

Dear Employees,

In compliance with the provisions of Section 25 of Act XXV of 2023, we hereby inform you of the following:

The National Assembly adopted Act XXV of 2023 on complaints, public interest disclosures and rules related to whistleblowing.

The Act is based on a European Union directive (Directive (EU) 2019/1937 — the Whistleblowing Directive), which every Member State was required to transpose into its national legal system. The Act regulates the so-called internal whistleblowing system, through which persons employed in the public and private sectors may report infringements they have experienced or become aware of (primarily economic / corruption-related infringements, but also information concerning workplace harassment). Infringements may be committed by an act or by omission.

The purpose of the whistleblowing system is to provide an effective, confidential and secure channel for investigating identified infringements while protecting whistleblowers against possible retaliation.

The Act enables citizens to submit complaints, public interest disclosures and whistleblowing reports in accordance with the options regulated by the Act. Complaints and public interest disclosures may be submitted to state bodies and local government bodies. For the sake of clarity, the Act defines the meaning of a complaint and a public interest disclosure.

“A complaint is a request aimed at remedying an individual infringement of a right or interest, the handling of which does not fall within the scope of another — in particular judicial or administrative — procedure. A complaint may also contain a proposal.”

“A public interest disclosure draws attention to a circumstance whose remedy or elimination serves the interests of the community or society as a whole. A public interest disclosure may also contain a proposal.”

The Act also specifies who is entitled to submit a complaint or a public interest disclosure. Accordingly:

“Any person may submit a complaint or public interest disclosure to the body authorised to act in the subject matter concerned by the complaint or public interest disclosure. An oral complaint or oral public interest disclosure shall be recorded in writing by the body authorised to act, and a copy shall be provided to the complainant or the person making the public interest disclosure.”

The appropriate reporting channels for submitting complaints and public interest disclosures are provided and made available to citizens by state bodies and local government bodies.

The procedural rules for complaints and public interest disclosures are likewise communicated to the complainant or the person making the public interest disclosure by state bodies and local government bodies.

A public interest disclosure may also be made through a so-called protected electronic system, the establishment and operation of which are ensured by the Commissioner for Fundamental Rights.

Under the Act, separate whistleblowing systems are established by the following authorities:

- a) Directorate General for Audit of European Funds,
- b) Hungarian Competition Authority,
- c) Integrity Authority,
- d) Public Procurement Authority,
- e) Hungarian Energy and Public Utility Regulatory Authority,
- f) Magyar Nemzeti Bank (the Central Bank of Hungary),
- g) Hungarian National Authority for Data Protection and Freedom of Information,
- h) National Media and Infocommunications Authority,

- i) Hungarian Atomic Energy Authority, and
- j) Supervisory Authority for Regulated Activities.

More detailed information on the procedures for complaints and public interest disclosures and on the options for submitting them is available from state and local government bodies and authorities, as well as from the state bodies named above that operate separate whistleblowing systems.

It is important to note that any measure detrimental to a person making a public interest disclosure that is taken because of the public interest disclosure is deemed unlawful, even if the measure would otherwise be lawful.

Employees are hereby informed that if a person making a complaint or public interest disclosure is subjected to any unlawful retaliation because of the complaint or public interest disclosure, the State provides legal assistance for their protection in accordance with the forms of support specified in Act LXXX of 2003 on Legal Aid.

In accordance with the statutory obligation, our Company has established a whistleblowing system and the reporting channel required for its operation. Persons in an employment relationship are entitled to submit whistleblowing reports; the Act clarifies this concept as follows:

Employment relationship: any legal relationship in which the employed person performs activities for and under the direction of the employer in return for consideration, or is self-employed,

Employer: a person or entity that employs a natural person within an employment relationship,

Employed person: a natural person who performs activities for and under the direction of the employer within an employment relationship in return for consideration, or is self-employed. Accordingly, in addition to employees, persons who have another legal relationship with our Company for the performance of work (under a contract for services, agency agreement, etc.) are also considered employed persons.

The eligible persons specified here may submit a whistleblowing report in the manner described below, using the reporting channel set out below.

The whistleblowing channel used by our Company:

For the operation of the whistleblowing system, our Company has appointed the following person as the operator of the internal whistleblowing system:

Bognár Botond

e-mail address: beielentes@appsters.me

postal address: 1023 Budapest, Lukács utca 4, 3rd floor, door 8

The internal whistleblowing system may be used to report information concerning an unlawful or suspected unlawful act or omission, or other misconduct, provided that the matter does not fall within the jurisdiction of a court, an authority dealing with administrative offences, or another authority.

Under the above definitions, a report may be made through the internal whistleblowing system by

- a) a person employed by the employer,
- b) a person whose employment relationship with the employer has ended, and
- c) a person seeking to enter into an employment relationship with the employer, where the procedure for establishing such a relationship has commenced.

In addition to an employee, a report may therefore be made through the internal whistleblowing system by

- a) a sole trader or sole proprietorship, if in a contractual relationship with the employer,

- k) causing damage, including damage to the person's reputation or financial loss, including loss of business opportunity and loss of income,
- l) a measure as a result of which it can reasonably be expected that the person will in the future be unable to enter into an employment relationship in the sector in which they were employed,
- m) requiring a medical fitness examination,
- n) early termination or cancellation of a contract for goods or services, and
- o) revocation of a licence.

Our Company guarantees that the reporter's personal data will be processed in accordance with the applicable legislation and, accordingly, will be used exclusively for the purpose of handling the report.

Reports are received and investigated by the operator of the internal whistleblowing system. Employees and other contributors participating in the procedure are subject to confidentiality obligations undertaken in a separate declaration. The operator of the internal whistleblowing system may disclose the reporter's personal data to the employer only if the reporter has consented to such disclosure.

The operator of the internal whistleblowing system processes only those personal data of the reporter, the person whose conduct or omission gave rise to the report, and any person who may have material information concerning the matters contained in the report that are strictly necessary for investigating the report, and only for the purposes of investigating the report and remedying or terminating the conduct that is the subject of the report.

Until the investigation is concluded or formal accountability proceedings are initiated as a result of the investigation, the persons investigating the report may share information concerning the content of the report and the person concerned by the report — beyond informing the person concerned by the report — with another organisational unit or employee of the employer only to the extent strictly necessary for conducting the investigation.

If the report concerns a natural person, when that natural person exercises their rights to information and access under the rules on the protection of personal data, the reporter's personal data may not be made available to the person requesting the information.

Personal data that are not necessary for conducting the investigation shall be deleted by the operator of the internal whistleblowing system.

During the investigation, the operator of the internal whistleblowing system ensures the exercise of data subject rights in accordance with the data processing notice made available to the reporter following receipt of the report.

Within 30 days following the conclusion of the investigation of the report, the operator of the internal whistleblowing system anonymises the personal data — with the exception of the reporter's name.

Our Company provides information and training to its employees on whistleblowing reports twice a year.



Appsters Kft

**Bubla Áron ügyvezető**

**Appsters**

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