



# WHISTLEBLOWING SYSTEM TO REPORT BREACHES OF LAW

DPD Hungary Kft.



# What does whistleblowing mean?

## Whistleblowing

Purposefully created reporting channels that enable us to hand over information about actual or potential

- Wrongdoers
- Ethical violations
- The attempt to conceal them



# Who can make a report?

**Anybody,**

who is trying to provide information in good faith about illegal and/or unethical behaviour

**Can be DPD's**

- current or former employee
- subcontractor or their employee
- customer using its services

**Or anybody** wishing to make a report on an ethical issue



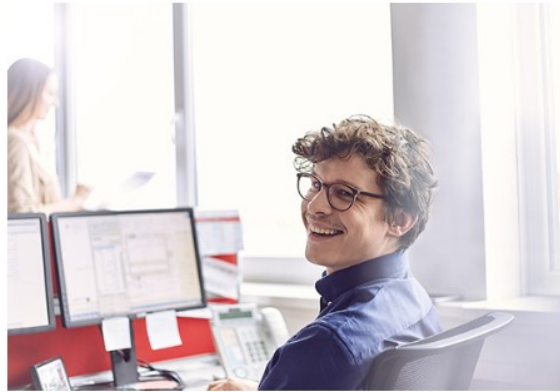


# What can be the content of a report?

It is recommended to report without delay the following issues among others :



- HARASSMENT
- DETECTION OF CORRUPTION
- CONFLICT OF INTEREST
- UNATHORISED USE OF INTELLECTUAL PROPERTY
- SUSPICION OF BREACH OF CONFIDENTIALITY
- DISCRIMINATION
- CHILD LABOUR
- BREACH OF COMPETITION LAWS
- VIOLATION OF PRIVACY AND BREACH OF CONFIDENTIAL INFORMATION



### Careers at DPD

We are looking for people as ambitious as we are. Get to know DPD as an employer and check out our latest job offers!

The world of DPD

Current job vacancies

#### Delivery partner

Become a system partner or a delivery driver!

More details

#### DPD News

Read interesting background information about DPD.

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If you are a journalist with a question, contact us!

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# How can reports be made?

Through DPD Hungary Kft. whistleblowing channels :

## 1. On DPD website:

Under the menu item „Ethics and compliance”, by filling in the available form.

<https://www.dpd.com/hu/en/ethics-and-compliance/>

## How can reports be made?



Through DPD Hungary Kft. whistleblowing channels:

2. In a letter addressed to the Ethics Committee

Address: 1134 Budapest, Váci út 33. 2. em.



## How can reports be made?

Through DPD Hungary Kft. whistleblowing channels:

### 3. ORALLY:

- to any member of the Ethics Committee, or
- to the Compliance and HSSE Group Leader

In both cases reports can be made at DPD Hungary Kft. Headquarters by prior appointment.

Address: 1134 Budapest, Váci út 33., 2. emelet  
To make an appointment call the following number:

+36 1 501 6200



# How can reports be made?

Through channels of authorities and NGOs

## 1. Competition Authority:

By completing the form published on <https://www.gvh.hu/> website in case of suspicion of an unfair commercial practice, misleading of business partners, abuse of a dominant position, cartel, agreement resulting in restriction of competition

## 2. Office of the Commissioner for Fundamental Rights Directorate for Equal Treatment

1387 Budapest, Pf. 40. on freephone number +36 80 203 939, via email at [egyenlobanasmod@ajbh.hu](mailto:egyenlobanasmod@ajbh.hu), in case of wishing to report a violation of equal rights.





# How can reports be made?

Through channels of authorities and NGOs

**3.** The competent Courts

**4.** The competent Police Department

In case of suspicion of crime

**5.** Háttér Support Society

1136 Budapest, Balzac u. 8-10. fszt. 1., +36 1 238 0046; hatter@hatter.hu, free legal advisory services and representation provided for victims of discrimination based on sexual orientation or gender identity, abuse or harassment

**6.** NANE Association

Helpline for victims of violence against women: +36 80 505 101



# How can reports be made?

Through channels of authorities and NGOs

## 7. Patent Association

Their free legal advisory service shares invaluable legal and psychological information with the women turning to them for help, +36 70 220 2505 [jog@patent.org.hu](mailto:jog@patent.org.hu).

