

AT&T Global Network Services Slovakia, s.r.o.

POLICY ON REPORTING ANTI-SOCIAL ACTIVITIES

in accordance with Act No. 54/2019 Coll. on the Protection of Persons Reporting on Anti-Social Activities and Act no. 189/2023 amending Act No. 54/2019 (the “Act”)

Introduction

This Policy has as purpose to implement, within AT&T Global Network Services Slovakia s.r.o. (the “Company”), the requirements of Slovak legislation on reporting anti-social activities.

The Act aims to improve the detection and disclosure of anti-social activities (the “Activities”) and to enhance their prevention.

The Act requires the enterprises concerned to implement an internal regulation (Policy) for their employees wanting to report on such Activities.

Notification of anti-social activities shall not be considered as a breach of contractual obligation to maintain confidentiality or breach of obligation to maintain confidentiality in compliance with specific regulations applicable in the Slovak Republic in cases where the obligation arises from the employment, profession, position or office, and it is not an obligation of confidentiality in connection with the protection of classified information, postal secrecy, privacy of telecommunications, tax secrecy, protection of confidential statistical data, it is not an obligation of confidentiality in connection with the provision and disclosure of medical documentation, obligation of confidentiality of intelligence services officers, or obligation of confidentiality in the provision of legal services.

Article 1 - General scope

This Policy applies to each employee (“Employee”) under an employment agreement with the Company as the employer or in another similar relationship.

The Employee must ensure to be familiar with this Policy.

Any breach by Employee of this Policy shall be considered as misconduct and subject to the disciplinary measures set forth in the Company Internal Regulation.

Article 2 - Definitions

- Act: means the Act of the Slovak Republic No. 54/2019 Coll. on the Protection of Persons Reporting on Anti-Social Activities, and Act no. 189/2023 amending Act No. 54/2019.
- Reporting person: means the natural person who makes a notification in good faith to the authority competent to receive the notification or to the employer; A natural person who, in good faith, is also considered a whistleblower:
 - o 1. makes a notification and his/her employment relationship or other similar relationship ended, if he/she became aware of information about anti-social activity during the duration of that employment relationship or other similar relationship;
 - o 2. makes a notification and his/her employment relationship or other similar relationship has not yet arisen, if he/she became aware of information about anti-

social activities during the selection procedure or as part of pre-contractual relations,

- 3. made the report anonymously and her identity was revealed;
 - 4. disclosed information on anti-social activities which it became aware of during the selection procedure or in the context of pre-contractual relations and its employment relationship or other similar relationship has not yet arisen or during the duration of the employment or other similar relationship or after the termination of the employment or other similar relationship due to the fact that:
 - 4a. made a notification through an internal system and was not informed of the outcome of the verification) or appropriate measures were not taken and subsequently made such notification to the authority competent to receive the report and was not informed within a reasonable period of time of the verification status or of the outcome of the verification;
 - 4b. has notified the authority competent to receive the notification and has not been informed within a reasonable period of time of the verification status or of the outcome of the verification,
 - 4c. there is a well-founded fear that the anti-social activity may constitute an imminent or manifest threat to the public interest; or
 - 4d. there is a well-founded fear that, if a communication is made to the authority competent to receive the notification, it would be liable to penalty or, in view of the particular circumstances of the case, there is a risk that the authorities to receive the notification will fail to ensure an impartial and independent examination of the facts set out in the notification.
- Good Faith: means any conduct by any other individual in any other similar relationships who is convinced about the reported facts being true, given the circumstances known to this Employee or any other individual in any other similar relationships. and the knowledge that such individual has at that time. For the avoidance of doubt, such conduct is considered as conduct in Good Faith until proven otherwise.
- Report: is the notification for disclosure of facts that have come to an Employee's knowledge, or any other individual in any other similar relationships in connection with the performance of his/her employment, occupation, position, office or in connection with an activity in public interest relating to anti-social activity and which may significantly contribute, or have contributed, to revealing serious antisocial activity or to identification or conviction of the wrongdoer.
- Qualified report: is a notification which may contribute, or have contributed, to the clarification of a serious anti-social activity or to the finding or conviction of its offender.
- Other similar relationships: means in particular the exercise of participation, administrative or management rights in a legal person, the activity of a person acting as a member of an organ of a legal person, the activity of a self-employed person, the exercise of rights and obligations arising from a contract having as its object the supply of goods, execution of works or provision of a service, professional experience, graduate experience, activation activity, volunteering.
- Serious anti-social activity is:
- a) offences under Sections 168, 170, 170b, 177, 212, 213, 217, 221, 226, 233a, 237 to 240, 243, 243a, 247a, 247, 251, 252d, 254a, 261 to 263, Sections 266 to 268, 271 to 278,

