

## **Information on the Protection for Whistleblowers** (hereinafter referred to as the “Information”)

MSM GROUP has established a system for submitting and investigating notifications of activities undermining the functioning of society, within the meaning of Act No. 54/2019 Coll., on the Protection of Whistleblowers Notifying Activities Undermining the Functioning of Society and on Amendments and Supplements to Certain Acts (hereinafter also referred to as the “Act”).

In accordance with the provisions of the Act, MSM GROUP publishes the following information:

1. The issue of whistleblower protection is regulated in the MSM GROUP Policy on Protection for Whistleblowers (Directive No. P40B-50-MSG-COM-VS001, hereinafter referred to as the “MSM GROUP Policy”) and is elaborated in more detail in Directive No. P40B-50-MSG-COM-VS002, Implementation of the Whistleblower Protection Agenda (hereinafter referred to as the “Directive”). This Information uses the terminology of the Act, MSM GROUP Policies and the Directive.
2. Within the meaning of Article 6 of the Directive, the Responsible Person is the Legal Compliance Manager, Juraj Kaščák – phone: +421 903 440 747, email: [juraj.kascak@msm.sk](mailto:juraj.kascak@msm.sk).
3. Notifications can be submitted:
  - a. through the MSM GROUP common online reporting system, which is available from the website [www.msm.sk](http://www.msm.sk); or
  - b. by sending an email to [etika@msm.sk](mailto:etika@msm.sk); or
  - c. in writing, by dropping them into one of the boxes located at the ZVS premises in Dubnica nad Váhom; or
  - d. to the Responsible Person orally in the form of minutes.

All methods of submitting notifications allow for anonymous reporting. With the exception of oral notifications, all methods of submission are available at all times.

4. The internal system of investigations into the notifications includes the following obligations of the MSM GROUP or the Responsible Person:
  - a. Obligation to confirm receipt of the notification, if possible. The notification receipt must be confirmed within 7 days from the date it is received.
  - b. Obligation to assess the accuracy of the allegations made in the notification. If necessary, an ad hoc committee may be convened to investigate into the notification. Details are provided in the Directive. The aim of the investigation is primarily to determine whether the notification is based on truth and to take the necessary measures to prevent activities undermining the functioning of society.
  - c. Obligation to notify the whistleblower of the investigation results of his or her notification, if possible. The deadline for fulfilling this obligation is 90 days from the date of confirmation of receipt of the notification, or within 90 days from the date of expiry of 7 days from the date of receipt of the notification.

- d. Obligation to take measures to remedy the shortcomings identified during the investigation into the notification and the obligation to communicate these measures to the whistleblower.
- e. Obligation to take measures to prevent attempts to hinder reporting.
- f. Obligation to keep proper records of each notification.
- g. Obligation to raise public and employer awareness of an activity undermining the functioning of society reporting and whistleblower protection.
- h. Obligation to increase the professional competence of the Responsible Person and other employees involved so that this agenda is always carried out according to the latest knowledge in this area.

Any of the obligations set out herein may be delegated by the Responsible Person to another employee of the Legal Compliance Department. Details are provided in the Directive.

- 5. An application for the provision of protection in cases of notification of serious activities undermining the functioning of society which is considered to be a criminal act can be submitted together with the notification itself or within the criminal proceedings. In the latter case, the application is submitted to the prosecutor in either written form or orally as a part of the court record. If such an application is submitted to another public body, this body will immediately transfer the application to the prosecutor.

An application for the provision of protection according to this paragraph includes the name, surname, date of birth and address of the whistleblower who is submitting it, the place of his employment and the name of his employer. The application also includes details of a close individual, if he or she is in an employment relationship with the same employer as the whistleblower, or is in an employment relationship with an employer who is a dependent entity in relation to the employer of the whistleblower, and the whistleblower is asking for protection for this close individual as well.

(Section 3 of the Act)

- 6. An application for provision of protection in instances of notification of serious activities undermining the functioning of society which are considered to be administrative delicts can be submitted together with the notification itself, or within an administrative proceeding. In the latter case, the application is submitted in either written form, or orally as a part of the record of the authority, which is leading the administrative proceedings (hereinafter referred to as the “administrative authority”). If such an application is submitted to another public body, this body will immediately transfer it to the appropriate body, in accordance with the first sentence.

An application for the provision of protection according to this paragraph includes the name, surname, date of birth and address of the whistleblower who is submitting it, the place of his employment and the name of his employer. The application also includes details of a close individual, if he or she is in an employment relationship with the same employer as the whistleblower, or is in an employment relationship with an employer who is a dependent entity in relation to the employer of the whistleblower, and the whistleblower is asking for protection for this close individual as well.

(Section 5 of the Act)

7. If the whistleblower believes that he or she has had an employment act which he or she does not agree with carried out against him or her as the result of the notification, he or she can ask the Office, within 15 days from the day he or she learned of the employment act, to suspend the effect of this act.

The Office shall suspend the effect of the employment act as described in the previous paragraph, without undue delay, if the time limit according to the previous paragraph has been observed, and if the employer does not show within a reasonable period of time set out by the Office that the employment act is in no way connected to the notification. The Office shall issue a confirmation of suspension of effect of the employment act and it shall deliver this confirmation to both the employer and the whistleblower.

The confirmation as according to the previous paragraph shall entail the name, surname, date of birth and address of the whistleblower, the name of the employer, and the employment act the effect of which has been suspended. If the Office rejects the application according to the first paragraph of this Article, the underlying reasons of such a decision shall be notified to the whistleblower.

In accordance with the second paragraph of this Article, suspension of the effect of an employment act starts on the day the confirmation has been delivered to the whistleblower. The enforceability of a decision which is an employment act shall be postponed when the effect is suspended.

Upon the delivery of the confirmation according to second paragraph of this Article, the Office shall instruct the whistleblower in writing about the availability of the option to submit an application to a court, asking for a preliminary measure according to the according to the following paragraph of this Article (and about the consequences following from it) to be put in place.

Suspension of the effect of an employment act will end 30 days after the confirmation has been delivered to the whistleblower in accordance with the second paragraph of this Article. Delivery of an application for a preliminary measure to a court within this period prolongs the suspension of the effect of an employment act until the decision of the court in this matter becomes effective.

Provisions entailed in this paragraph shall be used (where appropriate) for persons under Section 1 subsection 4 of the Act.  
(Section 12 of the Act)

8. This Information was published on the MSM GROUP website ([www.msm.sk](http://www.msm.sk)) on 01.03.2026. Later versions of this Information become effective on the date of their publication at the same website where the original version was published.