



**Your letter number/ dated**

**Our number**

SNSLP/2024/00056-15

**Responsible**

Mesároš/21

**Bratislava**

26.03.2024

## **Expert opinion**

You have submitted a complaint to the Slovak National Centre for Human Rights (hereinafter referred to as "the Centre") in which you object to the violation of the principle of equal treatment in the provision of goods and services under Act No. 483/2001 Coll. on Banks and on Amendments and Additions to Certain Acts, as amended (hereinafter referred to as "the Act on Banks").

The Centre performs tasks in the field of human rights and fundamental freedoms<sup>1</sup>. To this end, it monitors and evaluates compliance with human rights, fundamental freedoms, and the principle of equal treatment under the Anti-Discrimination Act<sup>2</sup>, provides human rights services, provides legal assistance to victims of discrimination and intolerance, issues expert opinions on matters of compliance with the principle of equal treatment on request or on its own initiative and carries out independent inquiries concerning discrimination.

## **Content of the complaint**

In the complaint you refer to cases of refusal of banks providing banking services in Slovakia to establish current accounts for citizens of the Russian Federation residing in the territory of the Slovak Republic. This also applies to persons living in Slovakia for a long time, employed in Slovakia in a permanent employment relationship, with permanent residence for an indefinite period. Citizenship of the Russian Federation has been cited by Československá obchodná banka, a. s., with registered office at Žižkova 11, 811 02 Bratislava, ID No: 36 854 140 (hereinafter referred to as "the bank"), as an obstacle to the opening of an account, due to European Union sanctions. When asked to identify the specific European Union legislation and the specific provision prohibiting the bank from opening an account for a person with permanent residence in

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<sup>1</sup> Provision of § 1 (2) of Act No. 308/1993 Coll. on the establishment of the Slovak National Centre for Human Rights, as amended.

<sup>2</sup> Act No 365/2004 Coll. on equal treatment in certain areas and protection against discrimination and on amending and supplementing certain acts (Anti-discrimination Act), as amended.



the Slovak Republic and citizenship of the Russian Federation, the bank argued that it was not obliged to open an account for a client. It is a contractual relationship between the bank and the client which arises from the conclusion of a contract, for example, on a current account, based on the free will of the two contracting parties. Similar reasoning was used by Slovenská sporiteľňa, a. s., with registered office at Tomášikova 48, 832 37 Bratislava, ID No.: 47 251 336, when refusing to open a bank account. An employee of 365.bank, a. s., a branch of Poštová banka, with registered office at Dvořákovo nábrežie 4, 811 02 Bratislava, ID No: 31 340 890, should have verbally stated that he had been instructed not to open accounts for citizens of the Russian Federation. Such information should also have been communicated to other citizens of the Russian Federation during personal visits to the following banks: Tatra banka, a. s., with registered office at Hodžovo námestie 3, 811 06 Bratislava, ID No: 00 686 930, Prima banka Slovensko, a. s, with registered office at Hodžova 11, 010 11 Žilina, ID No: 31 575 951, Privatbanka, a. s., with registered office at Einsteinova 25, 851 01 Bratislava , ID No: 31 634 419 and UniCredit Bank, branch address: Krížna 4923/50, 821 08 Bratislava, Slovakia, branch address Krížna 4923/50, 821 08 Bratislava<sup>3</sup>.

When they visited banks, they did not observe their cautious and diligent individual assessment of the circumstances of a banking transaction, its riskiness or safety. As soon as the bank learned that the person was a person of Russian nationality, it refused to set up a standard account for her. You point out that the principle of autonomy of will and freedom of contract can be accepted in commercial relations, where even banks as business partners enter contractual relations according to mutual convenience and their business intentions. The consumer is in a different situation vis-à-vis the bank, being the weaker party. Every entrepreneur conducting business activity is obliged to provide the service offered to every client equally. Discrimination is prohibited by anti-discrimination law and cannot be confused with freedom of contract. You consider that if the bank is not prevented by any legal reasons or by specialisation in certain products and clients, it is obliged to provide an account to everyone without discrimination. You ask the Centre to issue an expert opinion on the legal question of whether a bank's refusal to open a current account for a citizen of the Russian Federation residing in the Slovak Republic may constitute discrimination.

