

PRO-HU-0005

Ethics Hotline / Whistleblowing System
(English translation of the Hungarian version)

AI-generated translation. In the event of any discrepancy, the Hungarian-language version shall prevail.

Amended by:	Reviewed by:	Approved by:
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1. Revision History

Version	Revision	Revision date
1	First version	2021/07/06
2	Full review on the basis of Act XXV of 2023 on complaints, public-interest disclosures and rules relating to the reporting of misconduct	2024/01/11
3	Ethics Hotline Policy (this document): Section 6: relocation of the Ethics Hotline collection box to Reception and change of the frequency of emptying the collection box to once per week. Annex 1: change of the location of the collection box to Reception Annex 2: no change (header updated only) Annex 3: clarification of the location of the whistleblowing policy Annex 4: clarification of the location of the whistleblowing policy	2025/05/08
4	Ethics Hotline Policy (this document): Section 5.3.i: clarification of the investigation of anonymous reports Section 6: relocation of the Ethics Hotline collection box to an area not monitored by cameras (at the entrance to the canteen). Annex 1: change of the location of the collection box to an area not monitored by cameras (at the entrance to the canteen). Stylistic correction: "with appropriate seriousness" replaced with "with appropriate thoroughness" Annex 2: 1. Data Controller: change in the person of the representative Identification – handling of reports made by a reporting person who cannot be identified Annex 3: clarification of the location of the whistleblowing policy Annex 4: clarification of the location of the whistleblowing policy	2025/06/19
5	Comprehensive legal and compliance review; Environmental, Social and Governance complaint-handling requirements; standard reporting form; key performance indicators; internet access; clarification of data-protection and deadline rules	2026/07/23

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2. Objectives

The reputation of Alpine Kft. is founded on the standards governing the quality of the products we manufacture, our operational controls and procedures, and our workplace ethics and integrity. Our clients, customers, investors and suppliers expect us to operate in accordance with the highest standards, which all of our employees are required to observe. As an employer, Alpine Kft. seeks to monitor problems, grievances and misconduct occurring within its organisation or in connection with its activities so that such matters can be prevented in the future.

The Company operates the previously established Ethics Hotline as an internal whistleblowing system pursuant to Act XXV of 2023 on complaints, public-interest disclosures and rules relating to the reporting of misconduct (hereinafter: the Complaints Act) and, where the statutory conditions are met, as an Environmental, Social and Governance complaint-handling system pursuant to Section 28(2) of Act CVIII of 2023.

Within the whistleblowing system operated by Alpine Kft. under the name Ethics Hotline, information, facts and findings may be reported where the reporting person believes that they concern an unlawful act or an act believed to be unlawful, an omission or other misconduct. A report may also be made concerning an actual or suspected breach of the requirements set out in Alpine Kft.'s internal policies, in particular conflict-of-interest rules, the code of ethics, rules on the use of social media, rules on the operation of the camera system and rules on the use of information technology systems.

At Alpine Kft., the internal whistleblowing system is operated, pursuant to Section 19(1) of the Complaints Act, by an impartial person designated for this purpose, the Ethics Hotline Manager. When performing Environmental, Social and Governance complaint-handling duties, the Ethics Hotline Manager may not be instructed in this capacity and handles cases separately from other organisational units.

Legal Compliance and Related Reporting Obligations

In operating the Ethics Hotline and conducting procedures within its framework, particular regard must be had to the applicable provisions of the Complaints Act; Sections 28 to 31 of Act CVIII of 2023 on the Environmental, Social and Governance reporting and due-diligence obligations of enterprises (hereinafter: the Environmental, Social and Governance Act); Directive (European Union) 2019/1937 of the European Parliament and of the Council; and Regulation (European Union) 2016/679, the General Data Protection Regulation.

For complaints falling within the scope of the Environmental, Social and Governance Act, the system is accessible to anyone; case handling is impartial, separate and documented; and no retaliation or other adverse measure may be taken on account of a report.

To the extent that sustainability reporting obligations apply to the Company, the Company takes appropriately aggregated or anonymised information derived from the system into account when preparing sustainability reports and developing risk management and internal controls.

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When processing personal data, the Company applies Regulation (European Union) 2016/679, the General Data Protection Regulation, and the data-processing provisions of Act XXV of 2023.

3. Whistleblowing System (hereinafter referred to as the Ethics Hotline)

It is the duty and responsibility of the Company's Managing Director to establish and operate a procedure for handling reports concerning ethical matters, the Ethics Hotline.