283, 299a, 302, 305a, 326, 327, 328 to 336a, 336 to 348b, 352d, 374, <>a or <> of the Criminal Code;

- b) criminal offence, for which the Criminal Code provides for a maximum custodial penalty of more than two years;
 - c) administrative offence for which a fine can be imposed, with an upper limit calculated in line with the relevant law;
 - d) administrative offence for which a fine of minimum EUR 30,000 can be imposed.
- Anonymous report: is a Report which does not include name, surname and residential address of the Reporting Person.
 - Authorized Person: is the AT&T function in charge of receiving, acknowledging and investigating a Report. This AT&T function is, for the appliance of this Policy, designated by and its employees report in dotted line to the Company's statutory body; it will solely be bound by instructions of the statutory body of the Company.

Article 3 – How to make a Report

The Reporting Person, wanting to make a Report to the Company, must observe the following rules:

- (1) the Report will be solely submitted to the Authorized Person, without any other form of disclosure by the Reporting Person to any other individual or other organization
- (2) the Reporting Person must:
 - (a) address the Report to the Company's email address <mailto:rm-Skantisocialreporting@intl.att.com>
This email account is only accessible by the Authorized Person and is available 24hours/7days, except during Company's maintenance or required interventions windows.
 - (b) Raise a report directly by:
 - a. Telephone (24/7 voicemail): +421269257057 or
 - b. Address: 24 Einsteinova, Bratislava, 85101, Slovakia
45 Letna, Kosice, 04001, Slovakia
 - (c) Use the Company's tools on encryption or apply equivalent measures in case the Report is not submitted via the Company's email system
- (3) the Report must contain the following information:
 - (a) the name, surname, and residential address of the Reporting Person, unless the Report is submitted on an Anonymous basis;
 - (b) the identification of the individual, about whom the Report is made, by name, surname, function in case this information is known by the Reporting Person or otherwise by all relevant and accurate precisions about this individual to ensure the latter is identifiable;
 - (c) a detailed and objective description of the facts upon basis of which the Report is made.

The Authorized Person shall acknowledge receipt of the notification within seven days of its receipt, unless of a referral of the case for processing under the Code of Criminal Procedure or special regulations.

Article 4 - Request for protection in criminal proceedings and administrative delict proceedings

Protection in criminal proceedings

(a) The Reporting Person may apply for protection when reporting a serious anti-social activity that is a criminal offence together with the report or during criminal proceedings. The application shall be submitted to the competent prosecutor in written or oral form.

(b) In line with Article 4(1)(a) the application shall include:

- name, surname, date of birth and residence of the Reporting Person;
- place of work of the Reporting Person;
- designation of his/her employer;
- data concerning the Reporting Person's close relative in cases where the latter is employed by the Company or by an employer that is dependent to the Company and the Reporting Person applies for protection of this close relative.

Protection in administrative delict proceedings

a) The Reporting Person may apply for protection when reporting a serious anti-social activity that is an administrative offence or during administrative proceedings. The application shall be submitted in written or oral form to the competent authority.

b) In line with Article 4(2)(a) the application includes:

- name, surname, date of birth and residence of the Reporting Person;
- place of work of the Reporting Person;
- designation of his/her employer;
- data concerning the Reporting Person's close relative in cases where the latter is employed by the Company or by an employer that is dependent to the Company and the Reporting Person applies for protection of this close relative.

