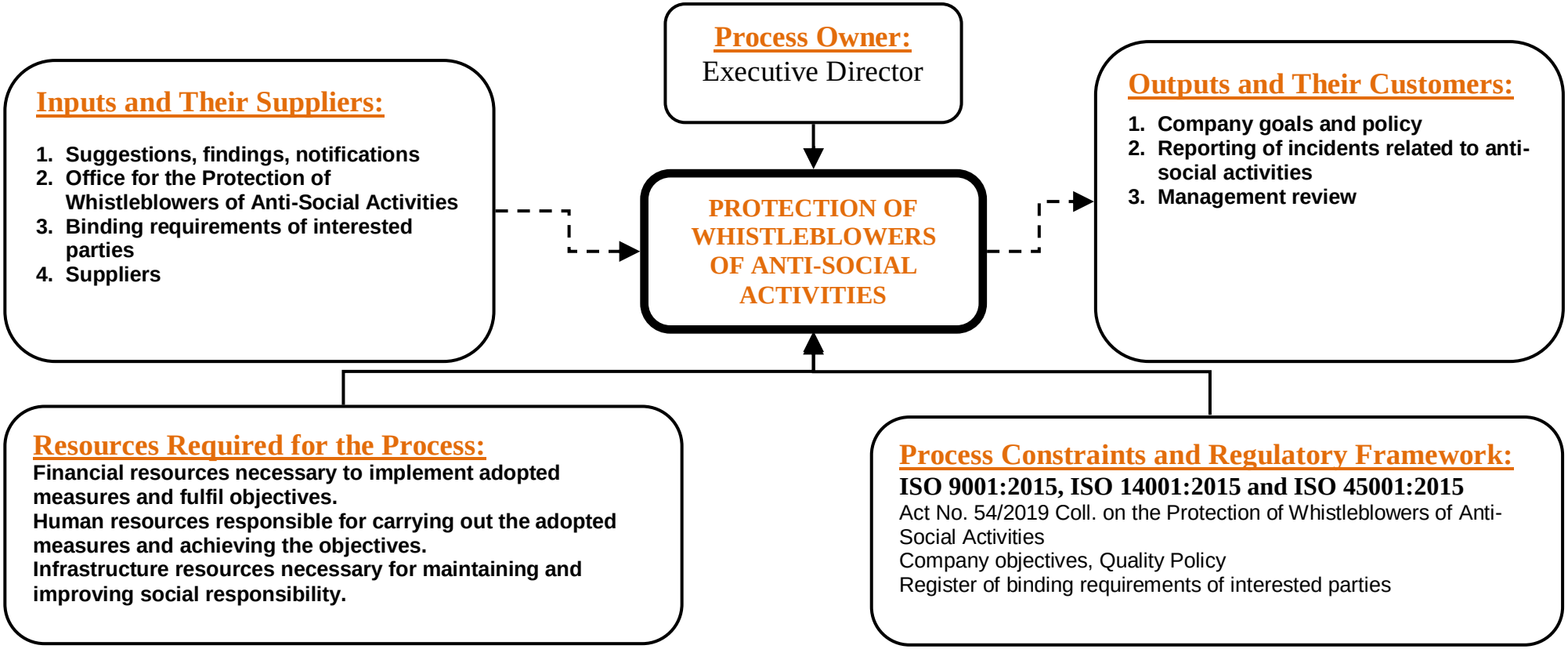
1. Process Model “Protection of Whistleblowers of Anti-Social Activities”:



	Prepared by	Verified by	Approved by
Name:	Ing. Emil Rovňan		Ing. Peter Packo
Date:	18.11.2025		18.11.2025
Signature:			

2. Goals and Parameters of the Process:

2.1 The purpose of this directive is to define the competences for the protection of whistleblowers of anti-social activity, designate the responsible person, establish the method of receiving, assessing and reporting submissions, and ensure implementation of the directive within the company.

2.2 To monitor the fulfilment of these objectives, the following parameters are tracked:

a) **Sanctions imposed by state authorities for violations of binding requirements of interested parties (€) – financial limit €0**

b) **Number of incidents in the area** (evaluated by the Executive Director based on the incident record)

c) **100% of employees trained in whistleblower-protection matters**

2.3 The parameters are monitored annually by the Executive Director, following the evaluation of objectives for the previous period.