## Dealing with a complaint

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<sup>3</sup> In summary, these are almost all banks according to the list of financial market entities published by the NBS: [Subjekty fin. trhu \(nbs.sk\)](http://subjekty.fin.trhu(nbs.sk)).



In view of the provision of Section 6(1) of the Banking Act<sup>4</sup> and the legal status and tasks of the Centre, anti-discrimination legislation and the request to investigate the alleged violation of the right to equal treatment, the Centre requested the National Bank of Slovakia, with its registered office at Imrich Karvas 1, 813 25 Bratislava (hereinafter referred to as the "NBS") to provide information and a statement on the alleged facts of unequal treatment. It requested an assessment of the factual and legal grounds<sup>5</sup> for the refusal to provide banking services to persons with citizenship of the Russian Federation, access to the source of the information used by the banks in this respect<sup>6</sup>, whether the NBS has dealt with the refusal of applications for the opening of payment accounts on the grounds of Russian nationality in the past and with what result they were assessed or dealt with.

The NBS pointed out that under the provisions of Article 27d of the Law on Banks, banks and branches of foreign banks are obliged to provide banking services to an eligible person within the scope of a standard account if they provide all banking services of a standard account (hereinafter also referred to as "current account", "standard account", "account with basic functions") within the scope of their business. They shall provide a standard account to an eligible person based on an application for a standard account, unless the conditions for refusal pursuant to paragraph 7 are met. An eligible person is a customer who is a consumer<sup>7</sup> and is a resident of the European Union<sup>8</sup>. Pursuant to Section 27d (7) of the Banking Act, a bank and a branch of a foreign bank shall refuse a consumer's application for a standard account if

- a) the establishment of a standard account is contrary to Act No 297/2008 Coll. on the Protection against the Legalisation of Proceeds from Crime and on the Protection against the Financing of Terrorism and on the Amendment and Supplementation of Certain Acts,
- (b) the authorized person has established a payment account with a bank or a branch of a foreign bank which contains all the banking services of a standard account,

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<sup>4</sup> According to which: The activities of banks and branches of foreign banks shall be subject to supervision by the National Bank of Slovakia; 8) to the extent provided for by this Act, the activities of other persons and entities related to the activities or management of banks or branches of foreign banks shall also be subject to supervision. Supervision shall be exercised, to the extent provided for by this Act, over individual banks, branches of foreign banks or other entities, as well as over consolidated units of which banks are a part and financial conglomerates.

<sup>5</sup> Also defined in the provision of Section 27d (8) of the Banking Act.

<sup>6</sup> In addition, Council Regulation (EU) No 269/2014 of 17 March 2014 on restrictive measures in view of acts undermining or threatening the territorial integrity, sovereignty and independence of Ukraine provides for restrictive measures against specific persons and entities from the Russian Federation. None of the citizens of the Russian Federation with whom you are in contact are aware that they belong to these specific persons and entities of the Russian Federation.

<sup>7</sup> Pursuant to the provisions of Article 52(4) of the Civil Code, a consumer is a natural person who, when concluding and performing a consumer contract, does not act within the scope of his or her trade or other business activity.

<sup>8</sup> Including a consumer without residence in the Slovak Republic, an asylum seeker and a consumer who has not been granted a residence permit but whose expulsion is not possible for legal or factual reasons.



(c) the time limit for the completion of an incomplete or incorrect application form by the consumer after a prior request by the bank expires in vain.

In view of the above, the NBS stated that banks are obliged to provide the consumer with the services of a standard account if this is not prevented by one of the facts exhaustively defined by the Banking Act. At the same time, banks and branches of foreign banks are under a general obligation to act prudently and with professional care in each application for a payment account, to evaluate all the circumstances of the banking transaction being concluded and, consequently, to take a commercial decision on whether to conclude a contractual relationship with the consumer who has expressed an interest in the provision of a financial service<sup>9</sup>. She further noted that since the beginning of the armed conflict in Ukraine, a wide range of legal acts have been adopted at the level of the European Union, the purpose of which is to impose international sanctions on entities of the Russian Federation and the Republic of Belarus. One such act is Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of acts undermining or threatening the territorial integrity, sovereignty, and independence of Ukraine, mentioned by the Centre. However, this does not apply to those citizens of the Russian Federation who are not among the persons and entities from the Russian Federation specified in the Regulation.

