

ANTI-SOCIAL ACTIVITY

Directive VAS-f040
Revision: A/01.11.2022

INTERNAL REGULATION ON SOME MEASURES RELATED TO REPORTING ANTI-SOCIAL ACTIVITY of VAS SYSTÉM, spol. s r.o.

with registered office/place of business M.R.Štefánika 2215, 026 01 Dolný Kubín, registered in the Commercial Register of the District Court in Žilina, section Sro, insert no. 14718/L, ID: 36416401, VAT ID: SK2021786712

issued according to § 10 par. 8 of Act No. 54/2019 Coll. on the protection of whistle-blowers of anti-social activity and as amended by later laws

PREAMBLE

of the trading company VAS SYSTÉM, spol. s r.o. with registered office/place of business M.R.Štefánika 2215, 026 01 Dolný Kubín, registered in the Commercial Register of the District Court in Žilina, section Sro, insert no. 14718/L, ID: 36416401, VAT ID: SK2021786712, hereinafter referred to as "employer" or "company" according to § 10 par. 8 of Act No. 54/2019 Coll. on the protection of whistle-blowers of anti-social activity and as amended by later laws

publishes this one

INTERNAL REGULATION ON DETAILS RELATED TO REPORTING ANTI-SOCIAL ACTIVITY

Article I. Introductory provisions

1. The purpose of this internal regulation is in accordance with § 10 par. 8 of Act No. 54/2019 Coll. on the Protection of Whistle-blowers of Anti-Social Activity and as amended by later laws, hereinafter referred to as "the law" specifying details of:
 - a. filing notices,
 - b. verification of notices and authorizations of the responsible person when reviewing notices
 - c. maintaining confidentiality about the identity of the informant,
 - d. registered notices according to § 11 par. 1 of the Act,
 - e. notifying the notifier of the result of the verification of his notification,
 - f. processing of personal data specified in the notice
2. This internal regulation is binding for the employer and all its employees, and it is the source of the employer's and employees' obligations. This internal regulation is binding

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for all employees of the employer who have an employment relationship with the employer on the basis of an employment contract, as well as employees who perform work for the employer based on a work performance agreement, an agreement on work activities or an agreement on part-time student work.

Article II. Definition of basic terms

1. **the whistle-blower** is a natural person, an employee who, in good faith, makes a notification to a person or authority competent to receive such a notification; a person close to him is also considered a whistle-blower if he is in an employment relationship with the same employer.
2. **notification** is a statement of facts that a natural person, an employee, has become aware of in connection with the performance of his job, profession, position or function and which can significantly contribute or have contributed to the clarification of a serious anti-social activity or to the detection or conviction of its perpetrator.
3. **qualified notification is a** statement of facts that can significantly contribute or have contributed to the clarification of a serious anti-social activity or to the detection or conviction of its perpetrator,
4. **serious anti-social activity**
 - a. **the criminal offense of damaging the financial interests of the** European Union according to § 261 to § 263 of the Criminal Code, the criminal offense of manipulation in public procurement and public auction according to § 266 to 268 of the Criminal Code, criminal offenses of public officials according to § 326 to 327a of the Criminal Code or criminal offenses of corruption according to § 328 to 336b of the Criminal Code,
 - b. **a criminal offense** for which the Criminal Code provides for a prison sentence with a maximum penalty exceeding three years,
 - c. **administrative delict**, for which a fine can be imposed with an upper limit determined by the calculation, or
 - d. **an administrative offence**, for which a fine with an upper limit of at least 30,000 euros can be imposed,
5. **employment relationship** is an employment relationship or a similar employment relationship,
6. **employer means** a person employing at least one natural person in an employment relationship,
7. **public authorities**
 - a. state authority, municipality, higher territorial unit,
 - b. legal entity established by law and legal entity established by the state, municipality or higher territorial unit,

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- c. a legal entity established by a person mentioned in point a) or point b),
 - d. a legal entity to which the law entrusts the authority to decide on rights and obligations in the field of public administration,
8. **acting in good faith** is the act of a natural person who, given the circumstances known to him and the knowledge he has at the time of notification, reasonably believes that the stated facts are true; in doubt, the action is considered to be in good faith, until proven otherwise.
9. Reporting anti-social activity is not considered a violation of the contractual obligation to maintain confidentiality or a violation of the obligation to maintain confidentiality according to special regulations, if it is an obligation resulting from the performance of employment, profession, position or function.
10. **Criminality** is an action that is a criminal act.
11. Actions that are not a misdemeanour or other administrative offense but have a negative effect on society are considered other anti-social activities.

