

PUBLISHED BY ABB HUNGARY EXTERNALLY AND INTERNALLY

ABB Values

ABB Group is an organization with strong values of responsibility and integrity. Our [Code of Conduct \(Viselkedési Kódex\)](#) contains general guidelines for conducting business with the highest standards of ethics.

ABB Group is committed to an environment where open, honest communications are the expectation, not the exception. There are a number of channels whereby you can report complaints or concerns of possible improper conduct or illegal activities without threat of retaliation. We want you to feel comfortable in making a report of misconduct where you believe violations of policies or standards have occurred and to do so without fear of retaliation.

The purpose of this document is to inform about ABB's internal reporting channels and how reporting and follow-up of reports takes place, and to ensure that we fulfill our obligations according to the Hungarian Act XXV of 2023 on complaints, disclosures in public interest, and related rules on reporting abuses („**Whistleblower Protection Act**”).

Reporting Misconduct

You can make a report if you have received or obtained information about misconduct in a work-related context. This may apply to the business of an ABB company or to another business that you have been in contact with through your work, even if you yourself are not directly in a contractual relationship with ABB.

At the time of receiving the information, you must have been a current or former ABB employee or jobseeker at a Hungarian ABB company, performed work for a Hungarian ABB company or otherwise been active at such a company (e.g., as an intern, staff, consultant, contractor or subcontractor). The fact that you have terminated your work-related relationship with us, or that it has not yet begun, is thus not an obstacle to reporting a malpractice.

You can also make a report if you are:

- A regular full-time and part-time employee (including those on approved leave of absence, volunteers, and interns, and all whose onboarding is in progress) employed directly by a Hungarian ABB company. This includes supplemental/casual employees, employees on fixed contracts, paid and unpaid trainees.

- A private entrepreneur and current (including whose onboarding is in progress) and past personnel supervised and managed by contractors, sub-contractors, and vendors (including staff leasing personnel) engaged in work by a Hungarian ABB company.
- A shareholders and person belonging to the administrative, management and supervisory body, including non-executive members of a Hungarian ABB company.
- An external stakeholder from outside ABB (e.g., from one of its partner companies) and you come to know or hear of misconduct within any ABB company.

What can I make a report about?

Through our internal reporting channels, you can report on unlawful, suspected unlawful act or omission and other misconduct, especially, if it concerns the EU law within the scope of Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law related to the fields of public procurement, financial services, product and transport safety, protection of the environment, food and feed safety, public health, consumer protection, protection of privacy and personal data, tax, competition law, radiation protection and nuclear safety, security of network and information services, anti-money laundering and terrorist financing.

Other conducts foreseen by the ABB Code of Conduct may not meet the above criteria but can also be reported using the ABB internal channels, such as occupational health and safety breaches, other, not-listed actions or omissions that may constitute a crime or administrative offence. Although such reporting is not covered by the protection under the Whistleblower Protection Act, ABB still applies the group-wide non-retaliation policy described below also for such reporting.

Whistleblower protection policy

Our internal reporting channels are there to ensure that you feel safe reporting irregularities without the risk of being subjected to any form of retaliation. ABB's [Whistleblower Protection Statement](#) offers reporters of misconduct, or whistleblowers, protection from retaliation provided the complaint is made:

- In good faith, in a manner that is consistent with ABB's values, particularly respect for others; and
- In the reasonable belief of the whistleblower that the conduct or matter covered by the complaint constitutes, or has the potential to constitute, a violation.

If you use the reporting channels to knowingly report false information, unfounded rumors or hearsay, you are not covered by Whistleblower Protection Act's protection, whereupon your Hungarian ABB company may, for example, take employment law measures in relation to you.

For more information on ABB's group-wide non-retaliation policy see [Reporting channels \(abb.com\)](#).

Reporting channels

ABB encourages you to speak up and voice concerns. To allow employees to do this, we maintain a variety of reporting channels.

