

❖ Internal whistleblowing procedure in company

Mobis Slovakia s.r.o.

Legal basis	Act No. 54/2019 Coll. on whistle-blower's protection (so called „Whistleblowing Act“)
Internal MSK Regulation	Regulation No. MSK-LT-05 on Internal Whistleblowing System, available at Controlled Documentation
Responsible persons	<ul style="list-style-type: none"> • Members of Legal & Compliance team responsible for investigating of notices » Paulina Maruskova, tel.: 041/515 8152, paulina.maruskova@mobis.com » Petra Cickanova, tel.: 041/515 8157, petra.cickanova@mobis.com » Michal Papula, tel.: 041/515 8550, michal.papula@mobis.com
Submitting of notices	<p>1) Non-anonymous</p> <ul style="list-style-type: none"> ➤ contains whistle-blower 's name, surname and work position ➤ responsible person is obliged to maintain confidentiality about whistle-blower 's identity <p>2) Anonymous</p>
Procedures for notice 's submitting	<p>Whistleblowing notice can be submitted to the employer (MSK) or to competent authority for notice acceptance, which is:</p> <ul style="list-style-type: none"> ➤ Whistleblower Protection Office: https://www.oznamovatelia.sk/chcem-oznamit/ ➤ Public prosecutor ➤ Administrative and Inspection Body ➤ Competent institution, authority, office or agency of the European Union
Ways of notice 's submitting to MSK	<ul style="list-style-type: none"> ➤ Verbally to responsible person, who prepares written record about verbal notice ➤ In writing, by post addressed to one of the responsible persons to Mobis Slovakia s.r.o., MOBIS ulica 1, 013 02 Gbeľany ➤ By email to oznamenie.msk@mobis.com ➤ By webpage form available at website https://mobis.sk/podat-oznamenie/ • Result of the investigation + corrective actions → notice to the whistle-blower within 90 days from confirming notice receipt

❖ Whistle-blower protection

<p>Protection of the protected whistle-blower</p>	<ul style="list-style-type: none"> • If the employee notifies serious anti-social activity and submits qualified notice → status of protected whistle-blower (granted by prosecutor / administrative body upon request submitted along with the notice / during the proceedings) • Qualified notice – one which could contribute / have already contributed to revelation of serious anti-social activity and punishing of its perpetrator • Employment act (other than employment act which grants rights or which is related to the termination of employment relationship due to reason independent from the employer 's assessment) towards protected whistle-blower → only with consent of whistle-blower or of Whistle-blower 's protection Office • Act without the consent → automatic invalidity + possibility of penalty to employer
<p>Protection of the whistle-blower in other cases</p>	<ol style="list-style-type: none"> 1. Notifies serious anti-social activity but does not submit qualified notice 2. Notifies less serious anti-social activity <ul style="list-style-type: none"> • Employee – whistle-blower, who assumes that employer 's act towards him/her was issued only due to submitted notice (warning letter, termination notice...) and whistle-blower doesn 't agree with this act, requests protection by Whistleblower Protection Office within 15 days after delivery of employment act to employee • If connection between employer 's act and the notice is identified and employer does not prove absence of such connection Whistleblower Protection Office suspends respective employment 's act effectiveness for 30 days • The employee must seek invalidity employment act via court proceedings (in interim injunction proceedings – right for free legal aid) within this period – ineffectiveness of employment act prolongs until court's decision on interim injunction comes into effect