Article III. Ways of submitting notifications

1. The notification can be submitted:
- a. **writing** via mail to the employer's mailing address: VAS SYSTÉM, spol. s r.o., M.R.Štefánika 2215, 026 01 Dolný Kubín in a sealed envelope clearly marked "**Into the hands of the responsible person - DO NOT OPEN**",
 - b. **in person at the employer's office** in a sealed envelope clearly marked "NOTICE",
 - c. **via e-mail** 24 hours a day to the e-mail address: podnety@vas.sk ; notification in this way is considered received on the day the e-mail was received by the company, the data from the company's system being decisive,
 - d. **orally in the minutes**, a sample of which is given in the annex to this directive on weekdays from 08.00 a.m. until 3 p.m. directly to an employee designated by the company (**also as a responsible person**)
 - e. by placing a notice in the box located at the VAS System Dolný Kubín building, marked:

" **A place to receive suggestions when reporting anti-social activity** ".
2. The minutes of the oral notification must contain:
- a. reasons for submitting the notification,
 - b. designation of the person against whom the notification is directed,
 - c. in the annex to the notification, it is necessary to attach documents proving the facts stated in the notification,

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- d. contact details of the notifier (name, surname, permanent or temporary residence, telephone number, e-mail address) for the purpose of notifying him of the result of the verification of the notification submitted by him,
- e. the date,
- f. signature of the notifier.

Article IV.

Procedure for checking notifications and the authorization of the responsible person

1. The Company is obliged to receive and verify each notification.
2. When checking the notification, its content and not the marking by the notifier himself is decisive.
3. The responsible person designated by the company according to Article 5 or Article 6 of this Directive is responsible for checking notifications. If it follows from the content of the notification that only part of the notification is a notification of anti-social activity, only the relevant part of the notification will be checked.
4. During the review of notifications until they are disposed of, the responsible person has the following rights:
 - a. request, if necessary, additional statements and documents from the notifier,
 - b. request a statement and documents from the person to whom the notification of anti-social activity is directed,
 - c. request a statement and documents from the statutory representative, if the initiative is directed against him,
 - d. to invite in writing the notifier, as well as the company, the affected employee, or the statutory representative to cooperate in the verification of the notification, together with determining a reasonable deadline for providing cooperation,
 - e. if the initiative is directed against a specific employee or statutory representative of the company, the responsible person will inform the concerned employee or statutory representative of the content of the notification without undue delay and allow him to comment on it, as well as invite him to submit documents, documents and to provide other information necessary for reliable verification things.
5. The responsible person is excluded from checking the notification in cases where:
 - a. the notice goes directly to the responsible person,
 - b. there may be doubts about the impartiality of the person responsible for the checked matter, the whistle-blower or other persons who are also directly or indirectly affected by the notification; if the mentioned fact occurs, the responsible person will notify the stated fact to the company's statutory body, which will appoint another responsible person to verify the given notification. In

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the event that the responsible person does not notify the circumstances of his impartiality or it is a case according to letter a) of this point, the company is entitled immediately after discovering this fact to interrupt the verification of the notification by the responsible person, withdraw his notification and appoint another responsible person to verify the notification.

6. If it follows from the content of the notification that it is not a notification according to the Act on the Protection of Whistle-blowers of Anti-Social Activities, but that another body is responsible for handling it, the responsible person shall inform the notifier of this fact.
7. If, in the case of verification of the notification, it is proven that a crime has been committed, the responsible person is obliged to notify the company's statutory representatives and also the law enforcement authorities of this fact.
8. A repeated notification that does not contain new facts is not checked. He shall inform the informant of this fact.
9. If the submitted notification contains incomplete or unclear information, or if the documents attached to it are insufficient to verify the notification, the company may require the notifier to supplement and clarify them within a specified period. In the event that the submitter does not specify the notification within the specified period and does not submit the required documents, the company, through the responsible person, is entitled to postpone the notification without processing, while informing the notifier of this fact.
10. If the contact information of the notifier is missing in the notification, the company is obliged to deal with this case, but it is not obliged to inform the person who submitted the notification about the result of the verification.
11. If the notification was submitted in person (orally in the minutes), the responsible person rather with the notifier the minutes of the submitted notification in two copies. Both copies of the minutes of the submission of the notification shall be signed by the notifier and the responsible person.
12. Before making a written record of the result of the notification, the responsible person will allow the notifier, or to all concerned persons to comment on the established conclusions. If the informant states new facts and submits new evidence of his claims or disagrees with the established conclusions, the responsible person is obliged to check these new facts and evidence and to deal with disagreeing objections in a written record of the result of the examination of the notification indicating whether these facts and objections are justified.
13. Screened persons are obliged to participate in the discussion of the results of the screening and the writing of the minutes of the screening of the notice at the place and

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time determined by the responsible person.

