

WHISTLEBLOWING PROCEDURE TMMP – INFORMATION FOR WHISTLEBLOWERS

Below you will find the most important information on the whistleblowing procedure in force with Toyota Motor Manufacturing Poland sp. z o.o. ("TMMP").

I. REPORTING VIOLATIONS

A. Who can report a violation?

Naruszenie może być zgłoszone przez:

- a) current or former Employee - this term is understood as a person employed under an employment contract as well as any person employed by a Toyota Group company other than TMMP, who has been delegated to work on the premises of TMMP for a definite period of time;
- b) current or former Associate - this term is understood as any person other than an Employee who performs work or provides services to TMMP, including (i) a temporary worker, apprentice, intern, volunteer, (ii) persons performing work on a basis other than an employment relationship, including on the basis of a civil law contract, including in the B2B model, (iii) contractor, subcontractor, supplier or service provider, including persons performing work under their supervision, (iv) entrepreneurs, proxies, shareholders or partners, (v) other persons authorized to make notifications in accordance with the Act;
- c) a person who applies for the status of an Employee or Co-worker (including, m.in by a candidate taking part in the recruitment process)

B. What can be reported?

- a) violations of generally applicable law in accordance with the categories listed in Article 3(1) of the Act of 14 June 2024 on the Protection of Whistleblowers,
- b) violations of the TMMP's Code of Conduct, including regulations on the prevention of corruption and conflict of interest,
- c) other internal regulations of TMMP, including in particular regulations on bullying, discrimination, harassment or sexual harassment and the Work Regulations.

Please be advised that all reported violations will be dealt with in accordance with the Procedure. However, only the violations described in point 2(a) above will be subject to the rigor of the Act.

C. Reports should be made in good faith.

It is the responsibility of the person making the report to exercise due diligence in order to verify the situation, facts and circumstances concerning the report before it is made.

D. Submission content

A Whistleblower Report should contain a clear and complete explanation of the subject-matter of the report, including at least:

- a) detailed description of the violation;

- b) date and place of violation or date and place where the information about the violation was obtained;
- c) a description of the specific situation or circumstances giving rise to the possibility of a violation;
- d) identification of the person or other party who is the subject of the Report or who is associated with the occurrence of the violation;
- e) identification of a possible victim;
- f) identification of possible witnesses to the violation of the law;
- g) identification of relevant evidence and information available to the Whistleblower that may be useful during evaluation and processing of the report.

E. Types of reports

- a) **Whistleblower Reports stating the name of the Whistleblower** - TMMP encourages to make non-anonymous Whistleblower Reports as they allow, if necessary, to obtain additional information from the Whistleblower that may be necessary to implement effective and appropriate Follow-up Actions.
- b) **Anonymous Whistleblower Reports** - TMMP also allows making anonymous Whistleblower Reports provided that such a Report will include information on, in particular, the person who allegedly committed the Violation, the business area / organisational unit of TMMP to which the Violation is related (e.g. administration, foundry etc.), and a detailed description of the situation including its time of occurrence and frequency.

Anonymous Whistleblower Reports that do not contain the above information and the information set out above in item B. "Content of Whistleblower Reports" shall not be processed.

F. Form of reports

Whistleblower Reports may be made verbally or in writing.

- a) **Written** Whistleblower Reports are made by e-mail or via:
 - e-mail to the e-mail address: zaufanie@toyotapl.com;
 - dedicated external electronic communication channel –WHISTLELINK system (details below);
- b) **Verbal reports** may made:
 - dedicated external electronic communication channel –WHISTLELINK system (details below);
 - or - at the request of the Whistleblower - during face-to-face meetings; such a meeting should be held within 14 days of the receipt of the aforementioned request.

Oral reports will be appropriately documented and, depending on the circumstances and the form of the report, this may be done through recording, making a transcript or minutes of the call/meeting by a Person-of-Trust. If a transcript of the call/meeting or the minutes documenting it is made, the Whistleblower may check, correct and approve such documents.

Reports via the WHISTLINK system:

- Using the WHISTLINK app.

LINK to the app: tmmp.whistlelink.com

Applications in the application can be made via a written or voice FORM. In the case of a voice call, the voice of the caller is modulated. For more information on how to apply, please visit WHISTLINK.

