



**DIRECTIVE ON THE RECEIPT AND MANAGEMENT OF  
WHISTLEBLOWING REPORTS AT STM Slovakia, s.r.o.**

S7

REV. 02

DATE: 01/01/2023

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**DIRECTIVE ON THE RECEIPT AND MANAGEMENT  
OF  
WHISTLEBLOWING REPORTS AT STM Slovakia,  
s.r.o.**

REV.	Date	DESCRIPTION	Prepared by:	Approved by:
00	21/12/2017	Issue	M.Šmulíková	M. Ševčík
01	01/04/2020	Change of person in charge	V. Budayová	M. Ševčík
02	01/01/2023	Relocation of the company	M. Rusnáková	M. Ševčík

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## Article 1

### Whereas

(1) The directors of STM Slovakia, s.r.o. issue, pursuant to Whistleblowing Act 54/2019 and other laws as amended (hereinafter referred to as the "Law"), this directive on the reporting antisocial activities at STM Slovakia, s.r.o.

(2) This directive outlines, as appropriate, the procedures for receiving and managing whistleblowing reports at STM Slovakia, s.r.o., as well as the rights and obligations of employees of STM Slovakia, s.r.o. to report antisocial activities of which they become aware in relation to their employment.

This directive is binding on all employees of STM Slovakia, s.r.o.

(3) The breach of the contractual obligation of confidentiality or the breach of the confidentiality obligation arising from work activities, or a mandate is not considered a report of antisocial activity and does not constitute a confidentiality obligation pursuant to § 1, paragraph 3, of the Law.

## Article 2

### Definition of basic concepts

(1) **Whistleblowers** are natural persons who, in good faith, make a report to a competent authority, declaring the facts of which they have become aware in relation to their work, profession, position or assignment and which may significantly contribute or have contributed to the detection of a serious antisocial activity or the identification or conviction of its author.

(2) **Whistleblowing** is a statement of facts of which the natural person has become aware in connection with their work, profession, position or assignment and which may contribute or have contributed significantly to clarifying a serious antisocial activity or to discovering or convicting the author.

(3) **A serious antisocial activity** is an unlawful act, pursuant to Article 2 of the Law.

(4) **A report** is:

(a) a whistleblowing report, also anonymous,

(b) a non-anonymous report by a natural person of an antisocial activity other than the serious antisocial activity of which they have become aware in connection with their work, profession, position, or assignment.

(5) **An anonymous report** refers to a disclosure, submission, and report that do not include the name, surname, and residential address of the whistleblower.

(6) For the purposes of this Directive and the Law, acting in good faith shall be understood as the action of a person who, taking into account the known circumstances and the knowledge in their possession, believes that the facts declared are true; in case of doubt, the conduct will be considered in good faith until proven otherwise.

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(7) **The person responsible** for managing the reports is the person designated pursuant to § 10, paragraph 1 of the Law. The person responsible at STM Slovakia, s.r.o. is the person appointed by the appointment decree, which is an integral part of this directive.

### Article 3

#### Reporting

- (1) The report can be submitted: verbally, in writing or electronically, via email.
- (2) The responsible person will, upon request, in cases of non-anonymous reports, confirm in writing that the report has been submitted.
- (3) Written reports may be sent in a sealed envelope labeled "Ethics Line" or „whistleblowing“:
  - by mail to STM Slovakia, s.r.o., Robotnícka 4991/125, 017 01 Považská Bystrica.
  - in person, at the Human Resources Office of STM Slovakia, s.r.o.,
  - in person to the responsible person,
- (4) The report can be sent to: [info@stmcompany.net](mailto:info@stmcompany.net) at any time, 24 hours a day. The subject of the email must be "Ethics Line" or "whistleblowing". Reports received via email from a person other than the responsible person shall be immediately forwarded for processing to the responsible person,
- (5) Recorded oral statements may be made through the responsible person who must put the statement on record.

### Article 4

#### Verification of the reports and authorizations of the responsible person.

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- (1) The reports submitted are verified by the designated responsible person referred to in Article 2 of this Directive.
  
- (2) The responsible person receives and reviews each report within 90 days of receipt; this period may be extended by 30 days, provided that, in the case of non-anonymous reports, the extension is communicated to the person who submitted the report, indicating the reasons for the extension.
  
- (3) The investigation of a report is based on its content, regardless of its title.
  
