



BLUELINK

Sommaire

- I. DISPOSITIF D'ALERTE GROUPE
- II. DISPOSITIF D'ALERTE PROPRE À BLUELINK INTERNATIONAL CZ,
FILIALE TCHÈQUE (DISPONIBLE UNIQUEMENT EN ANGLAIS)

I. Dispositif d'alerte groupe

BlueLink a mis en place un dispositif de recueil et de traitement des alertes accessible à tous ses salariés ainsi qu'à ses parties prenantes (cocontractants, fournisseurs, sous-traitants, communautés, etc...) en conformité avec la Loi n° 2016-1691 du 9 décembre 2016 relative à la transparence, à la lutte contre la corruption et à la modernisation de la vie économique (dite « Sapin II ») et tout acte sur la protection des lanceurs d'alerte et des personnes concernées.

La transparence et la confiance sont intrinsèques à notre culture d'entreprise et essentielles à la mise en œuvre efficace de notre Code de Conduite anticorruption et de ses Politiques.

QUI PEUT LANCER UNE ALERTE ?

Le dispositif d'alerte est destiné à tous les salariés et toutes les parties prenantes de BlueLink quelle que soit leur localisation, particulièrement :

les salariés, les anciens salariés et les candidats à un emploi
(lorsque les informations communiquées ont été obtenues dans le cadre de leur candidature)

les salariés extérieurs et occasionnels
(ex : stagiaires, apprentis, intérimaires, etc...)

les cocontractants et autres parties prenantes : clients, prestataires, fournisseurs, sous-traitants, etc...

Le lanceur d'alerte doit transmettre, en même temps que son signalement, tout élément ou toute information permettant de justifier qu'il appartient à l'une des catégories de personnes visées ci-dessus.

Le lanceur d'alerte doit agir de bonne foi, c'est-à-dire en ayant des motifs raisonnables de croire, à la lumière des circonstances et des informations dont il dispose au moment du signalement, que les faits qu'il signale sont véridiques. L'utilisation abusive du dispositif, c'est-à-dire une utilisation de mauvaise foi ou avec l'intention de nuire à autrui, peut aboutir, le cas échéant, à des poursuites judiciaires à l'égard du lanceur d'alerte.

Le lanceur d'alerte doit agir sans contrepartie financière directe. La démarche de signalement ne doit pas être accompagnée d'une récompense ou d'une rémunération ayant une nature financière. Par exemple, le lanceur d'alerte ne doit pas rechercher de gratification en échange de son signalement ou conditionner la communication des éléments d'information à sa disposition au paiement d'une somme d'argent.

QUELS TYPES D'ACTES OU DE COMPORTEMENTS PEUT-ON SIGNALER ?

Tout manquement au Code de conduite anti-corruption BlueLink et ses Politiques et autres règles internes applicables, toute violation de lois et réglementations nationales et/ou internationales et notamment toute situation liée aux domaines suivants :

- Fraude comptable / Financière
- Actes de corruption ou de trafic d'influence
- Pratiques anticoncurrentielles
- Atteinte aux libertés fondamentales et droits humains, à la santé ou sécurité des personnes
- Non-respect des normes et des standards en matière d'environnement
- Utilisation frauduleuse des données à caractère personnel
- Tout autre crime, délit, menace ou préjudice sérieux causé à l'intérêt général

COMMENT LANCER UNE ALERTE ?

Le Groupe Air France - KLM a mis en place un dispositif numérique permettant d'effectuer des signalements de manière confidentielle et anonyme, le cas échéant, accessible directement via ce lien :

<https://integrity.airfranceklm.com>

Au travers de cette plateforme BlueLink dispose d'un espace dédié, confidentiel et sécurisé lui permettant de gérer les alertes concernant le Groupe BlueLink.

Ce dispositif est disponible 7 jours sur 7, 24 heures sur 24, en 11 langues et permet de lancer une alerte auprès de l'ensemble des entités du Groupe participantes.

