



WHISTLEBLOWING SYSTEM INFORMATION

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What is the whistleblowing system for, and what can be reported?

The Hungarian Complaints Act allows employees, as well as the partners of companies and institutions, to report acts they consider unlawful — including anonymously. Only information concerning an unlawful or allegedly unlawful act or omission, or other abuse, may be reported in the system.

Please note that the investigation of reports submitted anonymously may be dispensed with.

Who may submit a report in the whistleblowing system?

- a person employed by the Company;
- a former employee whose employment relationship with the Company has ended;
- a person who intends to enter into an employment relationship with the Company, where the procedure for establishing that relationship has already begun;
- a sole trader or single-member company that:
 - has a contractual relationship with the Company, or
 - is in the process of establishing such a relationship, or
 - whose relationship with the Company has already ended;
- a person holding an ownership interest in the Company, or a member of the Company's administrative, management or supervisory body — including non-executive members — who:
 - currently has such a relationship with the Company, or
 - is in the process of establishing such a relationship, or
 - whose relationship with the Company has already ended;
- a person working under the supervision and direction of a contractor, subcontractor, supplier or agent who:
 - has a contractual relationship with the Company, or
 - is in the process of establishing such a relationship, or
 - whose relationship with the Company has already ended;
- a trainee or volunteer who:
 - currently has such a relationship with the Company, or
 - is in the process of establishing such a relationship, or

- whose relationship with the Company has already ended.

An acknowledgement of receipt must be sent to the reporting person within 7 days of the receipt of a written report submitted through the internal whistleblowing system. The report must be investigated within the shortest time permitted by the circumstances, but no later than 30 days from its receipt. In the course of the investigation, the operator of the internal whistleblowing system maintains contact with the reporting person, and may in this context invite the reporting person to supplement or clarify the report, to help establish the facts, or to provide further information.