PORTFOLION KOCKÁZATI TőKEALAP-KEZELő ZRT.
ETHICAL REPORTING SYSTEM

INFORMATION NOTE

PortfoLion Kockázati Tőkealap-kezelő Zrt. (hereinafter: Company) has created a system (hereinafter: ethical reporting system) suitable for reporting perceived or real violations of the values defined in its Code of Ethics and for handling reports.

The Company's Code of Ethics is available on the Company's website. The Company's Code of Ethics is available on the Company's website here .

Please note that if you wish to make a complaint - i.e. you wish to express your dissatisfaction with the Company's service, and you wish to object to the Company's activities before the conclusion of the contract, related to the conclusion of the contract, its performance, the termination of the contractual relationship, and the subsequent settlement of the legal dispute concerning the contract or failure to do so based on the provisions of the Complaints Handling Procedures.
https://www.portfolion.hu/complaint

The purpose of this information note (hereinafter: Information) is to present the rules regarding the operation of the ethical reporting system and the procedure related to reporting.

In all cases, the Company treats the identity of the whistleblower, reports, inquiries, and investigations as confidential, in compliance with the relevant legislation and the Company's internal regulatory documents, while protecting the whistleblower. The ethical reporting system has been designed in such a way that the identity of the reporting person, who is not anonymous, cannot be known by anyone other than those investigating the report. Those who investigate the report are obliged to keep the information about the content of the report and the persons affected by the report confidential until the investigation is concluded or until formal prosecution is initiated as a result of the investigation, and they may not share it with any other organizational unit or employee of the Company, except for the information of the person affected by the report.

The whistleblower is protected against discrimination and unfair treatment, it is prohibited to discriminate against him or her because he/she made the report. At the same time, an unfounded report by a whistleblower in bad faith is an unwanted phenomenon, and making a report in bad faith (defamation) may have legal consequences.

The purpose of operating the ethical whistleblowing line is to enable the whistleblower to draw attention to real events that violate the Code of Ethics. Therefore, the notifier must declare when making his report that he is making the report in good faith about circumstances of which he is aware or has sufficient grounds to assume that they are real.

Ethical issues can be reported anonymously.

the (anonymous) whistleblower must be informed that if the information provided by him/her is not sufficient/adequate for the investigation of his/her report, or if the information essential for the initiation or successful conduct of the investigation cannot otherwise be obtained for any reason, the investigation may be unsuccessful. for closure. When recording the Report, the Company asks the

notifier to provide contact information while maintaining anonymity, in order to request additional information and inform about the conclusion of the investigation.

1. Method of notification

The announcement can only be made through the following channels:

- in person, during working hours (at a time agreed in advance by e-mail) at the Portfolion Zrt. Compliance Officer , or in the case of a notification involving the Compliance Officer at the CEO,
- in email: etika@portfolion.hu,
  to the Compliance Officer (1131. Budapest Babér utca 9.), or
- of the OTP Group Ethical Abuse and Legal Violation Reporting System .

2. Recording of the announcement

The Company records and handles reports in a closed system.

If the notification is partially or completely not by the values defined in the Code of Ethics, perceived or real
(the offending activity, event, or condition does not violate the Code of Ethics), then the report (or the affected part) will be forwarded to the relevant organizational unit of the Company in order to carry out the appropriate procedure. The Company notifies the notifier in writing within seven days, at the contact information provided by the notifier, of the initiation of the investigation, the omission of the Report, or the transfer of the investigation to another field of expertise.

3. Examination of the notification

The Company has 30 (thirty) days from the date of its receipt to investigate the contents of the notification, which deadline may be deviated from - only in particularly justified cases, with simultaneous notification of the notifier. The duration of the examination may not exceed 3 (three) months.

The report will be investigated by the Company, except the following. The investigation is carried out by the Company's Compliance Officer, and in case of involvement by the CEO and /or the person designated by him. Other organizational units of the Company may be involved in the investigation if it is justified and necessary from the point of view of conducting the investigation.

Examination of the report may be waived if:

- the harm to the public interest or the compelling private interest would not be proportionate to the restriction of the rights of the legal entity of the person affected by the report resulting from the investigation of the report;
- the notification is a repeated Notification made by the same notifier, with the same content as the previous notification
- the notification was made by the notifier after 6 (six) months from becoming aware of the aggrieved activity or omission

- the notification was made by an unidentified (unreachable) notifier, and the Notification is incomplete to such an extent that no result can be expected from its investigation;
- the notification is incomplete even after receipt of the deficiency correction to such an extent that no result can be expected from its investigation;
- the notifier withdrew the notification.