Le lanceur d'alerte doit sélectionner l'entité concernée dans le premier écran de saisie. Les entités du Groupe BlueLink sont les suivantes :

BlueLink : 74 avenue Vladimir Ilitch Lénine - 94 112 Arcueil Cedex

BlueLink International Maurice : Blue Connect Ltd, 6th floor, Wing B, Shri Atal Bihari Vajpayee Tower – Ebène – Mauritius

BlueLink International Prague: Florentinum - Na Florenci 2116/15 Prague 1 Czech Republic

BlueLink International Santiago: Av. Presidente Kennedy 5735 Torre Poniente Piso 10 of. 1002., Las Condes

BlueLink International Strasbourg: 18, rue Livio, 67100 Strasbourg

BlueLink International Sydney: 2/55 Murray Street Pyrmont NSW 2009 Australia

Après envoi au travers du dispositif numérique, le lanceur d'alerte reçoit un accusé de réception sous 7 jours ouvrés maximum lui indiquant que son alerte va faire l'objet d'un examen approfondi. Le lanceur d'alerte est informé des différentes étapes de traitement de son alerte au travers de l'espace sécurisé mis à sa disposition.

L'alerte pourra également être lancée via pli confidentiel adressé à BlueLink – Dispositif Alerte – Correspondant Conformité – 74 avenue Vladimir Ilitch Lénine – 94112 Arcueil Cedex
L'auteur du signalement sera informé par écrit de la bonne réception de son signalement dans un délai de sept (7) jours ouvrés à compter de la réception de l'alerte.

Si un signalement est lancé de manière anonyme, c'est-à-dire sans identification de son auteur ou, par exemple, en renseignant un nom qui ne correspond pas à la vraie identité de son auteur, BlueLink n'est pas tenue d'accuser réception du signalement et d'informer le lanceur d'alerte des différentes étapes de traitement. Dans cette hypothèse, le lanceur d'alerte a l'initiative de la prise de contact avec BlueLink pour le suivi de son alerte.

Les signalements anonymes sont traités uniquement si la gravité des faits mentionnés est établie et les éléments factuels communiqués par le lanceur d'alerte sont suffisamment détaillés.

Enfin, le lanceur d'alerte a la possibilité d'effectuer, soit directement, soit après avoir lancé une alerte via le dispositif numérique, un signalement externe vers les autorités dont la liste a été définie par le « Décret n° 2022-1284 du 3 octobre 2022 relatif aux procédures de recueil et de traitement des signalements émis par les lanceurs d'alerte ».

COMMENT LES ALERTES SONT-ELLES TRAITÉES ?

BlueLink a désigné en interne des personnes dédiées, impartiales et compétentes, en charge chargées de réceptionner et de traiter les signalements reçus via le dispositif numérique. Ces référents examinent le contenu des alertes soumises, vérifient qu'elles correspondent aux critères d'acceptabilité, peuvent contacter les lanceurs d'alerte afin de clarifier les informations signalées, le cas échéant, et/ou de les informer des suites données au traitement de leurs alertes.

Le dispositif numérique utilisé et la procédure interne de traitement des alertes garantissent une stricte confidentialité s'agissant :

de l'identité des lanceurs d'alerte

des informations recueillies par l'ensemble des destinataires du signalement

de l'identité des personnes visées par les lanceurs d'alerte et, le cas échéant, de tout autre tiers mentionné dans le signalement

COMMENT LES ALERTES SONT-ELLES TRAITÉES ?

Les traitements de données à caractère personnel sont réalisés dans le respect de la réglementation applicable, notamment les dispositions de la Loi n° 78-17 du 6 janvier 1978 relative à l'informatique, aux fichiers et aux libertés et du Règlement (UE) 2016/679 du Parlement européen et du Conseil du 27 avril 2016 relatif à la protection des personnes physiques à l'égard du traitement des données à caractère personnel et à la libre circulation de ces données ou « RGPD ».