The Managing Director may delegate the operation of the Ethics Hotline within the organisation to the Ethics Hotline Manager.

The relevant parties must be informed of the existence and operation of the Ethics Hotline.

As a general rule, only aggregated or anonymised information concerning the operation of the Ethics Hotline may be provided to the parent company's Internal Audit and Compliance Office. Identifiable data may be transferred only where the necessity is documented, appropriate access authorisation and a legal basis exist, and the Complaints Act and the General Data Protection Regulation are complied with, including Chapter V of the General Data Protection Regulation in the case of a transfer to a third country.

To protect Reporting Persons, reports and enquiries must be examined in an independent procedure, and influencing the course of the procedure is prohibited.

If a report concerns the Ethics Hotline Manager, the operation of the Ethics Hotline, or a person whose involvement would jeopardise the impartiality of the investigation, the matter must be investigated by an impartial person designated by the Managing Director who is not involved in the matter or, where necessary, by an independent external organisation. An investigation may not be omitted for this reason.

4. Users of the Ethics Hotline / Persons Entitled to Submit a Report

- a) an employee;
- b) a former employee;
- c) a person seeking to enter into an employment relationship, including an applicant or a person applying for a vacancy, provided that the recruitment procedure has already commenced;
- d) a sole proprietor, sole proprietorship or other person who has or had a contractual relationship with Alpine Kft., or who seeks to enter into such a contractual relationship, provided that the procedure for establishing the contractual relationship has already commenced;
- e) a person holding an ownership interest in Alpine Kft.; a person belonging to Alpine Kft.'s administrative, management or supervisory body, including a non-executive member; a

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person who formerly had such a relationship; or a person intending to establish such a relationship where the procedure for establishing that relationship has already commenced;

- f) a person working under the supervision and direction of an undertaking, subcontractor, supplier or contractor that has initiated a procedure to establish a contractual relationship with Alpine Kft., currently has a contractual relationship with Alpine Kft., or had such a relationship;
- g) an intern, former intern or person seeking to enter into a contractual relationship for an internship, if the procedure for establishing that contractual relationship has commenced;
- h) a volunteer, former volunteer or person seeking to enter into a contractual relationship for voluntary activity, if the procedure for establishing that contractual relationship has commenced.

For reports concerning Environmental, Social and Governance matters, the persons entitled to submit a report also include:

- i) natural and legal persons involved in the Company's supply chain;
- j) employees of suppliers;
- k) civil society organisations and representative bodies;
- l) representatives of local communities;
- m) any third party who identifies an Environmental, Social and Governance risk or violation connected with the Company's activities.

5. Matters Handled Through the Ethics Hotline

Reporting Persons may submit reports concerning the following matters where they become aware of unlawful or improper conduct or practices: information, facts or findings which the reporting person believes concern an unlawful act or an act believed to be unlawful, an omission or other misconduct. A report may also be made concerning an actual or suspected breach of the requirements set out in Alpine Kft.'s internal policies, in particular conflict-of-interest rules, the code of ethics, rules on the use of social media, rules on the operation of the camera system and rules on the use of information technology systems.

Reports Concerning Environmental, Social and Governance Matters

Any report indicating a social responsibility or environmental risk connected with the economic activities of the Company, its subsidiary or its direct or indirect supplier, or indicating a breach of a related obligation, constitutes a complaint under the Environmental, Social and Governance Act. Reports concerning corporate governance, corruption and other ethical matters may continue to be handled within the broader scope of the Ethics Hotline.

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Environmental:

- environmental pollution or illegal waste management;
- breach of environmental protection requirements;
- breach of climate-protection obligations.

Social:

- violation of employees' rights;
- child labour or forced labour;
- discrimination or harassment;
- breach of occupational health and safety rules.

Governance:

- corruption or bribery;
- breach of ethical standards;
- lack of supply-chain transparency.

