

Reports Acceptance – Whistleblowing

Pursuant to the provisions of Act No. 171/2023 on the Protection of Whistleblowers (hereinafter only the “Whistleblower Protection Act”), OTE, a.s. (hereinafter only “OTE” or “Company”) being the obligated entity has established an internal whistleblowing system and has designated a Competent Person responsible for receiving and handling reports. The competent person is Mgr. Petr Novák, LL.M.

The Competent Person shall receive and handle any reports that may be given in relation to the Company in connection with work or other similar activity, which shall mean:

- a) dependent work carried out in the basic employment law relationship,
- b) self-employment,
- c) the exercise of rights associated with participation in a legal entity,
- d) the exercise of function of a member legal person’s body,
- e) performance of tasks within the scope of the activities of a legal entity, in its interest, on its behalf or on its account,
- f) administration of a trust fund,
- g) volunteering,
- h) on-the-job practical training, internship, or
- i) exercise of rights and obligations arising from a contract, the subject of which is the provision of supplies, services, construction works or other similar performance.

Work or other similar activity includes applying for a job or other similar activity (hereinafter only the “Whistleblower”).

Anonymous submissions are not considered to be the reports within the meaning of the Whistleblower Protection Act and will be investigated by the Competent Person to the extent necessary for the Company.

The reports can be given:

- in writing
 1. in paper form via the postal service operator with the text “Whistleblowing – NEOTVÍRAT” (Whistleblowing - DO NOT OPEN), to Sokolovská 192/79, Prague 8 Karlín, Postal Code 186 00,

2. in paper form with the text “Whistleblowing – NEOTVÍRAT” (Whistleblowing - DO NOT OPEN) by handing it to the reception desk at the Company's registered office or by handing it to the Competent Person,
3. by electronic mail to the e-mail address of the Competent Person Eticka-linka@ote-cr.cz

- orally

1. by telephone to the Competent Person on 730 139 001
2. in person to the competent person – Mgr. Petr Novák, LL.M.

Oral submissions are recorded in writing or in electronic form (voice recording) after the Notifier's consent has been granted.

The Competent Person shall notify the Notifier of the receipt of the report within 7 days of its receipt.

Pursuant to Section 2 of the Whistleblower Protection Act, the report shall contain information on the name, surname and date of birth, or other information from which the identity of the Notifier can be inferred. It shall furthermore contain information about possible infringements that have occurred or are about to occur at OTE, which

1. has the attributes of a criminal offence,
2. has the attributes of a misdemeanour for which the law sets a fine of at least CZK 100,000,
3. violates the Whistleblower Protection Act or
4. violates another legal regulation or a regulation of the European Union in the field of
 - a) financial services, due diligence and other verification services, financial products and financial markets,
 - b) corporate income tax,
 - c) prevention of money laundering and terrorist financing,
 - d) consumer protection,
 - e) compliance with product requirements, including product safety,
 - f) transport, traffic and road safety,
 - g) environmental protection,
 - h) food and feed safety, animal health and welfare
 - i) radiation protection and nuclear safety,
 - j) competition, public auctions and public procurement,
 - k) protection of internal order and security, life and health,
 - l) protection of personal data, privacy and security of electronic communications networks and information systems,
 - m) the protection of the financial interests of the European Union pursuant to Article 325 of the Treaty on the Functioning of the European Union, or
 - n) the functioning of the internal market under Article 26(1) and (2) of the Treaty on the Functioning of the European Union, including the protection of competition and state aid under European Union law.

A whistleblower may also similarly submit a report regarding a violation of the OTE Code of Conduct. This type of report does not fall under the protection offered by the Whistleblower Protection Act and may be submitted anonymously.

A whistleblower should, given the circumstances and the information available to them at the time of the reporting, have reasonable grounds to believe that the facts they are reporting are authentic and true. It is not allowed to report facts that are knowingly false. A whistleblower should be able to identify the area of the infringement and think about what verifiable information they can provide about the reported illegal activities. The extent and quality of the presented information may positively influence the way in which the Report is investigated.

A whistleblower is further authorized to use other reporting options under the Whistleblower Protection Act, which can be made through the external reporting system administered by the Ministry of Justice: <https://oznamovatel.justice.cz/chci-podat-oznameni/>.

More information is available on the website of the Ministry of Justice here: <https://oznamovatel.justice.cz/>.