3. Process Procedure

3.1 General Responsibility

The purpose of this directive is to establish an internal system for verifying notifications of anti-social activity within FENEGA, s.r.o. as the employer, and to define detailed procedures for detecting activities harmful to the company, submitting notifications, verifying notifications, resolving issues primarily by internal means, identifying deficiencies and adopting corrective measures, determining the authorisations of the responsible person during verification, maintaining records of notifications, and informing the whistleblower about the outcome of the verification.

This directive regulates the legal relationships arising between the company, the responsible person and the employees of FENEGA, s.r.o., and is issued pursuant to § 10(8) of **Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activities** and on Amendments to Certain Acts (“Whistleblower Protection Act”).

The directive has also been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”), and Act No. 18/2018 Coll. on Personal Data Protection and on Amendments to Certain Acts, as amended, effective from 25 May 2018.

The directive has also been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”), and Act No. 18/2018 Coll. on Personal Data Protection and on Amendments to Certain Acts, as amended, effective from 25 May 2018.

The company refers to FENEGA, s.r.o., Kračúnovce 51, 087 01 Kračúnovce, Company ID: 36 600 938 (“the company”), represented by its statutory body – the Managing Director. The company is registered in the Commercial Register of the District Court Prešov, Section Sro, Insert No. 45996/P.

The Office refers to the establishment and competence of the Office for the Protection of Whistleblowers of Anti-Social Activities. The Office is an independent national public authority with nationwide jurisdiction, protecting the rights and legitimate interests of whistleblowers. The Office is headquartered in Bratislava.

A whistleblower is a natural person who, in good faith, submits a notification to the competent authority or to the employer; a whistleblower is also considered a natural person who in good faith:

- submits a notification after their employment or other similar relationship has ended, if they learned information about anti-social activity during the duration of that relationship,

- submits a notification before their employment or similar relationship has begun, if they learned information about anti-social activity during the recruitment process or within pre-contractual relations,
- submitted a notification anonymously and their identity was subsequently revealed,
- disclosed information about anti-social activity learned during the recruitment process or within pre-contractual relations, regardless of whether the employment or similar relationship subsequently arose, or whether it occurred during or after the employment or other similar relationship because:

- they submitted a notification through the internal verification system and were not informed of the outcome under § 10(8), or no appropriate measures were taken under § 10(8), and subsequently submitted a notification to the competent authority and were not informed within a reasonable period about the status or the outcome,
- they submitted a notification directly to the competent authority and were not informed within a reasonable period about the status or outcome,
- there is a reasonable concern that the anti-social activity poses an immediate or obvious threat to the public interest, or
- there is a reasonable concern that in the case of submitting the notification to the competent authority, retaliation may occur, or due to the specific circumstances of the case, the competent authority would fail to ensure an impartial and independent verification of the reported facts.

A whistleblower is also considered **a close person** of the natural person, if that close person is in an employment relationship with the company.

A close person is a relative in the direct line, a sibling, a spouse, or persons in a family-type or similar relationship who are regarded as mutually close.
A notification means the reporting of facts which a natural person learned in connection with the performance of their employment, profession, position or function and which relate to anti-social activity..
A qualified notification means a notification that may contribute or has contributed to clarifying serious anti-social activity, or identifying or convicting its perpetrator.
Anti-social activity in accordance with Act No. 583/2008 on Crime Prevention and Other Anti-Social Activities, refers to committing criminal offences, misdemeanours, other administrative delicts, or any other conduct that negatively affects society.
Serious anti-social activity includes:

a/ criminal offences under §§ 168, 170, 170b, 177, 212, 213, 217, 221, 226, 233a, 237–240, 243, 243a, 247, 247d, 251a, 252–254, 261–263, 266–268, 271, 278a, 283, 299a, 302, 305, 326–327a, 328–336b, 336d, 348, 352a, 374 or 417a–417d of the Criminal Code,
b/ any criminal offence punishable by a term of imprisonment with an upper sentencing limit exceeding two years,,
c/ an administrative delict for which the upper limit of the fine is determined by calculation,
d/ an administrative delict for which the minimum upper limit of the fine is at least EUR 30,000.
Other anti-social activity includes, for example: conflict of interest, unethical conduct, favouring personal interests, misuse of information obtained in connection with employment for personal benefit or for the benefit of close persons or other natural or legal persons, using work-

related symbols for personal gain, requesting or accepting gifts or other benefits, inducing others to provide gifts or benefits in relation to employment (except for customary gifts or benefits permitted under special regulations or provided by the employer), et
Discrimination represents unequal treatment based on race, skin colour, religion, disability, age, marital status, political orientation, social origin, property status, etc., or due to reporting crime or anti-social activity.