14. If the inspected persons refuse to familiarize themselves with the result of the inspection, this fact shall be stated in the minutes.
15. In the minutes, the responsible person comments on the individual facts discovered during the inspection, comments on the veracity of the whistle-blowers claims and proposes measures that may need to be taken to eliminate the illegal situation.
16. The notification of anti-social activity is completed on the date of sending the notification about the result of the verification of the notification to the notifier. The notification of the result of the verification of the notification is signed by the responsible person. The anonymous notification is equipped with the date of approval of the minutes on the result of the verification of the notification.
17. Filing a notification must not become a reason for drawing consequences that would cause any harm to the notifier.

Article V. Responsible person

1. The company in accordance with § 10 par. 1 of the Act specifies that the responsible person is **Ing. Hutira Tomáš** in the job position of the company manager, which is under the direct management authority of the company's statutory representative and fulfils the tasks according to § 10 par. 4 to 7 and § 11 par. 1 of the Act. This is responsible for receiving, checking, processing and recording notifications and performing other tasks established by law and this Directive.

Article VI. Alternate responsible person

1. In the event that the responsible person will not be able to deal with the initiative within the time limit established by the law and this Directive mainly due to long-term medical incapacity or for another objective reason worthy of special attention, the statutory representative of the employer may without undue delay appoint a replacement responsible person for a specific case in accordance with the law and relevant generally binding legal regulations.
2. The substitute responsible person is obliged to follow the relevant law and this Directive, while the rights and obligations of this substitute responsible person are applied analogously to the rights and obligations of the responsible person.

Article VII. The obligation to maintain confidentiality about the identity of the whistle-blower

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1. The statutory representative, the responsible person and anyone who knows the identity of the informant is obliged to maintain confidentiality about it, as well as about the facts that they learned about in connection with the verification of the notification according to this directive.
2. The obligation of confidentiality continues even after the end of the employment relationship, similar employment relationship or function.

Article VIII. Registration of notices

1. VAS Systém, spol. s r.o. keeps records of notices for three years from the date of delivery of the notice in the scope of:
 - a. the date of delivery of the notice,
 - b. name, surname and residence of the notifier,
 - c. the subject of the notification,
 - d. result of notification verification,
 - e. the end date of notification verification.

After the expiration of the three-year period, the responsible person shall ensure the shredding of the records of notifications together with all attachments in the manner determined by the document shredding company.

2. Records of notifications are stored separately. Members of the company's statutory body or another person based on authorization (e.g., substitute responsible person) have access to the record of notifications.
3. The responsible person is obliged to protect the records of notifications from loss, destruction, damage, misuse and other unauthorized interference.
4. Each notification is required to be registered by the responsible person without delay in the notification register and is marked:
 - a. serial number of its delivery,
 - b. calendar year of delivery.
5. Records of notifications are kept separately for each calendar year, starting with serial number 1 and ending with the serial number that was last assigned in the respective calendar year.
6. In the case of an anonymous notification, the responsible person registers the notification as "anonymous" and proceeds according to the law.
7. An anonymous notification that is not a notification according to the Act on the Protection of Whistle-blowers of Anti-Social Activities will be postponed by the responsible person.

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Article IX. Deadline for reviewing the notification

1. The Company is required to receive and review each notice within 90 days of its receipt; this period can be extended by another 30 days, with the notification of the extension of the period to the notifier stating the reasons for the extension.

Article X. Notification of the notifier with the result of the verification of his notification

1. The company is obliged to notify the notifier of the result of the verification of the notification within ten days from the verification of the notification.
2. Notification of the result of the review of the initiative to the notifier is accomplished by sending a written notification of the result of the review through the postal company.
3. If the notifier does not accept the notification about the result of the review of the initiative, the shipment is considered delivered on the day the unclaimed shipment is returned to the company.

Article XI. Processing of personal data specified in the notification

1. For the purpose of keeping records of notifications, the personal data of the natural person who submitted the notification is processed in the scope of:
 - a. name surname,
 - b. address of permanent residence of the notifier or correspondence address.
2. The employer is further authorized to process personal data without the consent of the natural person concerned:
 - a. which have already been published in accordance with the applicable Personal Data Protection Act,
 - b. the processing of which is necessary to protect the rights and legally protected interests of the employer or a third party, in particular personal data processed within the framework of the protection of the property, financial or other interests of the employer,
 - c. the processing of personal data is necessary to fulfil an important task carried out in the public interest,
 - d. these are special categories of personal data that the data subject has published himself or that are necessary for the exercise of his legal claim.
3. When processing personal data mentioned in the notice and related documents, persons coming into contact with this data are obliged to proceed in accordance with the law, this directive and the applicable law on the protection of personal data.

