

Whistleblowing Notification Line - information brochure of OTE, a.s. (hereinafter only OTE) Eticka-linka@ote-cr.cz

What is it used for

- 1) A means of reporting an infringement or intent to commit such an infringement. This type of notification is covered by the European Directive on the protection of notifiers.¹
- 2) Reporting conduct that is **not** in **accordance with the Code of Ethics** (see VP Program Compliance).

Principle of protection of notifiers

The main purpose of the European directive is to ensure the protection of whistleblowers.

In this context OTE is required to:

- 1) keep the notifier anonymous (if they wish so),
- 2) not commit any obvious or covert discrimination against the notifier.
- ¹ Directive 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law.

How does it work and who is responsible for it

Each submitted complaint is delivered to a compliance officer (Petr Novák), who has the obligation to register it, confirm receipt and initiate an investigation. They are obliged to **notify** the notifier **of the result** of the investigation and the measures taken within the **30-day period**. In the case of a more complex complaint, the time limit may be extended, but by a maximum of another 30 days.

The Compliance Officer must not disclose the identity of the notifier and is also responsible for ensuring that the employer does not discriminate in any way against the notifier in connection with the submitted notification.²

Who is it for

Employees, job seekers, business partners, tenderers and other entities with which OTE comes into contact.

Other ways to submit a report

- 1) In writing (ie to the employer's address at the hands of the compliance officer),
- 2) By phone (+420234686390),
- 3) In person

At the request of the notifying party, the compliance officer is obliged to create a record of the submission, on which the notifier may comment.

The Compliance Officer also provides consulting and advisory services on the interpretation of whistleblowing issues (pnovak@ote-cr.cz)

How the external notification option works

In the event that the notifying person has a legitimate concern about submitting a notification through the internal notifying channel or, if they are not satisfied with the remedy, they may use the external possibility of notifying the authorized state authority.

Company (OTE) may defend itself through legal action against false notifications made in bad faith (ie notifications that are not true and the notifier knows this fact).

² Examples of discriminatory behavior: dismissal, transfer to another position, reduction of salary, exclusion from the tender for the supplier.