

REGULATION OF ETHICS REPORTS MANAGEMENT IN MOL GROUP

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I. PRINCIPLES FOR THE MANAGEMENT OF ETHICS REPORTS

1. The principle of due process

All participants in ethics proceedings are required to act in accordance with the criteria of objectivity, impartiality and the Code of Ethics and Business Conduct and Business Partner Code of Ethics [hereinafter: Codes].

2. Conduct of the parties

In the course of the ethics procedure, participants must apply a communication style with each other and with others that is also expected in formal professional relations and conduct themselves in accordance with the principles of good faith, fairness and cooperation.

3. Deadlines

Participants in the ethics procedure shall use their best endeavors to meet the deadlines set forth in these Regulation so that the procedure of the Ethics Council can effectively facilitate the decision making of the executives authorized to take the necessary measures, as well as support the management of other contractual relationships.

4. Confidentiality

(1) In order to protect the personal data, reputation of all parties involved, as well as MOL Group's business data, all information and documents prepared or made available during the ethics process are confidential. In accordance with MOL Group's Data Classification Policy, documents related to ethics questions are classified as "MOL Secret" or "MOL Confidential".

(2) In ethics matters, all participants (members of the Ethics Council, Group Ethics Officer and their manager/employer, local Ethics Officer, other investigator, the reporter, the implicated person, witness, expert etc.) must keep confidential all details of the filed report and data regarding the Reporter, as well as the information pertaining to the person whose conduct or omission gave rise to the report or who may have relevant information on the content of the report [hereinafter: person concerned in the report].

(3) The obligation of confidentiality does not limit the implicated person's right to defend himself/herself or to clarify the facts, however, in exercising his/her rights, the implicated person is obliged to act lawfully including respect for personal rights, the right to information self-determination and to trade secrets.

5. Management of personal data

(1) MOL Group, as the data controller may - within the framework of the SpeakUp! whistleblower system - process those personal data of the persons involved in the report that are strictly necessary for the investigation of the report for the sole purpose of investigating the

report and remedying or terminating the reported conduct, and may transfer those data to another organisation within MOL Group which may participate in the inquiry.

(2) The legal basis for data processing is the data controller's legitimate interest: to prevent, detect an ethics violation which jeopardize the data controller's assets, trade secrets, intellectual property and business reputation, as well as the appropriate, respectful work environment devoid of intimidation and retaliation (pursuant to (1) f) of Article 6 and (b) and (g) of Section 2, Article 9 of the GDPR¹).

(3) Personal data not vital for the investigation of the report and for the remedying or termination of the conduct forming the subject matter of the report shall be deleted immediately from the data processed under the reporting system.

(4) During the investigation of the report, the Reporter or the person heard may request the confidentiality of his/her personal data, so that his/her personal data can only be known to the Chairperson of the Ethics Council and the Group Ethics Officer. If the request impedes or makes it impossible to conduct the investigation, the Group or local Ethics Officer in charge shall bring the matter to the attention of the Reporter.

(5) If according to the findings of the investigation, his/her report is not substantiated or no further action is required, the personal data relating to the report shall be deleted within 60 days of the completion of the investigation.

(6) If according to the findings of the investigation, action is taken, including action for legal proceedings or employment sanctions against the Reporter, the data relating to the report may be processed under the reporting system no later than the date of the final conclusion of the proceedings initiated on the basis of the report.

6. Use of mother tongue

At the request of the Reporter or the implicated person, the use of their mother tongue during the procedure shall be ensured by the Council primarily with the assistance of the local Ethics Officer who knows the given language, and shall provide the documents in their mother tongue. The transcripts and minutes of the concerned persons' hearings in their mother tongue will be translated into English with the assistance of the Group Ethics Officer.

7. Ethics procedure in cases pending at an authority or court

Proceeding described in this Regulation may not be initiated in case of a pending proceeding in the same or related matter until the proceeding in question is closed. Proceedings already in progress shall be suspended until the final judgement of the official or judicial proceedings.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC („General Data Protection Regulation”, „GDPR”)

8. Freedom of evidence

Participants in the ethics management system are free to choose their method of proof and to evaluate the available evidence according to their free beliefs.

