

SM/06/2023

**WHISTLEBLOWER PROTECTION AND
THE PROCEDURE FOR PROCESSING
AND INVESTIGATING WHISTLEBLOWER
NOTIFICATIONS**

**at the Institute of Molecular Genetics of the Czech Academy
of Sciences**

CONTENTS

PREAMBLE	3
1. Reasons and purpose for adopting this Directive	4
2. Definition of basic terms	4
3. Establishment of a notification line and its security	8
4. Appointment of a competent person	8
5. Rights and obligations of the competent person.....	9
6. Instructions to employees, duties of persons concerned and persons involved in the investigation	10
7. Procedures for internal notification and follow-up of notifications	11
8. Protection against secession measures	13
9. Processing of personal data	14
10. Keeping and maintaining records of notifications	15
11. Final provisions.....	15
Approval clause	16
Record of changes	16

PREAMBLE

The Directive is issued in order to fulfil the obligations set out in Act No 171/2023 Coll., on the protection of whistleblowers, as amended (hereinafter referred to as the "Act"), i.e. in particular to establish an internal whistleblowing system to protect persons who report possible violations of Czech or European Union (hereinafter referred to as the "EU") legislation within the entity, which is the **Institute of Molecular Genetics of the Czech Academy of Sciences**, ID No.: 68378050, with its registered office at Vídeňská 1083, 142 20 Prague 4 (hereinafter referred to as "IMG").

At the same time, the Directive introduces measures to protect such whistleblowers and sets out the procedure and method for investigating and dealing with such whistleblowing.

The Directive also regulates the obligations of IMG employees, members of its bodies, and persons performing professional practice or internship at IMG when investigating allegations.

1. REASONS AND PURPOSE FOR ADOPTING THIS DIRECTIVE

This Directive is being adopted as a tool for the prevention and detection of infringements within the IMG, the purpose of which is to contribute to the early detection of such infringements and the prevention of the associated negative consequences. At the same time, this Directive is adopted to protect whistleblowers who discover or may suspect an infringement and proceed to report it.

This Directive is being adopted with the intention of eliminating potential whistleblower concerns about harm and to enable the reporting of suspected infringements.

In the event that the whistleblower encounters possible illegal conduct, the scope of which is defined in the Act and this Directive, the whistleblower is allowed to make a notification of such conduct in relation to IMG, which will always be dealt with by the competent person, who is bound by a duty of confidentiality in relation to the identity of the whistleblower in relation to IMG and, in principle, to third parties. The competent person will also communicate with the whistleblower throughout the matter, informing him of the outcome of his/her investigation and of any measures taken to remedy and prevent future infringements, if found.

2. DEFINITION OF BASIC TERMS

2.1. Areas in which whistleblower notifications of possible infringements are protected (i.e., subject matter jurisdiction)

The Whistleblower Protection Act provides protection to whistleblowers whose report concerns a possible violation that:

- a) has the elements of a crime,
- b) has the characteristics of a misdemeanour for which the relevant law provides for a fine of at least CZK 100,000,
- c) violates the Act itself, or
- d) infringes another legal regulation or a regulation of the European Union in the field of
 1. financial services, due diligence and other assurance services, financial products and financial markets,
 2. corporate income tax,
 3. prevention of money laundering and terrorist financing,
 4. consumer protection,
 5. compliance with product requirements, including product safety,
 6. transport, traffic and road safety,
 7. environmental protection,
 8. food and feed safety and animal health,
 9. radiation protection and nuclear safety,
 10. competition, public auctions and public procurement,
 11. protection of internal order and security, life and health,

12. protection of personal data, privacy and security of electronic communications networks and information systems,

13. protection of the financial interests of the European Union, or

14. functioning of the internal market, including protection of competition and state aid under EU law.

2.2. Whistleblower

A whistleblower is a natural person who has performed or is performing work or other similar activity for IMG directly or indirectly, or who has been or is in contact with IMG in connection with the performance of work or other similar activity.

For the purposes of the Act and this Directive, work or other similar activity means:

- a) work under an employment contract, work performance agreement or work activity agreement,
- b) service,
- c) self-employment,
- d) exercise of rights associated with participation in a legal entity,
- e) performance of the functions of a member of a body of a legal person,
- f) performance of tasks within the scope of the activities of the legal entity, in its interest, on its behalf or on its account,
- g) administration of the trust fund,
- h) volunteering,
- i) professional practice, internship, or
- j) exercise of rights and obligations arising from a contract the subject of which is the provision of supplies, services, construction work or other similar performance,
- k) applying for a job or other similar activity.

