

Internal notification system (whistleblowing) for the notice about the illegal negotiations

On the basis of Directive (EU) No. 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law (hereinafter referred to as Directive (EU)), ECOM s.r.o. has introduced an internal notification system intended for employees and other natural persons who are related to the company and who have learned of an infringement in connection with work or other similar activities, which infringes a legal regulation falling within one of the areas defined by Directive (EU). The main objective of whistleblower protection is to make it possible to detect illegal or unfair conduct taking place at the workplace or in the performance of work (or other similar) activities. However, it must be a public interest, not a private interest, which means that the interest of society as a whole is threatened by this action.

What conduct belongs here

Corruption, breaches of product safety and labelling regulations, lack of protection of public health, abuse of powers, conflict of interest, unauthorized handling of waste, ignorance of consumer protection and personal data, money laundering, activities used to conceal listed types of conduct, ... The person in charge of receiving and handling submissions is Jana Jančurová, hereinafter referred to as "the relevant person".

Contact information for submitting a notification e-mail: oznamto@ecom.cz

The notification must be made by a natural person and must contain information about illegal negotiations.

- a) which has the characteristics of a crime or misdemeanour
- b) or violates a legal regulation or a regulation of the European Union governing areas defined by law
- c) and the commission of which the notifier became aware in connection with work or other similar activity

Whistleblower protection

The receipt and handling of complaints within this system is technically and organizationally set up in such a way that the identity of the whistleblower cannot be revealed. Only the person competent to receive and handle complaints, who is bound by confidentiality and is obliged to maintain the confidentiality of the content of the submission during the investigation of the complaint and after the termination of his employment, has the right to become acquainted with his identity and the content of the notification. Whistleblowers qualify for protection under the Directive (EU) if they had reasonable grounds to believe that the reported information on breaches was true at the time of reporting (i.e. the whistleblower must not knowingly make the report false). The main protection measure can be considered the prohibition of retaliation against the whistleblower and other natural and legal persons (eg. colleagues, assistants of the notifier, close persons of the whistleblower, legal entities whose companion is the whistleblower, etc.).

Procedure of the relevant person after the submission of the report

- a) the relevant person assesses whether the report fulfils the conditions for processing under Directive (EU) and informs the notifier accordingly within 7 days of receipt of the notification
- b) the relevant person examines the information in the report and, if confirmed, takes appropriate steps, in particular by proposing corrective measures and, where appropriate, taking further action

c) the result of the investigation and the proposed action shall be notified by the notifier within 3 months of the notification being informed

Final provision

Internal notification system comes into effect on 30.03.2022