G. Acknowledgement of receipt and deadline for processing applications

- a) The applicant will be informed about the fact of receipt of the application within 7 days from the date of its receipt;
- b) The applicant will receive feedback on the final decision on the application within 3 months from the date of confirmation of receipt of the application or – if the confirmation referred to above is not provided, within 3 months from the lapse of 7 days from the date of the internal report, unless the applicant has not provided a contact address to which the feedback should be sent.

II. PERSONS AUTHORIZED TO RECEIVE AND CONSIDER REPORTS

The recipients and persons examining reports submitted via the channels specified in point II.6 are Persons of Trust::

- Małgorzata Marciszak - Business Partner AM at TMMP-W
- Izabela Jarecka - Business Partner AM at TMMP-J

1. In the event of a risk of non-confidentiality of the whistleblower's data or any other breach during the examination of the report, or if the report concerns a Person of Trust, the whistleblower has the right to forward their objections to the Assistant Manager of the Corporate & HR Legal Section: asroka@toyotapl.com
2. If the report concerns a Manager or Assistant Manager of the Legal Department, it should be reported directly to the personal e-mail addresses of the Persons of Trust, i.e.: malgorzata.marciszak@toyotapl.com, ijarecka@toyotapl.com .
3. If the Trust Person evaluates the reports as justified or considerable, then the Trust Person appoints a Compliance Committee, which may include persons in the positions of Assistant General Manager and above, and the applicant's superiors in the positions of Assistant General Manager and above. The composition of this committee is decided by the Trust Person on a case-by-case basis and guided by the principle of avoiding conflicts of interest – so as to ensure that the Compliance Committee is impartial and will ensure confidentiality. The Person of Trust informs the reporting person about their decision..
4. The scheme of actions in connection with the notification is attached as Appendix 3 to this Information.

I. PROTECTION OF THE WHISTLEBLOWER

1. It should be remembered that the reporting person (whistleblower) is protected from the moment of reporting.
2. The Whistleblower is not responsible for the correctness of the assessment of a particular Violation - persons appointed in accordance with this procedure will analyse and assess whether the Whistleblower Report is justified. However, the Whistleblower should act in good faith, which means that he/she should have reasonable grounds to believe that the information that is the subject of the Report is true at the time of making the Report and that the information constitutes information on the Violation.
3. No retaliatory action or attempts or threats of such action may be taken against the Whistleblower. The scope of retaliation is set out in Article 12 et seq. of the Act of 14 June 2024 on the Protection of Whistleblowers.
4. Retaliation may not be used against anyone who assists the Whistleblower in making a Whistleblower Report (this also applies to legal entities or other organisational units assisting the Whistleblower) or anyone associated with the Whistleblower, which shall be understood to include, in particular, family members of persons close to the Whistleblower.
5. The Whistleblower should inform the Person-of-Trust of any possible retaliation against him/her or the persons referred to above in connection with making the Report. The Person-of-Trust should promptly analyse this information (confirm the fact of retaliation) and take the necessary actions in order to protect the Whistleblower or the aforementioned persons and to draw consequences against those responsible for the retaliation.

II. ACTING IN BAD FAITH, FALSE ACCUSATIONS

1. The deliberate falsification of the information contained in a Whistleblower Report (bad faith) may be treated as an unethical act or an act that falls under Article 57 of the Act of 14 June 2024 on the Protection of Whistleblowers.
2. A person who makes a Whistleblower Report in bad faith (i.e. knowing that a violation of the law has not occurred or knowingly indicating false facts and/or directing suspicion at a person who has not committed a violation) shall not be subject to the protection provided for in the Procedure and in the Act of 24 June 2024 on the Protection of Whistleblowers.
3. A person who has suffered damage due to a report made in the so-called bad faith has the right to claim compensation or damages for the infringement of personal rights from the Whistleblower who made such a report.
4. After an in-depth analysis, in the event that it is undoubtedly established that the Whistleblower has intentionally included false information in the Report or has acted in bad faith to the detriment of the person, who is the subject of the Report, the Person-of-Trust shall make the Whistleblower's data available to the affected person upon request submitted in accordance with Article 15(1)(g) of the GDPR.