## 8. Legal Defence Bureau for National and Ethnic Minorities

1447 Budapest Pf.: 510 , [info@neki.hu](mailto:info@neki.hu), phone number +36 1 303 8973, antidiscrimination legal aid service and pursuit of strategic litigation in human rights issues – primarily concerning the native Roma population



# How DPD Hungary handles reports

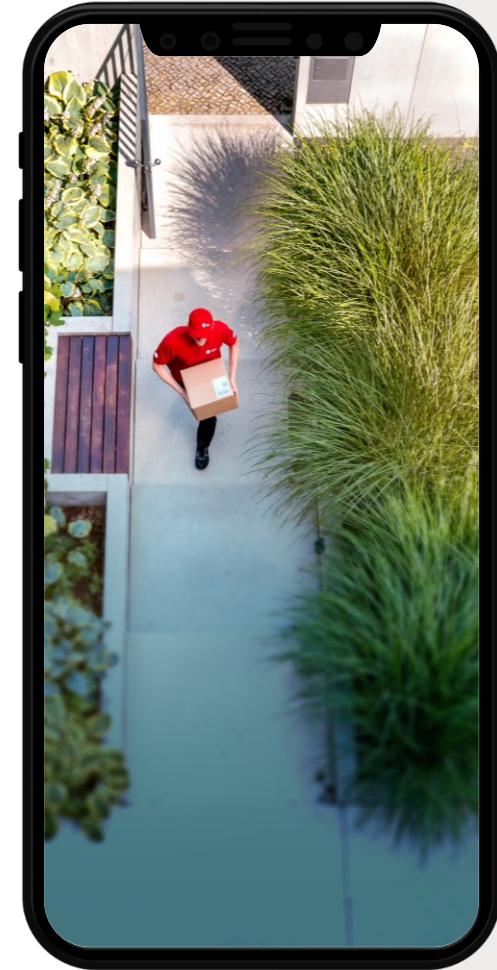
## I. Recording reports :

### 1. In case of written reports:

- Reports are registered by the Compliance and HSSE Group Leader or a person assigned by him/her who ensure their safekeeping and handling.

### 2. In case of oral reports:

- **Via a recorded phone line/voice message system:** based on the prior approval of the person filing the report, the call shall be recorded in a durable and retrievable form.
- **Via a non-recorded phone line/voice message system:** based on the prior approval of the person filing the report, the recipient of the call centre personnel shall make a complete and accurate note of the conversation and offer the whistleblower the possibility of checking and correcting the note and signing it in approval.
- **In person:** the representative of the Company shall draw up accurate minutes of the meeting. In this case the staff in charge offers the whistleblower the possibility of checking, correcting and signing the minutes of the meeting in approval.



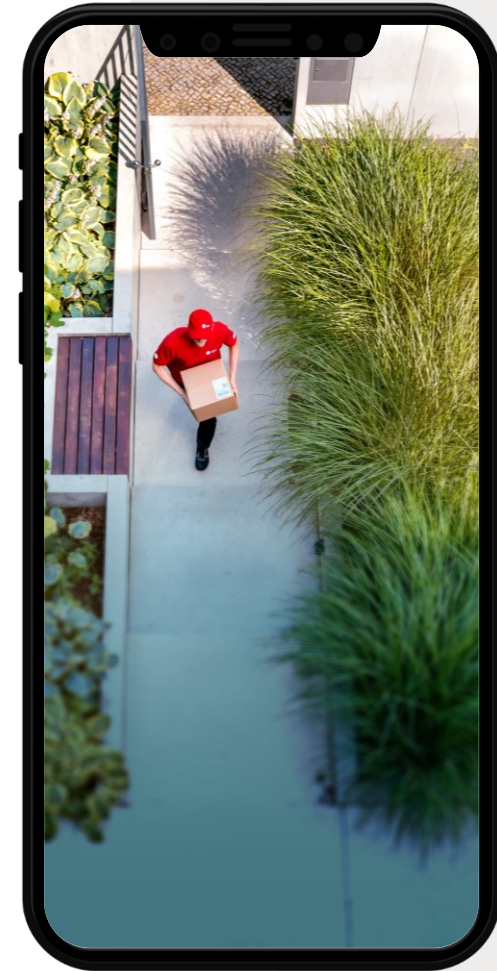
# How DPD Hungary handles reports

## II. Confirming reports:

- If the whistleblower provides his/her personal contact details, he/she will receive confirmation of the fact of filing the report and the ensuing process within 7 days of the day of receipt.

## III. Reports that can be excluded from an investigation:

- A report of identical content with a previous report filed repeatedly by the same whistleblower or a report filed 6 months after becoming aware of the objected activity or infringement..
- If public interest defence or the violation of overriding private interest is not proportionate to the restrictions of rights of the subject of the report.
- An ethical investigation may not be initiated in a matter that is already a subject of court and administrative proceedings or where a final decision has already been taken.





