

## REPORTING INCIDENTS THAT COMPROMISE INTEGRITY

European Power Services Zrt. operates a whistleblowing system to ensure its lawful and prudent operation. The purpose of the whistleblowing system is to ensure that there is a reporting forum and procedure in accordance with the provisions of Act CLXV of 2013 *on Complaints and Public Interest Disclosures* in the case of violations by employees of the law and the Code of Ethics Rules document available on the Company's website. European Power Services Ltd. maintains dedicated channels (so-called "whistleblowing" channels) for receiving reports of violations of organisational integrity and for lodging whistleblowing complaints.

An incident that breaches organisational integrity is considered to be, in particular, but not limited to:

- any violation of the provisions set out in the Code of Ethics of the European Power Services Zrt.
- corruption,
- fraud, and
- abuse.

The whistle-blower is expected to make the report in good faith and to provide all relevant information known to him or her to enable a proper assessment and investigation of the case. European Power Services Ltd. shall ensure that no whistle-blower shall suffer any detriment, harassment or any other form of retaliation or discrimination as a result of providing information in relation to suspected incidents of integrity breaches, while false or untrue reporting made in bad faith may result in legal consequences depending on the content of the report. The whistle-blower shall not be prejudiced or suffer any disadvantage even if the notification made in good faith proves to be unfounded during the investigation.

For a successful investigation of the notifications, at least the following information is required:

- information essential to the identification of the person complained about for breaches of the Code of Ethics or other breaches of organisational integrity;
- a description, as specific and detailed as possible (place, date, act, natural or legal persons involved), of the reported incident, ethical breach or breach of conduct that compromises organisational integrity;
- documents, information, means of proof at the disposal of the notifier that could be suitable to prove the case and/or data on their availability;
- identification of the persons who may attest to or have knowledge of the reported event, act or circumstances.

Notifications can be made through the following channels:

- Via e-mail: [compliance@eupowers.hu](mailto:compliance@eupowers.hu)
  - By post: Addressed to: European Power Services Zrt. Compliance Function, 1037 Budapest, Montevideo utca 3/A. 3.em. 34/A.,
- or
- <https://mvm.hu/Rolunk/KozerdekuInformaciok/IntegritastSertoEsemeny>

If the notification is made by post, the notification shall be sent in a sealed envelope and shall be marked as follows: „Integritást sértő esemény bejelentése” / “Reporting an incident compromising integrity”

Further information on reporting incidents that breach integrity:

- the e-mail account is checked daily,
- European Power Services Zrt. will investigate all notifications,
- only the designated staff member of European Power Services Zrt. - in charge of the Compliance function - has access to the notifications, and the confidentiality of the notification is guaranteed,
- anonymous reporting is possible, but even in this case it is necessary that at least some contact details of the whistle-blower (e.g. e-mail address, postal address or P.O. Box address) are known to European Power Services Zrt. in order to facilitate the efficient conduct of the investigation, to provide further information and to allow for feedback,
- whistle-blower reports are investigated in accordance with the relevant internal rules of European Power Services Zrt. (EPS-19-03: Internal Rules for the Handling of Incidents of Breach of Integrity within European Power Services Zrt.),
- as a first step in the procedure, an assessment is made as to whether the notification raises a suspicion of an integrity breach and, if so, an integrity breach investigation is launched, which concludes with an investigation report,

by submitting a notification, the whistleblowing natural person consents to the processing of his or her personal data as described in the "Privacy Notice for Whistle-blowers" (in Hungarian: [„Privacy Notice \(i.e. Privacy Policy\) on processing of personal data subject to individual consent to natural persons who notify the data controller of incidents breaching the integrity”](#)).

---