

REGULATION OF MANAGING WHISTLEBLOWER REPORTS IN MOL GROUP

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I. PRINCIPLES FOR THE MANAGEMENT OF WHISTLEBLOWER REPORTS

1. The principle of due process

All participants in the proceedings are required to act in accordance with the criteria of objectivity, impartiality and the Code of Ethics and Business Conduct and Business Partner Code of Ethics [hereinafter: Codes].

2. Conduct of the parties

In the course of the procedure, participants must apply a communication style with each other and with others that is also expected in formal professional relations and conduct themselves in accordance with the principles of good faith, fairness and cooperation.

3. Deadlines

Participants in the procedure shall use their best endeavors to meet the deadlines set forth in this Regulation so that the procedure of the Ethics Council can effectively facilitate the decision making of the executives authorized to take the necessary measures, as well as support the management of other contractual relationships.

4. Confidentiality

(1) In order to protect the personal data, reputation of all parties involved, as well as MOL Group's business data, all information and documents prepared or made available during the process are confidential. In accordance with MOL Group's Data Classification Policy, documents related to whistleblower reporting are classified as "MOL Secret" or "MOL Confidential".

(2) In cases received via the whistleblower system, all participants (members of the Ethics Council, Group Ethics Officer and their manager/employer, local Ethics Officer, other investigator, the reporter, the implicated person, witness, expert etc.) must keep confidential all details of the filed report and data regarding the Reporter, as well as the information pertaining to the person whose conduct or omission gave rise to the report or who may have relevant information on the content of the report [hereinafter: person concerned in the report].

(3) The obligation of confidentiality does not limit the implicated person's right to defend himself/herself or to clarify the facts, however, in exercising his/her rights, the implicated person is obliged to act lawfully including respect for personal rights, the right to information self-determination and to trade secrets.

5. Management of personal data

(1) MOL Group, as the data controller may - within the framework of the SpeakUp! whistleblower system - process those personal data of the persons involved in the report that are strictly necessary for the investigation of the report for the sole purpose of investigating the

report and remedying or terminating the reported conduct, and may transfer those data to another organisation within MOL Group which may participate in the inquiry.

(2) The legal basis for data processing is fulfillment of a legal obligation of the data controller : to prevent, detect violations which jeopardize the data controller's assets, trade secrets, intellectual property and business reputation, as well as the appropriate, respectful work environment devoid of intimidation and retaliation (pursuant to (1) c) of Article 6 and (g) of Section 2, Article 9 of the GDPR¹).

(3) Personal data not vital for the investigation of the report and for the remedying or termination of the conduct forming the subject matter of the report shall be deleted immediately from the data processed under the reporting system.

(4) During the investigation of the report, the Reporter or the person heard may request the confidentiality of his/her personal data, so that his/her personal data can only be known to the Chairperson of the Ethics Council and the Group Ethics Officer. If the request impedes or makes it impossible to conduct the investigation, the Group or local Ethics Officer in charge shall bring the matter to the attention of the Reporter.

(5) In the electronic system, data related to the report, the investigation based on it, and the measures taken must be kept for five years from the end of the last investigative act or measure, for the purpose of protecting the Reporter and for the subsequent verification of the measures taken, and then must be deleted.

6. Use of mother tongue

At the request of the Reporter or the implicated person, the use of their mother tongue during the procedure shall be ensured by the Council primarily with the assistance of the local Ethics Officer who knows the given language, and shall provide the documents in their mother tongue. The transcripts and minutes of the concerned persons' hearings in their mother tongue will be translated into English with the assistance of the Group Ethics Officer.

7. Procedure in cases pending at an authority or court

Proceeding described in this Regulation may not be initiated in case of a pending proceeding in the same or related matter until the proceeding in question is closed. Proceedings already in progress shall be suspended until the final judgement of the official or judicial proceedings.

8. Freedom of evidence

Participants in the whistleblower system are free to choose their method of proof and to evaluate the available evidence according to their free beliefs.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC („General Data Protection Regulation”, „GDPR”)

9. Governing Law

Provisions of section XXV of the 2023 Act about complaints, reports in the public interest, and rules related to reporting abuses shall apply to the present Regulation and the procedure conducted. If the applicable local law in another country of MOL Group must also be applied to the person concerned in the report or to a particular procedure, the provisions of local law must also be enforced.