1) Examples:

- Acts endangering the environment, for example the illegal disposal of large quantities of waste;
- Antisocial conduct, for example membership of a terrorist organisation;
- Conduct whereby Alps Alpine products or technologies used by the Company could be adapted for use as weapons or used in the manufacture of weapons;
- Conduct adversely affecting the safety or quality of products;
- Breach of fair-trading or competition rules, for example cartel conduct or insider trading;
- Disclosure of confidential Company information, for example sharing Company matters on social media;
- Unauthorised use of personal data;
- Breach of accounting or taxation rules;
- Theft, fraud, or removal of Company assets, products or raw materials without authorisation;
- Physical violence, fighting, abuse, psychological intimidation or humiliation;
- Discrimination or exclusion on grounds of religion, political views or sexual orientation;

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- l) Sexual or other harassment or abuse of position;
 - m) Intentional breach of Company instructions and incitement to such breach, for example failure to comply with hygiene requirements, breach of occupational health and safety requirements, or failure to disclose secondary employment;
 - n) Other unlawful or improper conduct.
- 2) The purpose of a report is to prevent, avert or bring to an end unlawful or improper conduct.
 - 3) A Reporting Person may submit a report regardless of whether they are personally affected by the subject matter of the report.

6. Bad-Faith or Knowingly False Reports

- 1) The reporting person is entitled to protection if, at the time of reporting, they had reasonable grounds to believe that the information reported was true. The absence of evidence, or the fact that the report cannot subsequently be substantiated, does not in itself make the report one submitted in bad faith.
- 2) It is prohibited to communicate knowingly false data or information in bad faith or to misuse the reporting system for the purpose of obtaining an unauthorised advantage.
- 3) Alpine Kft. may omit the investigation of a report if
 - i. the report is anonymous or the reporting person cannot be identified, and the investigation would require information additional to that contained in the report;
 - ii. the report was not submitted by a person entitled to do so;
 - iii. the report is a repeated report made by the same reporting person and is identical in substance to an earlier report; or
 - iv. the impairment of the public interest or of an overriding private interest would not be proportionate to the restriction of the rights of the person concerned by the report resulting from the investigation.

Where investigation of a Report may be omitted, the Ethics Hotline Manager must, until that determination is made, perform the tasks relating to receipt and recording of the Report and the provision of information connected with the Report.

7. Methods of Reporting

Reports concerning ethical matters may be submitted in writing to the e-mail address vonal@alpine.hu and by other methods published through Alpine Kft.'s customary local communication channels. Reports concerning Environmental, Social and Governance matters may be submitted in writing to the e-mail address vonal@alpine.hu or to the Company's postal address,

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2051 Biatorbágy, Vendel Park, Budai utca 1., marked "Environmental, Social and Governance report".

A report made by telephone or in person must be recorded completely and accurately by the Ethics Hotline Manager on the standard reporting form. The reporting person must be given the opportunity to review, correct and accept the written record by signature, and must be provided with a copy. At the reporting person's request, an in-person meeting must be provided within a reasonable period. Providing one's identity is not mandatory; investigation of a report where the reporting person cannot be identified may be omitted in the cases specified by the Complaints Act.

The collection box is emptied once a week, and any Report form found in the collection box must be stamped with the date and time.

The standard reporting form may be used both for submitting a written report and for the complete and accurate recording of an oral report made by telephone or in person.

The report must be recorded as accurately as possible on the basis of the available information; the reporting person is not required to prove the violation.

In the case of an oral report, the Ethics Hotline Manager signs the written record, gives the reporting person the opportunity to review, correct and accept it by signature, and then provides the reporting person with a copy. The absence of the reporting person's signature does not invalidate the report; this fact must be recorded in the written record.

Where a report is made in person, the reporting person's attention must be drawn to the consequences of reporting in bad faith, the procedural rules governing investigation of the report, and the fact that the reporting person's identity, if provided, will be treated confidentially at every stage of the investigation.

Within seven days of receipt of a written report, the Ethics Hotline Manager sends an acknowledgement to the reporting person if the reporting person has provided usable contact details for this purpose.

Together with the acknowledgement, the reporting person must be informed of the rules of the Reporting System and the rules governing the processing of personal data.

The Ethics Hotline Manager maintains a register of reports.

8. Information to the Reporting Person

- 1) If the Reporting Person identifies themselves, the Ethics Hotline informs the Reporting Person of receipt of the report, the investigation of the matter, the outcome of the investigation and the measures taken.
- 2) The obligation to provide information does not apply to anonymous reports.

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9. Protection of the Reporting Person

- 1) A reporting person acting in good faith may not suffer any disadvantage, for example disciplinary proceedings, demotion, transfer or dismissal, because of the report.
- 2) If the Ethics Hotline becomes aware that the Reporting Person has suffered any disadvantage because of the report, the circumstances must be investigated and the situation remedied.

