



# UCC

## Whistleblower System for Reporting Abuse

United Call Centers Ltd. (hereinafter referred to as UCC) operates a whistleblower system falling under the scope of Act CLXV of 2013 on complaints and public interest disclosures. The exclusive purpose of the whistleblower system is to provide an opportunity for UCC employees and members to report violations of laws, rules that harm public interest or UCC's interest.

In order to help those who wish to make a report, we provide a brief guide.

### Related Concepts:

- **Complaint:** A request aimed at resolving an individual's rights or interests infringement, and its resolution does not fall under the scope of any other procedure. A complaint may also include suggestions for improvement.
- **Reporting/Disclosure:** The verbal or written communication of an incident that has occurred.
- **Public Interest Disclosure:** Draws attention to a situation that serves the interest of the community or the whole society. The public interest disclosure may also include suggestions for improvement.

### 1. What can be reported?

In the UCC whistleblower system, reports can be made regarding illegal or suspected illegal actions, omissions, or other abuses.

### 2. Where can a report be made?

Reports can be submitted in writing through the UCC's electronic whistleblower system at <https://ethicshotline.uccbpo.com/> or in person at the following address: 9 Kis-Hunyad Street, 3525 Miskolc, Hungary. For in-person reports, please make an appointment in advance at +36-1-999-9615.

Reports can also be made to the following official authorities: <https://njt.hu/jogszabaly/2023-225-20-22>

### 3. Who can make a report?



# UCC

The UCC whistleblower system is open to UCC employees, individuals in contractual relationships with UCC members, including but not limited to:

- Employed by UCC
- Formerly employed by UCC
- In the process of establishing a contractual relationship with UCC
- Individual entrepreneurs or companies with contractual relations with UCC
- Owners with ownership interests in UCC
- Members of management or supervisory bodies, including non-executive members
- Contractors, subcontractors, suppliers, or individuals under the supervision and control of UCC
- Interns and volunteers working with UCC
- Individuals in the process of establishing or terminating a contractual relationship with UCC

#### 4. Information provided during the report and data protection

Each report must include the names of the persons and organizations involved, a detailed description of the incident, and any essential information related to the case. The report should provide comprehensive information about the alleged incident, including relevant background information, the sequence of events, the reason for the report, as well as names, dates, locations, and other pertinent details.

The report should also include the name and address of the whistleblower, although anonymous reports are also accepted. If personal data is provided, it will be treated confidentially in accordance with Act CLXV of 2013 and used solely for the investigation and resolution of the reported incident. Please note that if the report is submitted anonymously, UCC may refrain from investigating it.

UCC complies with the regulations concerning the protection of personal data concerning the provided personal and other information during the investigation.

#### 5. 5. Protection of the Whistleblower



No adverse actions can be taken against the whistleblower; therefore, discrimination, harassment, negative performance evaluations, reprimands, termination, and similar measures are strictly prohibited against the reporting individuals or cooperating parties. Through the feedback and reporting system, any adverse actions can also be reported. Any action that negatively affects the whistleblower due to the lawful submission of the report, and which is related to the previous relationship or connection disclosed by the whistleblower, will be considered unlawful, even if it would otherwise be considered lawful.

Adverse actions include but are not limited to:

- Suspension, collective redundancy, termination, or equivalent measures
- Demotion or denial of promotion
- Change in job responsibilities, work location, wage reduction, or alteration of working hours
- Denial of training opportunities
- Negative performance evaluations or work references
- Implementation of any adverse legal consequences concerning the employment relationship, including disciplinary measures, reprimands, or financial sanctions
- Coercion, intimidation, harassment, or isolation
- Discrimination, unfair treatment, or mistreatment
- Failure to transform a fixed-term employment relationship into an indefinite-term one when the legitimate expectation of the employee was that the employment relationship would be converted to an indefinite-term one
- Failure to renew a fixed-term employment contract or early termination of such a contract
- Causing harm, including damage to the person's reputation, financial losses, loss of business opportunities, and loss of income
- Taking actions that would reasonably prevent the individual from establishing future employment relationships in the sector related to their current employment relationship
- Requiring a health examination
- Early termination or termination of goods or service contracts, and
- Revoking permits.



# UCC

In the case of lawful reporting, the whistleblower shall not bear any liability regarding the acquisition or access to the information contained in the report, except when the whistleblower has committed a criminal offense related to the acquisition or access to such information. Furthermore, the whistleblower cannot be held accountable for the lawful submission of the report if they had reasonable grounds to believe that the report was necessary to reveal the circumstances addressed in the report.

## 6. Investigation of the report

Within seven days of submitting the report, the whistleblower will be identified and will receive confirmation of the report. Subsequently, the contents of the report will be investigated, and if necessary, the reporting officer may request further information, clarification, or additional details from the whistleblower to conduct a thorough investigation.

If needed, the reporting officers may involve other agencies in order to clarify the case. All communication with the whistleblower will take place exclusively through the reporting officers.

If the investigation cannot be completed within one month from the receipt of the report, the whistleblower will be informed of the expected timeframe for completion and the reasons for extending the investigation. In any case, the investigation period cannot exceed an additional two months.

## 7. Exemption from investigation

Reports may be exempt from investigation under the following circumstances:

- Repeated reports with identical content from the same whistleblower
- Reports on incidents the whistleblower learned about more than six months ago
- Reports on incidents that occurred more than a year before the report
- Reports submitted by unidentified individuals
- Reports containing intentionally false or misleading information from the whistleblower.

More information is available on the official website of the legislation:

<https://njt.hu/jogszabaly/2023-25-00-00>