II. WHISTLEBLOWER REPORTS PROCEDURE

10. Notification of reports and investigation

(1) The following persons are entitled to inspect the report, the investigation and the decision:

- a) the Chairperson of the Ethics Council;
- b) the members of the Ethics Council;
- c) the Group Ethics Officer and the employee assigned to replace him/her;
- d) the local Ethics Officer involved in the investigation of the case;
- e) the person filing the report (Reporter);
- f) the person suspected of having committed misconduct (implicated person);
- g) staff involved in the investigation of the matter who provide information and professional support (including the manager exercising the employer's rights over the implicated person and the HR partner) to the extent strictly necessary for their participation;
- h) the manager exercising the employer's rights over the Group Ethics Officer, excluding personal data, to the extent necessary to guarantee continuous fulfilment of the task.

(2) The reporting system should be designed in such a way that the personal data of the reporter who reveals his identity, and the implicated person cannot be known by anyone other than those authorized to do so.

Until the conclusion of the investigation or the initiation of formal prosecution as a result of the investigation, the persons investigating the report may share information about the content of the report and the persons involved in the report - in addition to informing the implicated person - with other organizational units or employees of the employer to the extent absolutely necessary for the conduct of the investigation.

(3) This shall be without prejudice to the implicated person's right to consult with his/her manager exercising the employer's rights, his/her legal representative or a delegate of his/her trade association to the extent necessary for their participation or to inform the witness nominated by him/her of the fact of the investigation.

11. Exclusion from investigation

(1) The Reporter, the implicated person and the person whose hearing is necessary during the procedure or from whom an impartial assessment of the case cannot be expected for other reasons may not conduct an investigation or participate in the decision-making.

(2) The person concerned in the report shall notify the Chairperson of the Council and the Group Ethics Officer of the reason for the exclusion immediately after becoming aware of it. The Group Ethics Officer is obliged to notify the Chairperson of the reason for his/her own exclusion immediately after becoming aware of it. The Chairperson of the Council shall immediately notify the Ethics Council of the reason for his/her exclusion as soon as he/she becomes aware of it.

(3) The Chairperson of the Council shall decide on an objection of bias from any party to the proceedings, and the Council as a body shall decide on an objection of bias against the Chairperson of the Council.

(4) All MOL Group employees are obliged to cooperate with the Group and local Ethics Officers to perform their duties, obtain information and support procedures.

(5) If an objective statement cannot be expected from the person heard due to bias or other reasons, he/she must make the ethics officer in charge aware and he/she may refuse to make a statement. In other cases, MOL Plc.'s employees and contractual partners are obliged to cooperate with ethics officers.

12. Means of inspection

(1) The following means of inspection in particular may be used during the procedure:

- a) hearing the person concerned in the report in person, by telephone or by videoconference;
- b) requesting available documents and other data or information relevant to the case;
- c) inspection of sites, locations or objects relevant to the case;
- d) the involvement of an expert in particularly justified cases.

(2) In addition to the interviewee and the person conducting the investigation, one more person may be present at the hearing to support the work of the person conducting the investigation.

(3) In addition to the person heard, the person conducting the investigation and the registrar, the relevant local Ethics Officer may be present at the hearing.

(4) At the request of the implicated person, his/her manager of the organisation exercising the employer's rights, the delegate of the trade association as an assistant or the legal representative of the implicated person may attend the hearing. The assistant may not make a statement on behalf of the person being heard, but may, with the permission of the person conducting the hearing, address a question to the person being heard.

(5) At the hearing, all other parties heard (witness, expert) must be informed about the management of their personal data (name, role, conclusion drawn on them based on what has been said during the case) and about their rights related to the protection of their personal data.

(6) Minutes or notes of the hearing are made, which the person heard can view. Minutes shall be taken of the hearing of the implicated person upon his/her request. With the express and prior consent of the person heard, a report of the hearing may, if it seems appropriate, be made by audio recording - in which case it is sufficient for the person conducting the hearing and the person heard to be present. Based on the recording, a content description of the hearing will be made. After the transcript is approved by those present, the recording must be deleted.

(7) A person requested to provide documents or information in the procedure must send the requested documents and information to the requesting Group Ethics Officer or local Ethics Officer within 5 days of the request.