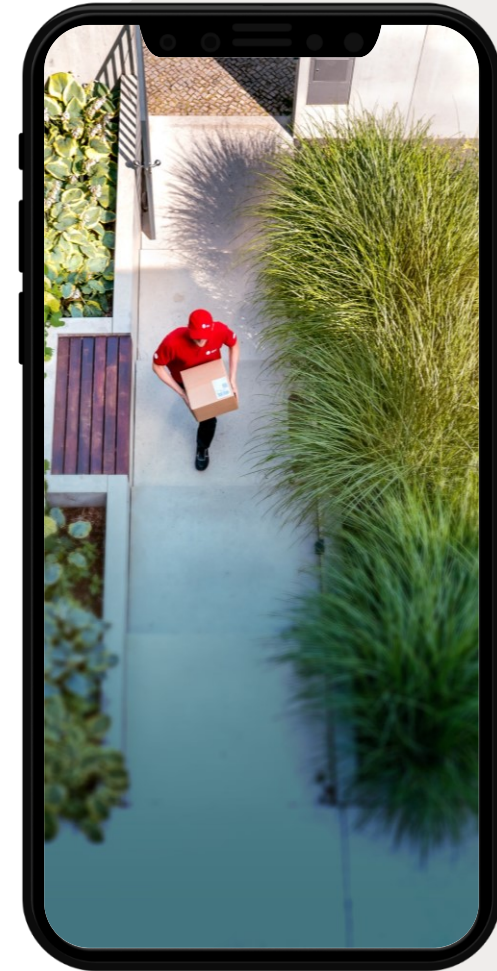
# How DPD Hungary handles reports

## IV. Handling of reports filed in good faith:

- The whistleblower shall declare that the report is being filed in good faith of such circumstances that he/she is aware of and he/she has substantial reason to believe that they are real.

## V. Confidentiality obligation, protection of personal data:

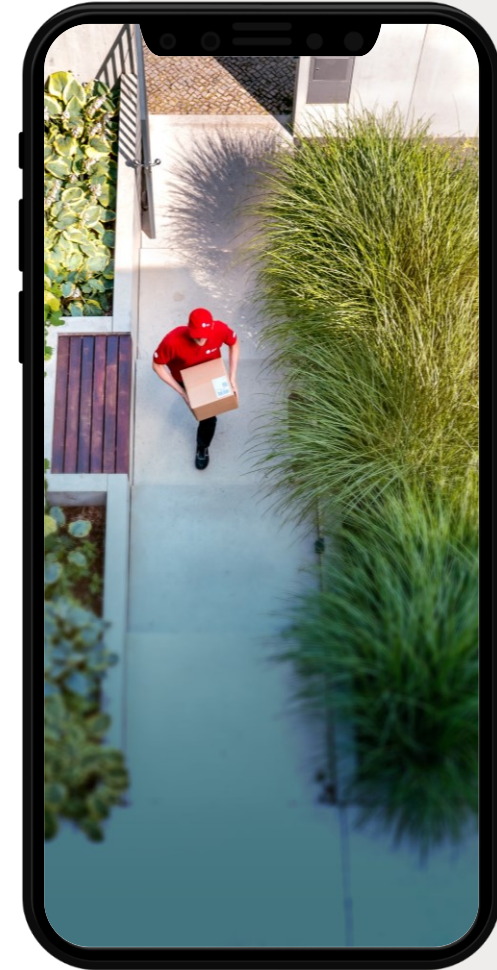
- All staff handling information provided by whistleblower as well as all members of the Ethics Committee are obliged to confidentiality.
- The identity of the whistleblower and all information that might reveal the identity of the whistleblower either directly or indirectly shall not be disclosed without the explicit approval of the whistleblower except when there is necessary and proportionate obligation to do so stipulated by court or in administrative proceedings.
- Company shall carry out the processing of personal data, including the exchange of personal data and their forwarding them to authorities, in compliance with the guidelines stipulated in the General Data Protection Regulation (GDPR) of the European Union.