An employment relationship means employment, a similar labour relationship, civil service or state service.

An employer is a legal entity employing at least one natural person under an employment relationship.
A responsible person is an individual appointed by the company pursuant to § 10(1) of the Whistleblower Protection Act, responsible for fulfilling the employer's duties under paragraphs 4 to 7 and § 11(1) of the Act (see Annex No. 4 to this directive). The responsible person must possess the professional qualifications required to fulfil the tasks under this Act. The responsible person is bound solely by the instructions of the company's statutory representative, to whom they submit an annual report on the number of registered and verified notifications and their justification or lack thereof.

The responsible person is: **Alžbeta Vereščáková,** accountant of FENEGA, s.r.o..
The authorised person, who will maintain the register of submissions for FENEGA, s.r.o., is also Alžbeta Vereščáková**.**
Acting in good faith means conduct by a natural person who, considering the circumstances known to them and the knowledge they possess at the time of the notification, reasonably believes in the truthfulness of the stated facts; in case of doubt, the conduct is considered to be in good faith until proven otherwise.

A conflict of interest - refers to situations that may jeopardise the impartiality of the notification verification process and thereby the credibility of the company's internal verification system.

A retaliatory measure is an act or omission related to the whistleblower's employment or similar relationship, triggered by the notification or disclosure of information on anti-social activity, which has caused or may cause unjustified harm to the whistleblower or to a person under Section 1, subsection 4, letters (a) to (e) of Act No. 54/2019 Coll. as amended by **Act No. 189/2023 Coll.;** retaliatory measures include in particular:
- termination or immediate termination of employment,
- termination during the probation period or non-extension of the employment contract for an indefinite period,
- removal from position, reassignment to a lower position, or refusal of promotion,
- changes to work duties, place of work, or working hours,
- reduction of salary, denial of bonuses or personal allowances,
- failure to provide professional training,

- disciplinary action, coercion, intimidation or harassment,
- damaging the whistleblower's reputation,
- withdrawal from a contract for the supply of goods or services,
- revocation of a licence or permit.

3.2 Submitting Notifications

A whistleblower may submit a notification in several ways:

a) in writing,
b) orally,
c) by electronic mail,
d) or by publishing the notification via the internet, television, etc.

a) **A written notification** may be submitted directly **to the responsible person**:

FENEGA, s.r.o..,
„For the attention of the Responsible Person“
Alžbeta Vereščáková
Kračúnovce 51, 087 01 Kračúnovce

b) or by post to the **authorised person at the company's address: poverenej osobe na adresu spoločnosti:**

FENEGA, s.r.o..,
„For the attention of the Authorised Person“
Alžbeta Vereščáková
Kračúnovce 51, 087 01 Kračúnovce

If a notification is delivered by post to the company's address, an employee receiving a letter marked "For the attention of the Authorised Person" shall register it and immediately hand it over to the authorised person for processing.

c) **An oral** notification may be submitted directly to the authorised person at the address Kračúnovce 51, 087 01 Kračúnovce during working days. When a notification is submitted in this manner, the authorised person shall prepare two written copies of the ***Record of Oral Submission of Notification*** (see **Annex No. 2 of this directive**), which contains:

- the date the record was made,
- the registration number,
- the whistleblower's name, surname and place of residence,

- the subject of the notification and any attached documents or evidence,
- the whistleblower's signature,
- uvedenie zodpovednej osoby, ktorá záznam vyhotovila a jej vlastnoručný podpis.

