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Based on Article 4 paragraph 6 of the Law on the Protection of Whistleblowers ("Official Gazette of P. Macedonia" no. 196/15), the Rulebook on Guidelines for Enacting of internal acts for protected internal reporting in the legal entity in the private sector ("Official Gazette of the Republic of Macedonia No. 46/2016) and the Articles of Association of GD Granit AD Skopje, the Management Board at the meeting held on 31.05.2016, adopted the following:

RULEBOOK

For protected internal reporting at GD GRANIT AD Skopje

I. Subject of regulation

Article 1

This Rulebook regulates the protected internal reporting in GD GRANIT AD Skopje (hereinafter: the Company), the rights of whistleblowers and the actions and duties of GD Granit AD Skopje in connection with protected internal reporting, ensuring protection of whistleblowers and referral of protected external reporting, i.e. protected public reporting, the method of determining an authorized person for receiving reports, the way of conducting the procedure in connection with the notification and other issues of importance for protected internal reporting.

Article 2

Under the term "protected internal reporting" in the sense of this Rulebook, it is understood to convey a reasonable suspicion or knowledge that a criminal or other illegal act has been committed, is being committed or is likely to be committed within the Company, which harms or threatens the public interest.

The term "public interest " in the sense of this Rulebook means the protection of the basic freedoms and rights of man and citizen recognized by international law and determined by the Constitution of the Republic of Macedonia, prevention of risks to health, defense and security, protection of the environment and nature, protection of property and freedom of the market and entrepreneurship, rule of law and prevention of crime and corruption.

The term "whistleblower " in the sense of this Rulebook means a person from the categories determined in paragraph 4 of this article, who makes a protected internal report in good faith, in accordance with the Law on the Protection of Whistleblowers and this Rulebook.

Categories of persons who can be called as whistleblowers are:

- A person who has an employment relationship based on an indefinite or fixed term in the Company;
- Candidate for employment, candidate for volunteering (volunteer) or intern in the Company;
- A person who is or has been a volunteer or intern at the Company;
- A person who, on any basis, is or was hired to perform work in the Company;
- A person who, on any basis, is or was in a business relationship or other relationship of cooperation with the Company;

II. Authorized person for receiving reports from whistleblowers

Article 3

The Manager of the Department for Legal, Human Resources and General Affairs in the Company (hereinafter: **the Manager**) appoints an authorized person for receiving applications submitted for the purpose of protected internal reporting (hereinafter: **Authorized Person**).

The appointment of an authorized person, in accordance with paragraph 1 of this article, is carried out by the Manager by adopting a Decision on the appointment of an authorized person for the reception of applications submitted for the purpose of protected internal reporting.

The Manager can also appoint several authorized persons, with each of them being individually responsible for the data they receive and individually submitting an annual report on received reports from whistleblowers.

In the event that the Manager does not appoint an authorized person, it is considered that the Manager is an authorized person.

Article 4

The Manager is obliged to provide the authorized person with independence and uninterrupted work. The Manager provides the authorized person with adequate space and equipment for work.

The person authorized to perform his duties in accordance with the law and this Rulebook has the right to a special business book, in which the received applications for protected registration and a special reception stamp are recorded.

III. Protected internal login

Article 5

Protected internal reporting in the Company is carried out by the whistleblower who has suspicions or knowledge that a criminal offense or other illegal action that injures or threatens the public interest has been committed, is being committed or will be committed.

a) Procedure for protected internal reporting in the Company

Article 6

The authorized person receives reports submitted directly to him by a whistleblower for the purpose of protected internal reporting in accordance with the law (hereinafter: **Report**).

Article 7

The whistleblower performs a protected internal reporting, i.e. submits a report, as follows:

- Orally, on a record with the authorized person for receiving reports from whistleblowers;
- In writing, by submitting an application in written form to an authorized person, in person or through a separate mailbox or electronic mailbox;

The application received in accordance with paragraph 1 of this article, the Authorized Person is obliged to certify it by placing a special receipt stamp and recording it in a special ledger.

Article 8

The authorized person in the Company, within the provided conditions, is obliged to:

- To act in relation to the received application in compliance with the procedures established by law and this Rulebook;
- To protect the whistleblower's personal data, that is, the data that may reveal the identity of the whistleblower who requests to be anonymous or reports confidentially, in accordance with the regulations for the protection of personal data, unless the whistleblower agrees to the disclosure of that data;
- To inform the whistleblower, who is known, about the measures taken in relation to the report;

Article 9

If the application is given orally, an authorized person compiles a Record that contains at least the following data:

- Information about the whistleblower (if known);
- Category of person to which the whistleblower belongs, in accordance with the Law on the Protection of Whistleblowers and in accordance with Article 2 paragraph 4 of this Rulebook;
- Request from the whistleblower to remain anonymous and the extent to which he requests it;
- Data on the person reported by the whistleblower;
- Description of illegal conduct;
- Method and form of communication with the authorized person (proposed by the whistleblower);
- Attachments;
- Date and place of receipt of the application;

The report must be signed by the whistleblower and the authorized person, and it is recorded as a received report.

Article 10

Personal data in connection with protected internal reporting is collected, processed and stored under conditions established by law and the regulations governing the protection of personal data and exclusively for the purposes established by the Law on the Protection of Whistleblowers.

Article 11

If the application is submitted in electronic form on an electronic record carrier, i.e. electronically, the authorized person is obliged to print the record that corresponds to the application according to the content and to record the printed with signed attachments received in the form of electronic records as a received application.

If printing the attachments from paragraph 1 of this article is uneconomical, the authorized person is obliged to save them in electronic form on a separate computer, provided with a password known only to him.