III. INFORMATION ON EXTERNAL WHISTLEBLOWER REPORTS

1. A violation may also be reported to the Ombudsman or a public authority, bypassing the internal Procedure, in particular when:
 - a) the Whistleblower has reasonable grounds to believe that the infringement of law is likely to pose a direct or obvious threat to the public interest, in particular, where there is a risk of irreparable harm;
 - b) no Follow-Up Actions were undertaken or no feedback was provided to the Employer within the deadline for providing feedback;
 - c) an internal Whistleblower Report was made and it is unlikely that the Employer will effectively address the violation due to particular circumstances of the case.
2. Where appropriate, the Whistleblower may submit a Report to EU institutions, bodies, offices or agencies.
3. A Report made to the Ombudsman or to a public body bypassing the internal reporting procedure shall not result in depriving the Whistleblower of the protection guaranteed by the provisions of the Act of 24 June 2024 on the Protection of Whistleblowers.

IV. ADDITIONAL INFORMATION ABOUT THE PROCEDURE

For more detailed information about the Procedure, please contact dslabon@toytopl.com

V. PERSONAL DATA CONTROLLER

TMMP is the controller of personal data processed in connection with receiving and examining reports and conducting further investigations, including follow-up actions. Information clause on data processing:

- a) reporting persons – constitutes Appendix No. 1 to this Information;
- b) persons included in the report, including persons to whom the report relates, witnesses – constitutes Appendix 2 to this information.

Appendix no 1

to the Information on the Procedure

INFORMATION ON THE PROCESSING OF THE REPORTING PERSON'S PERSONAL DATA IN CONNECTION WITH THE WHISTLEBLOWING REPORT (INFORMATION OBLIGATION UNDER ART. 13 OF THE GDPR)			
DATA OF THE PERSONAL DATA CONTROLLER	The administrator of your personal data in connection with the report of irregularities is Toyota Motor Manufacturing Poland Sp. z o.o., registered office: 26 Uczniowska Street, 58-306 Wałbrzych ("TMMP").		
CONTACT DETAILS OF THE PERSONAL DATA CONTROLLER	You can contact the data administrator in matters related to the protection of your personal data by sending an e-mail to the address of our Data Protection Officer: iod@toyotapl.com or by sending a letter to the correspondence address: 26 Uczniowska Street, 58-306 Wałbrzych with the note: "DPO"]		
SCOPE OF PERSONAL DATA PROCESSING	<p>We only process personal data that is necessary to receive a whistleblowing report, assess it, conduct an investigation and take any follow-up action. If the notification includes data that is not necessary to carry out the above-mentioned activities, it will be deleted and will not be further processed.</p> <p>The scope of the processed data may vary, depending on the circumstances of the request. In particular, we may process the following categories of data:</p> <ul style="list-style-type: none"> • Your name • your position or information about the relationship that binds you or has been connected to TMMP (if you are not our employee or co-worker), • Your contact details: e.g. e-mail address, correspondence address, telephone number, • Your vote (with the proviso that the voice will be modulated and the employee receiving the report will only receive the report in the version after the modulation of the voice), • Details of the application, • Other data provided in the report, if necessary for the receipt or assessment of the report or taking possible follow-up action, including, if provided, sensitive data. 		
PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING	<table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 50%;"> The processing of your personal data is carried out for the following purposes: 1. fulfilment of obligations under the law, in particular the Whistleblower Protection Act, in particular: - consideration of your irregularity report, including verification of its completeness and legitimacy, - conducting explanatory activities in connection with your report, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. 2. pursuing our legitimate interests to the extent exceeding the obligations set out in the law, including in the case of reports to which the provisions of the Whistleblower Protection Act do not apply: </td> <td style="vertical-align: top; width: 50%;"> Legal basis: Ad. 1 – Article 6(1)(c) of the GDPR – fulfilment of obligations arising from the provisions of law, and in the scope of special category data – Article 9(2)(g) of the GDPR.. </td> </tr> </table>	The processing of your personal data is carried out for the following purposes: 1. fulfilment of obligations under the law, in particular the Whistleblower Protection Act, in particular: - consideration of your irregularity report, including verification of its completeness and legitimacy, - conducting explanatory activities in connection with your report, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. 2. pursuing our legitimate interests to the extent exceeding the obligations set out in the law, including in the case of reports to which the provisions of the Whistleblower Protection Act do not apply:	Legal basis: Ad. 1 – Article 6(1)(c) of the GDPR – fulfilment of obligations arising from the provisions of law, and in the scope of special category data – Article 9(2)(g) of the GDPR..
The processing of your personal data is carried out for the following purposes: 1. fulfilment of obligations under the law, in particular the Whistleblower Protection Act, in particular: - consideration of your irregularity report, including verification of its completeness and legitimacy, - conducting explanatory activities in connection with your report, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. 2. pursuing our legitimate interests to the extent exceeding the obligations set out in the law, including in the case of reports to which the provisions of the Whistleblower Protection Act do not apply:	Legal basis: Ad. 1 – Article 6(1)(c) of the GDPR – fulfilment of obligations arising from the provisions of law, and in the scope of special category data – Article 9(2)(g) of the GDPR..		

