

GUIDANCE NOTES

NO.:

INŽINIERSKE STAVBY - 03/2016
CESTY NITRA - IS 03/2016
IS-LOM MAGLOVEC - SSRK 03/2016

**GUIDANCE NOTES
ON WHISTLEBLOWING**

Effective from: 15.03.2016

Approved by:



Philippe Corbel
predseda predstavenstva a.s.

Chairman of the Board of Directors

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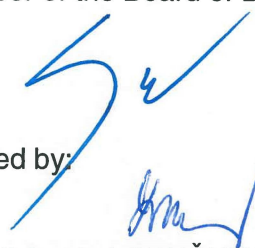
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I. INTRODUCTORY AND GENERAL PROVISIONS

1. Introductory Provisions

- 1.1 The present guidance note regulates details and procedure on complaints submission, investigation of complaints and authorizations of the responsible person in the investigation of complaints, maintaining confidentiality of the identity of the person making the complaint, keeping records of the complaints, informing the person who made a complaint about the results of investigation, processing of personal data stated in the complaint, all in compliance with the law.
- 1.2 The Guidance Notes is binding on all employees of COLAS group companies in Slovakia.

2. General Provisions

2.1 Definitions

- **Employer** – COLAS group companies in Slovakia
- **Complaint** in terms of this guidance note is:
 1. report, including anonymous report,
 2. non-anonymous complaint of an employee of the company on other whistleblowing as serious whistleblowing, that he/she has learned about in connection with exercising his/her employment, profession, position or function.
- **Report** – stating the facts that employee has learned about in connection with exercising his/her employment, profession, position or function and which can significantly contribute or have contributed to clarification of serious whistleblowing or to identifying or convicting the offender.
- **Serious whistleblowing** – lawless behaviour, which is:
 1. any of the criminal offences damaging financial interests of European Communities pursuant to Section 261 - 263 of the Criminal Code, criminal offence of deceitful practices in public procurement and public auction pursuant to Section 266 of the Criminal Code, any of the criminal offences committed by public officials referred to under the Chapter Eight, Title Two of the Special Part of the Criminal Code or any of the corruption criminal offences referred to under Chapter Eight, Title Three of the Special Part of the Criminal Code,
 2. criminal offence, for which the Criminal Code stipulates a maximum custodial penalty of more than 3 years, or an administrative offence, for which a fine can be imposed with upper limit in the amount of min. EUR 50.000
- **Responsible person** – legal department of Inžinierske stavby, a. s.

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2.2 Abbreviations used

- **company** Inžinierske stavby, a.s., CESTY NITRA, a.s., IS-LOM s.r.o., Maglovec
- **employee** employee of Inžinierske stavby, a.s., CESTY NITRA, a.s., IS-LOM s.r.o., Maglovec
- **ISK** Inžinierske stavby, a. s.
- **CN** CESTY NITRA, a.s.
- **IS-LOM** IS-LOM s.r.o., Maglovec
- **law** the Act No. 307/2014 Coll. on Certain measures related to whistleblowing and on Amendments of certain acts

II. COMPLAINT HANDLING RESPONSIBILITY

3. Employer's obligations for the internal system of handling the complaints

3.1 Employer is obliged to:

- designate a responsible person and methods of complaints submission. The methods of submitting the complaints have to be published and available to all personnel via usual and commonly accessible way, with at least one method of submission of complaint being available 24 hours a day
- accept and investigate every complaint within 90 day from its receipt
- maintain confidentiality of identity of the person making a complaint
- inform the person who made a complaint about the result of investigation within 10 days from the completion of the investigation of the complaint
- keep records of complaints within 3 years from the delivery date of complaint (including complaint's delivery date; name, surname and address of person who made a complaint – in the case of anonymous complaint, it shall be just stated that it is an anonymous complaint ; subject of the complaint; result of investigation of the complaint; date of completion of investigation of the complaint)

3.2 Method for submission of complaint:

- Personally on the legal department of Inžinierske stavby, a. s.
- electronically , i.e. via e-mail to: oznamovanie@iske.sk

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4.Responsible person designation

- 4.1 Basic precondition for business activity of COLAS group companies in Slovakia in compliance with the laws of the Slovak republic is observation of legal acts and decisions of state and public administration bodies resulting therefrom.
- 4.2 COLAS group companies in Slovakia, as members of Bouygues S.A. group, undertook to respect the strictest standards in business activity by Ethical Code. Ethical Code states obligation of a whole Bouygues S.A. group, therefore also of COLAS group companies in Slovakia, to help all employees to react appropriately on given situation with respect to clear and precise principles, and also procedure for reporting suspicions of misconduct. It is required from all personnel to respect the rules inherent in the Code in compliance with their job positions and responsibilities.
- 4.3 The Legal department of Inžinierske stavby, a. s., is responsible person, i.e. designated department that is obliged to handle complaints on whistleblowing (also the anonymous ones) within the scope of CESTY NITRA, a.s., a IS-LOM s.r.o., Maglovec (contract No. ZM 24/2016-SS).

5. Employee´s rights and duties in terms of making a complaint

- 5.1 Employee of Colas group companies in Slovakia is entitled to make a complaint, in which he/she states the facts he/she has learned about in connection with his/her employment, profession, position or function, and which can significantly contribute to clarification of serious whistleblowing. Complaint can be also anonymous.

III. FINAL PROVISIONS

6. Final provisions

- 6.1 Revision of this Guidance Notes shall be made by the document author as appropriate, at least every 3 years.
- 6.2 This Guidance Notes shall take effect on 15.03.2016.
- 6.4 This Guidance Notes is issued in one original hard copy signed by authorised persons to be filed with document administrator. Publication and briefing on this guidance note shall be completed electronically by posting the guidance note on the internal server. The employees not connected to the system shall receive briefed from their immediate superiors.

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7. Distribution list

- Inžinierske stavby, a. s.
- CESTY NITRA, a.s.
- IS-LOM s.r.o., Maglovec

8. List of Appendices

- Appendix No. 1.: List of complaints

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Appendix No. 1

List of complaints



ZOZNAM PODNETOV
LIST OF COMPLAINTS



Obdobie / Period:

P.č. / No.	Meno a priezvisko zamestnanca / Employee's name and surname	Popis podnetu / description of complaint

ISK-právne-03/2016-0-01-05.03.2015