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4. All personal data to the extent specified in the notification are processed exclusively for the purpose of verifying the specific notification.

Article XII. Whistle-blower Protection

1. An employee who filed a report on serious anti-social activity, which is a criminal offense, may also request the prosecutor to provide protection pursuant to Sections 3 and 4 of the Act in criminal proceedings or pursuant to Sections 5 and 6 of the Act in proceedings on administrative offences.
2. Filing a notification must not become an incentive or a reason for drawing consequences that would cause any harm to the notifier.

Article XIII. Office for the Protection of Whistle-blowers of Anti-Social Activities

1. Act no. 54/2019 Coll. on the Protection of Whistle-blowers of Anti-Social Activity and its § 13, the Office for the Protection of Whistle-blowers of Anti-Social Activity was established with its seat in Bratislava for the purpose of providing protection of the rights and legitimate interests of whistle-blowers when reporting anti-social activity.
2. The Office can provide a whistle-blower who has made a qualified notification on the basis of his request for a reward, a reward up to 50 times the minimum wage, if the conditions of the law are met in accordance with its § 9 par. 1 letter a) and letter b) (e.g., an indictment was filed in criminal proceedings).
3. The whistle-blower can submit a request for a reward according to § 9 par. 3 of the Act within six months from the date of delivery of the notice pursuant to § 9 par. 2 of the Act.
4. When deciding on a request for the provision of a reward, the Office will take into account the degree of merit of the whistle-blower in clarifying serious anti-social activity, the contribution to the detection or conviction of the perpetrator. For this purpose, the office will request the opinion of the prosecutor or the administrative body that acted in the matter.
5. The office will decide on the whistle-blowers request for the provision of a reward within three months from the date of its delivery.
6. According to § 9 par. 7 of the Act, a legal claim. Review of the office's decision on remuneration is excluded by the court.

Article XIV. Final provisions

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1. Managers are obliged to familiarize themselves with the content of this directive, and at the same time they are also obliged to demonstrably familiarize their subordinates with its content.
2. The directive is made accessible by being available for viewing at any time during working hours from 9:00 a.m. until 2 p.m. in the legal department, in the human resources department, as well as with the executive directors of individual sections of the company and on the company's information board.
3. This directive repeals the Directive on the internal system for receiving and handling complaints related to the reporting of anti-social activity issued pursuant to Act No. 307/2014 Coll. on some measures related to the reporting of anti-social activity and on the amendment of some laws as amended from NR-S-370-2015.
4. This directive includes:

Annex no. 1 - Sample: Minutes of receiving a verbal notification of anti-social activity

Annex no. 2 - Model: Notice of anti-social activity in writing

Annex no. 3 - Model: Notice on the extension of the deadline for verification of the notice to the notifier

Annex no. 4 - Sample: Minutes from the review of the received notification

Annex no. 5 - Sample: Record sheet on received notification

In Dolný Kubín, on November 1, 2022.

VAS Systém, spol. s r.o.

M.R.Štefánika 2215
026 19 Dolný Kubín
IČO:36416401, DIČ:2021786712
IČ DPH:SK2021786712



Ing. Hutira Tomáš
CEO

Attachment no. 1

MINUTE-BOOK

on receiving a verbal notification of anti-social activity
responsible person

The date:

Time:

Name and surname of the notifier:

Address of permanent residence or correspondence address of the notifier:

.....

Contact details of the notifier:

phone number: e-mail:

Subject of notification:

(indicate the person against whom the notification is directed, the shortcomings that are pointed out)

.....

.....

.....

.....

Made by:

(name, surname and signature of the responsible person who drew up the minutes)

Number of attachments submitted by the notifier:

Signature of the person who submitted the notification:

Note:

.....

Attachment no. 2

Recipient:

.....

Notification of anti-social activity

in written form

Date of notification:

Name and surname of the notifier:

Address of permanent residence or correspondence address of the notifier:

.....

Subject of notification:

(indicate the person against whom the notification is directed, the shortcomings that are pointed out)

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.....

Number of attachments:

Signature of the notifier:

Attachment no. 3

Notice on the extension of the notification
verification period to the notifier

Recommended!

