

Joint whistleblowing policy

1. Introduction

With the Act XXV of 2023 on complaints, whistleblowing and rules related to whistleblowing (hereinafter: the Complaints Act), the

- Airon Trust Fiduciary Asset Management Kft. (25550557-4-43),
- Airon Consulting Kft. (13149387-2-43),
- Airon Corporate Services Kft. (13668626-2-43),
- Airon Private Clients Kft. (24845049-1-43), and
- Airon Accounting Bt. (22874850-1-43) (a hereinafter: **Companies**)

has been required to set up an internal whistleblowing system (hereinafter: **Whistleblowing System**). As permitted by the Complaints Act, the Companies shall operate a Joint Whistleblowing System, which is regulated by this Joint Whistleblowing Policy (hereinafter: Policy).

We believe it is important that both internal and external employees receive prompt and effective redress through the establishment of the Whistleblowing System and whistleblower protection measures, and that their complaints are properly investigated, ensuring the transparent and compliant operation of the Companies.

Companies are committed to full compliance with the law and the scope of the Policy is therefore extended to include Clients.

The Airon Joint Privacy Statement is available in the following file: [Airon Joint Privacy Statement](#)

2. Definitions

- Complaint:** *a complaint is a request for redress for a violation of an individual right or interest, which is not subject to any other procedure, in particular judicial or administrative. A complaint may also contain a proposal;*
- Public interest report:** *a public interest report is a report drawing attention to a situation the remedying or removal of which is in the interest of the community or society as a whole. A public interest report may also contain a proposal;*
- Whistleblower Protection Officer:** *the impartial person or department designated by the Companies for this purpose to operate the internal whistleblowing system;*
- Report:** *a verbal or written communication containing a complaint or a Public Interest Report, which is submitted to the Whistleblower Protection Officer by the Whistleblower through the Whistleblowing System;*
- Whistleblower:** *a person who makes a Report verbally or in writing through the Whistleblowing System;*
- Person concerned by a report:** *a natural or legal person concerned by a Report;*
- Employment relationship:** *any legal relationship in which an employed person performs an activity for and under the direction of an employer for remuneration or for self-employment;*
- Employer:** *a person who employs a natural person under an employment relationship;*
- Employee:** *a natural person who performs an activity for and under the direction of the Employer within the framework of an Employment relationship for remuneration or who performs an activity for his/her own employment.*
- Client:** *the name of the natural person or the natural person's representative of the legal person in the case of a contractual relationship between the Companies and the Whistleblower.*

3. The Whistleblowing System and the Whistleblower Protection Officer

The Whistleblowing System, operated by the Companies, allows you to report information about an act or omission or other abuse that gives rise to a Complaint or Public Interest Report.

Contact details of the Whistleblower Protection Officer:

- Name: dr. Hancz Patrik
- Phone: +36 20 588 4444
- E-mail: co@airon.hu

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4. Persons entitled to make a Report

You can make a Report in the Companies' Whistleblowing System:

- a) an Employee employed by the Companies;
- b) an Employee who has terminated employment with the Companies;
- c) a person who wishes to establish an employment relationship with the Companies and for whom the procedure for establishing such a relationship has been started;
- d) a self-employed person or a sole proprietorship, if he has a contractual relationship with the Companies;
- e) any person who holds an ownership interest in the Companies and any person who is a member of the administrative, management or supervisory body of the Companies, including a non-executive or supervisory director;
- f) a person who has commenced a procedure for entering into a contractual relationship with the Companies and who is or has been a contractor, subcontractor, supplier or person under the supervision and control of a nominee;
- g) trainees and volunteers working for the Companies;
- h) any person who wishes to enter into a legal or contractual relationship with the Company as referred to in points (d), (e) or (g) and in respect of whom the procedure for the establishment of such a legal or contractual relationship has been started;
- i) a person who has terminated a legal or contractual relationship with the Companies pursuant to points (d), (e) or (g) and
- j) the Client.