Another such act is Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine<sup>10</sup>. This Regulation provides for a blanket prohibition for entities to accept deposits from Russian nationals or permanent residents of Russia or from legal persons, entities or bodies established in Russia or from legal persons, entities or bodies established outside the Union which are more than 50 % owned, directly or indirectly, by Russian nationals or natural persons permanent residents of Russia, if the total value of the deposits of the natural or legal person, entity or body per credit institution exceeds EUR 100.000,-. The Regulation also contains an exception to this prohibition, according to which the abovementioned restrictions do not apply to nationals of a Member State, a country that is a member of the European Economic Area or Switzerland, or to natural persons who have a temporary or permanent residence permit in a Member State, a country that is a member of the European Economic Area or Switzerland.

It also refers to the European Banking Authority's Guideline EBA/GL/2023/04 of 31.03.2023 on policies and controls for the effective management of money laundering and terrorist financing risks in the provision of access to financial services<sup>11</sup>, that credit and financial institutions should set up their policies, controls and procedures to identify relevant risk factors

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<sup>9</sup> According to the sixth part (§ 27 et seq.) of the Banking Act - requirements for the business of a bank and a branch of a foreign bank.

<sup>10</sup> [Regulation - 833/2014 - EN - EUR-Lex \(europa.eu\)](#)

<sup>11</sup> [Guidelines on MLTF risk management and access to financial services.pdf \(europa.eu\)](#). It is one of the agencies of European Union. See more: [About us | European Banking Authority \(europa.eu\)](#)



and assess the money laundering and terrorist financing risks associated with individual business relationships in accordance with the EBA Guidelines on risk factors associated with money laundering and terrorist financing. Within this framework, credit and financial institutions should distinguish between the risks associated with a certain category of clients and the risks associated with individual clients belonging to that category. Credit and financial institutions should ensure that the implementation of these policies, procedures and controls does not lead to the blanket rejection or termination of business relationships with entire categories of customers that they have assessed as posing a higher risk of money laundering and terrorist financing.

The relevant supervised entities - banks and branches of a foreign bank have internal regulations and methodologies regulating their internal processes, including the establishment of standard accounts<sup>12</sup>. These documents are subject to the supervision of the NBS, with the provision that supervised entities must comply with Slovak law when assessing individual client applications for the establishment of a standard account on a case-by-case basis. They are also obliged to comply with the methodological guidelines and measures of the NBS, such as the relevant Methodological Guideline of the National Bank of Slovakia Financial Market Supervision Units of 29 April 2019 No 3/2019 on the protection of a bank and a branch of a foreign bank against the legalization of proceeds from crime and the financing of terrorism<sup>13</sup>, as well as the guidelines and opinions of other regulators, relevant to the content of the expert opinion<sup>14</sup>.

In view of the above, the NBS formulates the opinion that the Russian nationality of the consumer at the current time does not in itself constitute such a fact that could be considered as a legitimate obstacle to the establishment of a payment account, preventing the bank from entering a contractual relationship with the consumer. A bank's refusal of a consumer's request to open a payment account solely on the ground that the consumer is a citizen of the Russian Federation, without taking into account the individual circumstances of the banking transaction, could be contrary to the obligation to comply with the principle of equal treatment in the provision of products and services pursuant to Article 4(3)<sup>15</sup> of Act No 250/2007 on consumer protection and

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<sup>12</sup> Their content is subject to the obligation of confidentiality pursuant to Act No. 747/2004 Coll. on Financial Market Supervision and on Amendments and Supplements to Certain Acts.

<sup>13</sup> Methodological Guideline of the Financial Market Supervision Unit of Národná banka Slovenska No 3/2019 of 29 April 2019 on the prevention of money laundering and terrorist financing at banks and branches of foreign banks - Národná banka Slovenska (nbs.sk)

<sup>14</sup> For example: Metodické usmernenia a stanoviská FSJ, Ministerstvo vnútra SR - Polícia (minv.sk)

<sup>15</sup> The Seller is obliged to comply with the principle of equal treatment in the provision of products and services set out in the Anti-discrimination Act in relation to the consumer. The seller may not refuse to sell to the consumer a product which he has on display or otherwise ready for sale or refuse to provide a service which is within his operational possibilities. He may not tie the sale of a product or the provision of a service (hereinafter referred to as 'tying of sales') to the sale of another product or the provision of another service. This shall not apply if the consumer does not meet the conditions for purchase under the special provisions. It shall not be deemed to be tying if the seller also sells those products or provides those services separately or if the tying of the sale is conditional on the technical impossibility of selling the products or providing the services separately.



amending Act No 372/1990 Coll. of the Slovak National Council on offences, as amended (hereinafter referred to as the 'Consumer Protection Act').