9. Governing Law

Provisions of section CLXV of the 2013 Act on reports and public interest disclosures shall apply to the present Regulation and the ethics procedure conducted. Where local law is also applicable to the person concerned in the report or to a particular ethics procedure, the provisions of local law must also be enforced.

II. ETHICS REPORTS PROCEDURE

10. Notification of ethics reports and investigation

(1) The following persons are entitled to inspect the report, the investigation and the ethics decision:

- a) the Chairperson of the Ethics Council;
- b) the members of the Ethics Council;
- c) the Group Ethics Officer and the employee assigned to replace him/her;
- d) the local Ethics Officer involved in the investigation of the case;
- e) the person filing the report (Reporter);
- f) the person suspected of having committed an ethics misconduct (implicated person);
- g) staff involved in the investigation of the ethics matter who provide information and professional support (including the manager exercising the employer's rights over the implicated person and the HR partner) to the extent strictly necessary for their participation;
- h) the manager exercising the employer's rights over the Group Ethics Officer, excluding personal data, to the extent necessary to guarantee continuous fulfilment of the task.

(2) The reporting system should be designed in such a way that the identity of any non-anonymous whistleblower cannot be known to anyone other than the investigators. Investigators of the report shall keep confidential the information concerning the content of the report and the data pertaining to the persons involved in the report until the investigation is closed or formal liability is established as a result of the investigation and must not share it – apart from notifying the person involved in the report – with any unit of the organization exercising the employer's rights or any of its employees.

(3) This shall be without prejudice to the implicated person's right to consult with his/her manager exercising the employer's rights, his/her legal representative or a delegate of his/her trade association to the extent necessary for their participation or to inform the witness nominated by him/her of the fact of the investigation.

11. Exclusion from ethics investigation

(1) The Reporter, the implicated person and the person whose hearing is necessary during the procedure or from whom an impartial assessment of the case cannot be expected for other reasons may not conduct an investigation or participate in the decision-making.

(2) The person concerned in the report shall notify the Chairperson of the Council and the Group Ethics Officer of the reason for the exclusion immediately after becoming aware of it. The Group Ethics Officer is obliged to notify the Chairperson of the reason for his/her own exclusion immediately after becoming aware of it. The Chairperson of the Council shall immediately notify the Ethics Council of the reason for his/her exclusion as soon as he/she becomes aware of it.

(3) The Chairperson of the Council shall decide on an objection of bias from any party to the proceedings, and the Council as a body shall decide on an objection of bias against the Chairperson of the Council.

(4) All MOL Group employees are obliged to cooperate with the Group and local Ethics Officers to perform their duties, obtain information and support procedures.

(5) During the ethics procedure, no one is obliged to provide information that is incriminating to himself/herself or his/her relative, but he/she has the opportunity to do so, however, providing misleading information during the investigation violates the provisions of the Codes.

(6) If an objective statement cannot be expected from the person heard due to bias or other reasons, he/she must make the ethics officer in charge aware and he/she may refuse to make a statement. In other cases, MOL Plc.'s employees and contractual partners are obliged to cooperate with ethics officers.

12. Means of inspection

(1) The following means of inspection in particular may be used during the procedure:

- a) hearing the person concerned in the report in person, by telephone or by videoconference;
- b) requesting available documents and other data or information relevant to the case;
- c) inspection of sites, locations or objects relevant to the case;
- d) the involvement of an expert in particularly justified cases.

(2) At least one other person must be present at the hearing in addition to the person heard and the person conducting the investigation.

(3) In addition to the person heard, the person conducting the investigation and the registrar, the relevant local Ethics Officer may be present at the hearing.