10. Investigation of the Report

- 1) Reports must be investigated, and measures appropriate to the outcome of the investigation must be taken.
- 2) The investigation may be conducted by the Ethics Hotline Manager or by a person authorised by the Ethics Hotline Manager or the Managing Director, after appropriate measures have been implemented to ensure confidentiality.
- 3) The investigation may not be conducted by a person who is involved in the report in any way, due to a conflict of interest.
- 4) The Ethics Hotline Manager investigates the report within the shortest period permitted by the circumstances, but no later than thirty days after receipt. In particularly justified cases, this deadline may be extended, provided that the reporting person is informed at the same time; the information must state the reason for the extension and the expected date of completion of the investigation. Even where the deadline is extended, the investigation and notification of the reporting person of the outcome may not exceed three calendar months from receipt of the report.
- 5) During the investigation of the Report, the Ethics Hotline Manager maintains contact with the Reporting Person and may request the Reporting Person to supplement or clarify the Report, clarify the facts, or provide additional information.
- 6) During the investigation of the Report, it must be determined whether the information contained in the Report is accurate, and measures suitable for remedying unlawful acts or omissions, acts or omissions suspected to be unlawful, or other misconduct must be taken.
- 7) If the content of the Report justifies the initiation of criminal proceedings, measures must be taken to file a criminal complaint.
- 8) The Ethics Hotline Manager informs the Reporting Person in writing of the investigation of the Report or the omission of the investigation and the reason for such omission, the outcome of the investigation, and the measures taken or planned. Written notification may be omitted only if the Ethics Hotline Manager informed the Reporting Person orally and the Reporting Person expressly acknowledged receipt of the information in a manner that can subsequently be verified.

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9) The Ethics Hotline Manager provides clear, comprehensible and readily accessible information, including information accessible on the internet, on the operation of the Ethics Hotline, the procedure, protection of the reporting person, data processing, and the external and separate whistleblowing systems and procedures under the Complaints Act.

10) Specific Rules for Investigating Environmental, Social and Governance Reports:

- A risk-based approach must be applied during the investigation.
- The investigation may also extend to relevant participants in the supply chain.
- Where necessary, an independent expert or auditor may be involved.
- The severity and impact of the risk must be assessed during the investigation.

11) The outcome of the investigation must be documented and, where necessary, corrective measures must be ordered.

11. Obligation to Support the Investigation

1) All employees and managers are required to provide support when requested in connection with the investigation of a report.

12. Confidential Treatment of Reports

- 1) Everyone is required to treat information obtained in connection with reports as confidential. In particular, information concerning the identity of the Reporting Person must be treated confidentially.
- 2) In the case of Environmental, Social and Governance reports, it must be ensured that reports are handled in accordance with the General Data Protection Regulation and the Complaints Act and that data relating to third parties, for example suppliers, are also afforded appropriate protection.

13. Procedure Where Unlawful or Improper Conduct Is Identified

- 1) Where unlawful or improper conduct is identified, the decision-maker must, on the basis of the Ethics Hotline report, take measures suitable for remedying the violations or misconduct, including the following:
 - i. the person or organisational unit engaging in the unlawful or improper conduct must be instructed to cease the conduct immediately and to adopt and implement corrective action;
 - ii. the Human Resources Department must be requested to conduct the appropriate disciplinary proceedings;

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- iii. if the report was submitted by the perpetrator or a co-perpetrator, disciplinary proceedings must still be conducted; however, the Reporting Person's cooperation must be taken into account as a mitigating circumstance;
- iv. if the report justifies the initiation of criminal proceedings, measures must be taken to file a criminal complaint.

14. Rules Governing Data Processing in Connection with Reports

1) Within the framework of the Whistleblowing System

- a) the Reporting Person;
- b) the person whose conduct or omission gave rise to the Report; and
- c) the person who may have material information concerning the matters contained in the Report, only those personal data that are strictly necessary for investigating the Report may be processed, and solely for the purpose of investigating the Report and remedying or bringing to an end the conduct that is the subject of the Report.

2) Among the data processed within the Whistleblowing System, personal data not falling within the scope of the preceding paragraph must be deleted without delay.

3) The Reporting Person's personal data, except for the data of a Reporting Person who has manifestly communicated false data or information in bad faith, may be transferred only to a state body or authority competent to conduct proceedings initiated on the basis of the Report, provided that such state body or authority is authorised by law to process the data, or where the Reporting Person has consented to the transfer. The Reporting Person's personal data may not be made public without the Reporting Person's express consent.

