

BASIC INFORMATION
ON THE SYSTEM FOR INVESTIGATING REPORTS OF ANTI-SOCIAL ACTIVITY
IN THE SLOVAK REPUBLIC – WHISTLEBLOWING

I. Internal system for investigating reports of anti-social activity

The companies **cargo-partner SR, s.r.o.** and **Cargo-Partner HQSC s.r.o.** (hereinafter referred to as "**Employer**") have implemented the following common internal system for investigating reports of anti-social activity:

1. Each Employee is entitled to report to the Employer facts of which he/she has learned in connection with the employment relationship and which relate to anti-social activity.
2. A natural person may also report to the Employer facts of which he/she has learned in connection with:
 - a) selection procedure or within pre-contractual relations,
 - b) performance of the function of managing director,
 - c) pursuit of self-employment activities,
 - d) performance of rights and obligations arising from a contract whose subject matter is the supply of goods, the execution of works or the provision of services,
 - e) professional practice, postgraduate training, activation or a voluntary activity,
and relate to anti-social activity.
3. Anti-social activity shall mean an activity:
 - a) that is a criminal offense;
 - b) that is not a misdemeanor or other administrative offense but has a negative impact on the company by threatening the public interest; in general, threatening the public interest shall mean a negative impact on a larger group of people or the entire company.
4. The report may be submitted:
 - a) **in writing** to the address: **cargo-partner SR, s.r.o., Kopčianska 92, 851 01 Bratislava, SR** in an envelope marked: „**Legal Department - WHISTLEBLOWING MOTION – CONFIDENTIAL**“,
 - b) **orally** and recorded by the Responsible Person at the registered office of the Employer; to that end, the Whistleblower may request the Responsible Person for the meeting in person within the reasonable period of time, or
 - c) **by e-mail** to the e-mail address **integrity.sk@cargo-partner.com** Electronic submission is available 24 hours a day.
5. In case of an **anonymous report**, the **written (document) form** is recommended as the preferred option in order to prevent the breach of integrity of the whistleblower's anonymity.
6. The report shall clearly state:
 - a) its subject-matter (especially description of facts related to anti-social activity),
 - b) name and surname of the Whistleblower if the report is non-anonymous,
 - c) postal or e-mail address where the confirmation of the report receipt and the notice on the result of the report investigation will be sent to the Whistleblower when the report is non-anonymous.
7. The investigation of reports is carried out by the so-called Responsible Person, namely: **Lucia Karlikova**.
8. **The identity of the Whistleblower shall be kept confidential by the Responsible Person.**
9. The Responsible Person shall **confirm the receipt of the report** (except for anonymous report) **within 7 days** following the date of receipt.

10. The Responsible Person shall **investigate the report and notify the Whistleblower of the report investigation result** (and **measures** if any are taken based on report investigation) **within the period of 90 days following the confirmation of the report receipt** or, should the receipt of the report fail to be confirmed, **within the period of 90 days following the seven-day period following the report receipt.**
11. If the report investigation results in the referral of the matter for handling in accordance with the Code of Criminal Procedure or any other generally binding legal regulations (e.g. Act No. 372/1990 Coll. on Misdemeanor as amended), the Responsible Person is obliged to inform the Whistleblower on this fact in advance; the same shall not apply if the information provided to the Whistleblower could hamper the investigation of the report.
12. Further details on the internal system for investigating reports are laid down in *Internal Directive on receiving and handling anti-social activity reports – WHISTLEBLOWING no. 12053.*

