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

ON THE APPEAL AND REPORTING PROCESS IN MATTERS OF EMPLOYMENT RIGHTS AND REMUNERATION

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

Article I.
Purpose and Scope

This Directive regulates the process through which employees may submit reports, complaints, and requests for review regarding employment rights, remuneration, working conditions, and other rights and obligations arising from the employment relationship.

The process may also be utilized by job applicants, academic staff, lecturers, individuals performing work under agreements outside of an employment relationship, students, and external collaborators, provided that their report relates to the activities of the University.

Article II.
Submission of a Report or Request for Review

A report or request for review may be submitted via the whistleblowing platform available on the University's intranet. The platform enables the secure submission of a report, the uploading of attachments, and subsequent confidential communication with authorized persons.

An employee may also report a discrepancy in their wage or remuneration via the whistleblowing platform. For the routine resolution of wage discrepancies, employees are provided with a wage discrepancy reporting form; the People Team shall investigate and resolve the report within 24 hours of its receipt.

The platform further enables the submission of reports particularly in the categories of bullying, sexual harassment, discrimination, non-compliance with occupational health and safety (OHS) and security risks, non-compliance with internal regulations,

directives, or the Code of Ethics, suspicions of theft, corruption or embezzlement, consumer protection, environmental protection, damage to the property or reputation of the University, damage to the property of colleagues, and physical aggression.

The reporting person should provide truthful and the most specific information possible, in particular a description of the matter, the time and location, the persons involved, and any available supporting documents. If necessary, they may include attachments.

Article III.
Access to the Report and Communication

Upon submitting the report, the reporting person shall receive a unique access key, through which they may securely return to the report, provide additional information, and receive responses. The reporting person is strictly responsible for the safekeeping of this access key.

Communication via the platform is encrypted. Information obtained during the processing of a report is made accessible solely to persons who strictly require it for the proper assessment and resolution of the matter, and it is processed in strict accordance with personal data protection rules.

Article IV.
Assessment and Forwarding to the Competent Department

The authorized person shall assess the report without undue delay and ensure its forwarding to the competent department or function according to the nature of the matter. In particular:

- reports concerning employment rights, wages, remuneration under an agreement, working conditions, recruitment, or employee relations shall be resolved by the **People Team**;
- reports related to the quality of processes, equality in education, or other matters within the purview of the University shall be resolved by the **Vice-Rector for Quality Management**;
- reports concerning study rights and obligations shall be resolved by the **Study Department**;
- reports concerning the support of students with specific needs shall be resolved by the **Counselor for Students with Specific Needs**.

Should the nature of the matter so require, the competent departments shall cooperate. The report is assessed by a person against whom there are no reasonable doubts regarding their impartiality; should such doubt exist, the matter shall be forwarded to another appropriate person.

Article V.
Resolution and Review

The competent department shall impartially investigate the matter, evaluate the available documentation, and adopt proportionate remedial measures if the report is substantiated. The reporting person shall be informed of the outcome and the measures adopted via the platform, where feasible and proportionate.

Should an employee disagree with the resolution of a report concerning employment law, wages, or remuneration, they may request a review via the same platform, stating the reasons for their disagreement or providing new facts. The review shall be ensured by a different authorized person or function who did not participate in the original assessment, taking into account the nature of the matter.

Article VI.
Protection of Reporting Persons

No person shall be penalized or disadvantaged for submitting a report or request for review in good faith, for providing cooperation during an investigation, or for exercising their employment rights.

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

Article VII.
Final Provisions

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

.....

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

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