(8) The Group Ethics Officer may also request the competent local Ethics Officer to carry out certain procedural actions (conducting interviews, obtaining data, documents, etc.) by giving a reasonable time limit. The local Ethics Officer shall comply with the request within the time limit and forward the case file documents to the Group Ethics Officer.

13. Administrative deadline

(1) The contents of the report must be investigated within the shortest time possible under the circumstances, no more than 30 days from the date of receipt of the report, which deadline can only be deviated from in particularly justified cases, with the exception of a report made by an anonymous or unidentifiable reporter, with simultaneous notification to the reporter. In this case, the whistleblower must be informed of the expected date of the investigation and the reasons for extending the investigation.

(2) The duration of the investigation should not exceed three months, not even in the case of an extension.

III. INITIATION OF APROCEDURE, PRELIMINARY INVESTIGATION AND DECISION- MAKING PROCEDURE

14. Whistleblower report

(1). The procedure is initiated on the basis of a report or disclosure.

(2) In the internal whistleblower system, information about ethical misconduct, illegal or suspected illegal acts or omissions, or other abuses can be reported [hereinafter: abuses].

(3) Anyone, who is an employee of, or has a contractual relationship with a company belonging to MOL Group or who has a reasonable legitimate interest in filing a report or remedying the conduct complained of, may initiate a procedure, file a report if they detect an abuse at a member organisation of MOL Group, a service station, supplier, distributor, contractual, sponsored or supported partner or a joint venture.

(4) Reporting or initiating proceedings may ensue in the ways listed in the Codes.

(5) To initiate a procedure, the reporter must provide the following information or make the following statements:

- a) the name and contact details of the Reporter;
- b) their relationship to MOL Group or an indication of their legitimate interest in remedying the conduct forming the subject matter of the report;
- c) if known, the name of the implicated person(s) and their role with MOL Group;
- d) a description of the alleged abuse and all relevant information to review the case;
- e) the evidence relating to the case which support the commission of the abuse ;
- f) the statement by the Reporter that he/she is making the report in good faith of circumstances of which he/she is aware or has reasonable grounds to believe that they are true.

(6) The operator of the internal whistleblower system shall send a confirmation of the reporting to the reporter within seven days of receiving the written report made in the internal whistleblower system. The Reporter needs to be made aware of the consequences of any report filed in bad faith, the procedural and data protection rules governing the report's investigation and the fact that his/her identity, if he/she provides the information necessary for identification, will be kept confidential at all stages of the investigation.

(7) If it becomes apparent that the Reporter or the person who filed the public interest disclosure has acted in bad faith, provided thus decisive, false information, the investigation on which the report or public interest disclosure is based may be terminated without any action taken.

(8) If it becomes apparent that the Reporter has acted in bad faith, provided thus decisive false information and there is a likelihood that it has caused unlawful damage or other impairment of a right of another person, his/her personal data shall be disclosed to the body or person authorized to initiate or conduct the proceedings.

15. Whistleblower report management

(1) A written record must be kept of all reports received via phone or in person. The verbal notification must be put in writing and - in addition to ensuring the possibility of checking, correcting and accepting it by signature - a duplicate must be given to the reporter.

(2) If the report is received by the Ethics Council, directly by its Chairperson or any of its members, it shall be forwarded to the Group Ethics Officer without delay.

(3) If the report is received by the relevant local Ethics Officer, he/she shall immediately forward the report - in encrypted form - to the Group Ethics Officer.

16. Deficiencies, dismissing a report

(1) Proceedings beyond 6 months of the Reporter becoming aware of an abuse , and beyond 3 years from the time of its commission, may be instituted only in particularly justified cases if they are proportionate to the seriousness of the alleged violation.

(2) An investigation of a suspected abuse may be dismissed if:

- a) the report was made by an unidentifiable reporter;
- b) the report was made by a person not authorized to do so;
- c) the report is repeated by the same reporter, with the same content as the previous report;
- d) the harm to the public interest or compelling private interest would be disproportionate to the restriction of the rights of the natural person or legal entity involved in the report resulting from the investigation of the report;
- e) the report has been submitted 6 months after becoming aware of the abuse complained of;
- f) the report is manifestly unfounded;
- g) the conduct complained of does not manifestly violate the Codes, does not constitute abuse;

(3) During the investigation of the report, the operator of the whistleblower system keeps in touch with the reporter, within the framework of which he/she may invite the reporter to supplement and clarify the report, to clarify the facts, and to provide additional information.

