

Pursuant to Article 14, Paragraph 4 of the Law on the Protection of Whistleblowers (Official Gazette of the Republic of Serbia, No. 128/2014) the employee, that is, another employed person, has received.

NOTICE on the Rights of Whistleblowers

To Whom It May Concern:

Below we have presented you with your rights in terms of the Law on the Protection of Whistleblowers (hereinafter: Law)

1. The Law provides protection to a natural person, a whistleblower, who whistleblowers in connection with their employment, employment process, use of services provided by the state and other authorities, holders of public authority or public services, business cooperation and ownership of a company.

Whistleblowing is the disclosure of information that contains data on a violation of regulations, a violation of human rights, the exercise of public authority contrary to the purpose for which it was entrusted, the danger to life, public health, safety, the environment, as well as for the prevention of large-scale damage.

The information may contain the whistleblower's signature and data on the whistleblower. The employer and the authorized body are required to act on anonymous notifications regarding the information, within the scope of their powers.

Preventing whistleblowing and taking harmful action, which is any act or omission in connection with whistleblowing that endangers or violates the right of the whistleblower or a person who has the right to protection as a whistleblower, that is, which puts those persons in a disadvantageous position, is prohibited.

2. Whistleblowers can be internal, external, or public whistleblowers.

Whistleblowing is considered to be the disclosure of information to the employer.

The employer is required, within the scope of his powers, to take measures to eliminate identified irregularities in connection with the information, to protect the whistleblower from harmful actions, as well as to take the necessary measures to stop harmful actions and eliminate the consequences of harmful actions. The employer may not take measures to reveal the identity of an anonymous whistleblower. The employer is required to designate a person authorized to receive information and conduct the procedure related to whistleblowing.

The internal reporting procedure begins with the submission of information to the employer. The employer is required to act on the information without delay, and no later than within 15 days from the day of receiving the information. The employer is also required to inform the whistleblower about the outcome of the procedure after its completion, within 15 days from the end of the procedure. The employer is required, at the whistleblower's request, to provide information to the whistleblower about the progress and actions taken during the procedure, as well as to allow the whistleblower to inspect the case files and to attend the actions in the procedure.

External whistleblowing means disclosure of information to an authorized body.

The external whistleblowing procedure begins with the submission of information to an authorized body. If the whistleblower refers to persons employed in an authorized body, the whistleblower will contact the head of that body, and if the whistleblower refers to the head of the authorized body, the whistleblower will contact the head of the immediately superior body. The authorized body is required to act on the submitted information within 15 days from the day of receiving the information. If the authority to which the information was delivered is not

relevant to act on the whistleblowing, it will forward the information to the relevant authority within 15 days from the day of receipt and inform the whistleblower at the same time. The relevant authority is required to apply protection measures provided to the whistleblower by the authority that gave him the notification.

If the whistleblower did not give his consent for his identity to be revealed, the authorized body that received the notification from the whistleblower, and is not relevant to act, is required to request the whistleblower's consent before forwarding the notification to the relevant authority, unless otherwise prescribed by law. The authorized body is required, at the whistleblower's request, to provide information to the whistleblower about the progress and actions taken in the procedure, as well as to enable the whistleblower to inspect the case files and attend the proceedings, in accordance with the law. The authorized body is required to inform the whistleblower about the outcome of the procedure referred to under Paragraph 1 of this Article upon its termination, in accordance with the law.

Notifying the public means disclosing information through the media, the Internet, public meetings, or any other means by which the information can be made available to the public. The public can be alerted, without prior notification of the employer or the authorized body, in the event of immediate danger to life, public health, safety, the environment, the occurrence of large-scale damage, or if there is an immediate danger of destruction of evidence. When alerting the public, the whistleblower is required to respect the presumption of innocence of the defendant, the right to protection of personal data, and not to jeopardize the implementation of court proceedings.

3. Protection of whistleblowers and other persons

The whistleblower has the right to protection, in accordance with the law - if he whistles to the employer, an authorized body or the public in the manner prescribed by law; if he discovers information within one year from the day of learning about the act that caused the alarm, and no later than ten years from the day of the act; if at the time of whistleblowing, based on the available data, a person with average knowledge and experience, as well as the whistleblower, would believe in the truth of the information.

