

Information on procedures for handling claims, public interest reports and events jeopardizing organizational integrity

In the course of its operations, a top priority of Magyar Pénzverő Zrt. (hereinafter: Hungarian Mint Ltd. or the Company) is to ensure compliance with legal regulations, open, honest behaviour and compliance with the standards defined in the Company's Code of Conduct.

The Company has established **procedures for the reporting of** events that jeopardize its prudent operations, in particular **violations, corruption and damages caused in the work environment**, as well as breaches of the Code of Conduct. On the basis of Act XXV of 2023 (Whistleblower Act) on complaints, public interest reports and regulations related to the reporting of violations, reports may be submitted according to the following procedures.

Reports may be submitted by **employees of Hungarian Mint Ltd., suppliers in a contractual relationship with the Company, and anyone else**, who has a fair, legitimate interest in submitting the report or obtaining remedy for the reported behaviour, or calls attention to circumstances the remedy or termination of which serves the interests of the community or society at large, or which pertains to the Company's operation. The report, regardless of whether it is a complaint or a public interest report, may also contain a proposal.

Investigation

The Company shall process reports falling within its scope of competence within 30 (thirty) calendar days of receipt. If it is foreseeable that the investigation underlying the procedure will take longer than thirty days, the reporting person shall be informed, along with notification of the anticipated time of completing the procedure and the reasons for extending such. In the case of public interest reports, the maximum duration of the investigation shall be 6 (six) months, while in the case of other complaints or reports related to internal integrity, the procedure shall last no longer than 3 (three) months.

In the event that the report does not fall under the scope of competence of the Company, the Company shall transfer the report to the competent organization within 8 (eight) days. The reporting person shall be informed of the transfer at the same time.

Upon completion of the investigation, the reporting person shall immediately be notified of the actions taken or not taken, along with an explanation of the reasons, but with the exception of qualified information, or confidential information of a business, economic or other nature.

If the report is justified, on the basis of the report, the following shall be ensured:

- the situation shall be brought into compliance with the law or public interest, and any other necessary measures shall be taken;
- the reasons for the problems shall be resolved;
- the violation shall be remedied; and
- in justified cases, actions to ensure accountability shall be initiated.

The **reporting person shall not be placed at a disadvantage** for submitting the report, unless it is found that they acted in bad faith and there is a justified suspicion that they committed a felony or misdemeanour act in relation to the report or caused damage or other injury to others.

In the event that the reporting person does not agree with the results of the Company's investigation, or is of the opinion that the Company failed to thoroughly investigate the matter or found the report to be unjustified, they may file a claim with the Office of the Commissioner for Fundamental Human Rights using the electronic system¹ **available on the AJBH website (www.ajbh.hu)**, **in the interests of obtaining remedy for the putative maladministration.**

While the Company's goal is to ensure the opportunity for every report to be investigated, this does not apply in the following cases (of which the reporting person shall be immediately notified in writing):

- reports submitted anonymously or by a person who cannot be identified;
- repeat reports with content identical to an earlier report by the same reporting person;
- reports submitted later than six months after the reported activity or omission was learned of;
- in the event that the damage to the public interest or significant private interest is not proportionate to the limitation on the rights of the person involved in the report.

Reports submitted later than one year after the occurrence of the reported activity or omission can be rejected without an investigation of the merits of the case.

Data management

In all cases, reporting persons shall provide their name and address; however, they may request that the report be handled anonymously. In such cases, the reporting person's personal data contained in the documents of the case shall be placed in a sealed envelope by the person assisting with receipt of the report, and – faithfully preserving the contents – an anonymous copy of the report shall be created, which the person assisting with receipt of the report shall mark with their signature/initials.

The personal data of the reporting person shall not be made public without the express consent of such person.

The personal data of the reporting person may only be provided to the organization competent for conducting the procedure initiated on the basis of the report, insofar as said organization is entitled by law to handle such data, or the reporting person gives their express consent to transfer of the data.

If it becomes clear that the reporting person has in bad faith reported mainly untrue information, and in this regard circumstances indicating the commission of a felony or misdemeanour are suspected, the personal data must be provided to the organization or person competent for conducting the procedure. In the event that it can be presumed that the reporting person has caused unlawful injury to or otherwise infringed upon the rights of third parties, the personal data of the reporting person must be provided at the request of the organization or person entitled to initiate or conduct the procedure.

¹ <https://www.ajbh.hu/forduljon-a-biztoshoz;jsessionid=4EED2A37DA3078E481B76B95A4366331>

Special personal data may not be handled in the reporting system; additionally, data related to third persons who are not involved in the report must be immediately deleted from the reporting system, as well as data which is not necessary for the investigation of the report or may not be handled pursuant to the Whistleblower Act.

In the course of the investigation, the Company shall handle all personal data confidentially and ensure that persons other than the investigator and the chief executive officer do not have access to the report or annexes thereunto, and that such persons have no information on planned measures. The person(s) investigating the report shall maintain confidentiality with regard to the contents of the report and the person(s) involved in the report until completion of the investigation or the initiation of accountability proceedings resulting from the investigation, and – with the exception of the person(s) involved in the report – shall not disclose such information to other organizational units or employees within the Company.

In the interests of protecting the person submitting the public interest report and subsequently demonstrating the measures taken, data related to the public interest report, the investigation conducted on the basis of such and the relevant measures taken shall be stored in the reporting system for a period of five years from the completion of last investigative action or measure and subsequently deleted.

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