(4) If the report does not comply with the provisions of paragraph (5) of point 14, the Group Ethics Officer or the local Ethics Officer will return it to the reporter in order to fill in the deficiencies, setting a short deadline of no more than 3 days.

(5) In the absence of the data written in point 14 (5), or a part of it, the Council investigates a report from an anonymous or unidentifiable reporter only if the other facts and data included in it are suitable for initiating the investigation.

(6) The Preparatory Committee shall, on the proposal of the Group Ethics Officer, decide not to examine incomplete reports.

(7) The Group Ethics Officer is obliged to inform the Ethics Council on a quarterly basis of all reports, including those that have been forwarded to another organizational unit for action or on the basis of which proceedings have not been initiated.

17. Immediate action proposal

(1) If the Group Ethics Officer or the local Ethics Officer finds, on the basis of a report or feedback received, that:

- a) the breach of the Codes and the liability arising therefrom are clearly identifiable; and
- b) supporting evidence is available; and
- c) the necessary measures do not require significant consideration either,

he/she shall immediately prepare a simplified report (e-mail summary) to the Preparatory Committee, on the basis of which the Preparatory Committee may decide to establish the violation of the Codes and make recommendations directly to the manager, who is entitled to decide on the necessary measures to be taken.

Communication of the resulting recommendations and follow-up Consequence management as set forth in Chapter 22. is arranged by the Group Ethics Officer.

18. Preliminary investigation

(1) If based on the report, it is not possible to adopt a conclusion to initiate the procedure, to decide on the appropriate procedure or on dismissing the investigation, a preliminary investigation collection shall be ordered. The deadline for preliminary investigation collection is 30 days, which can be extended once only with 15 days.

(2) During the preliminary investigation, the Group Ethics Officer may contact any person relevant to the investigation, ask them questions, inspect documents or hear the Reporter.

(3) The Group Ethics Officer may also submit the report to the local Ethics Officer for preliminary investigation.

(4) The Group Ethics Officer conducting or coordinating the investigation (in consultation with the local Ethics Officer or other organizational unit involved in the investigation) shall prepare a short, concise investigation plan/concept outlining the issues to be investigated, planned investigation steps (means of investigation, witness hearings, etc.), and the planned deadline for the investigation. The Chairperson of the Ethics Council may supplement or amend the investigation plan before approving it.

(5) Following the completion of the preliminary examination, the Group Ethics Officer shall make a proposal to the Preparatory Committee to determine:

- whether it is justified to initiate an investigation of merits, in which case the Group Ethics Officer provides an investigation plan – as already approved by the Chairperson of the Ethics Council;
- whether the examination of the report can be concluded with a proposal for action by the Preparatory Committee;
- whether the dismissal of the investigation is justified.

(6) If after completing the preliminary investigation the Preparatory Committee orders the procedure to commence, the preliminary investigation shall be included within the deadline of the procedure.

19. Involvement of other organizations in the investigation

(1) Provided that the legal protection of the bona fide reporter and the fair and impartial investigation of the report are not jeopardized, and the notified ethics violation

- a) also violates the obligation arising from the employment relationship, the Group Ethics Officer, based on the decision of the Preparatory Committee shall provide the necessary information to the manager exercising the employer's rights for further action and inform the senior manager exercising the employer's rights thereof;
- b) engages in other breach of contract that may be related to a specific contractual relationship, the Group Ethics Officer shall, upon the decision of the Preparatory

Committee, provide the necessary information to the head of the organisational unit managing the contract violated for further action;

- c) also constitutes an ethics violation of a specific obligation regulated by law or internal rules (e.g. competition law, health-safety-environment, property security, data protection incident², non-ethics related retail report, etc.), the Group Ethics Officer shall, upon the decision of the Preparatory Committee, provide the necessary information to the trade organisation overseeing the given field for further action;
- d) it is a criminal offense and there is a reasonable suspicion that it had been committed, the Group Ethics Officer shall, upon the decision of the Preparatory Committee, provide the necessary information to the Security Organization for the purpose of conducting the investigation, taking further action and initiating official proceedings. If the initiation of criminal proceedings is justified based on the report, measures must be taken to file the report.