The NBS also stated that it does not have an audio-visual record of the refusal to provide banking services to citizens of the Russian Federation residing in the territory of the Slovak Republic during a personal visit to Tatry banka, a. s., with its registered office at Hodžovo námestie 3, 811 06 Bratislava, ID No.: 00 686 930, based on which it would be possible to objectively investigate the factual situation in the individual case. However, in its opinion addressed to the NBS dated 25.09.2023, this bank recommends that the citizens of the Russian Federation concerned (who meet the conditions for opening a standard account and for whom there is no legal ground for refusal of the application) visit any of its branches and, upon presentation of a residence permit, apply for opening a current account, also referring to its opinion dated 25.09.2023. The NBS does not have an audio-visual record of the refusal to provide banking services to citizens of the Russian Federation residing in the territory of the Slovak Republic, even during a personal visit to Privatbank, a. s., with registered office at Einsteinova 25, 851 01 Bratislava, ID No.: 31 634 419. During the investigation, the NBS found that this bank does not have an internal instruction instructing its male and female employees not to accept citizens and nationals of the Russian Federation as clients. The NBS found similar facts about the lack of records based on which it would be possible to objectively investigate the facts of an individual case when investigating other banks. In the case of Slovenská sporiteľňa, a. s., with its registered office at Tomášikova 48, 832 37 Bratislava, ID No.: 47 251 336, the NBS found an individual failure of a bank employee who did not adequately apply the bank's otherwise compliant systemic procedures for assessing individual applications for the establishment of a banking product. In its opinion, the bank apologised for the misunderstanding, stating that if there was still an interest in providing a banking product, it was possible to revisit its sales outlet, where the application would be received and assessed under standard procedures.

### **Relevant anti-discrimination legislation**

The basic national legislation defining the conditions for compliance with the principle of equal treatment is the Anti-Discrimination Act. It defines the basic concepts, delimits the areas within which the principle of equal treatment must be respected, specifies the forms of discrimination and the grounds on which it is not possible to subjects are treated less favourably. Discrimination can only occur if all its legal elements can be identified at the same time. That means, there has been less favourable treatment (a form of discrimination) of a natural person, causally linked to a demonstrable protected ground which is actually or presumptively connected to that person, in a specific area defined by the anti-discrimination law.

The principle of equal treatment is regulated in the broadest and most general terms by anti-discrimination law (lex generalis). However, it further specifies in Article 3(2) that this





principle applies only in conjunction with the rights of persons which are regulated by special laws (*lex specialis*) in the individual areas it defines. According to Article 3(1) thereof, everyone is obliged to observe the principle of equal treatment in employment and similar legal relations, social security, health care, the provision of goods and services and education. For the purposes of this expert opinion, the specific law for goods and services is the Banking Act. Pursuant to Section 27(1) of the Banking Act, a bank, and a branch of a foreign bank conduct business with its customers on a contractual basis. A bank and a branch of a foreign bank are obliged to act prudently in the conduct of their business. In particular, they are obliged to conduct business in a manner which takes into account and mitigates risks, in a manner which does not harm the interests of their depositors in terms of the return on their deposits and which does not jeopardise the security and economic situation of the bank and the branch of a foreign bank or the safe functioning of the banking system by violating laws or other generally binding legal provisions, on economic and legal terms which are favourable to the bank or the branch of a foreign bank and to their customers in the course of business conducted by them for the account of the customer and with the exercise of professional diligence. The bank and branch of a foreign bank shall be obliged to demonstrate the exercise of professional care in a credible manner.

