

INFORMATION NOTE

– on the functioning of the whistleblowing system under the Complaints Act¹ –

I. MAGYARMET FINOMÖNTÖDE KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG (2060 BICSKE, KANIZSAI ÚT 12, 25196159-2-07) is committed to preventing and appropriately addressing any unlawful acts and omissions or suspected unlawful acts and omissions, or abuse, in connection with its activities or in relation to its person. The Company's whistleblowing system for reporting abuses is operated by MKVK Oktatási Központ Kft. (1063 Budapest Szinyei Merse u. 8., tax number: 11891019-2-42). In the internal whistleblowing system, which is designed in accordance with the requirements of the Complaints Act, the categories of persons (employees) in a legal relationship as defined by law are entitled to make disclosures² in the following way(s):

- a. By phone at the phone number +36 30 724 5096. Order of receipt of disclosures: on Wednesdays between 10 am-12 pm, if it is a working day. A record shall be made of the disclosure made.
- b. By post addressed to MKVK Oktatási Központ Kft., 1063 Budapest Szinyei Merse u. 8. To ensure data confidentiality, the envelope must be marked as follows: "Disclosure"
- c. Via an online disclosure interface in the following system: Panaszrendszer.hu <https://panaszrendszer.hu/bejelentes> MKVKOK Oktatási Központ Kft.

To quickly access the online interface, please use the QR code below:



We shall investigate the disclosures within 30 days (3 months in justified cases) and inform the non-anonymous whistleblower of the outcome. During the investigation, further information may be requested from the whistleblower. Please note that we will not investigate anonymous disclosures, disclosures made by a person other than the whistleblower under the Complaints Act or disclosures with the same content as a previous disclosure made by the same person. Furthermore, a disclosure may be exempted from examination if the harm to the public interest or to an overriding private interest would be disproportionate to the restriction of the rights of the natural or legal person concerned by the disclosure resulting from the examination of the disclosure. We shall inform the whistleblower in writing of an omission of the disclosure and the reasons for the omission, the outcome of the investigation of the disclosure, the action taken or envisaged (including any criminal charges brought), except in the case of information provided orally and accepted by the whistleblower. The whistleblower protection provisions of the Complaints Act give special protection to lawful disclosures made by a bona fide whistleblower and declare unlawful any action detrimental to the person of the whistleblower which is taken because of the lawful making of the disclosure and which is taken in the context of a specific legal relationship or connection with the employer. The processing of personal data is governed by the provisions of the GDPR and the Complaints Act.

The procedural and data processing rules for the receipt and handling of disclosures in the internal whistleblowing system are set out in the rules on the operation of the internal whistleblowing system of MAGYARMET FINOMÖNTÖDE KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG. Detailed information on the procedural and data processing rules will be provided to the whistleblower upon receipt of the disclosure or, in the case of disclosures made in writing, within 7 days of receipt of the disclosure.

II. Separate whistleblowing systems:

State and government bodies, as defined in the Complaints Act and the relevant Government Decree, operate a separate whistleblowing system to receive disclosures of unlawful acts and omissions or suspected unlawful acts and omissions, or abuse, to which anyone can make disclosures anonymously or non-anonymously. The bodies required to operate a separate whistleblowing system and their procedures are governed by the Complaints Act and their own internal rules.

¹ Act XXV of 2023 on Complaints, Disclosures of Public Interest and the Rules for Reporting Abuses.

² Section 20(2), Section 20(3) of the Complaints Act

Bicske, 15.12.2023

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