5. Ways to make a Report

- 5.1. The Whistleblower may make the Report in writing or verbally. A verbal report may be made in person. The personal filing may be made by appointment at the registered office of the Companies (1126 Budapest, Szendrő street 30., 2nd floor 1) on working days.
- 5.2. If the Whistleblower makes his/her Report in person, the Whistleblower Protection Officer shall, after having been informed in accordance with the provisions on the protection of personal data, record the verbal report in a durable and retrievable form or put it in writing and, after providing the possibility to verify, correct and accept it by signature, hand it over to the Whistleblower in duplicate.
- 5.3. The Whistleblower Protection Officer shall make a full and accurate record of the verbal Report in writing.
- 5.4. In the case of an verbal report, the person responsible for whistleblowing shall draw the attention of the whistleblower to the consequences of reporting in bad faith, to the procedural rules governing the investigation of the report and to the fact that the identity of the whistleblower, if he/she provides the information necessary to establish it, will be kept confidential at all stages of the investigation of the report.
- 5.5. In the case of a written Report, the Whistleblower Protection Officer will send an electronic confirmation of the submission of the Report to the Whistleblower by e-mail within 7 days of receipt of the written Report. In the confirmation, the Companies will provide the Whistleblower with general information on the procedural and data processing rules.

6. The process of investigating a Report

- 6.1. The Whistleblower Protection Officer responsible for the protection of whistleblowers shall investigate the facts contained in the Report received by him/her within the shortest possible time, but not later than 30 days from the date of receipt of the Report. This time limit may be extended in particularly justified cases and the Whistleblower shall be informed at the same time. In this case, the Whistleblower shall be informed of the expected date of the investigation and the reasons for the extension of the investigation by a short e-mail. The time limit for investigating the Report and informing the Whistleblower shall not exceed 3 months in the case of an extension.
- 6.2. During the investigation of the report, the Whistleblower Protection Officer responsible for the protection of whistleblowers shall maintain contact with the whistleblower, and may invite the whistleblower to supplement or clarify the Report, to clarify the facts and to provide additional information.

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- 6.3. The investigation of the Report may be omitted if
- a) the Report was made by an unidentified Whistleblower;
 - b) the Report was not made by a person authorised to make the Report;
 - c) the Report is a repeated Report by the same Whistleblower with the same content as the previous Report; or
 - d) the harm to the public interest or to an important private interest would not be proportionate to the restriction of the rights of the person concerned by the Report resulting from the investigation of the Report.
- 6.4. If the investigation of the Report may be omitted, the Whistleblower Protection Officer must, pending the determination of this fact shall be responsible for receiving and recording the Report and for providing the information relating to the Report.
- 6.5. In the process of investigating a Report, the relevance of the circumstances set out in the Report shall be assessed and appropriate measures shall be taken to remedy the acts or omissions or other abuses that are or are suspected to be illegal.
- 6.6. The Whistleblower Protection Officer shall inform the Whistleblower in writing of the investigation or non-investigation of the Report and the reasons for the non-investigation, the outcome of the investigation of the Report, and the measures taken or planned. The written information may be omitted if the Whistleblower Protection Officer has informed the Whistleblower verbally, who has taken note of the information.
- 6.7. The Whistleblower Protection Officer shall provide clear and easily accessible information on the operation of the whistleblowing system, the procedure for making a report and the whistleblowing systems and procedures.
- 6.8. If the content of the Report warrants the initiation of criminal proceedings, arrangements shall be made to bring criminal charges.