	<ul style="list-style-type: none"> - consideration of your whistleblowing report, including verification of its completeness and legitimacy - conducting explanatory activities in connection with your report, - registering reports of irregularities, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. <p>3. Disclosure of your identity – if you give us explicit consent to it.</p> <p>4. establishing, investigating and defending against claims – which is the implementation of our legitimate interests – in particular if you knowingly provide false information in your report.</p>	<p>Ad. 2 - Article 6(1)(f) of the GDPR – legitimate interests of the controller</p> <p>Ad. 3 – art. 6 USt. 1 lit a) RODO – Twoja zgoda</p> <p>Ad. 4 – Article 6(1)(f) of the GDPR, and in the case of sensitive data, Article 9(2)(f) of the GDPR.</p>
DATA RETENTION PERIOD	<p>Your personal data will be stored for a period of 3 years after the end of the calendar year in which the follow-up actions were completed, or after the end of the proceedings initiated by these actions (whichever is later).</p>	
DATA RECIPIENTS	<p>The recipients of your personal data may be entities providing us with a tool for receiving and recognizing reports, providing hosting services, IT or other services necessary to recognize a whistleblowing report and its registration. It may also be the person to whom your whistleblowing report relates, but only if an in-depth analysis shows that you made the report in bad faith, acting to the detriment of the employee to whom the report relates. In the event that you have given your explicit consent to the disclosure of your data, it may also be passed on to persons other than those authorized to handle the breach..</p>	
DATA TRANSFERS OUTSIDE THE EEA	<p>Your personal data will not be transferred outside the European Economic Area or to international organizations.</p>	
RIGHTS OF THE DATA SUBJECT	<p>You have the right to:</p> <ul style="list-style-type: none"> • access to your personal data • rectify your personal data • Erasure of your personal data • restrict the processing of your personal data • transfer the Data (only if the basis for data processing is your consent) • object to the processing of your personal data • withdraw your consent to the processing of your personal data (whereby its withdrawal does not affect the lawfulness of the processing carried out until the consent is withdrawn). <p>In order to exercise the above rights, please contact the data controller. Contact details are indicated above..</p> <p>You also have the right to lodge a complaint with the supervisory authority dealing with the protection of personal data – the President of the Office for Personal Data Protection.</p>	
INFORMATION ON THE VOLUNTARY NATURE OF PROVIDING DATA	<p>Providing your personal data is voluntary.</p>	
ABOUT AUTOMATED DECISION-MAKING	<p>Your personal data will not be used for automated decision-making.</p>	

