



SUSTAINABLE PROCUREMENT POLICY



Our approach

At Device Europe, we are guided by the principle of conducting business with honesty and integrity. We expect all employees and collaborators to uphold high standards of conduct.

We implement this Policy in order to:

- encourage reporting of suspected wrongdoing as early as possible — with the assurance that each case will be treated seriously, confidentially, and with due diligence,
- provide clear guidance on how to report,
- ensure all employees and collaborators are protected when making a report — even if it turns out to be unsubstantiated.

This Policy applies to all individuals involved in Device Europe's operations — regardless of the form of employment — including employees, consultants, contractors, volunteers, interns, temporary staff, and agency workers.

What is a whistleblowing report?

A whistleblowing report refers to the disclosure of actions or threats that may affect:

- our clients and partners,
- coworkers and shareholders,
- the natural environment,
- the public and the company's reputation.

Examples of reportable issues include:

- criminal activity,
- violations of laws, professional duties, or regulatory requirements,
- health and safety threats,
- environmental damage,
- bribery (as per our Anti-Corruption Policy),
- financial fraud or mismanagement,
- breaches of internal policies and procedures,
- actions harmful to the company's reputation or financial stability,
- unauthorized disclosure of confidential information,
- negligence or intentional concealment of wrongdoing,
- other cases specified in the Whistleblowing and Whistleblower Protection Procedure in accordance with the Act of June 14, 2024.

If you are unsure whether a situation qualifies, we encourage you to contact the Social Responsibility Representative.

Reporting channels

In many cases, issues can be reported directly to a supervisor. If that is not possible or you feel uncomfortable doing so, the following channels are available:

- dedicated email: compliance@deviceeurope.com
- Violation Report Form — Annex No. 1 to the procedure, submitted to the Whistleblowing Coordinator or Social Responsibility Representative.

After a report is submitted, we prepare a written summary of the case and provide a copy to the whistleblower following a meeting.

Anonymity and external support

We do not encourage anonymous reports, as they may hinder the investigation process. However, if you choose to remain anonymous, we will do our best to handle the case thoroughly.

If you are uncertain, you may consult the Ombudsman (Rzecznik Praw Obywatelskich).

What happens after a report?

Once a report is received:

- we conduct a preliminary assessment to determine if and what actions are necessary,
- we inform the reporting person of the outcome of the assessment,
- if needed, we request additional information or invite the person for clarification meetings.

Whistleblower protection

We provide full protection to anyone who reports a concern in good faith. All forms of retaliation are strictly prohibited, including:

- termination of employment,
- disciplinary actions,
- threats,
- any other adverse treatment related to the report.

However, if it is found that a report was made maliciously, knowingly falsely, or for personal gain, disciplinary action may be taken against the reporting person.

Supporting documents

An integral part of this Policy is the procedure:

Whistleblowing and Whistleblower Protection Procedure.