After drafting the Record of Oral Notification (hereinafter referred to as "the record"), the authorised person registers the record and assigns it a registration number, provides one copy of the record to the whistleblower, and keeps one copy for verification.

d) By electronic mail to the address *verescakova@fenega.sk* directly to the responsible person, specified in Annex No. 4 of this directive (this method of submitting notifications is available 24 hours a day). A notification submitted in this way is considered received on the day the email is received by the responsible person, with the decisive timestamp being the one recorded in the company's system. The responsible person prints the message, registers it, and assigns it a registration number.

An external IT service provider ensures that the responsible person's email is accessible to whistleblowers 24 hours a day.

e) By publishing the notification via the internet, television, etc. For the notification to be published legally, the legal conditions for publication must be met.

Conditions for legal publication of a notification:

1. The company's internal system was used, and the whistleblower was not informed of the status/outcome and no measures were taken to remove the identified issue. The whistleblower subsequently submitted the notification to the prosecution office, administrative authority or public office, and **was not informed within a reasonable time** about the status/outcome.
2. The whistleblower submitted the notification directly to the prosecution office, administrative authority or public office, and **was not informed within a reasonable time** about the status/outcome.
3. The whistleblower has reasonable grounds to believe that the matter represents an immediate or obvious threat to the public interest.
4. If the whistleblower would submit the notification to the prosecution office, administrative authority or public office and there is a risk that impartial or independent verification would not be ensured.

f) Notifications may also be submitted through external reporting channels, such as the police, prosecution office, administrative and supervisory bodies, the Office for the Protection of Whistleblowers, and relevant EU institutions (European Union Agency).

3.3 Content of the Notification

A notification must clearly include:

a) a detailed description of the event with all known essential facts (what happened, where, when, what behaviour led to the suspicion, who is suspected, etc.,
b) information on how the whistleblower obtained the information that is the subject of the notification,

c)) whether witnesses or other involved persons exist (specify and identify them),
d) whether the whistleblower has specific materials or evidence available (attach them),
e) whether the whistleblower has already discussed the matter with someone and, if so, with whom,
f) the identity and contact details of the whistleblower; if the whistleblower chooses to submit the notification anonymously, their identity is not provided.

If the notification contains incomplete or unclear information, or if the attached documents are insufficient for verification of the notification, the responsible person may request the whistleblower—using the contact details provided in the notification—to supplement the missing information within a specified deadline. If the whistleblower does not provide the requested supplementary information within the given deadline, the responsible person is entitled to dismiss the notification without further processing, and must inform the whistleblower of this decision.

The responsible person must issue a confirmation of receipt of the notification **within 7 days**.

Ak v oznámení chýbajú kontaktné údaje oznamovateľa, je zodpovedná osoba povinná sa týmto oznámením zaoberať, avšak nevzniká jej povinnosť oznámenia o prijatí oznámenia, resp. výsledku preverenia oznámenia osobe, ktorá oznámenie podala.

3.4 Verification of Notifications and the Authorisation of the Responsible Person during Verification

The company has designated, for the fulfilment of the employer's obligations arising from the Act on the Protection of Whistleblowers of Anti-Social Activities as stated in Section 2 of this directive, a responsible person **in accordance with the Authorisation** (see **Annex No. 4** to this directive).

The employer is obliged to enable the responsible person to perform their duties independently. The responsible person may also carry out tasks and obligations other than those under subsections 4 to 7 and Section 11(1) of the Act on the Protection of Whistleblowers of Anti-Social Activities. The employer is required to ensure that none of these additional tasks or obligations result in a conflict of interest. The employer must not penalise the responsible person for performing their duties and must provide the responsible person with the necessary cooperation; in particular, the employer must provide any additional resources needed for the performance of these duties and ensure access to personal data and documents, while continuously maintaining the required professional competence.

During the verification of notifications, until they are fully processed, **the responsible person is authorised to**:

a) request a written statement and supporting documents from the whistleblower if such documents or evidence have not been provided,
b) request a written statement and supporting documents from the person to whom the notification relates,

c) request a statement and supporting documents from members of the statutory body, if the notification concerns them or any of them,

d) formally request, in writing, the cooperation of the whistleblower, the employer, the affected employee, members of the statutory body or other employees of the company in the verification process, and specify a reasonable deadline for providing such cooperation,

e) is authorised to process personal data for the purpose of maintaining records of notifications, specifically**: the whistleblower's name, surname, and residence**. The responsible person is also authorised to process any additional personal data contained in the notification about the whistleblower or about the person to whom the notification relates.

