

Employer Whistleblowing System

Rules related to handling of whistleblower's reports

Deutsche Telekom TSI Hungary Kft. and Deutsche Telekom ITTC Hungary Kft. (referred to hereinafter as "Company") operates an internal whistleblowing system in compliance with the provisions of *Act XXV of 2023 on complaints, disclosures in public interest, and related rules on reporting abuses, (commonly known as the Whistleblower Protection Act)*, which is intended to ensure the reporting of any violations of the rules of conduct and other corporate rules set out in the Company's Code of Conduct, unlawful or allegedly unlawful actions or omissions, as well as information concerning other forms of abuse.

The purpose of this policy is to set out the rules and procedures associated with the whistleblowing system that operates at the Company.

1.1. WHISTLEBLOWER PROTECTION

No retaliation, discrimination or unfair treatment of any kind whatsoever may be imposed on a whistleblower where they will have acted in good faith. Nor shall a whistleblower be subject to any disadvantage if the report they will have made in good faith is found to be unsubstantiated during the investigation.

In the case of lawfully filed reports, protection is due to whistleblowers under law if they have been subjected to an adverse measure and the reported action stands in breach of certain EU laws and national statutory instruments ensuring their harmonized implementation. Such statutory instruments include the Union acts that are listed in Annex 1 and Annex 2 to *Act XXV of 2023 on Complaints, Disclosures in the Public Interest and Rules Associated with the Reporting of Abuse*, or the statutory provisions that ensure their implementation.

Reports filed in bad faith will be forwarded to the Company and, if necessary, to the authorities with appropriate powers, and this may also incur consequences under labour, civil and criminal law.

1.2. PARTIES ELIGIBLE TO FILE REPORTS USING THE INTERNAL WHISTLEBLOWING SYSTEM

- a) Employees of the employer,
- b) An employee whose employment relationship with the employer has been terminated, and
- c) Someone who wishes to establish an employment relationship with an employer in whose case the procedure for establishing the said relationship has commenced,
- d) Individual contractors or individual firms, if they are in a contractual relationship with the employer,



- e) Someone who has an ownership stake in respect of the employer, moreover anyone who is a part of the employer's management, executive or supervisory board, including a non-executive members,
- f) Someone who is subject to supervision and management by a contractor, a subcontractor, a supplier or an agent who is or has been in a contractual relationship with the employer, and regarding whom the procedure for establishing a contractual relationship with the employer will have been started,
- g) Interns and volunteers who engage in activities at the employer,
- h) Someone who intends to establish a legal or contractual relationship with the employer within the meaning of subsections (a), (b) or (g) and for whom the procedure for establishing such a legal or contractual relationship will have commenced, and
- i) Someone whose legal or contractual relationship with the employer within the meaning of subsections (a), (b) or (g) has been terminated.

Any legal relationship in which an employee engages in activities for and under the direction of the employer in return for consideration or engages in their self-employment will constitute *employment*.

An employer is the legal entity (Company) that employs the whistleblower in the framework of a legal relationship intended for employment.

1.3. HOW REPORTS CAN BE FILED

The whistleblower has the option to file a report through the following channels that are in place at the Company:

- Letter: Addressed to DT TSI Hungary Kft. Compliance Officer (1097 Budapest, Könyves Kálmán körút 36.) The caption "Intended for the original recipient only" must be marked on the envelope.
- Online portal: <https://deutsche Telekom IT Solutions.whistleblowing.biz/>
- E-mail to DT TSI Hungary Kft.: FMB-HU-DT-SYSO-Compliance
- E-mail to DT ITTC Hungary Kft.: FMB-HU-DT-ITTC-Compliance@t-systems.com
- In person: contact Compliance Management team

In the case of reports filed using the online portal, making reports anonymously is also possible.

Verbal reports are possible in person, and must be recorded in writing, a duplicate counterpart of which must be given to the whistleblower, providing them with an opportunity for verification, correction and signing off in acceptance.

In the case of verbal reports, whistleblowers will be informed about the consequences of reporting in bad faith, the procedural rules governing the investigation of the report and – where they provide details required for establishing their identity – the confidentiality of their identity.

If the content of a report is related to the operation of the parent company or the operation of other companies in the group or the conduct of their employees, filing the report will also be possible using Deutsche Telekom GmbH's [whistleblowing channels](#).

1.4. INVESTIGATING REPORTS

Operating the Company's internal whistleblowing system and investigating whistleblower reports falls in the scope of Compliance Management's powers. Depending on the complexity of the matter, other external organisations may also be engaged in the investigation of the report. Those investigating whistleblower reports will maintain the secrecy of information about the content and the individuals involved in the whistleblower report for as long as the investigation is not concluded or formal accountability proceedings are not initiated as the result of the investigation.

Compliance Management will send whistleblowers a confirmation of the report within 7 days of receiving their report filed in writing. In the case of verbal reports, within 7 days of the confirmation of the written content. They will also provide whistleblowers with general information about the procedural and data processing rules under law.

Compliance Management will investigate the allegations made in a whistleblower report within the shortest time possible under the circumstances, but within no later than 30 days from receiving the whistleblower report.

This time limit may be extended in particularly warranted cases, subject to informing the respective whistleblower thereof at the same time. In this case, they will inform the whistleblower about the expected date and the grounds for extending the investigation. The time limit for investigating a whistleblower report and informing the whistleblower in the case of an extension will be a maximum of 3 months.

During the investigation of a whistleblower report, Compliance Management will keep in touch with the whistleblower, in the scope of which it may advise the whistleblower to supplement or elaborate the content for accuracy, to clarify the facts, moreover to make additional information available.