2.3. Notification and publication

Notification means the oral (by means of long-distance communication or in person) or written (-by email or in documentary form) provision of information by the whistleblower about a possible violation, addressed to the competent person in accordance with the procedure described in this Directive or to an authorized employee of the Ministry of Justice in accordance with the procedure described on the website of the Ministry of Justice: <https://oznamovatel.justice.cz/chci-podat-oznameni/>.

The notification shall contain information on the name, surname and date of birth, or other information from which the identity of the whistleblower can be deduced, unless the identity of the whistleblower is known to the competent person or an authorised employee of the Ministry of Justice of the Czech Republic.

A notification is not the part of the notification that contains information:

- a) the notification of which could immediately endanger the essential security interest of the Czech Republic; for the purposes of the Act and this Directive, essential security interest of the Czech Republic meaning:
1. the sovereignty, territorial integrity and democratic foundations of the Czech Republic,
 2. internal order and security, including critical infrastructure and public administration information systems,
 3. to a greater extent, the lives and health of persons,
 4. protection of information on public contracts in the field of defence or security, unless the award of such contracts is regulated by a European Union regulation,
 5. fulfilment of international defence commitments,
 6. significant security operations, or
 7. combat capability of the Armed Forces of the Czech Republic,
- b) on the activities of the intelligence services of the Czech Republic, or
- c) the disclosure of which would constitute a breach of the duty of confidentiality of the clergy in connection with the exercise of confidentiality or a right similar to confidentiality.

Disclosure means the publication by the whistleblower of information concerning a possible infringement.

2.4. Internal notification system, notification line

Internal notification system means a set of organisational and technical measures aimed at ensuring that notifications are received and handled in accordance with the Act.

Notification line means a communication channel for the receipt of notifications that is designed, established and operated in a manner that ensures confidentiality of the identity of the whistleblower and prevents unauthorised persons (i.e., all persons except the person concerned) from accessing the information contained in the notification. The notification line shall take two forms - an e-mail box and a telephone number.

2.5. Competent person

Under the internal notification system, the notifications are received by a competent person whose main task is to deal with notifications from whistleblowers. The competent person is responsible for dealing with notifications and is the only person who can know the identity of the whistleblower and is responsible for his/her protection. The competent person shall conduct follow-up communication with the whistleblower, investigate the validity of the whistleblower's notification and propose measures to the IMG to remedy or prevent the infringement. The competent person may only be a natural person who is of good character, of legal age and fully competent. The competent person may be either an IMG employee or an external service provider. IMG may designate more than one competent person.

2.6. Person concerned

A person concerned is a natural or legal person who, in addition to the whistleblower, may also not be subject to retaliation under the Act and this Directive.

The person concerned is:

- a) a person who has provided assistance in ascertaining the information contained in the notification, filing the notification or assessing its validity,
- b) a person who is close to the whistleblower,
- c) a person who is an employee or colleague of the whistleblower,
- d) a person controlled by the whistleblower,
- e) a legal person in which the whistleblower has an interest, a person controlling it, a person controlled by it or a person controlled by the same controlling person as the legal person,
- f) a legal person of which the whistleblower is a member of an elected body, a controlling person, a controlled person or a person controlled by the same controlling person,
- g) the person for whom the whistleblower performs work or other similar activity, or
- h) a trust of which the whistleblower or a legal person referred to in point (e) or (f) is the settlor or a defendant or in relation to which the whistleblower or a legal person referred to in point (e) or (f) is a person who substantially increases the assets of the trust by contract or by acquisition on death.

2.7. Retaliatory measures

For the purposes of the Act and this Directive, a retaliatory measure means an act or omission in connection with the work or other similar activity of the whistleblower which was triggered by the making of a notification and which may cause harm to the whistleblower or the person concerned; where these conditions are met, a retaliatory measure is, in particular:

- a) termination of the employment relationship or non-renewal of the fixed-term employment relationship,
- b) exemption from service, out-of-service assignment or termination of service,
- c) termination of a legal relationship based on an agreement to perform work or an agreement to work,
- d) removal from the post of senior staff member or from the post of superior,
- e) imposition of a disciplinary measure or a disciplinary penalty,
- f) reduction in salary, wages or remuneration or the non-award of a personal allowance,
- g) transfer or reassignment to another job or post,
- h) service appraisal or performance review,
- i) not allowing professional development,
- j) change of working or service hours,
- k) requiring a medical report or an occupational health examination,
- l) notice or withdrawal from the contract, or
- m) interference with the right to protection of personality.