The responsible person has been instructed **about the obligation of confidentiality** under the Act on Certain Measures Related to Reporting Anti-Social Activity and under Section 79 of the Personal Data Protection Act.

In connection with activities under the Act on Certain Measures Related to Reporting Anti-Social Activity, the responsible person cooperates in the preparation of records of processing activities with the Data Protection Officer appointed under the GDPR, where relevant.

Information contained in the record of processing activities during the handling of notifications is governed by the Act on Certain Measures Related to Reporting Anti-Social Activity, particularly regarding the determination of the purpose of personal data processing, the description of categories of personal data, categories of data subjects, categories of recipients, and anticipated data retention periods.

Before drafting the written **Record of the Outcome of the Verification**, the responsible person must allow the whistleblower and all affected persons to comment on the conclusions identified during the verification. If, following such a request, the whistleblower or the affected person presents new facts or submits new evidence supporting their claims, the responsible person is obliged to examine these new facts and evidence.

The responsible person prepares a written record **of the outcome of the verification**, which includes the facts and evidence presented in the whistleblower's notification, an assessment of each fact, an evaluation of findings from the verification process, a statement regarding the truthfulness of the whistleblower's claims, and a proposal of the measures to be adopted, or, from the perspective of legal assessment, additional steps required to remedy the unlawful situation.

The responsible person is excluded from verifying a notification in cases where:

a) the notification is directed directly against the responsible person,

b) if, based on the facts stated in the notification and/or the circumstances of the case, there is reason to doubt the impartiality of the responsible person toward the verification of the matter, the whistleblower, or any persons concerned by the notification.

If such a situation occurs, the responsible person must report it to the statutory body, which will appoint another responsible person to verify the notification. If the responsible person fails to report circumstances indicating a lack of impartiality and/or if it concerns the case described in letter of this section, the statutory body is authorised, immediately upon discovering this fact, to suspend the verification conducted by the responsible person, remove the case from them, and appoint another responsible person to handle the notification. podnetu.

If the content of the notification indicates that it is **not** a notification under the Act on the Protection of Whistleblowers of Anti-Social Activities, but for example a **complaint** under Act No. 9/2010 Coll. on Complaints, as amended, the responsible person shall forward it to the company's office and immediately inform the whistleblower of this fact.

If, during the verification of a notification, the responsible person concludes that a **criminal offence has been committed**, they must inform **the company's statutory body and also the competent law enforcement authorities**.

Criminal offences that must be reported include:

a) a felony with an upper sentencing limit exceeding 10 years,
b) an intentional criminal offence punishable by imprisonment with an upper sentencing limit exceeding 5 years,
c) a misdemeanour (prečin) if, in its aggravated form committed intentionally, the upper sentencing limit exceeds 5 years,
d) criminal offences of corruption:
   - acceptance of a bribe,
   - bribery,
   - indirect corruption,
   - electoral corruption,
   - sports-related corruption,
   - acceptance and provision of undue advantage.

In verifying a notification, the assessment is based on its content regardless of how it is labelled.

3.5 Retaliatory Measures and Employee Protection

1. Retaliatory measures against whistleblowers are prohibited. No one may be subjected to discrimination, disciplinary action, loss of employment, or any other penalty for reporting anti-social activity in good faith, or for refusing to participate in anti-social activity. This does not apply if the whistleblower participated in the reported anti-social activity and violated related rules or regulation