Article 5 - Investigation of a Report by Authorized Person, rights of the Authorized Person and informing the Reporting Person of the result of investigation

a) The Authorized Person must:

- examine the notification and communicate to the Reporting Person the outcome of the examination of the notification and of the action, if any within 90 days of the acknowledgement of receipt of the notification or, if receipt of the notification has not been acknowledged, within 90 days of the expiry of seven days from receipt of the notification. If the outcome of the

examination of the report is the referral of the case for settlement under the Code of Criminal Procedure or special regulations, the Authorized Person will inform the Reporting Person of this fact in advance unless such information would frustrate the investigation of the report. The Authorized Person shall notify the Reporting Person of the result within 10 days from receiving the result from the Competent Authority.

- keep the identification of the Reporting Person confidential, when examining any non-Anonymous Report

- maintain records about a Report, such records having to include inter alia:

- (i) Delivery date of the Report;

- (ii) Name, surname and residential address of the Employee having filed the Report; a mention will be included in the records in case the Report is Anonymous

- (iii) Subject matter of the Report;

- (iv) Result of the Report's review;

- (v) Completion date of the Report's review.

- take measures to remedy any deficiencies identified during the investigation and communicate them to the Reporting Person

- take action against an employee who obstructs making a notification or keeping of a record of notifications.

b) Unless otherwise stated by the local legislation, for the investigation of a Report, the Authorized Person will be entitled

- (1) to have access to or request a copy of any information, available in whatsoever form, directly relevant for the investigation

- (2) to have access to all premises occupied by the Company and to make use of latter's equipment, or tools, comprising or required to access such relevant information

- (3) to meet with and interview the Reporting Person as well as any 3rd party, individual or organization holding any information which is directly relevant for the investigation, including the individual about whom the Report is made, unless this might be prejudicial to provisional measures which need first to be taken for preventing the destroying of evidences which are required for the investigation of the Report

- (4) within the AT&T group, to call upon and disclose, upon basis of a need to know, all relevant information, relating to the Report, to the employees of other AT&T functions with an expertise in matters for which the Authorized Person needs their assistance for the needs of this investigation.

c) Within the scope of the provisions set forth under the present Policy,

- (1) the identification of the employees of the AT&T function acting as Authorized Person and of the employees of other AT&T functions assisting the Authorized Person will be enacted in the minutes of the investigations, including verifications, made during the Report's review. The employees of this AT&T function, Authorized Person, are entitled to act jointly or not as well as to substitute to each other in case of an absence preventing them to receive and investigate a Report provided, this is duly enacted in these minutes.

(2) in case the Report appears to be duly proven and legitimate, the Authorized Person will inform (i) the appropriate management levels of the Business Unit of the individual about whom the Report is made in view of the Business Unit deciding upon disciplinary actions and (ii) the AT&T functions having as mission to assist and advise the Business Unit on disciplinary matters.

(3) in case the Report appears to be not substantiated, or legitimate and to not have been made in Good Faith, the Authorized Person will inform (i) the appropriate management levels of the Business Unit of the Reporting Person in view of the Business Unit deciding upon disciplinary actions and (ii) the AT&T functions having as mission to assist and advise the Business Unit on disciplinary matters.

Article 6 - Registry of Reports

The Authorized Person will maintain records of a Report for three years from the date of dispatch of the respective Report in the following extent:

- a) delivery date of the report;
- b) name, surname and residential address of the Reporting Person unless she/he is an anonymous whistle-blower;
- c) subject matter of the report;
- d) result of the report's review;
- e) completion date of the report's review.

Article 7 - Confidentiality and personal data processing

The Company ensures that:

- The internal channels available for receiving reports are designed, established and operated in a secure manner that guarantee that the confidentiality of the identity of the reporting persons, the person concerned as well as any third party mentioned in the report, is protected. This includes any information from which the identity of the reporting person may be directly or indirectly deduced.
- Data will not be shared with non-authorized persons ;
- Authorized persons will make every effort to ensure confidentiality;
- Authorized persons will receive regular specific training, including training related to data protection

Information may be disclosed only where this is a necessary and proportionate obligation imposed by Union or national law in the context of investigations by national authorities or judicial proceedings, including with a view to safeguarding the rights of defense of the person concerned.

