

# NOTICE ON SPRINT ASSET HUNGÁRIA ZRT.'S WHISTLEBLOWING SYSTEM

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## 1 Company details

- **Name:** Sprint Asset Hungária Fund Management Private Limited Company (hereinafter “Company”)
  - **Registered office:** 1138 Budapest, Révész u. 27., 4th floor
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## 2 Purpose and legal basis of the whistleblowing system

Pursuant to Act XXV of 2023 on complaints, public-interest disclosures and whistleblowing rules—implementing Directive (EU) 2019/1937—the Company, as an entity subject to Hungary’s Anti-Money-Laundering Act (Pmt.), operates an internal whistleblowing system. The system aims to **increase transparency and accountability** and to **protect persons who report actual or suspected breaches** from retaliation while their reports are investigated.

### Who may use the system?

- Current and former employees
  - Persons in other employment-type relations (including interns and volunteers)
  - Members of the Supervisory Board
  - Applicants whose recruitment procedure has begun
  - Sole traders or business entities contracting with the Company (current, former or prospective), their subcontractors, suppliers or persons under their supervision
  - Anyone who becomes aware of an unlawful act, omission or other wrongdoing related to the Company’s activities
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## 3 Procedure for making and handling reports

**Governing rules** — The detailed guarantees for receiving and investigating reports are set out in the Company’s **Whistleblowing Policy**.

### Designated officer (“Whistleblowing Officer”)

- **Name:** Benedek Pillér
- **E-mail:** bejelento@sprintasset.hu
- **Phone:** +36 1 770 7600

The Whistleblowing Officer—who is also the Company’s Compliance Manager—receives, assesses and investigates reports, prepares investigation plans and summary reports where necessary, and initiates any follow-up measures.

## Channels for submitting a report

- **In writing:** by e-mail to the above address
- **By telephone:** on the number above
- **In person:** directly to the Whistleblowing Officer

The Company does **not** use any device that automatically records reports. If a report is made orally in person, the officer will document it in a durable, retrievable form, give the whistleblower a copy, and allow them to check, correct and sign it.

In particularly justified cases an **external whistleblower-protection lawyer** may be appointed.

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## 4 Data processing and confidentiality

Personal data of the whistleblower, of the person whose conduct is reported, and of anyone who may have relevant information may be processed **only to the extent strictly necessary** to investigate the report and to remedy or stop the conduct concerned. Such data may be forwarded to the whistleblower-protection lawyer or an external body involved in the investigation.

The system is designed so that **no-one other than authorised persons can learn the identity** of the whistleblower or the persons named. Information may be shared within the Company **solely to the minimum extent necessary** for the investigation. If the report concerns an individual, the whistleblower's identity will **not** be disclosed to that individual when the latter exercises data-protection rights of access or information.

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*This English version is for information only. In the event of any discrepancy, the Hungarian original shall prevail.*