



MONDO INTERNATIONAL

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WHISTLEBLOWER REGULATION

Mondo International Academy Ltd. (hereinafter referred to as the “Company” or the “Employer”) issues this Directive on receiving and verifying suggestions according to § 11 of the Act c. 307/2014 Coll. About certain measures relating to the notification of anti-social security activities and on the amendment of certain laws (hereinafter. referred to as "the law") for the purpose of adjusting the details of acceptance and verification suggestions of the Company's employees for serious anti-social activities or other than serious anti-social activity that the employees are concerned about learned in connection with the exercise of their employment, position or function.

The purpose of this Directive is also to regulate the rights and obligations of employees, responsible person and the employer when notifying the anti-social partner activities, including the protection of Company employees who report anti-social activity under this Directive or under the law.

SCOPE

This guideline applies to all Mondo International Academy employees Ltd.: employed on the basis of employment contract, agreements on work performed outside the employment contract ratio. This directive is also binding on the statutory representative - the President of MIA.

RESPONSIBILITY

The Academic Director is responsible for the directive. They approve the directive company executives.

MARKINGS AND ABBREVIATIONS USED

The following terms have the following meanings in this Directive: "Anonymous complaint" means a notice, submission or complaint in which it is not the name, surname and address of residence of the person are given who serves it, "Other than serious anti-social activity" the offense, which is an offense, is different administrative tort or other conduct which is not serious anti-social activity, but despite by its nature, it has a negative effect on society, including other unfair, unethical or uneconomical proceedings, in so far as such proceedings or activities are concerned the employee has learned in connection with the performance of his employment, occupation, position or function,

"Acting in good faith" is the action of a person who, given the circumstances that are she knows her, and the knowledge she has at that time is convinced of the veracity of the facts alleged; in In case of doubt, the proceedings are considered to be good proceedings faith until proven otherwise,

"Non-anonymous suggestion" is the notification, submission or initiative in which it is the name, surname and address of residence of the person who: serves it

"Notifier" is a natural person who makes a notification in good faith the authority competent to receive such notification; for the notifier is considered not only § 9 of the Act but also him a close person if he has an employment relationship with him to a certain employer,

"Notice" means an indication of the facts of which a natural person is concerned learned in connection with the performance of his employment, professions, positions or functions and which they may make a significant contribution or clarification serious anti-social activity or to detect or the conviction of its perpetrator,

The initiative is:

1. notification, including anonymous notification,
2. non-anonymous submission of a natural person by other than serious anti-social activity in question learned in connection with the performance of his employment, occupation, position or function,

"Employer" is Mondo International Academy Ltd. how a legal person that employs natural persons - employees in an employment relationship,

"Serious anti-social activity" is an offense which is:

1. any of the offenses of harm financial interests of the European Communities pursuant to 261 to § 263 of the Criminal Code, a criminal offense machinations in public procurement and public auctions according to § 266 of the Criminal Code, some of the criminal acts of public officials under the eighth chapter of the second part of a special part of the Criminal Code or any of the crimes of corruption under Chapter 8 of the Third part of a special part of the Criminal Code,
2. a criminal offense for which the Criminal Code provides imprisonment with a maximum penalty exceeding three years, or
3. an administrative offense for which a fine may be imposed s an upper limit of at least EUR 50 000,

"Responsible person" is a natural person - an employee of the Company, who performs the tasks of the employer according to § 11 and 12 of the Act; for the purposes of this Directive is the responsible person is directly subordinate to the statutory body of the employer.

DESCRIPTION OF ACTIVITIES

COMPLAINT PROCEDURE - SERIOUS NOTIFICATIONS ANTI - SOCIAL ACTIVITIES

The employee may report, whether anonymously or non-anonymously, such facts which he has learned in the course of his employment and which can make a significant contribution to clarifying the serious anti-social activity or to identify or convict its perpetrator. The employee can report directly to the police or to the public prosecutor's office if the notification concerns serious anti-social activity, which is a crime. The employee may submit the notification directly to the administrative authority, which is competent to receive a notification under a special regulation, if the communication concerns serious anti-social activity, which is correct tort. The notice may be given by the employee in writing or orally in the minute's competent authority. If the notice of serious anti-social activity is made by the employee directly to the employer, the employer is obliged to transfer it competent authority for criminal or administrative proceedings torts.