.....
(Name and surname of the notifier).....
.....
(Home address)

Your letter number/dated

Our number

Dolný Kubín

A thing: Notice on the extension of the deadline for handling the notice according to § 10 par. 5 of Act no. 54/2019 Coll.

On (date) we received your notice pursuant to Act no. 54/2019 Coll. on the protection of whistle-blowers of anti-social activity and on the amendment and supplementation of certain laws (hereinafter referred to as Act No. 54/2019 Coll in the case:

.....
It is not possible to deal with your notification within the statutory period of 90 days from the date of receipt of the notification, for the following serious reasons:

.....
.....
.....
In accordance with paragraph § 10 par. 5 of Act no. 54/2019 Coll. To you

we announce

that for the serious reasons mentioned above, we are extending the deadline for processing your notice by another 30 days.

Sincerely

.....

Attachment no. 4

Initiative number:

Minutes from the review of the received notification

1. Subject of notification dated:

delivered to the company on:

2. Checked person (name, surname, job position):

.....
.....

3. The announcement was checked by: (name, surname, job position):

.....

4. The review of the notification was carried out on:

.....

5. Place of verification of notification:

6. Facts found when checking the notification:

(briefly state the established objective situation with reference to legal regulations, directives, checked documents, information and explanations of screened and invited persons regarding the subject of the notification, and further state the responsibility of the screened persons for detected deficiencies in case the notification is justified)

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7. Objections of the inspected person:

(objections of the inspected person to the established facts and to the possible responsibility and degree of culpability of the inspected person for the identified deficiencies shall be stated)

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8. Notification verification results:

(the results of the verification of the notification and its justification, taking into account the legitimate objections of the person being verified)

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9. List of attachments that are part of the minutes:

.....

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10. Signature of the person who checked the notification, submission, initiative:

.....

(name, surname, function, job position, signature)

11. Signatures of invited persons:

a.

(name, surname, function, job position, signature)

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b.
(name, surname, function, job position, signature)

c.
(name, surname, function, job position, signature)

12. The verified person/persons were informed of the contents of the minutes:

.....
(name, surname, function, job position, signature)

.....
(name, surname, function, job position, signature)

13. The minutes were written by:

.....
(name, surname, function, job position, signature)

14. Distribution list of printouts of the minutes:

- print no. 1 **responsible person**
- print no. 2 **for the verified person**

On date

.....
(name, surname, signature of the responsible person)

Taking printout no. 2 of the minutes confirms with his signature:

.....
(name, surname, position - verified person, signature)

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Attachment no. 5

Record sheet on received notification number

..... /

1. **Notification received on:**2. **Method of submission of notification:**

- in writing
- orally
- electronically
(x cross out what is inappropriate)

- Notification with attachments - number:
- Notice without attachments
- (x cross out what is inappropriate)

3. **Information about the notifier:**

a. Name and surname:

Permanent residence / correspondence address:

.....

b. Anonymous notification

(x cross out what is inappropriate)

4. **Subject of notification:**

.....

.....

.....

5. **Notification verification result:**

.....

.....

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.....

6. **End date of verification:**

7. **He wrote the registration letter on:**
(name, surname, signature of the responsible person)

Distributor:

Directive on the internal system of submitting, checking, processing and recording reports of anti-social activity from

8 prints made:

Print no. 1 took over

Print no. 2 took over

Print no. 3 took over

Print no. 4 took over

Print no. 5 took over

Print no. 6 took over

Print no. 7 took over

VAS Systém, spol. s r.o.

according to § 10 par. 4 of Act no. 54/2019 Coll. on the protection of whistle-blowers of anti-social activity and on the amendment of certain laws

publishes and makes available the designation of the responsible person

responsible person: **Ing. Hutira Tomáš**

address: **M.R. Štefánika 2215, 026 01 Dolný Kubín**

phone: **+421 905 778 752**

e-mail: **hutira.tomas@vas.sk**

Employees can report anti-social activity:

- in writing in a sealed envelope marked " **Into the hands of the responsible person - DO NOT OPEN** ",
- orally in the minutes of the responsible person,
- by electronic means to the email address: podnety@vas.sk
- by placing a notice in the mailbox located at the VAS Systém Dolný Kubín building, marked:

" **A place to receive suggestions when reporting anti-social activity** ".

In Dolný Kubín, on November 1, 2022.

VAS Systém, spol. s r.o.
M.R.Štefánika 2215
026 19 Dolný Kubín
IČO:36416401, DIČ:2021786712
IČ DPH:SK2021786712



Ing. Hutira Tomáš
CEO

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