




Notification of illegal activity

In accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report violations of Union law, also referred to as the Whistleblowing Directive, and in accordance with Act No. 171/2023 Coll., on the protection of whistleblowers, the internal reporting system allows all persons to report behaviour or situations that they have learned about in connection with work or other similar activities within DT-holding, with the exception of the Kroužky group, and which they believe are in violation of applicable legal regulations

Reporter

The whistleblower is a natural person.

The whistleblower should:

-  to act in the public interest and in good faith that the notification made by him is based on credible facts and circumstances;
-  have, at the time of the notification, given the circumstances and information available to him at the time, good reason to believe that the facts notified are accurate and true. Therefore, he cannot report knowingly false facts;
-  to avoid actions that could have the nature of a criminal offense. Documents documenting the reported facts obtained through such actions are inadmissible.

Notification

The notification must be clear and specific, it must be clear what action it refers to.

The notification must contain data on the name, surname and date of birth, or other data from which it is possible to infer the identity of the notifier; identification data is not required if the notification was submitted by a person known to the relevant person.

Anonymous notifications will not be processed according to Act No. 171/2023 Coll., on the protection of whistleblowers. The notifier is obliged to disclose his personal data. All information provided is protected by strict confidentiality and may not be disclosed to any third party without the consent of the informant.

A notification falls under whistleblower protection only if it relates to a violation (illegal activity) that

- (i) has the characteristics of a criminal offense, or
- (ii) has the characteristics of an offense for which the law stipulates a fine rate, the upper limit of which is at least CZK 100,000, or
- (iii) violates Act No. 171/2023 Coll., on the protection of whistleblowers or

(iv) violates another legal regulation or regulation of the European Union in the area of:

- financial services, products and financial markets, mandatory audit and other verification services,
- corporate income taxes,
- preventing the legalization of the proceeds of crime and the financing of terrorism,
- consumer protection,
- compliance with product requirements, including their safety,
- traffic safety, transport and road traffic,
- environmental protection,
- food and feed safety and the protection of animals and their health,
- radiation protection and nuclear safety,
- economic competition, public auctions and public procurement,
- protection of internal order and security, life and health,
- protection of personal data, privacy and security of electronic communications networks and information systems,
- protection of the financial interests of the European Union, or
- the functioning of the internal market, including the protection of economic competition and state aid according to European Union law.

Each notification must contain at least a description of the violation (illegal activity) that has occurred or is expected to occur within DT-holding, with the exception of the Kroužky group.

Notification can be submitted via:

- a. phone lines: +420 602 286 089
- b. e-mail: jiri.pursl@dt-holding.cz
- c. in person: at V Parku 2309/6, 148 00 Prague
always after telephone agreement with the relevant person within a reasonable period of time. A record will be made of the oral notification, which faithfully captures the essence of the oral notification.

Authorized person: Ing. Jiří Puršl

The whistleblower and the persons who provided him with assistance or information in connection with his whistleblowing are subject to the protection of non-retaliation. The identity of the notifier (or other persons) and the information provided in the notification are confidential information that is kept in such a way that it is not compromised.

Procedure of the relevant person after notification

- a) the relevant person assesses whether the notification meets the conditions for processing in the Directive (EU) regime, and informs the notifier about this within 7 days of receiving the notification,
- b) the relevant person investigates the information in the notification and, if confirmed, takes appropriate steps, in particular proposes corrective measures, or takes further

- steps, e.g. forwards the submission to law enforcement authorities, misdemeanor authorities or other materially competent public authorities,
- c) the relevant person will inform the notifier about the result of the investigation and about the proposed measures within 3 months from the notification of receipt of the notification.

The notification can also be submitted through an external notification system managed by the Ministry of Justice. Link to EOS: <https://oznamovatel.justice.cz/chci-podat-oznameni/> However, it is advisable to make the notification first through our internal notification system.

Please make a report only if you have reasonable grounds to believe that the facts stated in the report are true.

The protection does not apply to knowing reports of false or misleading information.

