

## **Whistleblowing System**

### **General Information**

MBH Bank Nyrt. (hereinafter: Bank) is operating an internal whistleblowing system falling under the scope of Act XXV of 2023 on Complaints, Notifications of Public Interest and the Rules for Whistleblowing (hereinafter referred to as: Whistleblowing Act). The purpose of the adoption of the Whistleblowing System is to enable rapid flow of information to ensure that the Bank's competent decision makers – organisations and persons alike – are informed in time, preferably immediately when the actual threat arises, so that they can take the necessary actions to prevent, avert and mitigate damage. This general information notice sets out the rules concerning the Whistleblower in relation to the whistleblowing channels, the procedural rules and data processing. The whistleblowing system makes it possible for all persons eligible to whistleblow to share with the Bank their knowledge and what they have detected or observed, upon experiencing any infringement, violation of the in-house regulations or policies, occurrence or permanent existence of violation of legitimate interests during the operation of the Bank, and it enables the Bank to receive and follow up on such information as well as to take the necessary actions.

#### **The following persons may file reports in the internal whistleblowing system (may be a Whistleblower):**

- a) an Employee (the natural person performing activities for, and under the direction of, MBH Bank or any member of the MBH Group [hereinafter collectively referred to as: Employer] under a legal relationship aimed at engaging others in work, or employing themselves, in exchange for consideration),
- b) any person whose legal relationship aimed at engaging them in work has lapsed or been terminated,
- c) any person who wishes to establish a legal relationship with the Employer with the aim of engaging them in work and the procedure to this end has been started,
- d) an individual entrepreneur or sole proprietorship if he/she or it is in a contractual relationship with the Employer,
- e) an person who or which has a shareholding in the Employer, any person who is a member of the Employer's body exercising rights of management or supervision, including members who are not executives,
- f) a contractor, subcontractor, supplier who or that has started a procedure aimed at establishing, or one who or that has, a contractual relationship with the Employer or a person supervised or managed/controlled by a contractor,
- g) a trainee or volunteer performing activities at the Employer,
- h) any person intending to establish a legal relationship (including contractual relationship) with the Employer as specified in paragraphs d)-e) or g) in whose case the procedure aimed at establishing such legal relationship has started,
- i) a person whose legal relationship (including contractual relationship) referred to in paragraphs d)-e) or g) with the Employer has ceased.

#### **I. The way of reporting and the procedural rules on investigations**

##### **The forms of reporting:**

- anonymous (by mail or e-mail, using a registered nickname)
- open reporting

In the case of open reporting the Whistleblower must give their name, place of work (name and registered office of the legal entity concerned), employee ID and organisational unit. The report must include the suspicious circumstances observed by the individual, the event(s) and person(s) concerned.

Moreover, the Whistleblower must make a declaration stating that they file the report in good faith about circumstances they have knowledge of, or reasonable grounds to believe that they are true.

It should be noted that in the case of a report filed in ill faith when it becomes obvious that the case warrants civil or criminal proceedings against the Whistleblower, the Bank has an obligation to provide the body or person authorised to conduct the proceeding with the Whistleblower's personal data.

**The Bank enables reports to be made orally or in writing, through the following channels.**

Written reports may be filed:

- By mail, addressed to: *MBH Bank Nyrt. Compliance és pénzmosásmegelőzés, 1117 Budapest, Magyar tudósok körútja 9. G épület* – The following should be written on the envelope: Általános Compliance vezető, S. K. bizalmas! (to the General Compliance Officer in person) or
- By e-mail, addressed to: [anonimbox@mbhbank.hu](mailto:anonimbox@mbhbank.hu)  
Mails received at this address will only be accessed by the heads and dedicated staff members of the organisational units authorised to conduct such investigations (Compliance and AML, Bank Security, Internal Control).  
Please be aware that messages sent to the above e-mail addresses are not suitable for anonymous reporting, as the sender's email address is identifiable. In case you wish to file a report anonymously by e-mail, you should create a separate email address or use an online disposable e-mail address.  
It should be noted that if you opt for anonymous whistleblowing the case may not necessarily be investigated.
- The Bank's employees may also file such reports in the so-called Anonim Box, available on the Bank's server. Whistleblowers sending reports through this application cannot be identified on the basis of their e-mail addresses; if the individual does not share any other personal data they can file their report anonymously.