2. Retaliatory conduct includes, in particular, threats of retaliatory measures and attempts at retaliation, isolation from other employees, humiliation, blocking career advancement, temporary reassignment without the employee's consent, unfavourable performance evaluations or references, reprimands, disadvantages, premature termination of a fixed-term employment relationship by the employer, termination of employment by the employer, undermining dignity, slander and other damage to one's reputation, removal from a managerial position, purposeful change of workplace location, bullying, or other forms of harassment or discrimination.
3. Retaliatory conduct does not include actions related to the termination or modification of an employment relationship if such actions result from a legal circumstance that does not depend on the employer's assessment or decision and is demonstrably unrelated to the employee's notification of anti-social activity.
4. If an employee believes that the termination or modification of their employment relationship is being carried out as retaliatory conduct, they have the right to report the suspicion of retaliation to the responsible person before it occurs.
5. The responsible person is obliged to verify the whistleblower's notification stating that retaliatory conduct is being applied against them.
6. The provisions of Sections 1, 2, and 3 of this directive apply appropriately to the submission, receipt, registration, and verification of notifications of retaliatory conduct.
7. The responsible person must submit a report on the results of verifying a notification of retaliatory conduct within 15 days of completing the verification to the statutory representative and the concerned employee. If suspicions of retaliation are confirmed, the report must propose corrective and preventive measures to prevent retaliatory behaviour in the workplace.
8. A person who applies retaliatory measures is subject to appropriate sanctions under Act No. 54/2019 Coll., as amended by Act No. 189/2023 Coll.
9. A whistleblower who has submitted a notification of serious anti-social activity to a law enforcement authority or an administrative authority may request preventive protection under Sections 3 and 4 of Act No. 54/2019 Coll., as amended by Act No. 189/2023 Coll., within criminal proceedings, or under Sections 5 and 6 of Act No. 54/2019 Coll., as amended by Act No. 189/2023 Coll..
10. The provisions of paragraphs 1 to 10 shall apply, as appropriate, also to:
a) a close person of the whistleblower,
b) a natural person – entrepreneur or a legal entity controlled by the whistleblower, in which the whistleblower has a share, holds a position on the governing body, or performs work activities,
c) a natural person – entrepreneur or a legal entity that controls a legal person in which the whistleblower has a share or holds a position on the governing body,
d) a person who provided assistance to the whistleblower in connection with the notification,
e) the responsible person or a person participating in the fulfilment of the responsible person's duties, and
f) other employees who cooperate in the verification of the notification.

3.6 Confidentiality of the Whistleblower's Identity and the Identity of the Affected Person

1. When verifying a notification, a transcript or, if possible, a copy of the notification is used without including any information that could identify the whistleblower. Anyone who knows the whistleblower's identity is obliged to maintain confidentiality.
2. The responsible person, the employer, employees, and cooperating persons are all required to maintain confidentiality regarding the identity of the whistleblower, the person to whom the notification relates, and any facts learned during the receipt and verification of the notification.
3. The responsible person must always contact the whistleblower in a manner that does not reveal their identity (via email, in person, or by telephone).
4. The obligation to maintain confidentiality regarding the whistleblower's identity continues even after internal verification or after investigations conducted by law enforcement authorities have concluded, including in cases where suspicions of anti-social activity were not confirmed, and also after the termination of the whistleblower's employment relationship.

3.7 Record-Keeping of Notifications and Deadlines for Handling Notifications

1. The responsible person is obliged to maintain a record of notifications according to the template specified in Annex No. 1, in which the following data are recorded:

a) the serial number of the notification based on the order of receipt and the year of receipt,
b) the date the notification was received,
c) the name, surname and residence of the whistleblower, unless the notification is anonymous,
d) the subject of the notification,
e) the result of the verification of the notification,
f) the date the verification of the notification was completed.

2. Each newly received notification must be immediately entered by the responsible person into the notification register under a notification number composed of the serial number and the year of receipt. The responsible person must record each notification separately from other documents and confirm receipt of the notification to the whistleblower no later than seven days after receiving it.
3. The register is kept in written form and is accessible exclusively to the responsible person and the employer's statutory representative. The responsible person must protect it from loss, destruction, damage, misuse or any other unauthorised handling, and ensure that no unauthorised persons gain access to it..
4. The employer is required to retain the data specified in paragraph 1 in the notification register for **three years** from the date of receipt.
5. The notification is stored in a file envelope inside a locked cabinet. After the verification is completed, the documentation is placed in a sealed envelope and stored in an archival box inside a locked cabinet in the archive.
6. If the employer has set up a telephone line for reporting anti-social activity, it must maintain a record of audio recordings of calls and store them for **three years** from the date of recording, on a non-rewritable electronic medium.