COMPLAINT PROCEDURE - SUBMISSIONS OTHER THAN SERIOUS ANTI - SOCIAL ACTIVITIES

The employee may also notify the employer anonymously facts which he has learned in the course of his employment and which they can make a significant contribution to clarifying a non-serious one anti-social activity or to find out or convict someone who committed.

Method of submission of complaints An employee may file a complaint - a non-serious notification anti - social activities in writing, orally on the record, by telephone or by e-mail: in writing in a sealed envelope in the name of the responsible person, the employee throws the notification in the box to receive suggestions placed before entering the academy, as follows the submitted complaint shall be submitted by the employee to the responsible person, - orally in the record directly to the person responsible, - by email to complaint@mondoi-academy.com, where access to This email box has only the responsible person this way submission is available 24 hours a day.

Complaints received by a person other than the responsible person is that person obliged to immediately transfer the equipment to the responsible person.

Verification of suggestions

The responsible person is responsible for verifying the complaints employer. The responsible person is obliged to verify as an initiative: anonymous or non - anonymous notification of a serious anti-social activities, non - anonymous submission of a natural person - employee by other than serious anti-social activity.

The responsible person is not obliged to verify an anonymous complaint against another as a serious anti-social activity.

The examination of a complaint is based on its content, regardless of its content designation.

As far as the content of the complaint shows that it is not a complaint under this Directive, but another body is competent to deal with the complaint (e.g. police, prosecutor's office, labor inspection, etc.), responsible person initiative shall forward it immediately to that authority. Responsible for this fact the person shall immediately inform the complainant. If the content of the submission shows that the complaint is only a part of the received submission, only the relevant part of the submission shall be verified under this Directive. The remaining parts submissions shall be processed according to the regime under which they fall. The responsible person shall be informed of this fact without delay informs the complainant.

The responsible person is obliged to check the complaint no later than 30 calendar days of its adoption. In justified cases, the responsible person extends the period referred to in the previous paragraph, for a maximum of another 30 days. About this fact as well as the reasons extension of the time limit is obliged to immediately inform the complainant, unless it is an anonymous initiative. Total time to examine the complaint may not exceed 90 days from its receipt.

If necessary, supplement or clarify the information provided in the complaint, the responsible person shall invite the applicant without undue delay initiative to supplement or clarify it, setting a time limit for carrying out this act.

If the complaint is directed to a specific employee or statutory representative of the employer (hereinafter referred to as “concerned employee ”or“ statutory representative ”), the responsible person without notify the staff member concerned without undue delay; or statutory representative with the content of the complaint and allow him to express his views to it, as well as to submit documents, documents or other information necessary for a reliable examination of the matter. When acquainted with the content of the complaint is responsible person obliged to ensure the confidentiality of identity the complainant and for the protection of personal data according to the law c. 18/2018 Coll. If the information that is part of or annex to the complaint, the identity of the complainant can be deduced, the responsible person with such information to the employee concerned or does not inform the statutory representative, but invites him only to introduce, resp. submission of the facts necessary for a reliable examination of the complaint.

In the case of a more complex stimulus that requires expertise experience, specific knowledge or expert judgment the person is entitled to establish for the given case the initiative of the so-called investigation team. The number of members of the investigation team depends on the decision of the responsible person a person who invites members to the team and arranges for the declaration to be signed confidentiality from all members of the investigation team. Investigative the activities of the members of the investigation team shall be without remuneration if they are employees of the Company.

Procedure for verifying a complaint:

1. upon receipt of the initiative, the responsible person shall become acquainted with the content initiative and propose further action to the statutory body, responsible person and decide on further action,
2. the responsible person himself or the investigation team will verify the complaint and submit a written report on the result of the verification to the statutory authority,
3. the statutory body shall be informed of the written report on the result examination of the initiative and determine the next steps,
4. communicating the result of the verification of the complaint to the person making the complaint she filed.