The Bank will send written confirmation to the Whistleblower of its receipt of a written report within 7 days.

A report may be made orally as follows:

- at the address of *1117 Budapest, Magyar Tudósok körútja 9., in building G*, at Compliance and AML – General Compliance

An oral report will be recorded by the Bank in writing and hand one copy of the resulting document to the Whistleblower after making it possible for them to review, correct and accept its content.

Such record must also be signed by the Whistleblower. While preparing the record the Bank brings the following to the Whistleblower's attention:

- the consequences of a report made in ill faith,
- the procedural rules governing the investigation of the report and

- the fact that his or her identity – in case they share the data required for their identification – will be treated confidentially during all phases of the investigation.

Please be informed that the investigation may be waived, if

- the report was made by an unidentifiable Whistleblower;
- the report was not made by the person who is authorised to do so;
- another report of the same content has been made by the same person;
- the prejudice to public interest or overriding private interest would obviously not be proportionate to the restriction of the rights of the person concerned with the report resulting from its investigation;
- the report was made after six months of the Whistleblower's becoming aware of the reported activity or omission;
- the report makes no sense.

The internal whistleblowing system is operated by the Bank's Compliance and AML division. The investigation is conducted on the basis of a lawfully made report by Compliance and AML or Bank Security, depending on the content of the report. The Bank investigates the report within the shortest possible time frame but not later than 30 days from the date of receipt. This time limit may be extended in particularly justified cases not more than twice, along with simultaneous notification of the Whistleblower. In such a case, the Bank informs the Whistleblower of the expected date of the completion of the investigation and the reasons for the extension of the procedure. The duration of even an extended investigation shall not exceed three months.

The Bank informs the Whistleblower in writing of the investigation – or of the fact that no investigation will take place, together with its reasons – as well as its findings and the actions taken or planned to be taken on the basis thereof.

### **Whistleblower protection**

The Whistleblower is protected by all available legal means during the investigation:

- The Whistleblower bears no liability regarding the report, provided he or she had reasonable grounds to believe that reporting was necessary. The Whistleblower cannot be held liable for lawfully making the report, provided they had reasonable grounds to believe that the report was necessary for uncovering the circumstances concerned.
- The Whistleblower is protected against discrimination and unfair treatment throughout and after the procedure, without time limit. Any form of retaliation for Whistleblowing, whether official or private, is an ethical violation in itself, regardless of the significance of the original issue.
- The Bank keeps the identity of the Whistleblower confidential throughout the investigation, if they have provided the necessary data to establish it.

The rights described above also apply to persons who are interviewed during the investigation and who have relevant information relating to the report or who provide information that constitutes a report.

Please note that, in accordance with the provisions of the Complaints Act, the person affected by the report will also be informed of the content of the report during the investigation. However, the right to information and access shall not extend to the disclosure of the personal data of the person making

the report. This protective measure aims to preserve the confidentiality of the identity of the Reporting Person.

## II. Rights and obligations of the person affected by the report

At the start of the investigation, the person whose conduct or omission triggered the report shall hereinafter be referred to as the *person affected by the report*.

The staff conducting the investigation shall disclose the content of the report to the person affected by it at the start of the investigation, unless this would jeopardise the effectiveness of the investigation. In such cases, the information will be provided at a later stage.

During the investigation, the person affected by the Report will be informed of Section III of this notice, which contains the data processing rules. In addition, during the procedure the person affected by the report must be provided an opportunity, either directly or through a legal representative, to comment on the report, express their position on it and support it with evidence.

