

INFORMATION NOTICE

The HFDA Hungarian Fashion & Design Agency Nonprofit Private Limited Company (registered seat: 1126 Budapest, Istenehyi út 18, company registration number: 01-10-049808; hereinafter referred to as “**HFDA Nonprofit Ltd.**” or “**HFDA**”) operates an internal whistleblowing system (hereinafter: the “**Reporting System**”) in accordance with the provisions of Section 19 of Act XXV of 2023 on complaints, public interest disclosures, and the rules related to whistleblowing (hereinafter: the “**Complaints Act**”).

Furthermore, in compliance with Section 19 of the Complaints Act, HFDA Nonprofit Ltd. employs an internal control officer responsible for ensuring the Reporting System’s compliance with legal requirements.

Internal Control Officer:	Dr Georgina Hollósi-Horváth
Address:	1126 Budapest, Istenehyi út 18
Email:	panaszbejelentes@hfda.com
Telephone:	+36 30 569 5989

Pursuant to Section 20(1) of the Complaints Act, the Reporting System may be used to report information regarding unlawful or suspected unlawful acts or omissions, as well as other forms of misconduct.

Reports may be submitted through the Reporting System by persons specified in Sections 20(2)-(3) and Section 51 of the Complaints Act (hereinafter: the “**Reporter**”).

The Reporter may submit their report in writing or verbally to the Internal Control Officer. Written reports may be submitted either by post or electronically to the Internal Control Officer.

The Internal Control Officer shall acknowledge receipt of any written report submitted through the Reporting System within seven days.

Verbal reports may be made in person at a time and location previously agreed by telephone with the Internal Control Officer.

If the Reporter submits the report in person, the Internal Control Officer shall record the report in writing and provide the Reporter with a duplicate copy, allowing them the opportunity to review, amend, and confirm the contents by signature.

During the investigation of the report, the Internal Control Officer shall maintain contact with the Reporter and may request the Reporter to supplement or clarify the report, to help establish the facts, or to provide additional information.

The matters reported shall be investigated as soon as reasonably possible, but no later than thirty (30) days from the date of receipt of the report. In duly justified cases, this deadline may be extended, with simultaneous notification to the Reporter; however, even in such cases, the investigation period may not exceed three (3) months.

In accordance with the provisions of the Complaints Act, the investigation of a report may be omitted in the following cases:

- a) the report was submitted by an unidentifiable individual;
- b) the report was not submitted by an authorised person;
- c) the report constitutes a repeated submission by the same individual with identical content to a previous report;
- d) the restriction of the rights of the natural or legal person concerned by the report, as a result of the investigation, would be disproportionate to the protection of the public interest or a compelling private interest.

During the investigation of the report, HFDA shall assess the validity of the facts presented and take any necessary measures that may remedy the misconduct identified in the report.

The Internal Control Officer shall provide the Reporter with written notification regarding the investigation or its omission, including the reasons for such omission. The Reporter shall also be informed of the outcome of the investigation and of any actions taken or planned as a result.

The identity of the Reporter must be treated as confidential throughout all stages of the investigation, provided that the Reporter has supplied the information necessary to establish their identity. The processing of personal data collected through internal whistleblowing reports is governed by Sections 26–27 of the Complaints Act.

The provisions of Sections 41–49 of the Complaints Act shall apply to the protection of the Whistleblower. Pursuant to these provisions, any adverse action taken against the Whistleblower as a result of a lawfully submitted report, particularly if such action is connected to the Whistleblower's legal relationship or affiliation, shall be considered unlawful, even if it would otherwise be deemed lawful.

The whistleblower protection rights described above apply only to lawfully submitted reports; therefore, a Whistleblower acting in bad faith shall not be entitled to the protection rights set out in the Complaints Act. If it becomes evident that the Whistleblower has acted in bad faith and disclosed false data or information, and

- a) if this gives rise to circumstances indicating the commission of a criminal or administrative offence, the Whistleblower's personal data must be disclosed to the authority or person authorised to conduct the relevant proceedings,
- b) or if it can be reasonably assumed that the Whistleblower has unlawfully caused damage or other legal harm to another person, then their personal data must be disclosed—upon request—to the authority or person entitled to initiate or conduct the relevant proceedings.

In accordance with the above, the Whistleblower's disclosure must not constitute a criminal offence or administrative violation.