Article 12

After receiving and filing the report, the authorized person is obliged to evaluate the content of the report without delay, which aims to determine whether it is logical and reasonable, whether it is a report from a whistleblower, in accordance with the Law on the Protection of Whistleblowers, as well as whether the report contains enough elements for further action.

After carrying out the assessment from paragraph 1 of this article, the authorized person makes a conclusion on further action after the report and taking appropriate measures to protect the whistleblower or a person close to him.

Article 13

The authorized person is obliged, if the report contains allegations that are directly or indirectly aimed at the management of the Company, to refer the whistleblower to a protected external report, i.e. a protected public report, in accordance with Articles 24 and 25 of this Rulebook.

The authorized person will direct the whistleblower to an external report and when, through no fault of his own, he is prevented from immediately, without delay, taking measures in connection with the report and for removing the harmful consequences for the whistleblower or his close person, in accordance with the Law on the Protection of Whistleblowers and this Regulation.

b) Protection of the whistleblower and a person close to him

Article 14

The Company, through the authorized person, ensures the protection of the whistleblower and a person close to him from any kind of violation of rights, harmful action or danger of occurrence of harmful actions due to internal reporting.

The company, through the authorized person, obligatorily undertakes all measures for the protection and prevention of violation of rights from an employment relationship or of any right and refraining from actions that violate or threaten any right of the whistleblower due to the report made.

Article 15

If the Company, through the authorized person, does not provide adequate protection in accordance with Article 14 of this Regulation, the whistleblower shall report this to the State Commission for the Prevention of Corruption, the Ombudsman of the Republic of Macedonia, the Inspection Council, the Ministry of Internal Affairs or the Public Prosecutor's Office of the Republic of Macedonia.

c) Protection of data and whistleblower identity

Article 16

It is prohibited to disclose or enable the disclosure of the whistleblower's identity by the authorized person in the Company, except when it is determined by a court decision.

Any person who gets to know the data from paragraph 1 of this article is obliged to protect that data.

Article 17

The authorized person in the Company is obliged to protect the whistleblower's personal data, that is, the data that can reveal the whistleblower's identity, unless the whistleblower agrees to the disclosure of that data, in accordance with a law regulating the protection of personal data.

Article 18

The authorized person in the Company is obliged to inform the applicant in the process of receiving the information that his identity may be disclosed to a competent authority if without the disclosure of the identity it would not be possible to act before those authorities, as well as to inform him of the measures for protection of the participant in the procedure.

If during the procedure it is necessary to reveal the identity of the applicant, the authorized person in the Company is obliged to inform the applicant before the identity is revealed.

The identity of the applicant must not be revealed to the person for whom the information is indicated.

d) Data protection in connection with protected registration

Article 19

The authorized person is obliged to ensure the protection of the data and the received applications, minutes, received or created documents and other materials in connection with the protected application and to keep and record them as confidential, i.e. classified information.

e) The whistleblower's right to information

Article 20

The authorized person in the Company is obliged, in writing, to inform the whistleblower about the measures taken in relation to the submitted report, without delay, and at the latest within 15 (fifteen) days, counting from the day of receipt of the report.

f) Abuse of reporting by the whistleblower

Article 21

It is forbidden to knowingly report false information about a natural or legal person in order to cause harmful consequences for the same.

The whistleblower's reporting is also considered abuse if, with due care and conscientiousness, to the extent that the circumstances allow, the whistleblower did not check whether they were accurate and conscientious.

Article 22

The whistleblower who misused the reporting loses the protection provided according to this Regulation. The whistleblower who misused the reporting, and because of which harmful consequences occurred for the natural or legal person, is the basis for initiating a procedure to determine his responsibility in accordance with the law.

g) Protected internal reporting report

Article 23

The authorized person prepares an annual report on protected internal reporting that contains general statistical data, measures taken in relation to protected internal reporting, and possibly statistical data on reports directed to protected external and public reporting.

IV. Protected external login

Article 24

The whistleblower can make a protected external report to the Ministry of Internal Affairs, competent public prosecutor's office, the State Commission for the Prevention of Corruption, the Ombudsman of the Republic of Macedonia or other competent institutions if:

- The reporting from Article 11a of this Rulebook is directly or indirectly directed against a managing person of the Company;

- In connection with the application, the indicator does not receive information about the measures taken within the period established in Article 20 of this Rulebook;

- No measures have been taken, he is not satisfied with the action, the whistleblower suspects that no measures will be taken or that the reporting from Article 1 of this Rulebook will cause harmful consequences for him or for his close person;

V. Protected Public Reporting

Article 25

The whistleblower can make a protected public report by making publicly available information regarding the knowledge that a criminal offense has been committed, is being committed or is likely to be committed, which injures or threatens the life of the whistleblower and a person close to him, the health of people, the safety, the environment, damages on a large scale or there is an immediate danger of destruction of evidence.

VI. Nullity of provisions in contracts and acts

Article 26

Provisions in employment contracts and other acts of the Company that regulate labor relations, and which prohibit the reporting of suspicion or knowledge of a criminal offense or other illegal or unauthorized conduct that injures or threatens the public interest, security and defense, are null and void.

Null are the provisions by which reporting from Article 1 of this Rulebook is defined as a violation of provisions for confidentiality, business secret, loyalty, professionalism and good performance of work duties.

VII. Transitional and final provisions

Article 27

The Manager from Article 3 paragraph 1 within 8 (eight) days, counting from the day of adoption of this Rulebook, shall issue a Decision determining the authorized person for receiving reports from whistleblowers in the Company.

Article 28

The Manager is obliged to deliver and introduce this Rulebook to all employees and other persons employed in the Company and to publish it on his website if there is a technical possibility.

Article 29

This Rulebook enters into force on the day of its adoption.

Official round seal of the company GD Granit AD Skopje, affixed
President of the Management Board
Strasho Milkovski, signed