4) If it becomes evident that the Reporting Person has, in bad faith, communicated false data or information and

a) circumstances arise indicating the commission of a criminal offence or regulatory offence in connection with such conduct, the Reporting Person's personal data must be transferred to the state body, authority or person authorised to conduct the relevant proceedings;

b) it may reasonably be presumed that the Reporting Person caused unlawful damage or another infringement of rights to another person, the Reporting Person's personal data must, upon request, be transferred to the state body, authority or person authorised to initiate or conduct the relevant proceedings.

5) If the Report concerns a natural person, the Reporting Person's personal data may not be made available to the person requesting information when that natural person exercises the rights to information and access granted under the rules governing the protection of personal data.

6) Data processed within the Whistleblowing System may be transferred to a third country or international organisation only if the recipient has undertaken a legally binding obligation to

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comply with the rules set out in the Complaints Act and the transfer also complies with a lawful data-transfer mechanism under Chapter V of the General Data Protection Regulation.

7) The personal data of a Reporting Person who discloses their identity, the person concerned by the Report, and any person who may have material information concerning the matters contained in the Report may not be accessed by anyone other than persons authorised to do so. Until the investigation is completed 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, in addition to informing that person, with other organisational units or employees of Alpine Kft. only to the extent strictly necessary to conduct the investigation.

8) At the commencement of the investigation, the person concerned by the Report and any person who may have material information concerning the matters contained in the Report must be informed in detail of the Report, their rights relating to the protection of their personal data, and the rules governing the processing of their data. In accordance with the requirements of a fair procedure, it must be ensured that the person concerned by the Report and any person having material information concerning the matters contained in the Report may state their position in relation to the Report, including through a legal representative, and support that position with evidence. Exceptionally, in justified cases, such persons may be informed at a later stage if immediate notification would frustrate the investigation of the Report.

15. Handling and Follow-Up of Environmental, Social and Governance Reports

1) Operation of the Environmental, Social and Governance Complaint Mechanism

The Company ensures that Environmental, Social and Governance reports are handled transparently, impartially, in a documented manner and separately from other organisational units; the Ethics Hotline Manager may not be instructed when performing Environmental, Social and Governance complaint-handling duties.

2) Measures

As a result of the investigation:

- a) corrective measures are identified;
- b) a supplier audit is initiated where necessary;
- c) in serious cases, contractual consequences may be applied.

3) Follow-Up

The Company follows up on the implementation of the measures adopted.

The outcome of an Environmental, Social and Governance complaint-handling procedure must be retained for five years after completion of the procedure. Other reporting records may be retained only for such period as is necessary and proportionate for the investigation,

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implementation of measures, handling of any legal claims and compliance with applicable retention obligations; personal data that are not necessary must be deleted without delay.

16. Reports on the Operation of the Ethics Hotline

- 1) The Ethics Hotline Manager is required to prepare regular reports on the operation of the Ethics Hotline.
- 2) The report must be brought to the attention of Alpine Kft.'s management at an appropriate forum, for example as part of the semi-annual Management Review.
- 3) As a general rule, the parent company's Ethics Hotline must be informed about the operation of the Ethics Hotline using aggregated or anonymised data; identifiable data may be transferred only where there is documented necessity and an appropriate legal basis.

17. Measurement of the Effectiveness of the Complaint Procedure

- 1) The key performance indicators must be calculated and documented on the basis of cases closed during the evaluation period defined for the Management Review.
- 2) Key Performance Indicator 1 – Cases closed after the deadline: the number of closed cases in which more than 90 days elapsed between receipt of the report and closure. If the result is zero, the assessment is green and no action is required; if the result is greater than zero, the assessment is red and a documented corrective action must be initiated.

The 90-day indicator is an internal operational key performance indicator. When assessing legal compliance, the final deadline of three calendar months under the Complaints Act must always be checked separately; a case exceeding that deadline is classified as red even if, according to the technical system, 90 days have not yet elapsed.

- 3) Key Performance Indicator 2 – Delayed extensions not communicated: the number of cases closed within 90 days in which more than 30 days elapsed between receipt of the report and closure and the reporting person was not simultaneously informed of the extension of the deadline, the reason for the extension and the expected date of completion of the investigation. If the result is zero, the assessment is green and no action is required; if the result is greater than zero, the assessment is red and a documented corrective action must be initiated.

