

intelliport

PROSPECTUS

ON THE RECEPTION OF NOTIFICATIONS AND THE PROTECTION OF WHISTLEBLOWERS

Why are whistleblowers important to us?

We see whistleblowing as an important feedback loop to improve our own organisation and processes and reduce our risks. It is therefore important for us to understand the risks associated with our operations and to protect and support bona fide whistleblowers. We support whistleblowing and protect whistleblowers in line with our anti-corruption policy and our anti-corruption management system. No one should be disadvantaged for making a bona fide report.

What is the whistleblowing system?

Intelliport Systems Ltd. and Intelliport Solutions Ltd. ("Intelliport") operate an integrated Employer Abuse Reporting System in accordance with our Anti-Corruption Policy and Anti-Corruption Management System, which is designed to ensure that data and information about a risk or deficiency in Intelliport's operations that is brought to the attention of decision-makers by a whistleblower and, if necessary, to take action to address the risk.

Who can be a whistleblower?

A whistleblower may be an Intelliport employee, a person who has a contractual relationship with Intelliport, or a person who has a legitimate interest in making a whistleblowing report.

What can be reported?

Any occurrence, circumstance, event, omission, defect, or information that may pose a risk to Intelliport's operations. This includes, in particular, concerns about corruption, attempted or suspected corruption, or any breach or deficiency in the anti-corruption governance system.

How to report?

Whistleblowing can be done primarily by emailing compliance@intelliport.hu, but can also be done by writing to the Head of Compliance or in person.

Can I report anonymously?

Personal whistleblowers are provided with a separate, sealed envelope for their data. We will assess whistleblowers on the basis of their content. We will also investigate a report made by an anonymous or unidentified whistleblower if its content is likely to reveal a risk relevant to the organisation's operations, but we encourage whistleblowers to provide their contact details to ensure feedback.

Who deals with the notification?

A specially trained Compliance Manager is responsible for receiving, processing and investigating the report.

What happens with the notification?

The Compliance Manager receives the notification and classifies it into a risk group (low, medium or high) based on its content and likely impact. If there is limited information available to assign a risk group or to investigate the notification, the whistleblower will be contacted using the contact details available. If the whistleblowing is low risk or easy to handle, the Compliance Manager will act at his/her discretion and notify the whistleblower within 8 days of the whistleblowing and no later than 30 days. If the notification is in a medium or higher risk category and the substantiation of the allegations cannot be clearly established, the Compliance Manager will take action to investigate the allegations in the notification.

What is investigated in relation to the notification?

The purpose of the investigation is to determine whether the data and information contained in the notification is factually correct and whether the organisation's risk mitigation procedures are justified. The notifier will be informed of the opening and progress of the investigation and, if necessary, will be asked to provide documents and other evidence to assist the investigation of the notification, with a deadline. In the course of the investigation, the Compliance Officer may conduct interviews, obtain statements, seize documents, and inspect and make copies of data found on computers without compromising the integrity of the original data.

When can a notification have an effect?

The time limit for processing a notification is 30 days, which may be extended once for a further 30 days in justified cases. If the investigation leading to the decision is expected to take longer than 30 days, the notifier will be informed of this, together with the expected date of the decision and the reasons for the extension.

What will be the consequence of the notification?

After the investigation is closed, the Compliance Manager will prepare a report on the outcome of the investigation, which will include a recommendation for a decision on further action. The Compliance Manager will send the report to the relevant manager of Intelliport. Based on the report, the manager will decide on further action and inform the Compliance Manager, who will notify the whistleblower.

What are the consequences of a non-bona fide report?

The non-bona fide whistleblower will be made aware of the consequences of his/her actions. Sanctions will be applied only in the most appropriate cases, which may be employment or contractual sanctions, commensurate with the seriousness of the offence and taking into account the circumstances of the whistleblowing. The Compliance Manager may propose any sanction.