A related person is entitled to protection as a whistleblower if he makes it likely that a harmful action has been taken against him because of his association with the whistleblower. The right to protection as a whistleblower belongs to a person who makes it likely that a harmful action has been taken against him, if the person who has taken a harmful action mistakenly believed that that person was a whistleblower, that is, a related person. A person who, during the performance of his official duty, submitted information, has the right to protection as a whistleblower if he makes it likely that a harmful action was taken against him due to the submission of that information.

A person who requests information related to information has the right to protection as a whistleblower, if he makes it likely that a harmful action has been taken against him because of the request for that information.

The person authorized to receive information is required to protect the whistleblower's personal data, *i.e.*, data on the basis of which the identity of the whistleblower can be revealed, unless the whistleblower agrees to the disclosure of such data, in accordance with the Law on Personal Data Protection. Any person who learns such data is required to protect that data. The person authorized to receive information is required to inform the whistleblower upon receiving the information that his identity may be revealed to the relevant authority, if without revealing the identity of the whistleblower it would not be possible for that authority to act, as well as to inform him of the measures to protect participants in criminal proceedings. If it is necessary to reveal the whistleblower's identity, during the procedure, the person authorized to receive information must inform the whistleblower about this before revealing his identity. This data may not be disclosed to the person referred to in the information, unless otherwise prescribed by a separate law.

4. A ban on putting whistleblowers at a disadvantage

The employer may not, by doing or not doing, put the whistleblower in a disadvantageous position in relation to whistleblowing, especially if the disadvantageous position refers to: employment; acquiring the status of a trainee or volunteer; work outside an employment relationship; education, training or professional development; job promotion, evaluation, gaining or losing a title; disciplinary measures and punishments; working conditions;

termination of employment; earnings and other benefits stemming from an employment relationship; participation in the employer's profit; payment of reward and severance pay; deployment or transfer to another workplace; failure to take measures to protect against harassment by other persons; referral to mandatory health examination, or referral for work ability assessment

The provisions of the general act of the employer which deny or violate the right of the whistleblower, or which put that person in a disadvantageous position in connection with whistleblowing actions, are null and void.

5. Right to compensation for whistleblowing

In cases of damage caused by whistleblowing, the whistleblower has the right to compensation for damages, in accordance with the Law on Contracts and Torts.

6. Right to judicial protection

The whistleblower against whom a harmful action was taken, in connection with the whistleblowing, has the right to judicial protection, which is achieved by filing a lawsuit for protection in connection with the whistleblowing to the Higher Court with territorial jurisdiction according to the plaintiff's place of residence, or according to the place where the harmful action was taken, within six months from knowledge of the harmful action taken, *i.e.*, three years from the day when the harmful action was taken.

7. Alerting if the information contains classified information

The information may contain confidential information. Secret data referred to under Paragraph 1 of this Article is considered to be data that has been previously marked as secret in accordance with the regulations on data confidentiality. If the information contains secret data, the whistleblower is required to contact the employer first, and if the information refers to a person who is authorized to act on the information, the information is submitted to the employer's manager. In the event that the employer did not act on the information containing secret data within 15 days, *i.e.*, if he did not respond or did not take appropriate measures within his jurisdiction, the whistleblower may contact the authorized body. Exceptionally, in case the information refers to the manager of the employer, the information is to be submitted to the authorized body. If the information contains secret information, the whistleblower cannot alert the public, unless otherwise stipulated by law. If the information contains secret data, the whistleblower and other persons are required to comply with the general and special measures for the protection of secret data prescribed by the Data Secrecy Law.

8. Prohibition of whistleblowing abuse

Abuse of whistleblowing is prohibited. The abuse of whistleblowing is committed by a person who:

- a) provides information that he knows to be untrue;
- b) in addition to the request for action in connection with the information used to whistle-blow - seeks illegal benefits.

9. The person who, by Decision of the Executive Board No. 4941/2015 from June 04, 2015, Snežana Starović is authorized to receive information and lead the procedure related to whistleblowing.

Declaration of the employed person on receipt of the notice:

I declare that this notice was delivered to me on the day of the year and that I am aware of its content.

EMPLOYED PERSON: _____

Signature: _____