



KOVÁCS KFT.  
ETHICAL  
HOTLINE



Kovacs Kft. operates a communication channel enabling the reporting of unacceptable behaviour to its employees, contractors (subcontractors, suppliers, customers, financial financiers) or other persons to whom the notification is made, or the subject of the notification have a legitimate interest in remedying behaviour.

We consider any act or conduct that

- illegal, unfair, or unethical.
- any violation of the law affecting the activities of Kovács Kft.

If a co-worker, contractual partner, or other interested party has reasonable suspicion of such conduct, they may report their suspicions directly to the dedicated email address ([etikaiforrodrot@kovacskft.hu](mailto:etikaiforrodrot@kovacskft.hu)). The contents of the Ethics Hotline mailbox can only be seen by persons designated and authorized for this purpose.

**We would like to inform the applicants that:**

- The identity of the notifier shall be kept confidential at all stages of the investigation and shall ensure during the procedure that the person of the non-anonymous notifier is not known to anyone other than the investigators of the notification.
- The notification must be made in good faith, and a bad faith report may have legal consequences.
- When making the notification, the name and address of the

applicant, the place of business of the applicant and the name of the legal representative of the applicant in the case of a legal person must be provided, and he must declare that he is making the application in good faith in circumstances of which he is aware or has sufficient grounds to believe, that they are real.

- The notification may not contain any special personal data (Act CXII of 2011 on the right to informational self-determination and freedom of information Section 3. § 3.).
- The examination of repeated notifications made by the same notifier with the same content, notified after six months of becoming aware of the activity or omission complained of, and made by an anonymous or unidentified notifier may be waived.
- Whistleblowers shall keep secret information on the content of the report and the persons involved in the notification until the investigation is concluded or formal accountability is initiated and shall not share it - except for informing the person involved in the notification - with others.
- The investigation shall be carried out as soon as possible but within 30 days of receipt thereof unless the notification comes from an anonymous or unidentified notifier. Otherwise, the time limit may be exceeded only in specially justified cases, but in this case, it may not exceed 3 months.
- The Kft. informs the applicant, if identifiable, of the results of the investigation. It shall also inform the notified person of the notification unless this would frustrate the investigation.
- If, on the basis of the investigation, the notification is unfounded or no further action is required, the data relating to the

notification shall be deleted within 60 days of the completion of the investigation.

- Where action is taken based on an investigation, including action against a reporting person for taking legal proceedings or disciplinary action, the data relating to the notification may be processed up to the conclusion of the proceedings initiated on the basis of the notification.