2.8. Follow-up measures

Any action taken by IMG or any competent authority following a notification to assess the veracity of the allegations in the notification and, where appropriate, to address the notified infringement or to prevent an infringement, including but not limited to measures such as internal investigations, investigations, prosecutions, remedial measures, including termination of investigations.

3. SETTING UP A NOTIFICATION LINE AND ITS SECURITY

IMG is establishing an email address as the primary communication channel for receiving notifications, the text of which is available on the IMG website, here: <https://www.img.cas.cz/about/official-noticeboard/whistleblower-protection/>. This email address is managed by the competent person and provides the possibility for whistleblowers to submit notifications from anywhere and to conduct follow-up communications between the competent person and the whistleblower.

Access data to the notification line shall be available only and exclusively to the person concerned. The email address is not managed by IMG, therefore IMG's IT department staff does not have access to the email address.

Alternatively, notification can be made by telephone by calling the competent person's telephone number, which is listed on the website <https://www.img.cas.cz/about/official-noticeboard/whistleblower-protection/>.

4. APPOINTMENT OF A COMPETENT PERSON

The competent person is appointed by the IMG Director on the basis of his/her personal qualities and knowledge of the issues in the areas referred to in Section 2.1 of this Directive and is listed on the IMG intranet and on the website <https://www.img.cas.cz/o-nas/uredni-deska/ochrana-oznamovatel/>. On appointment, the competent person shall be duly informed of his/her rights and obligations under the Act and this Directive. A record shall be kept of this briefing.

The appointment of the person concerned is subject to his or her consent to his or her appointment. The competent person must have all necessary access to the notification line.

The position, knowledge, skills, abilities and qualities of the person concerned must not give rise to any doubt that he or she is acting properly and impartially. The competent person shall not be instructed or otherwise influenced in such a way as to impede or jeopardise the proper performance of his or her duties. The control of the proper performance of the activities of the competent person by a superior (in the case of IMG employees) shall not be affected while maintaining the requirement of impartiality and confidentiality of information related to the notification under this Directive.

The competent person shall immediately forward the notification to another competent person for processing if, in view of his or her relationship to the whistleblower or the information contained in

the notification, there is reasonable doubt as to his or her impartiality. If the notification cannot be forwarded to another competent person for processing, the competent person shall inform the whistleblower of this fact and inform him of his right to submit the notification through the external notification system under the jurisdiction of the Ministry of Justice.

5. RIGHTS AND OBLIGATIONS OF THE COMPETENT PERSON

The competent person:

- a) is the only one entitled to know the identity of the whistleblower,
- b) shall be responsible for protecting the identity of the whistleblower and the persons concerned, as well as information that could lead to the disclosure of their identity; this shall not apply if the whistleblower or the person concerned consents to a procedure that could compromise confidentiality in accordance with paragraph 7.3(e) of this Directive,
- c) receives and assesses the validity of notifications made and conducts communication with the whistleblower,
- d) must ensure that all notifications are properly investigated and propose remedial or preventive action to IMG if the notification proves to be substantiated, unless this action may reveal the identity of the whistleblower or the person concerned,
- e) maintains confidentiality of the facts of which it has become aware in the course of its activities, even after its activities have ceased, and information about which confidentiality is maintained is not provided by the person concerned even on the basis of a request pursuant to Act No. 106/1999 Coll., on free access to information, as amended,
- f) shall act impartially and personally in the performance of his/her duties,
- g) complies with the IMG's instructions, unless they threaten or obstruct the performance of his/her activities under the Act, has the obligation to ensure that the identity of the whistleblower is not disclosed throughout the investigation of the notification,
- h) is obliged to inform the whistleblower of the progress and results of the assessment of the validity of the notification,
- i) is obliged to keep a record and archive of all notifications made,
- j) has a duty to protect the whistleblower from any retaliation,
- k) is obliged to provide information to public authorities to the extent provided by law,
- l) has an obligation to ensure that the information processed complies with the data protection measures,
- m) in the performance of his/her activities is directly responsible exclusively to the IMG Director; he/she shall not be sanctioned for the proper performance of his/her activities under the Act.