Pursuant to the provisions of Section 5(h) and (i), a customer of a bank or branch of a foreign bank is a person with whom the bank or branch of a foreign bank has concluded a transaction in the area of banking activities. A banking transaction is the creation, alteration, or termination of a relationship of obligation between a bank or a branch of a foreign bank and its customer and any operation related to banking activities, including the handling of deposits. Pursuant to the provisions of Section 27e of the Banking Act, a bank and a branch of a foreign bank are obliged to treat a consumer who is a resident of the European Union when applying for or accessing a payment account in accordance with the principle of equal treatment laid down in the Anti-Discrimination Act. In accordance with the principle of equal treatment, discrimination on grounds of nationality or place of residence of a consumer who is a resident of the European Union is also prohibited.

### **Legal assessment of the information contained in the complaint**

The case under review involved a negative assessment (non-acceptance) of an application for a payment account with basic functions, thereby denying clients and customers with citizenship of the Russian Federation access to such a payment account. The relevant anti-discrimination legislation includes this legal relationship in goods and services area protected by the anti-discrimination law. The Banking Act itself refers to the Anti-Discrimination Act for this legal relationship, prohibits discrimination in this relationship and refers to customers as consumers under the Consumer Protection Act. The first element of discrimination, the area of discrimination, can therefore be regarded as fulfilled.



The Centre further examined the second condition of discrimination - forms of less favourable treatment. The less favourable treatment of the banks characterised in the complaint - the refusal of the bank to open a current account for citizens of the Russian Federation residing in the territory of the Slovak Republic - can be classified as a form of direct discrimination<sup>16</sup>. All other eligible persons for the purposes of the Banking Act, other customers who are consumers residing in the European Union (regardless of their nationality), including non-residents, asylum seekers and consumers who have not been granted a residence permit but whose expulsion is not possible for legal or factual reasons, may be in a comparable situation to citizens of the Russian Federation. If a citizen of the Russian Federation is denied an application for a standard account without a relevant lawful reason or is denied access to properly submit such an application, he or she is thus disadvantaged and treated less favourably than a person in a comparable position would be treated. You state in your complaint that, according to your information, most banks operating on the Slovak banking market have treated several Russian citizens less favourably in this way. This could therefore be discrimination on a systemic scale, significantly limiting access to a service for a defined group of consumers, the complete lack of which could complicate their daily lives.

Generally, a prima facie case of discrimination implies a rebuttable legal presumption that the prohibition of discrimination has been violated. The legal presumption is established if there is no legitimate, objective, or rational fact to rebut it. The Centre therefore next turned to an examination of the hypothesis of the existence of that fact. The group refusal to establish a standard account for citizens of the Russian Federation residing in the territory of the Slovak Republic because of European Union sanctions is not a fact that would rebut the presumption of a violation of the prohibition of discrimination. It does not follow from the wording of the applicable Council (EU) Regulations that they should apply to all citizens of the Russian Federation. On the contrary, the NBS also refers to the guidance of the European Banking Authority on anti-money laundering and anti-terrorist financing measures as inappropriate. Rather than generalising, it emphasises the need to individualise the bank's approach to each client.

Banks' transactions with their clients are based on a contractual basis, and they are obliged (also under the supervision of the NBS) to act prudently and with professional care in their activities. Here, too, the principle of autonomous will and contractual freedom, identified by the bank as a fact with the ambition to rebut the presumption of a breach of the prohibition of discrimination in the expert opinion, applies. The principle of contractual freedom is expressed in the saying: "what is not prohibited by law is permitted" (*quod lege non prohibitum, licitum est*). This principle applies only to persons governed by private law; public law subjects exercising state power are, on the contrary, subject to the principle that they may do only what the law provides

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<sup>16</sup> According to Section 2a(2) of the Anti-Discrimination Act, direct discrimination is an act or omission in which a person is treated less favourably than another person in a comparable situation is, has been or could be treated.