We want you to feel comfortable in approaching your **supervisor or management** in instances where you believe violations of policies or standards have occurred. The ABB reporting channels also include the **ABB Business Ethics Helplines** (you can either use country specific telephone helplines or a web submission portal), and **direct contact** to a number of internal Legal & Integrity officers [Legal & Integrity Organizational chart \(abb.com\)](#).

The Legal & Integrity local designated representatives appointed for Hungary are:

ABB Kft. ("HUABB", locations: Budapest, Fót, Gyál, Győr)

- **Anita Gyóni-Maksa**, Local corporate counsel, Legal & Integrity Team, anita.gyoni-maksa@hu.abb.com; +36203998229
- **Bernadett Pichler**, Contract manager, Legal & Integrity Team, bernadett.pichler@hu.abb.com; +36204350511

ABB Installation Products Kft. ("HUTBG", location: Kecskemét)

- **László Menyhárt**, HR, laszlo.menyhart@hu.abb.com, +36302282702

Reporters and whistleblowers are welcome to be anonymous or self identify, but it is not a requirement, and the process is designed to be confidential. ABB respects your choice to remain anonymous, however, please note that in some cases this could hinder the fact-finding process and ultimately, affect the quality of the outcome of the investigation.

Further, your Hungarian ABB company may reject the investigation of your report, if you are not entitled to submit report, if you repeatedly and without basis submitted reports with the same subject, or, due to

protection of public interest or significant private interest. If the investigation is not followed-up, the designated representative of your Hungarian ABB company will notify you of this fact and the reasons of rejection.



In addition to the channels depicted on the above figure of ABB's Internal Reporting System, in case of the Hungarian ABB companies, the local designated representative(s) of your Hungarian ABB company are available as additional internal reporting channels.

Business Ethics Helpline and Web Submission Portal

The ABB Business Ethics Helpline was introduced for the purposes of providing all ABB employees and external stakeholders worldwide with a means to report suspected violations of the ABB Code of Conduct or any suspicious activities which may breach ABB policies – directly to Group Legal & Integrity.

If you are making a report from Hungary on the [Business Ethics Helpline and Web Submission portal](#), your report will be directed to the ABB Group Legal & Integrity (**Reporting to Group**), unless you clearly state that you would like your report to be handled by a local designated representative for your Hungarian ABB company (**Local Reporting; their names are listed above**).

Reporting to Group: Reports to this Helpline will usually be handled by the Integrity Investigations & Monitoring Team, which reports into ABB Group Function Legal & Integrity, or can be referred to another function, such as Human Resources, if appropriate.

Local Reporting: the local designated representatives will handle reports as described above.

External Reporting Channel

Please note that you may also choose to report misconduct directly to the competent national government authorities in Hungary, instead of using ABB's internal reporting channels.

How do I make a report?

You can report misconduct using any of the above channels, in writing or verbally either by telephone or at a physical meeting. If you wish to request a physical meeting, you must indicate your preference when making your report.

What happens after I make a report?

- **Confirmation of receipt of report and documentation of report**

- *If you report in writing through the **ABB Business Ethics Helpline**, based on your choice, your report will be forwarded, by the Helpline providers to ABB Group Legal & Integrity or to a local designated representative for your Hungarian ABB company. Once received, the recipient of your report will confirm receipt.*

- *If you report verbally by telephone (the [Business Ethics Helpline and Web Submission portal \(abb.com\)](#))*

- Your report is documented by a Communication Specialist employed ABB's outsourced service provider of the Global ABB Helplines – and based on your choice forwarded by **ABB Business Ethics Helpline** to ABB's dedicated global investigations team, Integrity Investigations & Monitoring, which reports into Group Function Legal & Integrity, unless you specifically request your report to be handled by a local designated representative for your Hungarian ABB company.
 - If requested, ABB will provide you with minutes of the report, which you can read, verify, rectify if necessary, and sign.

- *If you report verbally via telephone to your **local designated representative**:*

- Your report is documented by the person you are on the call with; your local designated representative will present you with detailed minutes of the report, which you can read, verify, rectify if necessary, and you must sign. You will also receive a copy of the minutes.