(2) The organization conducting an investigation pursuant to the previous paragraph shall inform the Preparatory Committee through the Group Ethics Officer of the outcome of its proceedings within a maximum of 20 days. The Preparatory Committee may accordingly decide to initiate a further ethics investigation or to conclude the procedure.

(3) The Group Ethics Officer or the local Ethics Officer shall inform the Reporter of any other non-ethics investigation of the report and shall monitor the progress of the further proceedings.

20. Decision of the Preparatory Committee

(1) The Preparatory Committee shall, on the proposal of the Group Ethics Officer, take one of the following decisions within 5 days at the latest:

- a) establish on the contents of the report that the Ethics Council of MOL Group has no competence to investigate or adjudicate the notified act or omission, however, if in the opinion of the Preparatory Committee any MOL Group organisation unit is entitled to investigate the report, it will, with the consent of the Reporter, order the transfer of the case;
- b) terminate the proceedings after the preliminary investigation, if no further data or information is expected from the initiation of the investigation of merits, based on which a well-founded decision on the violation of the Codes can be made;
- c) establish on preliminary investigation, that the act or omission notified is not in breach of the provisions of the Codes;
- d) decide on dismissing the investigation of merits in accordance with Chapter 16. (2);
- e) decide that the information and evidence contained in the report justify the investigation of merits and move to initiate the procedure.

² The Ethics Officer must immediately forward the case to databreach@mol.hu, while also informing the Reporter and the Chairperson of the Ethics Council

21. Investigation of merits

21/A. Initiation of an investigation of merits, notifications

(1) The initiation of the investigation of merits is ordered by the Preparatory Committee on the proposal of the Group Ethics Officer. In the event of the initiation of the investigation of merits, the Group Ethics Officer or on his/her behalf, the local Ethics Officer shall inform the Reporter of the initiation of the procedure and if necessary, forward it to the relevant local Ethics Officer competent to attend to the implicated person.

(2) A copy of the present Regulation of procedure and the data protection notice must be sent to the Reporter and to the persons heard during the investigation (witness, implicated person, etc.).

(3) The identity of the Reporter may be communicated to the implicated person only if this is expressly justified by the nature of the case or if this is necessary for the procedure to be conducted successfully.

(4) At the start of the investigation, the implicated person must be informed in detail about the report, his/her rights regarding the protection of his/her personal data, and the rules regarding the handling of his/her data. In accordance with the requirement of a fair procedure, it must be ensured that the implicated person expresses his position regarding the report through his legal representative and supports it with evidence. In exceptional cases, the implicated person may be informed at a later date if immediate information would prevent the investigation of the report.

(5) Paragraph (4) also applies to the person who may have substantial information about the content of the report.

21/B. Conducting an investigation of merits

(1) The Group Ethics Officer (or the local Ethics Officer designated by him/her to conduct the investigation) carries out an evidentiary procedure to obtain the data and evidence for the Ethics Council's decision to be based upon.

(2) In the investigation of merits, all means of proof listed in Chapter 12. (1) may be used to clarify the facts.

21/C. Suspending the procedure

(1) The Group Ethics Officer shall suspend the procedure if

- a) the conduct of the proceedings requires the examination of a preliminary issue falling within the competence of another external or MOL Group organization, pending the conclusion of that examination; or
- b) official or judicial proceedings have been instituted in respect of the same or a related matter, pending its final conclusion.

The Ethics Council may not interfere with ongoing official or judicial proceedings.

21/D. Termination of the procedure

(1) The Group Ethics Officer, in agreement with the Preparatory Committee shall terminate the procedure if:

- a) it has become apparent that the conduct under investigation does not conflict with the Codes;
- b) the investigation does not reveal any conduct in breach of the Codes and no result is expected from the continuation of the proceedings;
- c) the conduct under investigation has already been given final judgment by a public authority or court or it has already received a resolution by the Ethics Council.

(2) The termination of the procedure shall be communicated to the Reporter or the manager overseeing the operations concerned by the procedure, as well as to the competent local Ethics Officer.

