



Stredoslovenská vodárenská
prevádzková spoločnosť, a.s.

ANTI-CORRUPTION POLICY

1. Stredoslovenská vodárenská prevádzková spoločnosť, a.s., undertakes to comply with the requirements of the anti-corruption management system in accordance with the STN ISO 37001:2019 standard, and to comply with the anti-corruption laws of the Slovak Republic as applicable to our joint-stock company.
2. We strictly apply the procedure that enables employees to report, in good faith or on the basis of reasonable belief, actual or presumed corruption, or the breach of anti-corruption policy rules, or the breach of anti-corruption management system rules, while maintaining confidentiality and the whistleblower's identity and his/her protection against retaliatory measures.
3. We undertake to continuously improve the anti-corruption management system on the basis of regular internal audits, third party audits, management review, and supervisory function in relation to compliance with anti-corruption regulations and rules.
4. On the basis of designated documented information, senior management has appointed an official to supervise compliance with anti-corruption regulations and rules at StVPS, a.s. Such official has the necessary competence, particular position and authority, independence, and quick access to senior management in case of any matter or suspicion related to the need to raise concern in connection with corruption or the anti-corruption management system.
5. Public procurement pursuant to Act No. 343/2015 Coll. will be provided for by a separate department in direct subordination to the general manager of StVPS, a.s., so that all projects are always assessed according to the uniform guide for the assessment of the risk level of projects, transactions, and business partners.
6. In cases of sub-threshold contracts, we will introduce the "Elena" electronic workflow to ensure transparency and simple inspection of each contract.
7. As part of the "Purchase" process, we will pay attention to a wider selection of providers in order to achieve the lowest prices possible.
8. By introducing the corruption reporting process, guarantee of confidentiality, and protection of whistle-blowers' identity and its strict application in practice, we will avoid employees' concerns related to the reporting of corruption.
9. Through the management's leadership, which allocates the necessary resources for the functioning of the anti-corruption management system, and through third-party supervision of its implementation, we will gain the trust of employees that this system is effective, correctly applied, and efficient.
10. Our company StVPS, a.s. takes a responsible approach to any information about non-compliance with the anti-corruption policy. We carefully examine cases of non-compliance with the anti-corruption policy, and we draw conclusions as to whether the policy or legal regulations have been breached, and we adopt the appropriate corrective measures. For each breach of the anti-corruption policy, there is a disciplinary measure provided for on the basis of the nature of the breach, mitigating or aggravating circumstances, and previous disciplinary decisions.

In Banská Bystrica on 1 November 2020



Ing. Peter MARTINKA
General Manager of StVPS a.s.