- *If you report verbally at a physical meeting with your local designated representative:*

- Your report is documented by the person you are meeting with; and your local designated representative will present you with detailed

minutes of the report, which you can read, verify, rectify if necessary, and you must sign. You will also receive a copy of the minutes.

- *If you report in writing via e-mail to your local designated representative:*

- o Once received, your local designated representative will confirm receipt.

- **Follow-up and feedback on follow-up of report**

The recipient of your report (see above) is responsible for ensuring that the necessary and sufficient steps are taken to follow up and assess the accuracy of your report. This may include further contact with you, conducting internal investigations, taking labor law action, prosecution and / or recovering funds.

The follow-up may lead to the conclusion:

- (i) that further measures need to be taken to deal with the reported irregularities, including the referral of the report to ABB's Group Channel for further/more extensive investigation or follow-up, or the involvement of local and/or overseas external counsels in the course of the investigation; or
- (ii) that the case is to be handled in the context of another internal or external procedure (e.g. due to the fact that the case in itself relates to an irregularity, but does not concern a misconduct of public interest) and that information is thereby to be transferred to another function within ABB, such as HR, or outside of ABB; or
- (iii) that no further action needs to be taken and that the case can be closed.

You will receive feedback through your chosen method of communication on the follow-up performed and any conclusions that have been drawn from the follow-up at the end of the investigation.

- **Archiving of report and handling of personal data**

Your data will be handled and archived in accordance with the Whistleblower Protection Act and EU GDPR standards pursuant to the details of the data processing as shown in the table below, and ABB's privacy notice, ([available here](#)) which contains further information on your data privacy rights.

Purpose of the processing	Legal basis of the processing	Scope of processed data	Data retention period	Recipient of personal data
<p>Operating local, company-level internal reporting channels as part of a whistleblower system, including receiving, acknowledging, investigating, following up and acting upon the outcome of the investigation of a report.</p>	<p>Article 6(1)(f) of the GDPR: legitimate interest of the Hungarian ABB entities.</p> <p>The legitimate interest: to determine and remediate breaches of the code of conduct and ensure ABB's compliance with regulatory authorities and legislation as well as eliminate any financial, legal or reputational risks to the organization and ensure the safety and the well-being of the employees.</p>	<p>In case the reporter self-identifies:</p> <p>Name, position, name of relevant Hungarian ABB company, e-mail address, mobile phone number, any personal data contained in the report on the reporter and on other people concerned by the report.</p> <p>In case of anonymous reporting:</p> <p>Any personal data contained in the report on the reporter and on other people concerned by the report.</p>	<p>The general data retention period is 2 years.</p>	<p>The ABB Integrity Investigations & Monitoring Team (“IIM”) and ABB Group Function Legal & Integrity (also known as the “Group Integrity Office”) of the ABB Group Companies.</p> <p>If the investigation of a report 1) gives rise to criminal procedure, e.g., in case of fraudulent conduct, or 2) if the report made in bad faith likely causes infringement of rights, ABB must take the necessary steps to initiate the applicable official procedure and transfers the personal data to the competent</p>
		<p>Source of data:</p> <p>The reporter</p>	<p>The retention period of data processed in connection with labour-related claims or receivables is 3 years from the</p>	

			<p>date when the employment with a given Employee ceases in accordance with Section 286 (1) of Act I of 2012 on the Hungarian Labour Code.</p>	<p>national court, authority or government agency.</p>
			<p>The retention period of data serving for the enforcement of a claim or fulfilling an obligation in civil law is 5 years from the date when the civil law relation with the individual ceases as provided for in Section 6:22 (1) of Act V of 2013 on the Hungarian Civil Code.</p>	
			<p>Where the data needs to be kept pursuant to Sections 168-169 of Act C of 2000 on Accounting, the data will be deleted after 8 years from the date when the contractual relation ceases. A practical example would be where the data is part of the bookkeeping records e.g., in contract-related files (including purchase orders) or on an invoice.</p>	