Pour en savoir plus sur le traitement des données à caractère personnel dans le cadre de ce dispositif, vous pouvez consulter notre [Politique de confidentialité](#) dédiée.

PROTECTION DES LANCEURS D'ALERTE

Le lanceur d'alerte, s'il agit de bonne foi et sans rechercher la moindre contrepartie financière directe, bénéficie des mesures de protection prévue par la loi, notamment l'absence de toute forme de représailles. Si le lanceur d'alerte pense faire l'objet d'une telle mesure suite au lancement de son alerte, il doit immédiatement en informer BlueLink au travers du dispositif.

Bénéficient également des mêmes mesures de protection, les personnes suivantes :

Les facilitateurs - toute personne physique ou toute personne morale de droit privé à but non lucratif (ex : association) qui aide le lanceur d'alerte dans sa démarche

Les personnes en lien avec le lanceur d'alerte :

- Les personnes physiques qui risquent de faire l'objet d'une mesure de représailles dans le cadre de leurs activités professionnelles et personnelles (ex : collègues, proches du lanceur d'alerte, etc...) ;
- Les entités juridiques, au sens de l'article L. 233-3 du code de commerce, appartenant au Lanceur d'Alerte, pour lesquelles il travaille ou avec lesquelles il est en lien dans un contexte professionnel.

II. Dispositif d'alerte propre à BlueLink International CZ, filiale tchèque (disponible uniquement en anglais)

WHISTLEBLOWING POLICY

OWNER (DEPARTMENT): COMPLIANCE

Version	1.4
Valid from	1st August 2023
Prepared by	Mgr. Lucie Toniková, Zuzana Beslerová
Approved by	Vincent Léonardi
Note	The latest electronic version of this document is always the valid one.

CONTENTS

1. PURPOSE OF THIS DOCUMENT
2. PROCESS
 - 2.1 INTRODUCTORY PROVISIONS
 - 2.2 DESIGNATED EMPLOYEE
 - 2.3 WHISTLEBLOWING (NOTIFYING MISCONDUCT)
 - 2.4 WHISTLEBLOWING (NOTIFYING MISCONDUCT) VIA THE INTERNAL WHISTLEBLOWING SYSTEM
 - 2.4.1 PROTECTION OF WHISTLEBLOWERS
 - 2.4.2 SUBMITTING NOTIFICATIONS TO THE DESIGNATED EMPLOYEE; ASSESSING NOTIFICATIONS
 - 2.4.3 DOCUMENT HANDLING
 - 2.4.4 PROTECTION OF PERSONAL DATA
3. ANNEX - FACULTATIVE
 - 3.1 ABBREVIATIONS USED AND OVERVIEW OF RESPONSIBILITIES
 - 3.2 TEMPLATES AND OTHER RELATED DOCUMENTS

1. PURPOSE OF THIS DOCUMENT

The purpose of this document is to outline the policy for Whistleblowing, a process protecting the Persons notifying of Misconduct either internally or externally. The process below describes the roles of each participant in great detail, in accordance to the European Regulation and Czech law.

2. PROCESS

2.1 INTRODUCTORY PROVISIONS

1. This resolution introduces an internal whistleblowing system of the Employer, who is an obliged entity under the Act; it defines whistleblowing policies and processes (i.e. those for notifying suspected Misconduct) as well as the rules for protecting Whistleblowers within the meaning of the Act.
2. The objective of this internal regulation is to allow Whistleblowers to safely submit their Notifications relating to the Employer within the Internal Whistleblowing System or External Whistleblowing System, as appropriate, and to ensure that Whistleblowers and Protected Persons are subsequently protected from potential Retaliation in accordance with the Act.
3. BlueLink International CZ s.r.o. fosters and promotes corporate culture that is characterized by honesty and openness, where Employees can report any Misconduct at the earliest possible stage, without fear of being punished, knowing that their Notifications will be properly handled and thoroughly investigated.
4. Furthermore, BlueLink International CZ s.r.o. considers Whistleblowing to be effective means of preventing potential Misconduct.
5. Information about available channels for submitting Notifications and about the Designated Employee and his or her contact details is also available on the Employer's website and Intranet.

