



WHISTLEBLOWING / REPORTING OF ANTI-SOCIAL ACTIVITIES

1. What is anti-social activity?

Anti-social activity is an act that constitutes a criminal offence, misdemeanour, other administrative offence or an act that has a negative impact on society. Examples of anti-social activity are:

Abuse of market position

Fraud, corruption, bribes

Discrimination

Masking of the above

2. Who can be a whistleblower

A whistleblower may be a current, former or potential employee, as well as an agent or business partner, or another natural person.

3. Notification of anti-social activity

Anti-social activity can be reported to the Broker anonymously or with the contact details of the whistleblower in one of the following ways:



- a) In writing to Finax, o.c.p., a.s. (hereinafter also referred to as "Broker"), the envelope to be prominently marked "Do Not Open Confidential - Whistleblowing"
- b) By email to whistleblowing@finax.eu
- c) Online form at this [link](#), or by scanning the attached QR code.

Notification of anti-social activity shall not be considered a breach of the contractual obligation of confidentiality.

The notification of the anti-social activity may also be made to the authority competent to receive the notification (office, public prosecutor's office or administrative authority competent for administrative offence proceedings or competent authority, institution, body or agency of the European Union).

4. Whistleblower protection and confidentiality

There shall be a prohibition on the threat of reprisals or actual reprisals against the whistleblower as well as against his/her close persons, natural persons – entrepreneurs or legal persons who are in a relationship with the whistleblower's business or professional activity or persons who have provided assistance to the whistleblower in connection with the notification or the person in charge. Examples of retaliation include: termination of employment, harassment or intimidation, defamation, withdrawal from a contract for the supply of goods or services.

In the event that the whistleblower chooses to submit the notification non-anonymously, the Broker is obliged to maintain confidentiality of the identity of the whistleblower. The identity of the whistleblower may only be disclosed with the written consent of the whistleblower, except in criminal or administrative offence proceedings. In the case of non-anonymous notifications, the Broker processes the personal data of the notifier in accordance with the GDPR and Act 18/2018 Coll. on the Protection of Personal Data. In the case of a notification of serious anti-social activity that constitutes a criminal offence, the notifier may also request protection in criminal proceedings; such a request shall be made to the public prosecutor. In the case of a notification of serious anti-social activity which constitutes an administrative offence, the notifier may also request protection in the context of administrative offence proceedings; such request shall be made to the competent administrative authority. If the whistleblower considers that an employment action has been taken against him in connection with his notification, with which he disagrees, he may, within 15 days of becoming aware of the action, apply to the Office for the Protection of Whistleblowers for the suspension of the effect of that action.

5. Procedure for investigating anti-social activities

The Broker shall acknowledge receipt of the notification to the notifier within 7 working days of the notification, this does not apply to anonymous notifications. The Broker shall examine the notification received. The examination of the notification shall also be deemed to be the referral of the matter for processing in accordance with the Criminal Procedure Code or other regulations, e.g. the Offences Act. The Broker shall notify the notifier of the result of the examination and any measures taken within 90 days of acknowledging receipt of the notification. If the matter has been referred, the Broker must request the outcome of the investigation and inform the whistleblower of the outcome within 10 days of receipt of the outcome.

6. Responsible person

The Compliance Officer is the person responsible for the screening of notifications and the whole area of whistleblower protection.

7. Conclusion

Reporting of anti-social activity does not serve for the application of client complaints/complaints related to the Broker's products. Complaints are governed by the Complaints Policy.