7. Rules on data processing in relation to the Report

- 7.1. Within the framework of the Whistleblowing System
- a) the Whistleblower,
 - b) to the person whose conduct or omission gave rise to the Report; and
 - c) the person who may have information relevant to the facts contained in the Report, personal data which are essential for the investigation of the Report may be processed only for the purposes of investigating the Report and remedying or stopping the conduct which is the subject of the Report.
- 7.2. Personal data not covered by point 7.1 shall be deleted without delay from the data processed within the framework of the Whistleblowing System.
- 7.3. Personal data of the Whistleblower, with the exception of data of a Whistleblower who has provided manifestly bad faith or false information, may only be transferred to a public body or authority competent to conduct proceedings initiated on the basis of the Report, if such public body or authority is entitled to process the data by law or if the Reporting Party has consented to the transfer of its data. The personal data of the Whistleblower shall not be disclosed without his/her explicit consent.
- 7.4. If it has become obvious that the Whistleblower has provided false data or information in bad faith and there are circumstances indicating that a crime or an offence has been committed, the Whistleblower's personal data must be disclosed to the competent public authority or person, and there are reasonable grounds to believe that the Whistleblower has caused unlawful damage or other legal harm to another person, the personal data must be disclosed upon request of the competent public authority or person.
- 7.5. If the Report relates to a natural person, in the exercise of the right of information and access of that natural person under the provisions on the protection of personal data, the personal data of the Whistleblower shall not be disclosed to the person requesting the information.
- 7.6. The transfer of data processed within the framework of the Whistleblowing System to a third country or an international organisation may only take place in the case of a legal commitment by the recipient of the transfer to comply with the rules on whistle-blowing set out in the Complaints Act and subject to the provisions on the protection of personal data.
- 7.7. Personal data of a Whistleblower who reveals his or her identity, of a person covered by a Report, or of a person who may have relevant information about the facts contained in a Report, shall not be disclosed to persons other than those entitled to know them. Until the investigation is concluded or formal charges are initiated as a result of the investigation, the persons investigating the Report may share information about the content of the Report and the person concerned in addition to the information provided to the person

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concerned in the Report with other departments or employees of the Company to the extent strictly necessary for the conduct of the investigation.

- 7.8. The person subject to the Report and any person who may have material information about the facts contained in the Report shall be informed in detail about the Report, his or her rights regarding the protection of his or her personal data and the rules on the processing of his or her data at the start of the investigation. In accordance with the requirement of a fair trial, it should be ensured that the person concerned by a Report or in possession of material information about the facts contained in a Report can express his views on the Report through his legal representative and that he can provide evidence in support of his views. Exceptionally, and in duly justified cases, the person subject to the Report or in possession of material information relating to the Report may be informed at a later stage if immediate information would impede the investigation of the Report.
- 7.9. Information on legal remedies: in Hungary, the data protection supervisory authority is the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH, address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C, e-mail: ugyfelszolgalat@naih.hu). The decision of the NAIH may be subject to judicial review.

