DIRECTIVE NO. S/2024-09-01/DIS

ON EQUAL TREATMENT, THE PROHIBITION OF DISCRIMINATION, AND THE PROTECTION OF REPORTING PERSONS

Vysoká škola NEWTON, a.s. (hereinafter referred to as the "University")

Article I.
Purpose and Scope

The University ensures equal treatment and maintains a zero-tolerance policy toward discrimination, harassment, sexual harassment, bullying, threats, abuse of authority, or victimization in connection with education, admissions, employment, or any other activities of the University. Furthermore, the University strictly prohibits forced labor, modern slavery, human trafficking, and child labor within its operations, employment relations, provision of education, and procurement of goods and services.

This Directive shall apply to applicants for studies, students, job applicants, employees, academic staff, lecturers, individuals performing work under agreements outside of an employment relationship, and persons performing activities for the University through a supplier or other contractual party.

Article II.
Prohibition of Discrimination and Equal Treatment

Discrimination is strictly prohibited, in particular on the grounds of race, ethnic origin, nationality, citizenship, sex, gender identity, sexual orientation, age, disability, religion, belief, worldview, language, social origin, property, marital status, pregnancy, maternity or paternity, political or other opinions, membership or activity in a trade union, or any other legally protected ground.

Within employment relations, the University ensures equal treatment, specifically in the recruitment and selection of employees, remuneration, working conditions, assignment of work tasks, professional development, performance appraisal, and opportunities for career advancement. Employment-related decisions shall be made based on objective criteria relevant to work performance, qualifications, experience, and the requirements of the position.

Every individual who performs work for the University or acts on its behalf is strictly obligated to respect the human dignity of others and to refrain from the conduct specified in this Article. Managerial employees are obliged to respond appropriately to any identified or reported risk of discrimination or harassment.

Article III.
Decent Working Conditions and Responsible Procurement

In selecting suppliers and procuring goods and services, the University shall, in addition to price, quality, and other relevant factors, take into consideration the risk of forced labor, modern slavery, human trafficking, and child labor. The University actively strives to promote lawful, safe, and decent working conditions throughout its supply chain.

The University may request from suppliers information or reasonable assurances regarding compliance with these standards. Where proportionate to the nature and risk profile of the performance, the University shall incorporate into its contractual terms the supplier's obligation to:

- comply with legal regulations governing lawful employment and prohibiting forced labor, human trafficking, and child labor;
- ensure safe and decent working conditions when performing work for the University;
- maintain a zero-tolerance policy toward discrimination and harassment;
- impose analogous obligations on their relevant subcontractors;
- inform the University without undue delay of any reasonable suspicion of a breach of these standards during the performance of work for the University;
- provide reasonable cooperation in the verification and remediation of any identified breach.

Should the University discover a severe breach of these standards in connection with its activities or its contractual partner, it shall adopt proportionate steps to remediate or mitigate the risk, including the re-evaluation of the collaboration, provided that legal and contractual terms permit such actions.

Article IV.
Protection of Reporting Persons

Protection under this Directive shall be afforded to any person who, in good faith and based on a reasonable belief, reports potential conduct that is in breach of this Directive, provides cooperation during its investigation, or supports the affected person.

No person shall be penalized or otherwise subjected to any disadvantage as a result of filing a report, participating in an investigation, providing cooperation, or exercising their right to equal treatment.

Impermissible retaliatory measures shall include, in particular: the deterioration of study conditions, grading, access to examinations, practical training, scholarships, or other educational opportunities; the deterioration of working conditions, reduction of remuneration, restriction of professional development, adverse change in job assignment, or other adverse treatment in employment; coercion, intimidation, harassment, threats, dissemination of disparaging information, or social exclusion.

Article V.
Reporting Channels

A report may be submitted confidentially by any person specified in Article I, including students, employees, lecturers, applicants for studies or employment, and external collaborators, through any of the following channels:

- via email to the People Team at **people@newton.university**;
- via the contact information for the **Vice-Rector for Quality Management**, as published on the website or intranet of the University;
- for employees, additionally via the link to the **whistleblowing platform** available on the University's intranet.

A report may also be submitted by a person other than the individual who feels directly affected by the conduct. Should the report concern the individual to whom it is supposed to be delivered, the reporting person shall utilize one of the alternative channels provided.

The reporting person should, if possible, provide a description of the conduct, the time and location, the persons involved, and any available supporting documents. The University shall investigate anonymous reports to the extent permitted by their content.

Article VI.
Confidentiality, Investigation, and Remediation

The University shall protect the identity of the reporting person as well as the information contained in the report. Access to such information is restricted solely to individuals who strictly require it for the proper assessment of the matter and the adoption of subsequent measures.

The report shall be assessed impartially by an authorized person. Should there be any reason to doubt their impartiality, the matter shall be transferred to another appropriate

person. The affected persons shall be granted the opportunity to express their views on the relevant facts, with due regard for the protection of privacy and confidentiality.

Should the University identify a risk of retaliatory measures or other harm, it shall adopt proportionate protective measures without undue delay. Following the investigation, the University shall implement appropriate remedial or preventive measures and, where feasible and proportionate, shall inform the reporting person of the outcome.

Article VII.
Final Provisions

This Directive does not restrict the right of individuals to contact competent public authorities or seek protection through other lawful means.

This Directive was promulgated on September 1, 2024, by posting on the official notice board of the University and is accessible to all persons to whom it applies.

Done in Prague, on September 1, 2024

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For and on behalf of Vysoká škola NEWTON, a.s.

Anna Plechatá Krausová, DPhil.
Chairwoman of the Board of Directors