Data protection

This Policy provides information in furtherance of notice and transparency obligations under data privacy laws, including the processing of certain personal data, the entities which will have access to personal data, and for how long personal data will be retained. This Policy should be

read in furtherance of the AT&T Most of World Employee Privacy Notice. In additional support of personal data protection:

- The Company will not collect personal data when it is not relevant for the handling of a specific report. If accidentally collected, the Company will delete the data without undue delay.
- Data collected about any person concerned when investigating a report will not be included when provisioning personal data in response to an Employee Data Subject's request to ensure no adverse effect is occurring to the rights and freedoms of the reporting person. Further information about an Employee Data Subject's rights may be found at the [Employee Data Subject Right to Access Request Submission Guidelines](#) link on IHR OneStop. Former employees, applicants and others who have performed work for AT&T may contact the [International Human Resources mailbox](#).

Article 8 - Protection of the Reporting Person

- a. The Company will not tolerate any form of threat or retaliation against any Reporting Person who, in Good Faith, submits a Report in accordance with the present Policy.

Retaliation means an act or omission of an act in connection with an employment or other similar relationship of a whistleblower caused by the reporting or disclosure of information on anti-social activities and which caused or may cause unjustified harm to the whistleblower, or a person referred to in b of this article.

The retaliation means in particular:

- termination or immediate termination of employment,
- termination of the probationary period or non-renewal of the employment relationship for an indefinite period,
- dismissal, demotion or refusal of promotion;
- change of job duties, place of work or change of working hours,
- reduction of wages, non-award of remuneration or personal supplement,
- failure to provide training,
- disciplinary action,
- coercion, intimidation or harassment;
- reputational damage,
- withdrawal from the contract for the supply of goods and services,
- revocation of a licence or permit.

Company will provide any other measure of protection required by the Act or the local legislation.

- b. The measures of protection against any form of threat or retaliation apply to the Reporting person, but also to any individual close to the Reporting Person, a natural person – entrepreneur or legal person controlled by the Reporting Person, in which he participates, in which he performs the function of a member of an organ of a legal person, or for which he performs an occupational activity, a natural person – entrepreneur or legal person who controls a legal person in which the notifier has a participation or in which he performs the function of a member of an organ of a legal person, the person who assisted the Reporting Person with the notification; and the data protection officer or the person involved in the tasks of the data protection officer.

Article 9 - Measures of support

If the reporting person is a Company employee and suffers retaliation, he/she will be entitled to support through [the Employee Assistance Program \(EAP\)](#). In addition, [meQuilibrium](#) is also available to employees, their families or officers and is a stress management website and mobile app designed to help discover simple techniques to build resilience when facing stressful thoughts and situations.

Support is also available to a reporting person, as well as to facilitators, persons who are connected with the reporting persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting persons; or any other individuals as required by the local legislation.

Article 11 – Contact details of the Office for the Protection of Whistleblowers

For any question, or need for advice, the Office for the Protection of Whistleblowers can be reached at:

Namestie slobody 29, Bratislava, 81106, Slovakia

Article 10 - Final provisions

Matters which are not subject to the present Policy remain regulated by the other Company's rules which apply as specified in the AT&T Code of Conduct, latter's related policies and in other AT&T instructions or policies including the Company's grievance procedure.

The present Policy will become valid and effective on April 24, 2019, for an indefinite period of time.

In case of any discrepancies between the Slovak language version and the English language version the Slovak language version shall prevail.

Resolution by the Company's statutory body

On April 24, 2019, by resolution of Mr. Michael J. Springham, statutory body ("konateľ") of the Company has:

- approved this Company's Policy on reporting anti-social activities
- decided and appointed the AT&T HR Country Management Team, operating in Slovakia, as Authorized Persons and comprising at present as employees, located in Slovakia
 - o Mr Ivan Zacharovsky, Senior Specialist, HR Country Management
 - o Ms Simona Vargova, Specialist, HR Country Management