2.2 DESIGNATED EMPLOYEE

1. is: Zuzana Beslerová, employee ID 112.
2. Contact details of the Internal Whistleblowing System are as follows:
 - Email: bluelinkprg@gmail.com;
 - Telephone: +420 725 447 435.
3. Designated Employee shall:
 - a. Accept and assess the merits of Notifications submitted via the Internal Whistleblowing System or in person; as appropriate;
 - b. Propose corrective or preventive measures to the Employer in connection with submitted Notifications, unless it could lead to disclosure of identity of Whistleblowers or Protected Persons;
 - c. Comply with instructions of the Employer, unless such instructions compromise or impair the performance of his or her duties under the Act or this internal regulation;
 - d. Act impartially in performing his or her duties under the Act and this internal regulation;
 - e. Keep confidential any facts that come to his or her knowledge in connection with the performance of his or her activities under the Act and this internal regulation, even after the completion of such activities, unless the Act specifies otherwise.
4. The Designated Employee cannot be sanctioned for the proper performance of his or her duties under the Act and this internal regulation and the Employer or anyone cannot interfere with the proper performance of Designated Employee's duties or compromise his or her impartiality.
5. Employees are required to provide the Designated Employee with any necessary assistance in connection with the performance of his or her duties under the Act and this internal regulation. Individuals who were involved in any Misconduct covered by a Notification cannot take part in any investigation (inquiries) relating to such Notification or subsequent discussions and decisions on measures to be taken.

2.3 WHISTLEBLOWING (NOTIFYING MISCONDUCT)

1. Employees may, at their discretion, report any Misconduct via:
 - a. Internal Whistleblowing System; or
 - b. External Whistleblowing System.
2. A Whistleblower may use the External Whistleblowing System even if he or she had previously used the Internal Whistleblowing System.
3. For more details regarding the form and procedures for Notifications via the External Whistleblowing System, see the website of the Ministry of Justice of the Czech Republic.
4. A Whistleblower must reasonably believe that the information in his or her Notification is true at the time it is made.
5. In his or her Notification, a Whistleblower shall namely specify the following: detailed description of Misconduct; how and when he or she learned of such Misconduct, and any other information or factors that could assist in verifying the relevant facts.
6. If a Whistleblower wishes to remain anonymous he or she does not have to specify his or her first name, surname or date of birth in the Notification.
7. A Whistleblower may disclose his or her Notification, if:
 - a. The Notification was submitted via the Internal Whistleblowing System and External Whistleblowing System or via the External Whistleblowing System only and no suitable measures have been taken within the period set down by the Act; in particular, the Designated Employee or competent person, as appropriate, failed to assess the merits of the Notification pursuant to Section 12(3) of the Act, the Employer failed to adopt any other suitable measure to correct or prevent the relevant infringement pursuant to Section 12(5) of the Act, or a government employee pursuant to Section 13 failed to assess the Notification pursuant to Section 17(1) of the Act;
 - b. He or she has reasonable grounds to believe that the Misconduct reported in the Notification may constitute an immediate or clear threat to internal order or safety, life or health, the environment or other public interests or resulted in irreparable damage; or
 - c. He or she has reasonable grounds to believe that, where the Notification is submitted via the External Whistleblowing System, there is an increased risk that, given the circumstances of the case, he/she or the Protected Person would be subject to Retaliation or that the procedure foreseen by Title III of the Act is being put at risk.

2.4 WHISTLEBLOWING (NOTIFYING MISCONDUCT) VIA THE INTERNAL WHISTLEBLOWING SYSTEM

1. Employee may, at their discretion, report any Misconduct to the Designated Employee, either:
 - a. In person;
 - b. By email to the email address specified in Section III hereof;
 - c. By mail to the address of BlueLink International CZ s.r.o., whereas the address must first specify the name and surname of the Designated Employee and “DO NOT OPEN – WHISTLEBLOWER”; or
 - d. By telephone at the number specified in Section III hereof.