# How DPD Hungary handles reports

## VI. Zero tolerance for retaliation against whistleblowers:

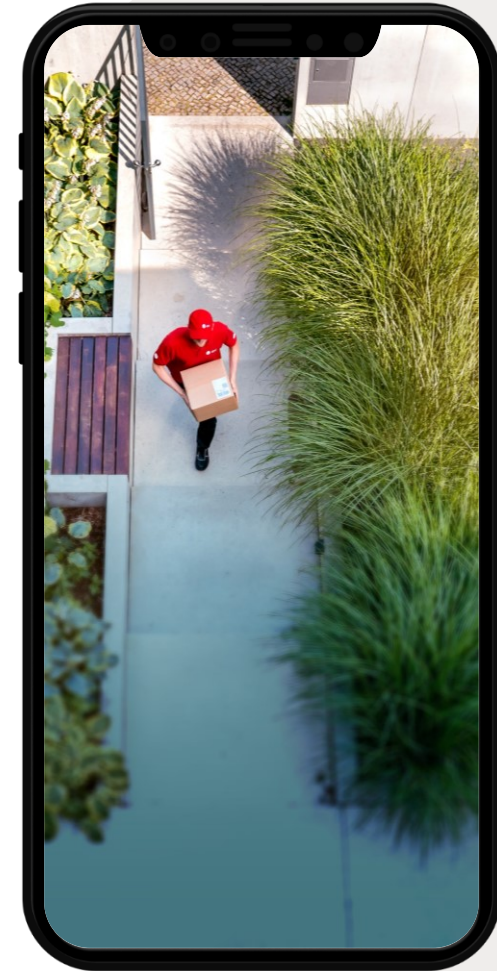
- DPD does not tolerate any form of retaliation against whistleblowers acting in good faith
- Retaliation for whistleblowing can be reported through any DPD channel for whistleblowing. The Ethics Committee shall investigate every such incident and shall initiate disciplinary proceedings against anybody who retaliates against the whistleblower.



# How DPD Hungary handles reports

## VII. Investigation of the report:

- In order to rule on the case, the DPD Ethics Committee is entitled to call for any necessary documentation and make enquiries.
- The investigation must be closed within 30 days of the date of the report, which time limit in duly justified cases may be extended once with a period of 30 days.
- The Ethics Committee has full discretion regarding the time when it notifies the whistleblower about the opening of the proceedings, taking into account personal rights, the right to informational self-determination and trade secret.
- The person subject of the report has the right to defend themselves and to the clarification of the facts and they shall not be restricted to exercise their rights



# How DPD Hungary handles reports

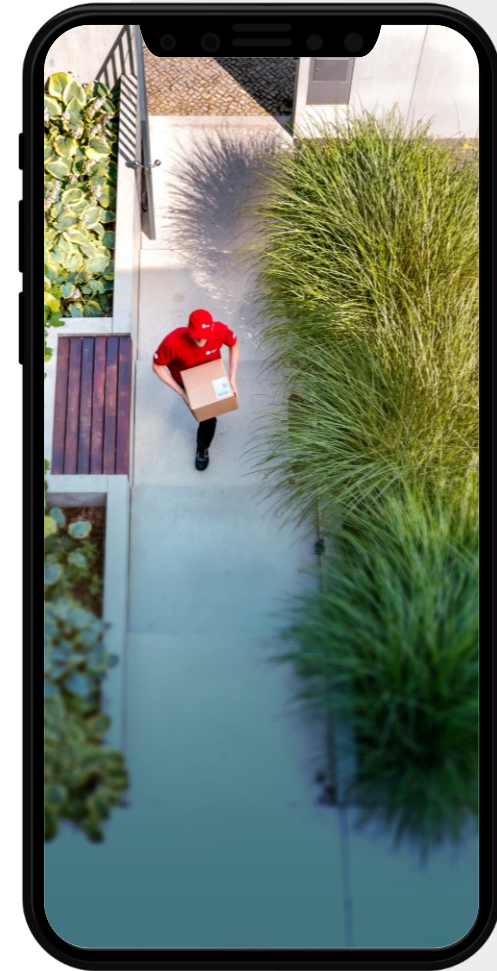
## VIII. Consideration of the report, initiating legal proceedings:

- The Committee shall draft a report on the results of the investigation, and shall disclose these results along with a proposal for a solution to the Managing Director.
- Should the behaviour subject to the report and based on the investigation require the initiation of legal proceedings, it shall be the responsibility of the Compliance and HSSE manager to take the necessary action.

## IX. Informing the persons concerned about the Managing Director's decision:

The Ethics Committee shall:

- inform the persons concerned in writing about the decision and the necessary proposals for a solution to the case
- send feedback to the whistleblower within 7 days of the completion of the investigation





# How DPD Hungary handles reports

## X. Retention and deletion of data related to the investigation:

- The Ethics Committee shall be responsible for the documenting and safekeeping of all incoming reports, investigations carried out, proposals for decisions and decisions.
- Personal data that are clearly not relevant in the handling of a report shall be not collected by DPD. Should any such data be accidentally collected, they shall be deleted without delay.
- During its proceedings the Ethics Committee shall not handle sensitive personal data.
- If based on the investigation the report is not substantiated or further action is deemed unnecessary, data and files related to the report shall be deleted within 60 days of the completion of the investigation.
- If based on the investigation action is taken, including legal action against the whistleblower or employer or disciplinary action , data related to the report may be handled until the completion of the proceedings initiated based on the report, but for maximum 5 years.