- (4) If only the submission only partially constitutes a report according to this Directive, only the relevant part of the submission shall be examined. The remaining parts of the submission will be addressed in accordance with the applicable procedures (e.g., complaints).
  
- (5) If the submission does not constitute a report according to this Directive but must be handled by another competent authority, the responsible person shall promptly forward it to such authority.
  
- (6) Based on the gravity of the facts contained in the report, the responsible person may request that a commission be established to examine the report.
  
- (7) If it is necessary to supplement or clarify the information provided in the report, the responsible person shall, without delay, invite the person who submitted the report to add details or clarify it, specifying a deadline for doing so.
  
- (8) If the report is directed against a specific employee or legal representative, the responsible person promptly informs the employee or the interested legal representative of the content of the report and provides them with the opportunity to comment on it and to submit documents or other information necessary for a reliable examination of the matter. Upon examining the report, the responsible person is required to maintain confidentiality regarding the identity of the person who submitted the report. If the identity of the person who submitted the report (the author of the report) can be

inferred from the information contained or attached to the report itself, the responsible person must not disclose such information to the employee or legal representative concerned, but merely invites them to state or submit the facts necessary for a reliable verification of the report.

- (9) The responsible person is authorized, to the extent necessary, to invite in writing the author of the report as well as the employee or legal representative concerned to cooperate in the investigation of the report, indicating a reasonable deadline for providing cooperation.
- (10) The responsible person must draw up a report on the outcome of the investigation into the report, summarizing the facts reported by the author and commenting on each fact in terms of their truthfulness and potential unlawfulness.
- (11) Before formalizing the outcome of the investigation, the responsible person must allow the author of the report to comment on the conclusions. If the author of the report adds new facts or disagrees with the conclusions, the responsible person must address such facts and disagreements in a written report on the outcome of the investigation, stating whether such facts and disagreements are justified.
- (12) Pursuant to § 10, paragraph 7 of the Law, the employer must submit the outcome of the review to the author of the report in writing, within 10 days from the date of the review.
- (13) The responsible person is excluded from the investigation into the report if:
- (a) the report directly concerns the responsible person;
  - (b) considering the facts set forth in the report or the circumstances of the case, doubts may arise about the impartiality of the responsible person, taking into account the relationship of the responsible person with the case, the author of the report, or with other stakeholders who are also directly or indirectly involved in the report.
- (14) The submission of a report cannot serve as an incentive or a reason to draw conclusions that may prejudice the author of the report.

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(15) If during the investigation it is ascertained that a crime has been committed, the responsible person must report the fact to the law enforcement authorities.

## Article 5

### Processing of personal data contained in a report

(1) In the processing of personal data, STM Slovakia, s.r.o. abides by Personal data protection Law 18/2018 and other laws as amended.

## Article 6

### Report records

(1) Pursuant to Article 13 of the Law, the responsible person is required to keep a record of reports for a period of 3 years after submission as well as the following details:

- (a) submission date,
- (b) name, last name, and address of the author; for anonymous reports, only anonymous labeling,
- (c) subject,
- (d) investigation outcome,
- (e) investigation end date.

(2) Each new report is immediately recorded by the responsible person in the report register with a number consisting of the sequential number and the year of receipt. In case of anonymous submission, the responsible person will record the report as an “anonymous report under Law 54/2019”.

(3) Reports submitted pursuant to Article 3 of this Directive are registered by the responsible person in the report register of STM Slovakia, s.r.o.

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## Article 7

### Validity and effectiveness of the directive

- (1) This Directive is available to all employees of STM Slovakia, s.r.o. at the company's headquarters.
- (2) This Directive is binding on all employees of STM Slovakia, s.r.o. Failure to comply with this Directive constitutes a minor violation of labor regulations.
- (3) This directive takes effect on 01/01/2023

Považská Bystrica, 22/12/2022

Mr. Martin Ševčík

Attorney-in-fact

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Attachment 1 to the Directive on the receipt and management of  
whistleblowing reports at STM Slovakia, s.r.o.

**STM Slovakia, s.r.o., Michalská 7, 811 01 Bratislava**

Považská

Bystrica, 22/12/2022

### **APPOINTMENT DECREE**

Pursuant to § 11 of Whistleblowing Act 54/2019,

**I hereby appoint**

**Ms. Lenka Cifrová**

as the person responsible for fulfilling the employer's duties in managing whistleblowing  
reports at STM Slovakia, s.r.o.

This appointment takes effect on 01/04/2020

Mr. M. Ševčík

Attorney-in-fact