2.4.1 PROTECTION OF WHISTLEBLOWERS

1. BlueLink International CZ s.r.o. wishes to create a safe environment, where Whistleblowers feel safe making their Notifications. For this purpose, the Employer has adopted the following protective measures:
 - a. Confidential treatment of Whistleblower’s identity, with the following measures taken to ensure such confidential treatment:
 - i. Notifications shall be managed by the Designated Employee and any documentation relating to Notifications, including documents obtained in connection with any investigation and the Final Report, shall be kept in a folder that is only accessible to the Designated Employee;
 - ii. The Designated Employee and any and all internal and external bodies taking part in any investigation relating to Notifications and subsequent measures shall be subject to strict confidentiality obligations;
 - iii. Neither the Employer nor the Designated Employee shall disclose information that could compromise or impair the purpose of Whistleblowing. This obligation also applies to any third party that gains access to Notifications or records of received Notifications contrary to Section VIII hereof;
 - iv. Identity of the Whistleblower and Protected Persons may only be disclosed with their written consent, unless the Employer or the Designated Employee is required to disclose such information to competent public authorities pursuant to other legislation; this shall apply, mutatis mutandis, to information about identity of individuals referred to in any Notification in case of the procedure foreseen by Title III of the Act;
 - v. If the Employer and Designated Employee are to disclose Whistleblower’s identity to competent public authorities pursuant to the above subsection iv., they must first jointly inform the Whistleblower about the reasons, for which they are required to disclose his or her identity and allow the Whistleblower to express his or her views on such conduct;

- b.** Whistleblowers may remain anonymous in making their Notifications, whereas:
 - i.** BlueLink International CZ s.r.o. or the Designated Employee, as appropriate, will not request that Whistleblower's identity be revealed;
 - ii.** The Internal Whistleblowing System ensures Whistleblower's anonymity;
 - iii.** The Designated Employee shall make every effort to investigate anonymous Notifications;
 - iv.** During a Notification investigation process, Whistleblowers may refuse to answer any questions that might, in their view, lead to their identification;
- c.** Prohibition of any form of Retaliation:
 - i.** BlueLink International CZ s.r.o. will not tolerate any Retaliation, threats, sanctions or discrimination against Whistleblowers, Protected Persons or individuals who assisted Whistleblowers in making their Notifications or took part in the investigation thereof;
 - ii.** If a Whistleblower/third party specified in the preceding subsection fears Retaliation or believes he or she has already been subject to Retaliation, he or she may directly contact Executive Directors of BlueLink International CZ s.r.o., who will ensure that relevant measures are taken to prevent or remedy any Retaliation.

2.4.2 SUBMITTING NOTIFICATIONS TO THE DESIGNATED EMPLOYEE; ASSESSING NOTIFICATIONS

- 1.** The Designated Employee shall confirm the receipt of a Notification to a Whistleblower within seven (7) days from the receipt thereof, unless:
 - a.** He or she had explicitly requested not to be informed about the receipt thereof; or
 - b.** It is clear that by informing the Whistleblower about the receipt of his or her Notification, his or her identity would be disclosed.
- 2.** If requested by a Whistleblower, the Designated Employee shall accept the Notification in person within a reasonable period of time; however, no later than 14 days from the day of the Whistleblower's request.
- 3.** If a Notification is submitted in person (i.e. orally), the Designated Employee shall make an audio recording thereof or another record that gives a fair account of such oral Notification's essence – provided the Whistleblower agrees. The Designated Employee shall then allow the Whistleblower to express his or her views on the audio recording or another record or transcript thereof, as appropriate; the Designated Employee shall enclose the Whistleblower's statement to the recording or transcript.
- 4.** If a Notification is submitted by telephone or in person and the Whistleblower does not wish an audio recording or another record to be made, the Designated Employee shall prepare a protocol of Notification and subsequently allow the Whistleblower to express his or her views on such protocol; the Whistleblower's statement shall be enclosed to the protocol.