Furthermore, the competent person shall be entitled to:

- a) require proof of the identity of the person concerned or any other person involved in the investigation,
- b) require the disclosure of data and production or access to documents, audiovisual and digital recordings and other items that may be relevant to the notification,
- c) make electronic images, extracts, copies or copies of documents produced or made available,
- d) to make copies of audiovisual and digital recordings submitted or made available,
- e) to make an audio or visual recording of the person concerned or any other person involved in the investigation, with the consent of the person concerned or any other person involved in the investigation,
- f) enter any IMG premises that may be related to the notification,
- g) request an oral explanation from the person concerned or any other person involved in the investigation, which they may refuse to give; they shall be informed of this fact by the person concerned. The person concerned shall make a record of the course and content of the explanation or make an audio or visual recording. The record shall be signed by the person concerned and by the person who gave the explanation.
- h) The competent person is also entitled to request IMG staff to provide a written expert opinion on the factual and legal issues related to the notification within a reasonable period of time.

The competent person shall also submit to the Director of the IMG, by 1 March of the following calendar year, a written report on his/her activities for the previous calendar year. Unless such action would breach confidentiality under this Directive, the report shall at least state:

1. the total number of notifications,
2. the number of notifications that have been forwarded to another competent person for investigation, including the reasons,
3. the number of notifications that have been forwarded to the competent public authority,
4. the number of ongoing investigations,
5. the number of completed investigations,
6. the number of notifications for which the information contained therein could not be investigated, including the reasons,
7. the number of notifications falling within the material scope of Section 2.1 of this Directive,
8. the number of notifications not falling within the material scope of Section 2.1 of this Directive; and
9. the deficiencies identified, the preventive or corrective measures proposed and the preventive or corrective measures taken.

6. INSTRUCTIONS TO EMPLOYEES, DUTIES OF PERSONS CONCERNED AND PERSONS INVOLVED IN THE INVESTIGATION

IMG has issued this Directive to inform and instruct all employees of the options and procedures for reporting potential violations. In the event that a directive is issued by the Director of IMG, employees

or a designated group of employees of IMG may be required to undergo whistleblower protection training.

The persons concerned and the persons involved in the investigation are obliged to allow the competent person to exercise his/her powers under the Act and this Directive.

Confidentiality under this Directive shall be maintained by any person who gains access to protected information.

7. PROCEDURES FOR INTERNAL NOTIFICATION AND FOLLOW-UP OF NOTIFICATIONS

7.1. Procedure before notification

All matters, including those that are considered notifications under this Directive, may be reported by an IMG employee to his/her immediate supervisor (Head of Department, Group, etc.), IMG management or the Data Protection Officer, if the matter concerns the handling of personal data, prior to notification via the notification line, and these persons are obliged to make every effort to resolve the matter in question and, where appropriate, to eliminate and/or remedy the consequences if an infringement as defined in Section 2.1 of this Directive is found.

7.2. Receiving notifications

In the event that the relevant direct supervisor, IMG management or the Data Protection Officer fails to remedy the violation or condition after being notified or otherwise informed by the whistleblower of the alleged violation, or even without prior notification pursuant to Section 7.1, the whistleblower shall be entitled to notify the competent person of the suspected threatened or ongoing violation orally or in writing via the notification line (by email or telephone) or in paper form by letter to the address of IMG's headquarters. The envelope must be labelled „NEOTEVÍRAT – OZNÁMENÍ OZNAMOVATELE – VÝHRADNĚ K RUKÁM PŘÍSLUŠNÉ OSOBY ÚMG“ (meaning "DO NOT OPEN – WHISTLEBLOWER'S NOTICE - EXCLUSIVELY TO THE HANDS OF THE IMG COMPETENT PERSON.")

At the request of the whistleblower, the whistleblower must be allowed to make the notification in person within a reasonable period of time, but no longer than 14 days from the date of the whistleblower's request. If the time limit cannot be complied with for reasons attributable to the whistleblower, the competent person shall note that fact in the file. In the case of an oral notification, the notification shall be recorded by means of an audio recording or a transcript/recording which faithfully captures the substance of the oral notification and on which the whistleblower is given the opportunity to comment. An audio recording of an oral notification may be made only with the consent of the whistleblower.