Authorizations of the responsible person in the examination of complaints

The responsible person is entitled to request in writing to the necessary extent the complainant as well as the employer, the employee concerned or the statutory representative to cooperate in the examination of the complaint together setting a reasonable deadline for providing co-operation.

The person responsible for the result of the verification of the complaint is rather a written report, in which it summarizes the facts stated by the complainant, and at the same time comment on each fact, from the point of view of verifying the truth alleged facts and from the point of view of assessing their legal relevance in in relation to the possible fulfilment of the element of illegality.

Before drawing up a written report on the outcome of the examination of the complaint the responsible person will allow the complainant to comment on the findings in conclusion. If the complainant states new facts or so disagrees with the conclusions reached, the responsible person must comply with these to settle the facts and dissenting objections in a written report the result of the examination of the complaint, stating whether these facts are and substantiated objections.

The responsible person is excluded from the examination of the complaint in the following cases: - If the complaint is directed directly to the responsible person, - If, in the light of the facts set out in the complaint or the circumstances case, there may be doubts about the impartiality of the responsible person having

regard to the ratio of the responsible person to the case under investigation, to the complainant or to other interested parties whose the complaint is also directly or indirectly affected, in such cases, the verification of the complaint will be carried out directly by the statutory body a body which will have the same rights and obligations as the responsible person when examining a complaint directed to the responsible person. The submission of a complaint must not become a complaint or a reason for inference consequences which would cause any harm to the complainant. If, in the case of a review of the complaint, it is established that an offense has been committed criminal offense, the responsible person is obliged to report this fact law enforcement authorities.

Maintaining secrecy about the identity of the complainant

The responsible person and the employer are obliged to maintain confidentiality the identity of the complainant.

Recording of suggestions

The responsible person is obliged to keep a record of complaints in which records the following data: - date of receipt of the complaint,

- name, surname and address of residence of the complainant; in case anonymous initiative, only a note that it is anonymous shall be given initiative,
- the subject of the complaint,
- the result of the examination of the complaint,
- the date of completion of the examination of the complaint.

Each newly received complaint is the responsibility of the responsible person without delay to be registered in the register of complaints under the complaint number, which consists from the serial number of its delivery and the year of delivery. The employer is obliged to keep the data on the complaints mentioned above in the register of complaints three years from the date of delivery of the complaint. In the case of an audio recording with the receipt of a stimulus, records will be kept sound recordings and will be kept for three years at electronic non-rewritable medium.

Informing the complainant of the result its verification

The result of the verification of the complaint in the form of a written record is responsible person obliged to send to the complainant no later than 15 days of its verification; this does not apply in the case of an anonymous complaint.

Processing of personal data provided in the complaint

For the purposes of keeping records of complaints, the employer is entitled process the personal data mentioned in the complaint to the extent: name, surname and the residence address of the complainant. The employer is entitled without the consent of the natural person concerned process personal data:

- which have already been published in accordance with the law and their operator duly marked as published,
- the processing of which is necessary for the protection of rights and rights protected interests of the operator or a third party, in particular personal data processed in the framework of protection of property, financial or other interests of the controller and the personal data processed to ensure the safety of the operator through cameras or similar systems; however, this does not apply if in such a case fundamental rights and freedoms prevail in the processing of personal data the person concerned, who are subject to protection under this Act,
- the processing of personal data is necessary to fulfil an important task performed in the public interest, or
- these are specific categories of personal data held by the data subject itself or are necessary for the application of its law claim.

Prohibition of discrimination against the complainant

The complaining employee must not be discriminated against in an employment relationship on the grounds that he has filed a report on crime or other anti-social activities. The responsible person is obliged to file the person who initiated this Directive, information concerning him subsequent legal protection, such as the possibility to seek redress, to refrain from discriminatory proceedings in order to remedy illegal activities condition or to provide adequate satisfaction. The responsible person shall also inform the person who initiated this Directive, on the possibility of applying for protection as a notifier serious anti-social activity in criminal proceedings, proceedings on administrative tort or protection in connection with the filing of a complaint under of this Directive.