- 5.** The Designated Employee shall assess the merits of the Notification within 30 days and immediately, carefully and thoroughly investigate it in compliance with the Act and this internal regulation, respecting the principles of confidentiality, impartiality, and fairness vis-à-vis everyone involved. In factually or legally complex cases, the Designated Employee may extend the aforementioned period by up to 30 days; however, no more than twice. The Designated Employee shall notify the Whistleblower of any extension in writing before the expiry of the original deadline.
- 6.** The Designated Employee may contact the Whistleblower (unless the Notification was anonymous) to collect more information and/or evidence for the purpose of investigating the Notification. Where necessary for conducting thorough and confidential investigation, the Designated Employee may also request assistance from third parties (e.g. attorney, tax advisors, accountants, etc.). Such individuals must comply with any obligations imposed on the Designated Employee under the Act or this internal regulation and the Designated Employee must inform the relevant individuals about this obligation in advance.
- 7.** If case of a repeated Notification that does not include any new facts, the Designated Employee is not required to further address it and shall notify the Whistleblower about this in writing, without undue delay, in the form of his or her Final Report.
- 8.** Furthermore:

 - a.** Where any Misconduct is suspected, the Designated Employee shall immediately inform the public authorities competent under the applicable legislation or directly applicable legislation of the European Union, unless it is clear from the circumstances known to the Designated Employee that the Notification is based on false information; where no such authority exists, the Notification shall not be addressed anymore; he or she shall notify the Whistleblower of his or her conduct in writing in the form of his or her Final Report, unless such notice to the Whistleblower is prohibited by the competent authority or applicable legislation;
 - b.** The Designated Employee shall, without undue delay, notify the Whistleblower in writing in the form of his or her Final Report that the Whistleblower's Notification is not a Notification covered by the Act; or
 - c.** The Designated Employee shall, without undue delay, notify the Whistleblower in writing in the form of his or her Final Report that, based on the facts specified in the Notification and circumstances known to the Designated Employee, he or she has found no evidence of suspected Misconduct or found that the Notification is based on false information, instructing the Whistleblower of his or her right to submit such Notification to public authorities.
- 9.** Where a Notification is found by the Designated Employee to have merits, he or she shall propose measures to the Employer aimed at preventing or correcting (remedying) such Misconduct. If the Employer fails to adopt the measures proposed by the Designated Employee, other suitable measures shall be taken to prevent or correct (remedy) Misconduct, immediately notifying the Designated Employee thereof; the Designated Employee shall, without undue delay, subsequently notify the Whistleblower in writing in the form of his or her Final Report.
- 10.** The Designated Employee shall prepare his or her Final Report that describes the conducted investigation, relevant findings, adopted decision, and proposed measures.

2.4.3 DOCUMENT HANDLING

1. Any Notifications and documents obtained in connection with investigating Notifications, such as protocols of Notifications, audio recordings or other records or transcripts thereof, as well as Final Reports and notices relating to Notification investigations and intended for Whistleblowers, shall be kept by the Designated Employee in the dedicated folder, thereby ensuring strict confidence of such documents.
2. The Designated Employee shall maintain electronic records of received Notifications in a dedicated folder such records shall include the following:
 - a. Notification receipt date;
 - b. Name(s) and surname, date of birth, and contact address of a Whistleblower, or any other information that may be used to infer Whistleblower's identity, provided such information is available;
 - c. Summary of the Notification contents and identity of the person, against whom the Notification was directed, provided his or her identity is known;
 - d. End date of the assessment of merits of the Notification and its outcome.
3. Any and all documents specified in subsection 1 hereof and information specified in subsection 2 hereof shall at most be retained for as long as strictly necessary and reasonable and shall be deleted/destroyed after 5 years from the execution of the Final Report, unless the relevant Misconduct or Notification, as appropriate, is subject to proceedings/investigation by public authorities. In such case, they shall be retained for the duration of the proceedings/investigation by public authorities and 5 years after the completion of the last of the proceedings/investigation by public authorities, unless the applicable legislation specifies