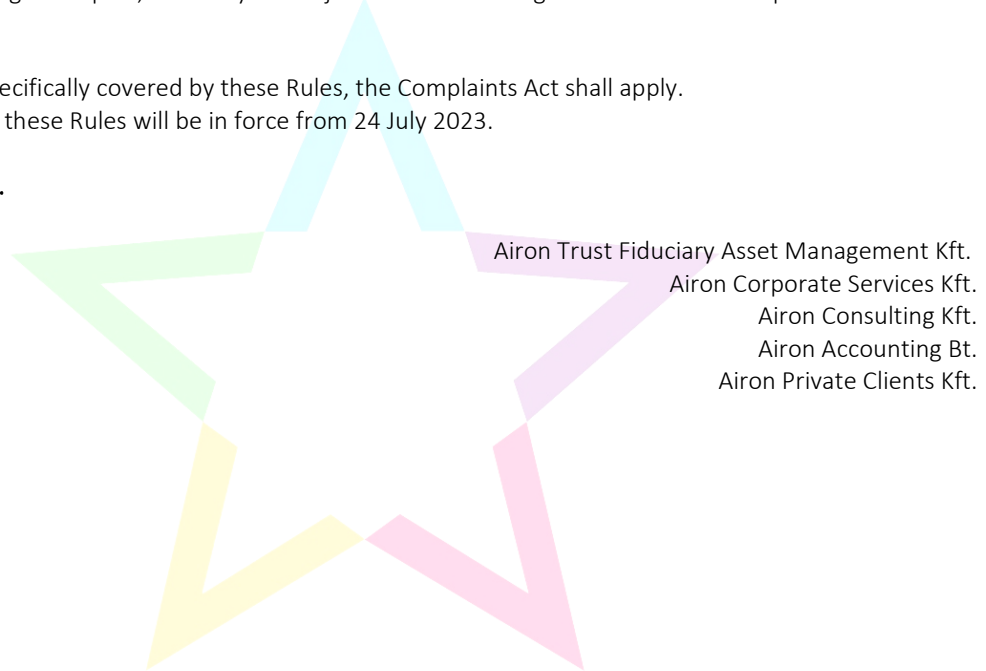
8. Protection of Whistleblowers

- 8.1. Any action that is disadvantageous to the Whistleblower,
- is taken because of the lawful making of the Report; and
 - is taken in connection with the legal relationship or connection as defined in paragraph 4, shall be unlawful even if it would otherwise be lawful.
- 8.2. A disadvantageous measure is an act or omission which is disadvantageous to the Whistleblower, in particular
- suspension, collective redundancy, dismissal or equivalent measures;
 - the transfer of duties, change of place of work, reduction of pay, change of working hours;
 - refusal to provide training;
 - negative performance appraisals or job references;
 - the application of any disadvantageous legal consequence under the law applicable to his/her employment relationship, in particular disciplinary measures, reprimands, financial sanctions;
 - coercion, intimidation, harassment or ostracism;
 - discrimination, disadvantageous or unfair treatment;
 - failure to convert a fixed-term employment relationship into an employment relationship of indefinite duration, if the Employee had a legitimate expectation that his/her employment relationship would be converted into an employment relationship of indefinite duration;
 - failure to renew or early termination of a fixed-term employment contract;
 - damage, which includes damage to a person's reputation or financial loss, including loss of business opportunity and loss of income;
 - an action as a result of which it may reasonably be concluded that the person concerned may not in the future establish an employment relationship in the sector in which he or she is employed;
 - the requirement of a medical assessment;
 - early termination or cancellation of a contract for goods or services; and
 - withdrawal of the licence.
- 8.3. In administrative or judicial proceedings relating to an disadvantageous action, if the Whistleblower proves that the Report was lawfully made, the disadvantageous action shall be presumed to have been taken because of the lawful making of the Report and the burden of proof shall be on the person who took the disadvantageous action to prove that the disadvantageous action was taken for a valid reason and not because of the lawful making of the Report.
- 8.4. Where a Report has been lawfully made, the Whistleblower shall not be deemed to have breached any restriction on disclosure of a legally protected secret or any other legal restriction on disclosure of information and shall not be liable in respect of such a Report if the Whistleblower had reasonable grounds to believe that the Report was necessary to disclose the circumstances to which the Report relates.
- 8.5. Where a Report has been lawfully made, the Whistleblower shall not be liable for obtaining or having access to the information contained in the Report unless the Whistleblower has committed a criminal offence in obtaining or having access to the information. A Whistleblower shall not be held liable for lawfully making a Report if the Whistleblower had reasonable grounds to believe that the Report was necessary to disclose the circumstances to which the Report relates.
- 8.6. It is lawful to make a Report if,

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- a) the Whistleblower has made the Report in accordance with the rules set out in the Whistleblowing System, in these Rules or in the Complaints Act;
 - b) the Whistleblower obtained the reported information concerning the circumstances to which the Report relates in the context of his or her employment-related activities; and
 - c) the Whistleblower had reasonable cause to believe that the information reported concerning the circumstances covered by the Report was true at the time of the Report.
- 8.7. The protection afforded to a Whistleblower shall apply to a person who
- a) provides assistance to a lawful Whistleblower in making a Report,
 - b) a person related to the person making a lawful Report, in particular a co-worker or family member of the person making the report, who may be subject to a disadvantageous measure under point 8.1.
9. **Mixed provisions**
- 9.1. In matters not specifically covered by these Rules, the Complaints Act shall apply.
- 9.2. The provisions of these Rules will be in force from 24 July 2023.

Budapest, 2023.07.24.



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