It is an important rule that the person affected by the Report shall not attempt in any way to discover the identity of the Reporting Person, and even if their identity becomes known, they shall not take any action that could be detrimental to the Reporting Person. During the investigation such conduct may be considered an aggravating circumstance or it may form the basis for initiating further proceedings to investigate suspected ethical misconduct after the investigation has been closed.

## II. General information on the rules on data processing

### THE CONTROLLER'S DATA

|                             |  |
|-----------------------------|--|
| Controller's name           | <b>MBH Bank Nyrt.</b><br>("Bank" or "Controller")  |
| Registered office           | 1056 Budapest, Váci u. 38.   |
| Central contact details     | E-mail: <a href="mailto:ugyfelszolgalat@mbhbank.hu">ugyfelszolgalat@mbhbank.hu</a><br>Telephone: 06 80 350 350 ( <b>TeleBANK</b> ) |
| Web                         | <a href="http://mbhbank.hu">mbhbank.hu</a>   |
| Company registration number | 01-10-040952   |

### DATA PROTECTION OFFICER'S CONTACT DETAILS

|                 |  |
|-----------------|--|
| Mailing address | 5600 Békéscsaba, Andrásy út 37-43.                                 |
| E-mail address  | <a href="mailto:adatvedelem@mbhbank.hu">adatvedelem@mbhbank.hu</a> |

Any request, question, complaint relating to the protection of personal data or any request relating to the exercise of a right or rights relating to the processing of personal data should be made to MBH Bank Nyrt's data protection officer.

## PURPOSE OF PROCESSING PERSONAL DATA, LEGAL BASIS AND SCOPE OF DATA PROCESSED, RETENTION PERIOD

In the case of an open report, the purpose of processing is to investigate the report and to remedy or eliminate the conduct that is the subject of the report.

The categories of data processed: personal data of the Whistleblower, those of the person whose conduct or omission gave rise to the report and of the person who may have the relevant information about the facts contained in the report, which are indispensable for the investigation of the report.

The data processed: the name of the Whistleblower, and in the case of Employees the place of work, employee ID, organisational unit. The event and the person concerned must be identified in the report.

The Company will immediately delete any personal data other than the above that comes to its knowledge in connection with the investigation of the report, or, if such additional data include any data that are necessary for the investigation as described above, it will render illegible the other data that are not necessary for the investigation.

The purpose of processing is to fulfil the obligation laid down in Article 6 (1) c) of the GDPR pursuant to Act XXV of 2023 on Complaints, Whistleblowing and the Rules for Reporting Abuse.

Unless otherwise provided by law, the Data Controller shall process the personal data provided during the notification in accordance with the general limitation period, i.e. for 5 years from the completion of the investigation of the report.

The personal data of the Whistleblower and the person concerned in the report may be known and processed only and exclusively by the limited circle of persons authorised to do so, acting in exercise of their duties under this information notice, involved in the receipt and investigation of the report.

## AUTOMATED DECISION MAKING AND PROFILING

The Bank does not carry out any decision-making or profiling based on automated data processing in connection with data processing.

## THE RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 15-22 of the GDPR the Data Subject has the right to:

- request **access** to their personal data;
- request **rectification** of their personal data;
- request **erasure** of their personal data;
- request **restriction** on the processing of their personal data;
- request data **portability**;
- **object** to the processing of their data based on the Bank's legitimate interest; and
- request not to be subject to a decision based solely on **automated processing**;
- **withdraw** their **consent** to processing; and
- **lodge a complaint with the Bank** in relation to processing; and



- **lodge a complaint with the competent supervisory authority** or turn to court.

Detailed information on your rights relating to data processing and on possible legal remedy is available in the General Privacy Notice at [mbhbank.hu/adatvedelem](https://mbhbank.hu/adatvedelem) and, in the case of Employees, in the Employee Privacy Notice.