2.4.4 PROTECTION OF PERSONAL DATA

1. Personal data of a Whistleblower and individuals referred to in a Notification or other individuals (if any) collected in connection with investigating such Notification shall be processed for the purpose of examining and investigating the Notification, preparation of a Final Report and adoption of corrective measures.
2. Personal data of individuals referred to in subsection 1 hereof shall be processed by the Employer to the extent they are included in a Notification or collected during the investigation thereof. Such data may include name, surname, title, job title or relationship to the Employer, and information about actual or suspected Misconduct, as appropriate. Notifications may also include special categories of personal data, such as information about racial and ethnic origin, political beliefs, religious convictions or philosophical beliefs, trade union affiliation, health, and sexual relationships or sexual orientation.

3. The processing of the personal data referred to in subsection 2 hereof for the purpose specified in subsection 1 hereof constitutes an Employer's legal obligation.
4. The personal data referred to in subsection 2 hereof shall only be shared with parties involved in the investigation relating to the Notification; such parties shall always be required to properly process such personal data and maintain confidentiality under the applicable legislation or separate agreement, as appropriate. Furthermore, such personal data may be disclosed to public authorities for the purpose of investigating the Notification.
5. The Employer shall retain the personal data for a period foreseen by Article 2.4.3 (3) hereof.
6. The individuals referred to in subsection 1 hereof shall have rights in the area of personal data protection, as specified in the Information about the Processing of Personal Data of Employees or Information about the Processing of Personal Data of Contractors currently in force; such documents are available to Employees on the Employer's Intranet and on the website of BlueLink International CZ s.r.o.

3. ANNEX - FACULTATIVE

3.1 ABBREVIATIONS USED AND OVERVIEW OF RESPONSIBILITIES

For the purpose of this resolution, the capitalized terms defined below shall have the following meanings:

Definition, abbreviation or symbol	Explanation
External Whistleblowing System	System of the Ministry of Justice of the Czech Republic for submitting Notifications.
Retaliation	Actions or omissions in connection with the work or other similar activities of the Whistleblower, which was caused by his or her Notification and which may cause harm to the Whistleblower or Protected Person, including, but not limited to: a. Termination of employment or non-renewal of fixed-term employment; b. Suspension or termination of service; c. Termination of legal relationship existing under an agreement to complete a job / perform work; d. Removal from a management post or superior post; e. Disciplinary sanctions or punishment; f. Reduction of wage, salary or remuneration or refusal to grant personal supplementary allowance; g. Transfer to another job or post; h. Service evaluation or performance assessment;

Definition, abbreviation or symbol	Explanation
Retaliation	<ul style="list-style-type: none"> i. Refusal to allow professional development; j. Change in working hours or hours of duty (service); k. Requests for a medical report (opinion) or occupational medical examination; l. Notice of termination or agreement termination; or Infringement of rights to personality.
Protected Person	<p>Shall mean:</p> <ul style="list-style-type: none"> a. Person that has assisted in identifying information that is included in the Notification, submitting the Notification or assessing the merits thereof; b. Close relative of the Whistleblower; c. Employee or colleague of the Whistleblower; d. Person controlled by the Whistleblower; e. Legal entity, in which the Whistleblower has an equity interest, controlling or controlled entity of such legal entity or an entity controlled by the same controlling entity as the legal entity; f. Legal entity, in which the Whistleblower is a member of an elected body, controlling or controlled entity of such legal entity or an entity controlled by the same controlling entity as the legal entity; g. Person, under which the Whistleblower performs work or other similar activities; or Trust, for which the Whistleblower or legal entity pursuant to subsection e) or f) acts as a settlor or beneficiary or in respect of which the Whistleblower legal entity pursuant to subsection e) or f) acts as a person that significantly increases such trust's assets by an agreement or disposition of property by will.
Notification	Notification of Misconduct by a Whistleblower.
Whistleblower	Employee who submitted a Notification ("blew a whistle").
Misconduct	<p>Potential Misconduct that has occurred or is likely to occur in connection with a person, for whom the Whistleblower performed or performs – even indirectly - his or her work or other similar activities, or a person, with whom the Whistleblower was or is in contact in connection with the performance or his or her work or other similar activities, provided such conduct:</p> <ul style="list-style-type: none"> a. Meets the criteria for a felony; b. Meets the criteria for a misdemeanor or infraction, for which the law foresees a fine with an upper limit of at least CZK 100,000; c. Is in violation of this Act; or