18. Environmental, Social and Governance Reporting Linkage

The Company ensures that information derived from Environmental, Social and Governance reports is incorporated into:

- Environmental, Social and Governance reports;
- the risk-management system;

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- the development of the internal control system.

19. Protection of Reporting Persons

- 1) Any measure adverse to the Reporting Person
 - a) which is taken because the Report was lawfully made and
 - b) which is implemented in connection with the legal relationship or other relationship specified in Section 3 is deemed unlawful even if it would otherwise be lawful.
- 2) An adverse measure means an act or omission detrimental to the Reporting Person, including in particular:
 - a) suspension, collective redundancy, termination of employment or equivalent measures;
 - b) transfer of duties, change of place of work, reduction in remuneration or change in working hours;
 - c) withholding of training;
 - d) a negative performance assessment or employment reference;
 - e) the imposition of any adverse legal consequence under the law governing the employment relationship, including in particular disciplinary action, reprimand or a financial penalty;
 - f) coercion, intimidation, harassment or ostracism;
 - g) discrimination, disadvantageous treatment or unfair treatment;
 - h) failure to convert a fixed-term employment relationship into an indefinite-term relationship where the Employee had a legitimate expectation that the employment relationship would be converted into an indefinite-term relationship;
 - i) failure to renew a fixed-term employment contract or its premature termination;
 - j) causing damage, including damage to the person's reputation or financial loss, including loss of business opportunity and loss of income;
 - k) a measure that may reasonably result in the person being unable in the future to enter into an employment relationship in the sector in which they are employed;
 - l) requiring a medical fitness examination;
 - m) premature termination or cancellation of a contract for goods or services; and
 - n) revocation of a licence.
- 3) In administrative or judicial proceedings relating to an adverse measure, if the Reporting Person proves that the Report was lawfully made,
 - a) it must be presumed that the adverse measure was taken because the Report was lawfully made; and

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- b) the person who took the adverse measure bears the burden of proving that the adverse measure was taken for a duly justified reason and not because the Report was lawfully made.
- 4) Where the Report is lawfully made, the Reporting Person is not deemed to have breached any restriction relating to the disclosure of a legally protected secret or any other statutory restriction on the disclosure of information, and bears no liability in respect of such Report, provided that the Reporting Person had reasonable grounds to believe that the Report was necessary to reveal the circumstances concerned by the Report.
- 5) Where the Report is lawfully made, the Reporting Person bears no liability in respect of acquiring or accessing the information contained in the Report, unless the Reporting Person committed a criminal offence in acquiring or accessing the information. The Reporting Person may not be held liable for lawfully making the Report if the Reporting Person had reasonable grounds to believe that the Report was necessary to reveal the circumstances concerned by the Report.
- 6) The making of a Report is lawful if
 - a) the Reporting Person submitted the report in accordance with the rules of the Whistleblowing System, this Policy and the Complaints Act;
 - b) the Reporting Person obtained the reported information concerning the circumstances addressed by the Report in connection with work-related activities; and
 - c) the Reporting Person had reasonable grounds to believe that the reported information concerning the circumstances addressed by the Report was true at the time of reporting.
- 7) The protection afforded to the Reporting Person also applies to a person who
 - a) assists a Reporting Person who lawfully makes a Report in making that Report;
 - b) is connected with a Reporting Person who lawfully makes a Report, in particular a colleague or family member of the reporting person, and may be subject to an adverse measure.

20. Miscellaneous Provisions

If the operator of the system receives, in error, a Report concerning a suspected adverse effect of a product manufactured or distributed by Alpine Kft., the operator of the system must immediately forward it to the competent organisational unit of Alpine Kft.

In the case of Environmental, Social and Governance reports, when processing personal data it must be ensured that the processing of data concerning participants in the supply chain also complies with the General Data Protection Regulation and the Complaints Act.

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Matters not regulated in detail by this Policy are governed by the provisions of the Complaints Act, the Environmental, Social and Governance Act, the General Data Protection Regulation and other applicable legislation.

Alpine Kft. is entitled to unilaterally change or amend the provisions of this Policy at any time.

21. Related Documents

Annex 1: Standard reporting form for written reports and for the complete and accurate recording of oral reports

Annex 2: Information for the reporting person on the protection of personal data

Amended by:	Reviewed by:	Approved by:
Lakner Tibor	dr. Orbán Ágota LL.M.	Zsolt Demeter