and the protection measures, no later than within 15 days from the date of receipt of the report.

Protected external disclosure

Article 21

The whistle-blower can make a protected disclosure to:

- The Ministry of Internal Affairs
- The competent public prosecutor's office
- The State Commission for Prevention of Corruption
- The Ombudsman of Macedonia or
- other competent institutions.

The whistle-blower can make a protected external disclosure to these institutions:

- If the disclosure is directly or indirectly directed against the legal entity where the disclosure is being made or
 - If the whistle-blower doesn't receive any information about the measures taken in relation to the report within the stated deadline or
 - If no measures have been taken, or if the whistle-blower is not satisfied with the action taken, suspects that no measures will be taken, or believes that the disclosure will cause harmful consequences for them or a person close to them.

Protected public disclosure

Article 22

A whistle-blower can make a protected public disclosure by publicly releasing information related to the knowledge of a criminal action that has been committed, is being committed, or is likely to be committed, which poses a threat or harm to:

- The life of the whistle-blower and individuals close to them.
- Human health, safety, and the environment, leading to large-scale damages.
- Imminent danger of destruction of evidence.

The whistle-blower can make a protected public disclosure only after making an internal or external disclosure; otherwise, they forfeit their right to personal protection and the protection of individuals close to them.

Collection of data for the introduced protected internal disclosure

Article 23

Prilepska Pivarnica AD Prilep will collect data on the introduced protected internal disclosure to enhance its processes and establish effective practices for handling reports based on self-assessment.

Whistle-blower's violation of disclosure

Article 24

The whistle-blower commits a violation of the protected internal disclosure if they knowingly report false information about a natural or legal person with the intention of causing harmful consequences for them.

If harmful consequences result for the reported natural or legal persons due to such a disclosure, a procedure can be initiated against the whistle-blower to determine their responsibility in accordance with the law. Additionally, a request for compensation for damages may be pursued.

If the whistle-blower commits a violation through unfounded disclosure, disciplinary proceedings will be initiated against them in accordance with the Rules (Regulations) for work order and discipline of Prilepska Pivarnica AD Prilep, Collective Agreements, and other internal policies of the Company.

Article 25

These Regulations will be displayed on the notice board of Prilepska Pivarnica AD Prilep and on the corporate website www.prilepskapivarnica.com.mk, making it available to all employees and other persons.

Article 26

These regulations take effect on the day of adoption.

Prilep,
18.10.2021

Prilepska Pivarnica AD Prilep

Sashko Samardzioski