Definition, abbreviation or symbol	Explanation
Misconduct	<p>d. Is in violation of other legal regulations or European Union regulations in the area of:</p> <ol style="list-style-type: none"> 1. Financial services, statutory audit and other verification services, financial products, and financial markets; 2. Corporate income tax; 3. Prevention of money laundering and terrorism financing; 4. Consumer protection; 5. Compliance with product requirements, including their safety; 6. Safety of transport, transportation, and road traffic; 7. Environmental protection; 8. Food and feed safety and protection of animals and animal health; 9. Radiation protection and nuclear safety; 10. Competition, public auctions, and public procurement; 11. Protection of internal order and safety, life, and health; 12. Protection of personal data, privacy, and security of electronic communications networks and information systems; 13. Protection of the financial interest of the European Union; or <p>Functioning of the internal market, including the protection of competition and state aid control under the European Union law.</p>
Designated Employee	<p>Employee designated by the Employer herein in accordance with the Act, who is in charge of receiving Notifications; such Designated Employee must act with integrity and be of age and of sound mind and body.</p>
Internal Whistleblowing System	<p>Procedure defined by the Employer in this internal regulation for submitting and addressing Notifications. The Employer shall be liable for the proper functioning of the Internal Whistleblowing system.</p>
Act	<p>Act No. 171/2023 Coll., on the Protection of whistleblowers</p>

Definition, abbreviation or symbol	Explanation
Employee	For the purpose of this internal regulation, an employee shall mean any person, who has applied for a job or other similar activities with the Employer or who has performed work or other similar activities for the Employer; work or other similar activities shall mean: a. Dependent work performed under a standard employment; b. Service; c. Self-employment; d. Exercise of rights associated with an equity interest in a legal entity; e. Performance of duties of a corporate body member; f. Performance of duties as part of activities of a legal entity or in the interest, on behalf or on the account of such legal entity; g. Management of trust; h. Volunteering; i. Apprenticeship, internship; or Execution of rights and obligations arising from an agreement or contract that relates to the provision of supplies, services, construction work or other similar transactions
Employer	Employer BlueLink International CZ s.r.o.
Final Report	Document on any investigation and its results relating to a Notification and on adopted corrective measures, if any.

3.2 TEMPLATES AND OTHER RELATED DOCUMENTS

Note: put the documents that are logically attached: templates, neighboring documents

Document	Link or Path
memorandum – applicable for employees of BlueLink international CZ only	https://bluelinkgroup.sharepoint.com/sites/grp-corp-gdpr/Documents%20partages/Forms/AllItems.aspx?id=%2Fsites%2Fgrp%2Dcorp%2Dgdpr%2FDocuments%20partages%2F%2D%20PRG%20Data%20Protection%20Documents%2FMy%20Personal%20Data%20Q%26A%20Prague%2-DUK%20V%2E05%2Epdf&parent=%2Fsites%2Fgrp%2Dcorp%2Dgdpr%2FDocuments%20partages%2F%2D%20PRG%20Data%20Protection%20Documents