for<sup>17</sup>. It is based on the constitutional principle of liberty under Article 2(3) of the Constitution of the Slovak Republic: everyone may do what is not prohibited by law and no one may be compelled to do anything that the law does not require. This article, although primarily an expression of the principle of liberty, contains a link with the principle of legality, both in relation to the imposition of obligations and to the creation of private law obligations<sup>18</sup>. According to the Constitutional Court of the Slovak Republic, *"The essence of the rule of law is the requirement that private law acts, as public law principles, must have a basis in law - a legal title. It is always necessary to ask again and again what the legal basis is for each intervention, what the legal basis is for the act under review, and finally also to ask what the legal basis is for the decision of the Constitutional Court."*<sup>19</sup> The principle of contractual freedom is therefore not unlimited. Its fundamental and principal limit is the law itself. The Banking Act explicitly imposes an obligation on banks to open an account<sup>20</sup> for a consumer resident in the European Union, including a consumer not resident in the Slovak Republic, if he has expressed an interest in opening a payment account with basic functions pursuant to Section 27d of the Banking Act, provided that the statutory conditions are met. If a bank or a branch of a foreign bank rejects such an application, it shall inform the authorised person in writing free of charge and without delay, unless public order, state security or a special regulation prevents the provision of reasons for the rejection of the application. The Centre specifies that, for the purposes of the Banking Act, under its provision Section 5(ae), a payment account with basic functions (also referred to as a "standard account") is a payment account that includes the following banking services related to the payment account:

- 1.setting up, maintaining, and cancelling a payment account,
- 2.execution of payment operations
  - 2a. deposit of funds in cash in euro currency into the payment account,
  - 2b. withdrawal of funds in cash in euro currency from the payment account,
  - 2c. wire transfers of funds from or to a payment account
  - 2ca.direct debit, including standing direct debit orders,
  - 2cb.by credit transfer, including a standing order for credit transfer,
  - 2cc.by payment card,
- 3.issuance of a payment card.

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<sup>17</sup> Fekete, I.: Civil Code 1 Volume (General Part). Large commentary, 2nd updated and expanded edition. Bratislava: Eurokodex, 2014, p. 12.

<sup>18</sup> Orosz, I., Svák, J. et al.: Constitution of the Slovak Republic. Commentary. Volume 1. Bratislava: Wolters Kluwer SR s. r. o., 2021, p. 47.

<sup>19</sup> Judgment of the Constitutional Court of the Slovak Republic, Case No. PL. ÚS 5/2017 of 9 January 2019.

<sup>20</sup> Other such cases, albeit of a different nature, are the obligations to provide a basic banking product under Section 27c, to establish and maintain a special borrower account under a special regulation under Section 27f, or to establish and maintain a special account for the payment of election campaign expenses under Section 27g of the Banking Act.



The provision of Section 27e of the Banking Act also specifically prohibits discrimination in this case. The principle of contractual freedom of banks is also limited by their obligation to exercise professional care in their activities. However, a bank and a branch of a foreign bank are obliged to provide credible evidence of the exercise of professional care. It cannot, and must not, be a catch-all, generalised and, without adequate explanation of its justification, used as an “exculpatory formula” to make out that there has been a breach of the prohibition of discrimination. Accordingly, the invocation of the principle of contractual freedom (without further specific explanation, demonstration, and individualisation) is not sufficient to rebut the presumption of an alleged breach of the prohibition of discrimination. Thus, the Centre does not identify facts capable of rebutting the legal presumption of a violation of the prohibition of discrimination in the form of direct discrimination. The form of (direct) discrimination, as one of the essential elements of discrimination, in the cases complained of, may exist.

The third legal feature of discrimination, the protected ground, which is borne by the persons to be treated less favourably, can also be identified. It is their citizenship (of the Russian Federation). The circumstances of the complaint suggest that there is a causal link between that protected ground and the less favourable treatment. The protected ground of nationality is not included in the Anti-Discrimination Act's list of protected grounds. However, a specific piece of legislation, the Banking Act, expressly prohibits discrimination on grounds of nationality or place of residence of a consumer who is a resident of the European Union when applying for or accessing a payment account with basic features.

The wording of the protected ground used is state membership. The complaint predominantly uses the term citizenship. To explain these two terms, the Centre states that citizenship is a permanent legal union between a person and a State, which results in a set of mutual rights and obligations between the citizen and the State, determined and secured by the State. It enables the citizen to participate actively in the political, state, economic and cultural life of the state and society. The relationship between the concepts of state membership and citizenship is that the citizen is a member of the state.

## Conclusion

The Centre notes that direct discrimination against Russian nationals may occur if, after presenting proof of identity to a bank when applying for a state account, bank staff refuse their application solely because of information about their nationality. However, it is necessary for the persons concerned to be able to produce, or at least to identify, such means of proof as would make it possible to demonstrate the discriminatory practice described above.

Yours sincerely



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