Upon receipt of the notification, the competent person shall immediately start dealing with it and shall acknowledge receipt of the notification to the whistleblower within 7 days of receipt.

The notification should always contain sufficient information to allow a proper investigation by the competent person. In particular, a factual description of the situation to be notified and a justification of what the whistleblower perceives to be the alleged infringement are considered to be essential information that should not be missing from the notification. The whistleblower may also attach additional material and evidence.

7.3. Handling of notifications, (un)reasonableness of notifications

- a) The competent person shall inform the whistleblower in writing of the receipt of the notification without delay, but not later than 7 days from the date of receipt of the notification. The first sentence shall not apply if it is clear that such action would reveal the identity of the whistleblower or if the whistleblower has so requested.
- b) The competent person shall assess the validity of the information contained in the notification and shall inform the whistleblower in writing of the results of the assessment within 30 days of receipt of the notification. In cases of factual or legal complexity, this period may be extended by up to 30 days, but not more than twice. The competent person shall inform the whistleblower in writing of the extension of the time limit and the reasons for it before the expiry of the time limit. The second sentence of point (a) shall apply *mutatis mutandis*.
- c) If the notification does not contain all the necessary information or data, the competent person shall invite the whistleblower to complete it.
- d) If the assessment of reasonableness does not reveal an infringement as referred to in Section 2.1 of this Directive, the competent person shall inform the whistleblower within the time limit referred to in point (b) of the right to notify the Ministry of Justice and the competent public authority.
- e) The competent person shall give priority to protecting the identity of the whistleblower over continuing to assess the validity of the notification, unless he or she clearly informs the whistleblower of the risk of his or her identity being revealed when continuing the assessment and of the consequences of doing so, and the whistleblower agrees to continue the assessment. Where a possible infringement has been identified during the assessment of the grounds, the competent person shall, where possible with regard to the confidentiality of the identity of the whistleblower and/or the person concerned, propose to the IMG, without undue delay, measures to prevent or remedy the infringement. IMG shall promptly notify the person concerned of the adoption of the corrective measures.
- f) The competent person shall inform the whistleblower in writing of the outcome of each stage of the notification immediately after it has been completed, but no later than 90 days from the date of receipt of the notification. In addition to the outcome of the assessment of the reasonableness of the information contained in the notification, it shall in particular inform of
 - 1) the protection to which the whistleblower is entitled on the basis of the notification,
 - 2) the infringement detected,
 - 3) the preventive or corrective measures proposed and the reasons for their proposal,

- 4) the preventive or corrective measures taken and their reasonableness, if any, within the time limit referred to in this paragraph; and
- 5) another way of handling the notification.
- g) If a notification to be received and dealt with by the competent person reaches another person or organisational unit of IMG, it must be forwarded without delay to the competent person for handling in a manner that ensures the confidentiality of the content of the notification and the identity of the whistleblower. At the same time, all information relating to the notification must be deleted from the document records and from the file, if possible.
- h) If the competent person receives a submission which he/she is not competent to receive because it is not a notification within the meaning of the Act and this Directive, he/she shall immediately forward it to the relevant IMG organisational unit. Before forwarding the submission, the competent person shall inform the submitter that it is not a notification under the Whistleblower Protection Act and that the provisions in question do not apply. The competent person shall disqualify or otherwise conceal information and personal data from which the identity of the applicant can be inferred, unless the applicant consents to the forwarding of such information and data.
- i) This Directive shall be without prejudice to the obligation to provide information on the identity of the whistleblower or the person concerned to the competent public authorities in accordance with applicable law.

8. PROTECTION FROM RETALIATION

Neither the whistleblower nor the person concerned may be subjected to the revocation measure.

Where the whistleblower had reasonable grounds to believe that the notification was necessary to detect an infringement as referred to in Section 2.1 of this Directive, the notification shall not be deemed to be a breach of banking secrecy, of the contractual obligation of confidentiality, of the obligation of secrecy under the Tax Code, or of the obligation of confidentiality under the legislation governing employment or other similar activities, except for the obligation:

- a) to ensure the protection of classified information and information the disclosure of which could obviously jeopardise ongoing criminal proceedings or the protection of special information under the law governing crisis management,
- b) confidentiality in the performance of the activities of a notary, notary candidate and trainee notary, public prosecutor, assistant and legal examiner, advocate and law clerk, bailiff, bailiff candidate and trainee, judge, judge of the Constitutional Court, assistant judge, judicial candidate and confidentiality of an employee of a notary, a bailiff, an advocate and an employee of a company through which an advocate practises law as a partner under the law regulating the practice of law, or of a similar foreign company, or of another person who participates in the provision of legal services within such a company,

- c) confidentiality when providing legal assistance in proceedings before a court or other public authority, or
- d) confidentiality in the provision of health services.

