

Information on ELI-HU Non-Profit Ltd.'s whistleblowing system

ELI-HU Non-Profit Ltd. (hereinafter referred to as the "Company") is committed to operating responsibly and in full compliance with the law, its own internal regulations and the basic ethical and moral standards.

To this end, the Company has set up and operates an efficient internal whistleblowing system in compliance and in accordance with the provisions of Act XXV of 2023 on the rules of complaints, public interest disclosures and misconduct reporting (the Whistleblowing Act), to ensure transparent and responsible operation, as well as the effective prevention, timely detection and appropriate remediation of cases of misconduct.

The Company's internal whistleblowing system and the detailed rules on the treatment and protection of whistleblowers, as well as on the processing of their personal data are available here:

www.eli-alps.hu → About us → Public Information and Public Interest Data → change the language to Hungarian → 2. Information related to activities and operations → Whistleblowing system:

<https://www.eli-alps.hu/files/StaticFiles/file/3-2023-07-24-szabalyzat-a-tarsasag-belso-visszaeles-bejelentesi-rendszererol-valamint-a-bejelentesek-kezelesenek-rendjerol.pdf>

What can be reported?

Any act or omission that is unlawful or is reasonably suspected to be unlawful, or that is contrary to or in breach of the rules of conduct set out in the Company's internal policies, or other information on any act of misconduct.

Who can make a whistleblowing report?

Any of the persons belonging to the following categories may make a report if they encounter any form of misconduct in the course of their work or during preparation for work:

- employees of the Company;
- trainees, students or volunteers;

- self-employed people, one-man companies;
- contractors, subcontractors, suppliers, or their subordinates;
- Owners, management, supervisory body.

The above persons may also make a report if the underlying employment relationship or contractual relationship giving rise to the right has been started or previously existed but has been terminated.

Anonymous reporting is also possible, however, in this case the Company has the right not to investigate the report if the anonymous report does not contain sufficient and substantial information for the proper investigation of the report or is clearly unfounded and/or was made in bad faith.

Reporting channels:

The Company provides the following reporting channels:

Orally (*during the office hours of the Company, on working days except Fridays: 8:00-16:50; Fridays: 8:00-14:20*):

- **in person at the Company's Compliance Advisor**
- **by telephone at + 36 30 503-0309**

The report can be made either in English or Hungarian.

In writing:

- **via an email sent to the compliance@eli-alps.hu e-mail address**

Content of the report:

Please ensure that the content of your report is sufficiently detailed and specific to allow it to be properly investigated.

The report should identify the misconduct that gave rise to the report, if known, the persons involved in the misconduct or those with substantial information about it, as well as the evidence, if any, available to support the misconduct.

If the report is not made anonymously, without providing identifiable personal data, please provide the following information:

- whistleblower's name;
- whistleblower's mailing or e-mail address;

- whistleblower's telephone number.

In case the report is made in writing, please attach documents and other available evidence supporting the allegations made in the report, if possible.

The Company's internal whistleblowing system must not be used in bad faith, or for making untrue or unsubstantiated disclosures known to be incorrect by the whistleblower.

Protection of whistleblowers:

The Company will ensure that a lawful whistleblower will not suffer any retaliation, discrimination or other unfair treatment in connection with or as a result of making a disclosure.

No whistleblower shall suffer any disadvantage, harassment or any other form of discrimination as a result of providing information on any misconduct.

The whistleblower shall not suffer any disadvantage in case the public interest disclosure made in good faith proves to be unfounded during the investigation.

Investigation of public interest disclosures:

It is the responsibility of the Company's Compliance Officer to operate the whistleblowing system in an impartial manner and to investigate public interest disclosures.

Public interest disclosures must be investigated within 30 days from the date of receipt of the disclosure. Noncompliance with this deadline is possible only in particularly justified cases, and the whistleblower shall be concurrently notified. The investigation shall not last longer than 3 months.

Protection of the whistleblower's personal data, confidentiality:

The information provided by the whistleblower or the whistleblower's personal data will be processed by the Company in strict confidentiality, in compliance with the applicable legal provisions, in particular Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information and the provisions of Regulation (EU) 2016/679 of the European Parliament and of the

Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation - GDPR), as well as the Company's Privacy Policy and the information notice attached to the Internal whistleblowing system of the Company and the procedure for handling whistleblowing.