

### Annex No. 3 – Local Addendum for Poland

In connection with the entry into force in Poland of the Act of June 14, 2024, on the protection of whistleblowers, it is necessary to implement this Whistleblowing Policy with the amendments outlined below, which will apply solely to Kompania Piwowarska SA ("KP").

1. In the chapter "**Who this Policy applies to**" the following categories are added:

Temporary workers, individuals performing work under a basis other than an employment contract, including under a civil law contract; individuals participating or wishing to participate in recruitment processes; commercial proxies; shareholders or partners; members of a legal entity's governing bodies; individuals performing work under the supervision and direction of a contractor, subcontractor, or supplier; interns; volunteers; trainees.

2. In the chapter "**Matters that may be reported under this Policy**" the following categories are added:

Violation of constitutional freedoms and human and civil rights; violations of law in the areas of financial services, products, and markets; consumer protection; privacy and personal data protection; network and information systems security; product compliance; transport safety; environmental protection; radiological protection and nuclear safety; food safety; animal health and welfare; public health; terrorism financing; public procurement; financial interests of the State Treasury of the Republic of Poland, local government units, and the European Union; the internal market of the European Union, including public law competition rules and state aid and corporate taxation.

3. After the last paragraph of the chapter "**Matters that shall not be reported under this Policy**" the following paragraph is added:

Matters concerning undesirable behaviors in the workplace reported locally to KP, including suspected mobbing or discrimination, will be handled under the separate procedure specified in KP's Anti-Harassment Policy, including the Prevention of Mobbing.

4. In the chapter "**How to Make a Report**" the following paragraphs are added:

The internal organizational unit in KP authorized to receive reports is the Ethics Committee and the Fraud Team. The Ethics Committee is supported in its activities by the Ethics Officer.

National reports within the KP structure:

Ways to report ethical issues to the Ethics Committee (you can choose any of the following reporting channels):

- Fill out the form: o KP website: <https://www.kp.pl/zrownowazony-rozwoj/etyka>

- Phone report to one of the following numbers:
    - For KP employees and external individuals: (0) 801 133 133\*\*
    - For KP employees (internal landline): (00) 801 133 133
    - Phone number for reporting irregularities managed by an independent external company, NAVEX: 0-0-800-4911988\*
    - Phone number for reporting irregularities managed by an independent external company, NAVEX (internal landline): 0-00-800-4911988
- \*free for domestic numbers  
\*\* charge according to mobile network rates

- Send information to a dedicated email address at Kompania Piwowarska: [etyka@asahibeer.pl](mailto:etyka@asahibeer.pl)

- Send a letter by traditional mail to the address:

Internal Audit Director  
Kompania Piwowarska  
Szwajcarska 11  
61-285 Poznań

Regional reports within the Asahi Group structure:

The reporter may also choose to make a report through the Asahi Group Speak Up channel using the channels indicated in the Policy.

The reporter may review, correct, and approve the conversation transcript or protocol by signing them.

#### 5. In the chapter "**What happens when you file a report**":

- a) The following paragraphs are added:

Relevant national (Polish) reports will be investigated by the KP Ethics Committee or the Fraud Team, which are impartial internal organizational units. The composition of these teams is available on Infonet. The Ethics Committee and the Fraud Team may consist of board members, legal department members, internal audit, HR, and/or other departments, as well as external parties, including accountants, lawyers, and experts, depending on the nature of the reported issue and the needs.

If a report is made anonymously or you do not provide a contact address, you may not receive feedback from us, unless you use the Navex reporting channel. In such a case, even with anonymous reporting, you will have access to feedback.

- b) The following paragraph is deleted:

In complex cases or where appropriate follow-up actions are still being determined, this period may be extended. We will inform you of this and any anticipated feedback to the extent possible.

#### 6. In the chapter "**Whistleblowing externally**" the following paragraph is added:

In Poland, a report can be made directly to the appropriate public authority or the Commissioner for Human Rights and, where applicable, to institutions, bodies, or organizational units of the

European Union without first reporting to the Company and bypassing the procedures outlined in this Policy.

The Commissioner for Human Rights accepts reports in writing at the address: al. Solidarności 77, 00-090 Warsaw, in person at the offices of the Commissioner for Human Rights, and online.

7. In the chapter "**Record Management**" the following paragraph is added:

Personal data processed in connection with the receipt of a report or the taking of follow-up actions, as well as documents related to the report, are stored by KP for 3 years after the end of the calendar year in which the external report was sent to the public authority responsible for taking follow-up actions or the follow-up actions were completed, or after the conclusion of proceedings initiated by these actions.