The investigation of a whistleblower report may be waived if

- (a) The report will have been filed by someone other than the person eligible to make the whistleblower report (Section 3.2),
- (b) The report is a repeated report filed by the same whistleblower with content identical to the previous report,
- (c) The harm to public interest or to a cogent private interest would be disproportionate to the restriction of the rights of the person concerned under the whistleblower report resulting from the investigation thereof,
- (d) The investigation of the whistleblower report may also be waived if the complainant will have lodged their complaint six months after becoming aware of the action or omission which the complaint concerns.



At the start of the investigation, the individual subject to the whistleblower report will receive detailed information about the report, their rights to which they are due in commission with the protection of their personal data, and the rules applicable to the processing of their data.

The whistleblowers will be informed about the consequences of reporting in bad faith, the procedural rules governing the investigation of the report and – where they provide details required for establishing their identity – the confidentiality of their identity.

In compliance with the requirements of fair, independent and professional proceedings, the Company will ensure that those subject to a whistleblower report are treated fairly and that the presumption of innocence is asserted in relation to them. The Company will furthermore ensure that those subject to a whistleblower report are permitted to express and provide evidence in support of their position concerning the report – including by way of their legal counsel – at any time. No information will be provided to someone subject to a whistleblower report at the time the investigation is launched in cases where immediate information provision would thwart the investigation of the respective whistleblower report.

When investigating whistleblower reports, Compliance Management will investigate and assess the relevance of the circumstances set out in the report, and the Company will implement measures that will be appropriate for remedying the reported abuses. If a whistleblower report warrants instituting criminal proceedings, the Company will arrange for a criminal complaint to be filed.

If, based on the investigation, the conduct set out in the whistleblower report is not a criminal offence, but nonetheless stands in breach of the Company's rules of conduct, internal policies or rules governing employment, then the Company may instigate employer measures against the employee concerned.

If the investigation concludes that the whistleblower report is unfounded and taking further action is thus rendered unnecessary, Compliance Management will conclude the procedure and delete the data of the whistleblower and those subject to the whistleblower report.

Compliance Management will inform the whistleblower in writing about the investigation of the report or such having been waived, along with the grounds for waiving the investigation, the outcome of the investigation of the report, and any measures instigated or planned. Providing information in writing may be waived where a whistleblower will have been informed verbally and has acknowledged such information provision.

1.5. DATA PROCESSING

Within the framework of the internal whistleblowing system,

- (a) The whistleblower,
- (b) The person whose conduct or omission gave rise to a whistleblower report, and
- (c) Any person who may have substantive information relevant to the matter the whistleblower report concerns,



may have personal data that are essentially necessary for the investigation of a whistleblower report, which in turn will be processed solely for the purposes of investigating the respective report and remedying or eliminating the conduct that is the subject of the respective report. Data may be transferred to an external organisation participating in investigating the whistleblower report.

Any personal data of individuals beyond the scope of the actors mentioned in the previous section will be deleted from the data processed in the framework of the internal whistleblowing system.

The personal data of a whistleblower who will have disclosed their identity, moreover the personal data of someone subject to the whistleblower report, as included in the internal whistleblowing system, may not be disclosed to anyone other than the duly authorised persons. Pending the conclusion of the investigation or the initiation of formal prosecution as a result of the investigation, the persons investigating a whistleblower report may, in addition to informing the person concerned under the whistleblower report, share information about the content of the report and the person concerned with other departments or staff of the employer to the extent strictly necessary for conducting the investigation.

At the start of the investigation, the individual subject to the whistleblower report will receive detailed information about the report, their rights to which they are due in commission with the protection of their personal data, and the rules applicable to the processing of their data.

In the case of verbal reports, whistleblowers will be informed about the consequences of reporting in bad faith, the procedural rules governing the investigation of the report and – where they provide details required for establishing their identity – the confidentiality of their identity.

Where it becomes apparent that a whistleblower has disclosed untruthful data or information in bad faith, and this leads to the arising of circumstances suggesting that a crime or a breach of rules has been committed, or if there are reasonable grounds to believe that they have caused unlawful damage or other legal harm to someone else, their personal data will be transferred at the request of the agency or person authorised to institute and conduct the proceedings.

Where a whistleblower report concerns a natural person, the personal data of the whistleblower may not be disclosed to the person requesting such information in exercising their right of information and access under the requirements on personal data protection.

Transferring data processed within the framework of the internal whistleblowing system to a third country or an international organisation may only take place if the recipient of the transfer has provided a legal commitment for compliance with the rules on whistleblower reporting as provided for in Act XXV of 2023, and having regard to the requirements applicable to the protection of personal data.

Deletion of Personal Data

If the content of a whistleblower report makes it possible to conclude that its investigation falls beyond the scope of *Act XXV of 2023 on Complaints, Disclosures in the Public Interest and Rules Associated with the Reporting of Abuse*, the personal data subject to the whistleblower report will be deleted immediately after waiving the investigation is determined and the whistleblower is notified.

If the investigation reveals that a whistleblower report is not substantiated or that no further action will be necessary, the personal data applicable to the report will be deleted within 60 days of concluding the investigation.



If measures are instigated based on the investigation – including legal proceedings or disciplinary action against the person filing the report – the Company will process the data applicable to the report until the proceedings instituted on the basis of the respective whistleblower report will have been concluded in a final and legally binding manner.

Every three years from when processing is started, the Company will review whether the processing of personal data it or a processor acting on its behalf or under its instructions processes is necessary for the purposes of processing, and document the circumstances and the results of the review.