Appendix no 2

to the Information on the Procedure

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN CONNECTION WITH A WHISTLEBLOWING – FOR DATA SUBJECTS AND WITNESSES (INFORMATION OBLIGATION UNDER ARTICLE 14 OF THE GDPR)			
DATA OF THE PERSONAL DATA CONTROLLER	The administrator of your personal data in connection with the report of irregularities is Toyota Motor Manufacturing Poland Sp. z o.o., registered office: 26 Uczniowska Street, 58-306 Wałbrzych ("TMMP").		
CONTACT DETAILS OF THE PERSONAL DATA CONTROLLER	You can contact the data administrator in matters related to the protection of your personal data by sending an e-mail to the address of our Data Protection Officer: iod@toyotapl.com or by sending a letter to the correspondence address: 26 Uczniowska Street, 58-306 Wałbrzych with the note: "DPO".		
DATA SOURCE	We have obtained your personal data from the person making the report. The provisions of the Whistleblower Protection Act prohibit us from providing information about the identity of the person making the report, unless the whistleblower has expressly consented to the disclosure of the data or does not benefit from the protection afforded by the Whistleblower Protection Act (in particular if the whistleblower knowingly reported false information about irregularities).		
SCOPE OF PERSONAL DATA PROCESSING	<p>We only process personal data that is necessary to assess the whistleblowing report, to carry out an investigation and to take follow-up action, if any.</p> <p>The scope of the processed data may vary, depending on the circumstances of the request. In particular, we may process the following categories of data:</p> <ul style="list-style-type: none"> • Your name • Your position, • Contact details (e.g. e-mail, telephone number), • In the case of persons affected by the whistleblowing – details of the alleged irregularities and information on possible follow-ups, • In the case of witnesses and other persons named in the report – data on the information held by these persons related to the irregularities described in the report. • We may also process your sensitive data (special category data) – as long as it has been provided in the report or has been disclosed in the course of follow-up actions. 		
PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING	<table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 60%;"> <p>The processing of your personal data is carried out for the following purposes:</p> <ol style="list-style-type: none"> 1. fulfilment of obligations under the law, in particular the Whistleblower Protection Act, in particular: <ul style="list-style-type: none"> - - conducting explanatory activities in connection with the report, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. 2. pursuing our legitimate interests to the extent exceeding the obligations set out in the law, including in the case of reports to which the provisions of the Whistleblower Protection Act do not apply: </td> <td style="vertical-align: top; width: 40%;"> <p>Legal basis:</p> <p>Ad. 1 – Article 6(1)(c) of the GDPR – fulfilment of obligations arising from the provisions of law, and in the scope of special category data – Article 9(2)(g) of the GDPR.</p> <p>Ad. 2 - Article 6(1)(f) of the GDPR – legitimate interests of the controller</p> </td> </tr> </table>	<p>The processing of your personal data is carried out for the following purposes:</p> <ol style="list-style-type: none"> 1. fulfilment of obligations under the law, in particular the Whistleblower Protection Act, in particular: <ul style="list-style-type: none"> - - conducting explanatory activities in connection with the report, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. 2. pursuing our legitimate interests to the extent exceeding the obligations set out in the law, including in the case of reports to which the provisions of the Whistleblower Protection Act do not apply: 	<p>Legal basis:</p> <p>Ad. 1 – Article 6(1)(c) of the GDPR – fulfilment of obligations arising from the provisions of law, and in the scope of special category data – Article 9(2)(g) of the GDPR.</p> <p>Ad. 2 - Article 6(1)(f) of the GDPR – legitimate interests of the controller</p>
<p>The processing of your personal data is carried out for the following purposes:</p> <ol style="list-style-type: none"> 1. fulfilment of obligations under the law, in particular the Whistleblower Protection Act, in particular: <ul style="list-style-type: none"> - - conducting explanatory activities in connection with the report, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. 2. pursuing our legitimate interests to the extent exceeding the obligations set out in the law, including in the case of reports to which the provisions of the Whistleblower Protection Act do not apply: 	<p>Legal basis:</p> <p>Ad. 1 – Article 6(1)(c) of the GDPR – fulfilment of obligations arising from the provisions of law, and in the scope of special category data – Article 9(2)(g) of the GDPR.</p> <p>Ad. 2 - Article 6(1)(f) of the GDPR – legitimate interests of the controller</p>		

	<ul style="list-style-type: none"> - conducting explanatory activities in connection with the report, - taking possible follow-up actions, - keeping a register of internal reports and storing documentation related to the report. <p>3. establishing, investigating and defending against claims – which is the implementation of our legitimate interests.</p>	<p>Ad. 4 – Article 6(1)(f) of the GDPR, and in the case of sensitive data, Article 9(2)(f) of the GDPR.</p>
DATA RECIPIENTS	<p>The recipients of your personal data may be entities providing us with a tool for receiving and recognizing reports, providing hosting services, IT or other services necessary to recognize a whistleblowing report and its registration.</p>	
DATA RETENTION PERIOD	<p>Your personal data will be stored for a period of 3 years after the end of the calendar year in which the follow-up actions were completed, or after the end of the proceedings initiated by these actions (whichever is later).</p>	
DATA TRANSFERS OUTSIDE THE EEA	<p>Your personal data will not be transferred outside the European Economic Area or to international organizations.</p>	
RIGHTS OF THE DATA SUBJECT	<p>You have the right to:</p> <ul style="list-style-type: none"> • access to your personal data • rectify your personal data • Erasure of your personal data • restrict the processing of your personal data • object to the processing of your personal data <p>In order to exercise the above rights, please contact the data controller. Contact details are indicated above.</p> <p>You also have the right to lodge a complaint with the supervisory authority dealing with the protection of personal data – the President of the Office for Personal Data Protection.</p>	
ABOUT AUTOMATED DECISION-MAKING	<p>Your personal data will not be used for automated decision-making.</p>	

Appendix no 3
to the Information on the Procedure

Diagram showing the reporting and follow-up process