II. Corporate system for investigating reports of anti-social activity

1. The cargo-partner group has also established a so-called corporate system for investigating reports.
2. The report of anti-social activity may be submitted to the Corporate Internal Audit as follows:
 - a) via the cargo-partner **intranet** (cargo-partner intranet homepage) which contains a whistleblowing link to submit an oral or written report (report confidentially/anonymously);
 - b) via website **<https://www.cargopartner.com>** which contains a link for reporting any activities that are considered to be unethical, illegal or in violation with the internal policy;
 - c) **by e-mail** to the e-mail address: **whistleblowing@cargo-partner.com**;
 - d) **by post** to: cargo-partner d.o.o. Beograd Ugrinovacka 205, 11272 Beograd, Serbia, in an envelope marked: „CORPORATE INTERNAL AUDIT – CONFIDENTIAL”;
 - e) **by phone** on the following number: **+381 63 59 11 46** (Bogdan Matovic – Head of Corporate Internal Audit), available from 8:00 a.m. to 6:00 p.m. (GMT+1).
3. The reports will be investigated by Corporate Internal Audit in accordance with *cargo-partner Group Procedure No. 3183 "Handle Whistleblowing Cases"*.

III. Procedures for submitting reports to the Whistleblower Protection Office and other authorities competent to receive such reports

1. If the Whistleblower has specific reasons why the objective investigation of the report within the internal system for reporting may not be expected, it is possible to address the **Whistleblower Protection Office** or other competent public authorities directly.
2. If the report is to be submitted to the Office, it is possible to use a special **on-line form** or **free telephone hotline** both available at the official website of the Whistleblower Protection Office (<https://www.oznamovatelia.sk/chcem-oznamit/>); or any other method offered by the Office for this purpose.
3. Depending on the nature of the case, the other authorities competent to receive the report are the **public prosecutor's office**, the **administrative authority** competent for administrative offence proceedings, and the **European Union authorities**.

IV. Whistleblower protection possibilities

1. If the Whistleblower believes that they were subject to any work-related act due to the report and they do not agree with such act, they may request the **Whistleblower Protection Office** (hereinafter referred to as "**Office**") **to suspend the effectiveness of such work-related act** no later than 15 days following the date the Whistleblower learns about the work-related act. The Office shall immediately suspend the effectiveness of the work-related act if the period of time specified in the sentence above is observed and if the Employer fails to prove within a reasonable period of time specified by the Office that there is not causal link between the work-related act and the report. The suspension of the effectiveness of the work-related act shall terminate 30 days following the date of delivery of the Office confirmation to the Whistleblower. If the Whistleblower's proposal for an urgent measure is delivered to the court within this period of time, the suspension of effectiveness of the work-related act shall be extended until the court's decision on this proposal becomes enforceable.
2. The Whistleblower who is in employment relation with the Employer and reports the so called **serious anti-social activity that is a criminal offense** (*i.e. criminal offense affecting the financial interests of the European Union, crime of machinations in public procurement and public auctions, criminal offenses by public officials, corruption offenses, criminal offenses with the maximum sentence of imprisonment of more than three years as stipulated by the Code of Criminal Procedure*), may request the prosecutor **for protection against legal acts and decisions of the Employer**
3. The Whistleblower who is in the employment relationship with the Employer and reports the so called **serious anti-social activity that is an administrative offense** (*i.e. an administrative offense for which the maximum fine specified by calculation may be imposed, or an administrative offense for which the maximum fine in the amount of no less than EUR 30,000 may be imposed*) may request the authority competent for administrative offense proceedings **for protection against legal acts and decisions of the Employer**.
4. **Protection of the Whistleblower** under points 2 and 3 of this Article is based on the duty of the Employer to request the Office for the consent to make a legal act or decision within the employment relationship against the protected Whistleblower who did not give their consent for such legal act. The legal act made without the consent of the Office shall not be valid.
5. The request under points 2 and 3 of this Article shall contain the name, surname, date of birth and domicile of the Whistleblower, the place of their work and identification of their Employer; the request shall also contain the data on the close relative if this close relative is in the employment relationship with the same Employer as the Whistleblower, or who is in the employment relationship with the Employer and is a dependent person in relation to the Whistleblower's Employer, and the Whistleblower requests for protection of this close relative as well.