21/E. Investigation report

(1) The investigation report of the Group Ethics Officer shall describe the used means of investigation, the established facts, the proposal for a decision by the Ethics Council and the proposed recommendations for action and shall describe the background and reasons for the proposal.

(2) If the investigation is carried out by a local Ethics Officer or another person, he/she shall forward his/her findings to the Ethics Council through the Group Ethics Officer, who will decide on any abuses accordingly. The local Ethics Officer prepares his/her report in accordance with the rules for the Group Ethics Officer's report.

(3) The reports of the Group Ethics Officer and the local Ethics Officers are approved by the Chairperson of the Ethics Council based on the opinion of the Preparatory Committee and submitted to the Ethics Council for decision. If requested by the Chairperson of the Council, the Ethics Officer shall attach to the investigation report the documents used, the relevant correspondence relating to the case and any other evidence obtained.

21/F. Decision of the Ethics Council

(1) The decision of the Ethics Council in any individual case can basically be the following:

- a) it finds that the conduct under investigation has violated a provision of the Codes; in this case it establishes individual responsibility and proposes to apply the appropriate legal consequences;
- b) it finds that the conduct under investigation does not violate the Codes;
- c) it finds that the conduct subject to the investigation of merits violates any provision of the Codes and identifies a misconduct that in addition to individual liability constitutes a potential and serious abuse of MOL Group's values. In this case, it will notify the relevant decision-maker of MOL Group of the findings.

(2) In the decision, the Ethics Council may formulate a proposal (recommendation) for the employer, the head of the business area and the supporting departments to remedy the violation, to take appropriate corrective measures and to take appropriate measures to avoid and prevent violations of the Codes and reduce risks.

(3) If required by law, if the conditions contained therein exist, the Ethics Council shall initiate the proceedings of the competent authority instead of establishing an ethics violation.

If a criminal report appears to be justified, it should be done in consultation with the organization responsible for security investigations, the one designated for communication with the authorities in case of criminal matters.

(4) The decision of the Ethics Council must be in writing and justified.

(5) The decision of the Ethics Council shall be communicated by the Group Ethics Officer to the parties concerned within 5 days (the Reporter and the implicated person, the local Ethics Officer concerned, and if necessary to the manager exercising the employer's rights over the implicated person).

(6) The reporter must be informed in writing about the investigation of the report or its omission and the reason for the omission, the result of the investigation of the report, the measures taken or planned. Written information can be dispensed with if the reporter received information orally and acknowledged the information.

(7) In proceedings described in this regulation, the decision of the Ethics Council is not public.

IV. CONSEQUENCE MANAGEMENT, REPETITION AND SUPPLEMENTING OF THE PROCEDURE

22. Consequence management

(1) If the Ethics Council makes a recommendation to promote a culture and behaviour in accordance with the Codes, to improve processes and to reduce the risk of conduct in violation of the Codes, it shall inform the Group Ethics Officer concerned by setting an appropriate deadline.

(2) Based on the decision of the Ethics Council, the manager managing the area concerned or exercising the employer's rights over the person involved in the proceedings, shall immediately, but not later than within 15 days, decide on the necessary additional measures, possible sanctions and consideration of abuse in performance evaluation, which shall immediately be brought to the attention of the Group Ethics Officer.

(3) If the manager concerned does not take action in accordance with the proposal of the Ethics Council, the Group Ethics Officer shall notify the manager exercising employer's rights over the manager, who shall decide on any necessary additional measures, possible sanctions or consideration in performance evaluation, which shall immediately be brought to the attention of the Group Ethics Officer.

23. Request for a review (repetition and supplementing of an investigation)

(1) In light of the decision of the Ethics Council, interested parties may, within 15 days after receiving notification about the decision, but not later than 6 months initiate a review of the decision with the Group Ethics Officer, especially if unknown, relevant new information becomes available after the decision of the Ethics Council.

(2). The Preparatory Committee shall decide on the initiation of repeating or supplementing an investigation.

V. FINAL PROVISIONS

24. Registration of cases received through the whistleblower system

The Group Ethics Officer maintains - anonymized - records and statistics on reports and actions taken.

25. Procedure amendment

Any member of the Ethics Council is entitled to initiate amendments and supplements to these Regulation of procedure.

26. Transitional rules

The amended version of the procedure shall apply to proceedings and measures initiated on the basis of reports received after its entry into force.