If the notification does not contain enough information for its substantive investigation, the Company will contact the notifier in order to fill in the missing data.

At the start of the investigation, the person affected by the report will receive detailed information about the relevant report, EUROPEAN PARLIAMENT AND COUNCIL (EU) 2016/679 no. on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, as well as on the repeal of Directive 95/46/EC (General Data Protection Regulation), on his rights in relation to the protection of his personal data, as well as his data
on the rules for its handling. In exceptional cases, the person affected by the report may be informed later than the start of the investigation, in justified cases, if immediate information would probably make it impossible or seriously endanger, or would frustrate the investigation of the report, or it can be omitted based on the above. In such cases, the Company must take appropriate measures - the including making information publicly available - in order to protect the rights, freedoms and legitimate interests of the data subject.

In accordance with the requirement of a fair procedure, the Company ensures during the procedure that the person affected by the report expresses his position regarding the report, even through his legal representative, and supports it with evidence.

The investigation is concluded by the Company with a decision: it determines whether or not an ethical violation has occurred, or whether an ethical violation and/or violation cannot be determined - in the absence of proof.

Based on the investigation, the Company will take the necessary measures due to the behavior contained in the report - for example, it can apply employer measures or initiate criminal proceedings in accordance with the rules on the employment relationship.

The Company informs the reporter and the person affected by the report about the results of the investigation, as well as the reporter about the measures taken.

If the reporter or the person affected by the report does not agree with the results of the investigation conducted in connection with the report, he or she may turn to the CEO of the Company , who will investigate the case at second level and make a decision:

- leave the decision made during the first instance investigation in place, or
- returns the case to the Investigator for further investigation
- changes the decision made during the first instance investigation, or
- in exceptionally justified cases, he hands over the materials of the investigation to an organizational unit designated by him or to an external whistleblower protection lawyer.

4. [1]Protection of personal data, data management[2]

XXV. of 2023 on complaints and announcements of public interest. law based on the authorization of the law , the Company may process the personal data of the notifier and the person affected by the notification provided in the notification to investigate the notification and forward it to an external organization participating in the investigation of the notification. Information for customers regarding data management and data protection is contained in the data management information sheet.

The purpose of handling personal data is to review and investigate received reports and follow up on their resolution. Personal data may only be used during the period necessary to perform the above tasks. The personal data will not be used for any other purpose, the data management is carried out exclusively by the Company's Compliance Officer, or by the CEO and/or the person designated by him and, if necessary, by another organizational unit involved in the investigation.

The reporting person's data - except the following paragraph - may only be transferred to a body or organizational unit authorized to conduct a procedure initiated based on a report, if this body or organizational unit is authorized to handle it by law, or if the reporting person has consented to the transfer of his data. The personal data of the whistleblower may not be made public without his clear consent.

If it has become apparent that the whistleblower has provided materially false information in bad faith and
a/ this creates a circumstance indicating the commission of a crime or violation of the rules, your personal data must be handed over to the body or person authorized to conduct the procedure;
b/ it is reasonably probable that you have caused illegal damage or other rights violations to others, your personal data must be transferred upon request to a body or person authorized to initiate or conduct the procedure.

special data is not permitted in the ethical reporting system [3]. If such information is entered into the ethical reporting system during the reporting, it will be deleted immediately.

XXV. of 2023 concerning third parties not involved in the report, which are not necessary for the investigation of the report, as well as complaints and public interest reports, will be immediately deleted from the reporting system. data that cannot be handled by law.

If, based on the investigation, the report is unfounded or no further action is necessary, the data relating to the report will be deleted within 60 (sixty) days after the end of the investigation.

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[1]personal data: any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable; (GDPR Article 4 1.)

[2]data management: any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as the collection, recording, organization, segmentation, storage, transformation or change, query, insight, use, communication, transmission, distribution or otherwise by making available, coordinating or connecting, limiting, deleting or destroying; (GDPR Article 4.2)

[3] special data: personal data relating to racial origin, belonging to a nationality, political opinion or party affiliation, religious or other worldview beliefs, interest-representation organization membership, sex life, health status, and pathological passion.

If action is taken based on the investigation - including legal proceedings or disciplinary action against the whistleblower - the data relating to the report may be processed in the reporting system at most until the conclusion of the proceedings initiated based on the report. After that, the data will be deleted.

The Data Subject's rights related to data management, including the possibility of legal remedies, are governed by the General Data Protection Regulation and Information Law its provisions shall govern.