



Podtatranská vodárenská
prevádzková spoločnosť, a.s.

ANTI-CORRUPTION POLICY

1. Podtatranská vodárenská prevádzková spoločnosť, plc. (PVPS, plc.) undertakes to fulfil the requirements of the anti-corruption management system in accordance with STN ISO 37001:2019 and observe compliance with anti-corruption laws of SR applicable to our public limited company.
2. We consistently apply the procedure that enables the employees, in good faith or based on justified presumption, to report realized or implied corruption or violation of anti-corruption policy or violation of anti-corruption management system regulations while respecting the confidentiality and identity of corruption reporters and their protection against retaliatory actions.
3. We undertake to improve the anti-corruption management system by means of regular internal audits, third-party audits, management examination and by supervisory function in order to supervise compliance with anti-corruption rules and regulations.
4. By means of disclosure of separate documented information, the top management appointed a representative responsible for supervision of compliance with anti-corruption rules and regulations in PVPS, plc. who has the appropriate capacity, special status and power, independence, and a fast access to the top management in case of any matter or suspicion with regard to the need to raise concerns in relation to corruption or the anti-corruption management system.
5. Public procurement pursuant to Act No. 343/2015 Coll. will be provided for by an independent officer who reports directly to the CEO of PVPS, plc. so that all projects are always assessed based on uniform assessment principles for project risk, transaction and business partners.
6. In case of public procurement below threshold we are going to introduce an electronic workflow „Elena“ in order to ensure transparency and an easy check of each order.
7. By means of appropriate trainings, e-learning and education we will provide guarantee of confidentiality and protection of identity to reporters of corruption whereby we exclude concerns of employees when reporting corruption.
8. We are implementing the system of electronic circulation of documents that will simplify and clarify internal and external audits as well as taking remedial actions leading to continuous improvement of the anti-corruption management system.
9. By manifesting their leadership the Board of Directors allocate the necessary funds to the functioning of the anti-corruption management system and by means of third-party supervision of its implementation and application, we will gain our employees confidence that the system is efficient, properly applied and effective.
10. Our company PVPS, plc. treats all information regarding non-observance of the anti-corruption policy responsibly. We examine cases with regard to non-observance of the anti-corruption policy confidentially and adopt conclusions if the policy or legal regulations have been violated and we take appropriate remedial measures. For each violation of the anti-corruption policy, a disciplinary measure is stipulated on the basis of the nature of violation, mitigating or aggravating circumstances, eventually on the basis of the past disciplinary decisions.

In Poprad 6th December 2021


Ing. Robert Tencer
Chief Executive Officer