3.8 Notifying the Whistleblower of the Result of the Verification of Their Notification

The responsible person shall postpone the verification of a notification if:

a) it concerns a repeated notification – a notification submitted by the same whistleblower regarding the same matter without presenting new facts,
b) the whistleblower failed to provide cooperation to the responsible person, or failed to provide such cooperation within the specified timeframe, and without this cooperation the notification cannot be verified,
c) the whistleblower has died, and without their cooperation the notification cannot be verified,
d) the employment relationship with the whistleblower has ended, and without their cooperation the notification cannot be verified,
e) the whistleblower withdraws the notification, and no other circumstances suggest that the withdrawn notification relates to anti-social conduct.

The responsible person shall inform the whistleblower in writing about the postponement of the notification and the reasons for the postponement.

The result of the verification in the form of a written record (Record of the Result of the Verification of a Notification — see Annex No. 3 to this directive) **must be sent to the whistleblower by the responsible person no later than 90** days from the confirmation of the receipt of the notification, or if receipt was not confirmed, within 90 days after the lapse of **seven days** from the date of receiving the notification.

If the result of the verification of a notification indicates that a criminal offence has been committed, the responsible person is obliged **to report this fact to the law enforcement authorities and to the whistleblower.** If the result of the verification is the referral of the matter for handling under the Criminal Procedure Code or special regulations, the responsible person must inform the whistleblower of this in advance; this does not apply if such notification could jeopardise the investigation of the case.

If the result of the verification indicates that an administrative offence has been committed, the responsible person is obliged to report this fact to the law enforcement authorities and to the whistleblower.

3.9 Processing of Personal Data Contained in the Notification

For the purpose of maintaining a record of notifications, the company is authorised, with the consent of the data subject, to process personal data contained in the notification within the following scope:

a) title, name, surname, and address of the whistleblower,
b) data about the person(s) to whom the notification relates,
c) data about persons invited to participate in the verification of the notification,
d) data about persons who participated in the verification of the notification (performed tasks related to the verification).

Ďalej je spoločnosť oprávnená **bez súhlasu dotknutej fyzickej osoby** spracúvať osobné údaje:

a) ktoré už boli zverejnené v súlade so Zákonom a prevádzkovateľ ich náležite označil ako zverejnené,

b) the processing of which is necessary for the protection of the rights and legally protected interests of the controller or a third party, in particular personal data processed for the protection of the controller's property, financial or other interests, and personal data processed to ensure the controller's security through camera or similar systems; however, this does not apply if, in such processing, the fundamental rights and freedoms of the data subject, protected under this Act, prevail,

c) the processing of personal data is necessary for the performance of an important task carried out in the public interest, or

the data involve special categories of personal data that the data subject has made public themselves or are necessary for the exercise of their legal claim.

The company processes the personal data contained in the notification in accordance with the Personal Data Protection Act and the GDPR. Further information on the processing of personal data is provided for:

- for employees, in the document **Information Provided to the Data Subject – Employee**, available on the company's premises,
- for job applicants, in the document **Information on the Processing of Personal Data for Job Applicants**, available on the company's premises and on the website www.fenega.sk,

for customers, suppliers, and visitors, in the document **Information on the Processing of Personal Data – Customers, Suppliers, Visitors**, published on the company's premises and on the website www.fenega.sk.

3.10 Adoption of Measures to Eliminate Deficiencies Identified During the Verification of Notifications and in Communication with the Whistleblower Regarding These Measures

1. If the notification is proven to be justified during the verification process, the responsible person shall propose measures in the **written record** (Annex No. 5), identify the organisational unit responsible for implementing them, and specify the deadlines by which they must be carried out. After the proposed deadline expires, the responsible person shall request information on the measures taken.
2. The responsible person shall **inform the whistleblower in writing** of the measures adopted on the basis of the verification, no later than **90 days** from the confirmation of receipt of the notification, or if receipt was not confirmed, within 90 days after the lapse of seven days from the date of receiving the notification.

3.11 Adoption of Measures Against Obstruction of Reporting Anti-Social Activity

1. The responsible person must immediately submit to the employer a **report on obstruction of reporting anti-social activity**. If suspicions of obstruction are confirmed, the responsible person shall propose corrective and preventive measures to the employer to prevent such obstruction in the workplace..
2. The employer shall impose appropriate sanctions, in accordance with Act No. 54/2019 Coll., as amended by Act No. 189/2023 Coll., on any person who obstructs the reporting of anti-social activity or the keeping of notification records.
3. Depending on the specific circumstances of the case, obstructing the reporting of anti-social activity may be considered a serious breach of work discipline.

