

Information on the setting up of the whistleblowing system

The purpose of this notice is to provide the Company's employees, other employees and contractors with the opportunity to report any activities, omissions, irregularities or irregularities of concern that they may have observed, which they believe to be or may be suspected of being illegal, through a secure, anonymous channel designated for this purpose.

What is whistleblower protection?

The background to the legislation is Directive 2019/1937 on the protection of persons who report violations of EU law ("Whistleblowing Directive", "the Directive"), which is, however, not included in the domestic legislation by the Act No. XXV of 2023 on Complaints, Whistleblowing and Rules for Reporting Abuse ("**Whistleblowing Act**") on the importance of whistleblowing and the need to protect whistleblowers as fully as possible, setting out minimum standards for this, and the Company is obliged to operate the so-called **internal whistleblowing** ("BVBR") system in order to comply with this legislation.

What cases can be reported?

According to the provisions of the Whistleblowing Act, information concerning any unlawful or suspected unlawful act or omission or other abuse may be reported.

Illegal activities and abuses of rights can take many forms: whether they are the commission of criminal offences such as corruption, bribery, embezzlement or violations of the applicable laws in the operation of the Company or professional misconduct, harassment, etc., which, if not properly addressed, may lead to serious harm to the public interest or to an individual right or interest.

If the Company has laid down rules of conduct for its employees pursuant to Article 9 (2) of the Labour Code, violations of these rules may also be reported.

In order to facilitate whistleblowers' reporting of abuse, the Company will ensure that they are protected from any illegal detriment.

How can such a notification be made?

The notification can be made via the following e-mail address (*notification made in this way is considered as a BVBR notification*):

bejelentovedelem@ntkft.hu

In addition to the above, notifications may also be sent by postmail to the Company to the following address:

6100 Kiskunfélegyháza, Kunsági Éden út 1.

To ensure protection of the notification, the notification may be made by the notifier in a sealed envelope with the words "whistleblowing" clearly marked on the envelope under the addressee's name, and the Company guarantees that the mailing may only be opened by the person authorized to receive the notification.

Detailed information on how to make a report and how to handle reports is set out in the Misuse Reporting Policy, which is available in printed form at the Company's headquarters or at its branches.

What happens after my notification?

The Company shall ensure that impartial responsible persons, designated for this purpose and authorized to receive such notifications, are in charge of receiving such notifications.

If necessary in the course of the investigation, the notifier may be asked to supplement or clarify the facts of the notification and to provide additional information.

Following a report, the investigation is carried out by the person designated by the Company's management (the person authorized to investigate the notification).

The person authorized to investigate the notification shall investigate the allegations contained in the report within the shortest time possible under the circumstances, but not later than thirty days from the receipt of the report.

What are the rights of the notifier in the procedure after the notification?

If the report has not been made anonymously, the whistleblower will be informed of the procedural rules governing the investigation of the report and of the confidential treatment of the data necessary to establish his/her identity, and will be made aware of the consequences of bad faith.

Written information may be omitted if oral information is provided and the notifier acknowledges this.

If the notification has been made in writing - by e-mail or by postmail via the contact details on the Company's website - the Company will send **an acknowledgement of** the notification within 7 (seven) days and the notifier will receive general information on the procedural and data management rules as described above, or the consequences of bad faith.

The data provided by the notifier to establish his/her identity shall be treated confidentially by the system operator at all stages of the investigation and only in connection with the notification, and may be disclosed only to authorized persons.

The notification will be investigated within a maximum of 30 days from the date of its submission, and if the extension of this deadline is necessary, the Company will inform the notifier of this, together with the expected date of the investigation and the reasons for the extension.

The person designated to receive the notification at the Company shall inform the notifying party in writing (or e-mail) of the investigation of the notification or of the decision not to investigate the notification (and the reasons for such decision), the result of the investigation of the notification and the measures taken or planned.

What rights does the Company have following the notification?

The responsible person may decide, taking into account the seriousness and the elements of the report, to involve other persons in the investigation, e.g. a senior manager, the head of the legal department, other employees or staff members of the department not concerned by the report, etc. However, he/she may only share information on the content of the report and the person concerned with other departments or staff members of the Company to the extent strictly necessary for the investigation.

If, during the investigation, other employees are to be involved in the investigation in order to assess the relevance of the circumstances or to clarify other facts, the protection of the person involved in the investigation must also be ensured.

What is the maximum time for the investigation?

The length of the investigation may not exceed three months from the date of notification, even in the case of an extension.

How is the data processed during the notification?

Within the framework of the internal whistleblowing system, personal data of a) the whistleblower, b) the person whose conduct or omission gave rise to the whistleblowing, and c) the person who may have material information about the facts of the whistleblowing, which is **essential for the investigation of the whistleblowing**, may be processed only for the purpose of investigating the whistleblowing and remedying or stopping the conduct that is the subject

of the whistleblowing, and may be disclosed to a whistleblower protection lawyer or an external organization that may assist in the investigation of the whistleblowing.

Personal data not covered by the above shall be deleted from the data processed in the course of the notification without delay.

Personal data may only be disclosed to the body competent to conduct the procedure initiated on the basis of the notification, if the body is entitled to process the data by law or if the notifier has consented to the disclosure of the data. Without consent, the data of the notifier shall not be disclosed.

Where the notification concerns a natural person, in exercising his or her right of information and access under the provisions on the protection of personal data, the personal data of the notifier shall not be disclosed to the person requesting the information.

The transfer of data processed in the course of an abuse report to a third country or an international organization may only take place if the recipient of the transfer has given an express legal undertaking (declaration of commitment) to comply with the rules of the Complaints Act in force in Hungary and in compliance with the provisions on the protection of personal data.

What can the notification cover, what exactly does the notification cover?

In all cases, the notification shall contain a description of the suspicion or specific fact, naming, if possible, the exact organizational units (department(s), business unit(s), regional headquarters, etc.), person(s), facts or factors or elements that led to the suspicion, in order to ensure an effective investigation.

In which cases can the Company not investigate the notification?

In the case of a notification from an unidentified notifier, the investigation may be waived.

The substantive examination of the notification may also be waived if

- by a person who is not authorized to do so,
- a notification is a repeated notification by the same notifier with the same content as the previous one,
- the harm to the public interest or to an overriding private interest would not be proportionate to the restriction of the rights of the natural or legal person (hereinafter together referred to as the "person concerned") resulting from the investigation of the notification.

The person authorized to receive the notification shall inform the non-anonymous reporter of the decision not to proceed with the investigation.