

Procedures of Ethics Committee of DPD Hungary

The purpose of setting up the Ethics Committee (hereinafter: the committee) is to answer questions related to the prescribed conduct, as well as to investigate cases of violation of the rules of conduct laid down there.

All participants of the committee are obliged to act in an objective and impartial manner.

All data and information made available to the committee during the procedure are strictly confidential, and the participants in the procedure are obliged to maintain confidentiality.

The task of the committee:

- coordinate the ethical operation of DPD
- help the management/managers to make decisions related to ethical matters
- promote compliance with the provisions of the ethical regulations with advice and decisions
- achieving the restoration of the ethical order in the event of its damage
- judging the reports in individual cases

Chairman of the committee:

- independent and cannot be instructed in ethical matters
- represents DPD's ethical culture in external and internal communication
- nominates the members by January 31 of each year, as well as nominates a deputy who can act on his behalf in case of obstruction
- ensures that the number of committee members does not fall below three people.

The chairman of the committee is the incumbent Head of Compliance & HSSE.

The committee consists of at least two permanent members and the chairman.

In order to avoid equality of votes, the committee must always have an odd number of members.

The members of the committee may not accept any benefits for their work, they may resign at any time with a written statement addressed to the chairman, and their membership will be automatically terminated upon the termination of the employment relationship.

Operation of the committee:

The committee acts as a body and makes decisions. It meets as needed, but at least once a year. The chairman notifies the members of the meeting at least five working days before. In urgent cases, the committee can be convened immediately.

A quorum requires a minimum of three people to be present. The decision is made by a simple majority. In case of personal involvement, a new committee member must be elected.

The committee is entitled to request the documents necessary for the assessment of the case and conduct investigations. If necessary, the committee can use the work of an expert, but this also requires the prior consent of the Managing Director.

Managing alerts

The Team Leader of Compliance and HSSE or the person designated by her files all alerts received. 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.

Investigating and evaluating of the alerts, informing the affected parties

The committee is entitled to request the documents necessary for the assessment of the case and conduct investigations. The investigation must cover the effects of the notification on DPD, the solution methods, damage mitigation, and the necessary consequences.

The Ethics Committee is independent, after its establishment it is not bound by any previous decision.

The Committee prepares a report on the results of the investigation, presenting the results and proposed solutions to the Managing Director.

The Ethics Committee informs those concerned in writing about the decision and the recommendations necessary to resolve the case.

The investigation must be completed within 30 days of the alert, which deadline can be extended once by an additional 30 days in justified cases.

If, after the decision has been made, unknown, relevant information emerges during the procedure, the Ethics Committee must be notified immediately. After learning about it, the Committee will decide whether to take the new evidence into account.

The Committee will send feedback to the whistleblower within 7 days of the conclusion of the investigation of the report.

The Committee monitors the implementation of the measures it recommends and makes new recommendations if necessary.

If, based on the investigation, the initiation of legal proceedings is justified due to the behaviour contained in the report, the Head of Compliance and HSSE will take action.

It is within the discretion of the Ethics Committee when to notify the notified party of the initiation of the procedure, taking into account privacy rights, the right to informational self-determination, and business secrets. The notified person has the right to defend himself and to clarify the facts, so it is forbidden to restrict his rights.

Alerts 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.

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.

The attention of the whistleblower must be drawn to the consequences of reporting in bad faith.

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.

Zero tolerance for retaliation against whistleblowers

DPD does not tolerate any form of retaliation against whistleblowers acting in good faith.

If someone feels that they have been retaliated against for reporting an ethical issue, they can report this by filling out the form on the Ethics and Compliance page of the DPD website, or in person to any member of the Ethics Committee.

The Ethics Committee shall investigate all such incidents and shall initiate disciplinary proceedings against anybody who retaliates against the whistleblower.

No one can be discriminated against or punished for making a report or refusing to accept or pay bribes, even if the company loses business opportunities as a result.