REGISTER OF NOTIFICATIONS OF ANTI-SOCIAL ACTIVITY

Annex No. 1

Reference number of the notification	Date of receipt of the submission	Whistleblower's name and surname	Whistleblower's address	Subject of the notification	Result of the verification	Date of completion of the verification

F-70/0

FENEGA, s.r.o.
Kračúnovce 51, 087 01 Kračúnovce
Company ID (IČO): 36 600 938
The company is registered in the Commercial Register of the District Court Prešov, Section: Sro, Entry No. 45996/P

RECORD OF NOTIFICATION RECEIPT

Notification submitted on:	**Method of submission:**

Whistleblower's details:	
Title, first name, surname:	
Residential address:	
Contact details:	

Subject of the notification:

Proposed evidence/witnesses:

Number of attachments/documents submitted by the whistleblower to the responsible person:	**Record prepared by:**

FENEGA, s.r.o.
Kračúnovce 51, 087 01 Kračúnovce
Company ID (IČO): 36 600 938
The company is registered in the Commercial Register of the District Court Prešov, Section: Sro, Entry No. 45996/P

RECORD OF NOTIFICATION VERIFICATION

Notification submitted on:	
Subject of the notification:	
Verified subject (affected person):	
Verification conducted by:	
Time and place of the verification:	

Established facts:

Objections of the verified subjects (affected persons):

Result of the verification:

Recommendations:

Referral to law enforcement / administrative authority / Whistleblower Protection Office:
yes / no

Notification of the whistleblower regarding the result of the verification:

List of attachments included with the record:

Place of drafting the record:	**Date of drafting the record:**
Record prepared by:	**Signature:**

Authorisation of the Responsible Person for Receiving, Verifying, Recording and Reporting the Results of Notifications Submitted by Employees in Connection with Anti-Social

FENEGA, s.r.o.
Kračúnovce 51, 087 01 Kračúnovce
Company ID (IČO): 36 600 938
The company is registered in the Commercial Register of the District Court Prešov, Section: Sro, Entry No. 45996/P
/hereinafter the "Employer"

pursuant to § 10 paragraphs 1, 3 and 4 of Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments to Certain Acts

h e r e b y a u t h o r i s e s

Alžbetu Vereščákovú,
Accountant of **FENEGA, s.r.o.**
As the

r e s p o n s i b l e p e r s o n,

who shall receive, verify, record and report the results of the verification of notifications, and propose corrective measures submitted by employees in connection with the reporting of anti-social activity pursuant to Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments to Certain Actt

at the address:

FENEGA, s.r.o..,
„ FAO the Responsible Person"
Alžbeta Vereščáková
Kračúnovce 51, 087 01 Kračúnovce

and

e-mail: verescakova@fenega.sk

methods of submitting notifications: orally into the record, in writing, and electronically.

The responsible person, in fulfilling the duties and obligations arising from Act No. 54/2019 Coll., is bound solely by the instructions of the statutory representative of the employer, FENEGA, s.r.o.

The authorisation becomes valid on the date of signature by the statutory representative of the employer and takes effect on the **day .....**

In Kračúnovce, on .....

.....
Ing. Peter Packo
Executive Director

I hereby accept the authorisation as the **responsible person who shall receive, verify, record and report the results of the verification of notifications and propose corrective measures on behalf of employees** in connection with the reporting of anti-social activity pursuant to Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments to Certain Acts.

In Kračúnovce, on .....

.....
Alžbeta Vereščáková
Responsible Person

FENEGA, s.r.o.
Kračúnovce 51, 087 01 Kračúnovce
Company ID (IČO): 36 600 938
The company is registered in the Commercial Register of the District Court Prešov, Section: Sro, Entry No. 45996/P

RECORD SHEET OF RECEIVED NOTIFICATION No..... / ..... *(to be completed with the sequential number of the notification and the year)*

Notification submitted on:	**Method of submission:**

Whistleblower's details, if the notification is not anonymous:	
Title, first name, surname:	
Residential address:	

Subject of the notification:

Result of the verification:	
Date of completion of the verification:	**Record sheet prepared by:**