The notification and the conduct of the whistleblower or the person concerned in connection with the discovery of information which subsequently becomes the subject of the notification shall not be deemed to constitute a breach of a contractual or legal obligation, except where the conduct in connection with the discovery of such information constitutes the commission of a criminal offence; this shall not apply unless the whistleblower or the person concerned had reasonable grounds for believing that the notification was necessary for the discovery of an infringement pursuant to Section 2.1 of this Directive.

9. PROCESSING OF PERSONAL DATA

In the performance of IMG's and/or the competent person's obligations under the Act and this Directive, the personal data of whistleblowers and affected persons are processed. The legal basis for the processing of personal data is the legal ground set out in Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"), namely that the processing is necessary for the fulfilment of a legal obligation to which the controller is subject, i.e., the obligations set out in the Act. Special categories of personal data pursuant to Article 9(1) of GDPR may be processed in relation to the notification on the basis of Article 9(2)(e), (f) or (g) of GDPR.

The processing of the personal data of whistleblowers is carried out exclusively by the competent person, who is not entitled to pass them on to any third party, not even to IMG management or the Data Protection Officer. However, the competent person is obliged to comply with all legal provisions and the relevant internal regulations of IMG when processing personal data. A request for access to personal data relating to a notification shall be forwarded by the Data Protection Officer to the competent person for processing. If the competent person finds that no data are held in relation to the notification or that an exemption from the obligation to provide such information applies, he or she shall defer the request without further delay. The obligation to notify a personal data breach to a data subject under the GDPR, while maintaining confidentiality under this Internal Regulation, shall also apply to the competent person.

The information obligation under Articles 13 and 14 of GDPR will be fulfilled while maintaining confidentiality under this internal regulation. Further information on the processing of personal data within IMG is provided in the document "Principles and Rules for Personal Data Protection" and on the IMG website: <https://www.img.cas.cz/about/official-noticeboard/gdpr/>.

The exercise of the right of access to personal data pursuant to Article 15 of GDPR may only be granted to the data subject in accordance with Article 23 of GDPR provided that the confidentiality of the identity of the whistleblower and other persons named in the notification is preserved.

10. KEEPING AND MAINTAINING RECORDS OF NOTIFICATIONS

The IMG shall keep, exclusively through the competent person, an electronic record of the data on the notifications received, in the following scope:

- a) the date of receipt of the notification,
- b) the name, or, where appropriate, the name, surname and date of birth and contact address of the whistleblower, or other information from which the identity of the whistleblower can be inferred,
- c) a summary of the content of the notification and the identification of the person concerned, if known,
- d) the date of completion of the assessment of the validity of the notification by the competent person, including the conclusions of the assessment.

The notification and related documents shall be kept for 5 years from the date of receipt. Only the competent person shall have access to these records.

11. FINAL PROVISIONS

This Directive is governed by Act No. 171/2023 Coll., on the protection of whistleblowers, as amended, as well as by other Czech legislation, in particular Act No. 341/2005 Coll., on public research institutions, as amended, and Act No. 262/2006 Coll., the Labour Code, as amended, as well as by the IMG Foundation Deed.

This Directive repeals and replaces Directive SM/01/2022 in its entirety.

APPROVAL CLAUSE

Document type: Directive
Document No: SM/06/2023
Effective of: August 1st, 2023
Issue No.: 1
Reg. No.: ÚMG/OFFICE/2023/871

	Position	Name	Date	Signature
Prepared by:	Lawyer	Kateřina Chmelová, MSc	27. 7. 2023	m.p.
Submitted by:	Institute Secretary	Věra Chvojková, MSc, MBA	27. 7. 2023	m.p.
Approved by:	Director of the Institute	Petr Dráber, DSc	27. 7. 2023	m.p.
Debated by:				
Debated by:				

LIST OF CHANGES

Description of changes

1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	