(4) At the request of the implicated person, his/her manager of the organisation exercising the employer's rights, the delegate of the trade association as an assistant or the legal representative of the implicated person may attend the hearing. The assistant may not make a statement on behalf of the person being heard, but may, with the permission of the person conducting the hearing, address a question to the person being heard.

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- (5) At the hearing, all other parties heard (witness, expert) must be informed about the management of their personal data (name, role, conclusion drawn on them based on what has been said during the case) and about their rights related to the protection of their personal data.
- (6) Minutes or notes of the hearing are made, which the person heard can view. Minutes shall be taken of the hearing of the implicated person upon his/her request. With the express and prior consent of the person heard, a report of the hearing may, if it seems appropriate, be made by audio recording - in which case it is sufficient for the person conducting the hearing and the person heard to be present. Based on the recording, a content description of the hearing will be made. After the transcript is approved by those present, the recording must be deleted.
- (7) A person requested to provide documents or information in the ethics procedure must send the requested documents and information to the requesting Group Ethics Officer or local Ethics Officer within 5 days of the request.
- (8) The Group Ethics Officer may also request the competent local Ethics Officer to carry out certain procedural actions (conducting interviews, obtaining data, documents, etc.) by giving a reasonable time limit. The local Ethics Officer shall comply with the request within the time limit and forward the case file documents to the Group Ethics Officer.

13. Administrative deadline

- (1) The contents of the ethics report shall be investigated as soon as circumstances allow, not later than thirty days from the receipt of the report, the possibility of derogating from which time limit may, except in the case of an anonymous or unidentifiable reporter, only occur in duly justified cases, pending the approval of the Ethics Council, while simultaneously making the reporter aware.
- (2) The duration of the inquiry should not exceed three months.

III. INITIATION OF AN ETHICS PROCEDURE, PRELIMINARY INVESTIGATION AND DECISION-MAKING PROCEDURE

14. Ethics report

- (1). The ethics procedure is initiated on the basis of a report or disclosure.
- (2) Anyone who is an employee of, or has a contractual relationship with a company belonging to MOL Group or who has a reasonable legitimate interest in filing a report or remedying the conduct complained of, may initiate an ethics procedure, file a report if they detect a conduct in violation of the Codes with a member organisation of MOL Group, a service station, supplier, distributor, contractual, sponsored or supported partner or a joint venture.
- (3) Reporting or initiating ethics proceedings may ensue in the ways listed in the Codes.
- (4) To initiate an ethics procedure, the reporter must provide the following information or make the following statements:

- a) the name and contact details of the Reporter;
- b) their relationship to MOL Group or an indication of their legitimate interest in remedying the conduct forming the subject matter of the report;
- c) if known, the name of the implicated person(s) and their role with MOL Group;
- d) a description of the alleged ethics misconduct and all relevant information to review the case;
- e) the evidence relating to the case which support the commission of the offense;
- f) the statement by the Reporter that he/she is making the report in good faith of circumstances of which he/she is aware or has reasonable grounds to believe that they are true.

(5) In case of the complete or partial absence of the above listed data, the Council shall examine the report received from an anonymous or unidentifiable Reporter only if the other facts and data contained therein are suitable for initiating the investigation.

(6) The Reporter needs to be made aware of the consequences of any report filed in bad faith, the procedural rules governing the report's investigation and the fact that his/her identity, if he/she provides the information necessary for identification, will be kept confidential at all stages of the investigation.

(7) If it becomes apparent that the Reporter or the person who filed the public interest disclosure has acted in bad faith, provided thus decisive, false information, the investigation on which the report or public interest disclosure is based may be terminated without any action taken.

(8) If it becomes apparent that the Reporter has acted in bad faith, provided thus decisive false information and there is a likelihood that it has caused unlawful damage or other impairment of a right of another person, his/her personal data shall be disclosed to the body or person authorized to initiate or conduct the proceedings.

15. Ethics report management

(1) A written record must be kept of all reports received via phone or in person.

(2) If the report is received by the Ethics Council, directly by its Chairperson or any of its members, it shall be forwarded to the Group Ethics Officer without delay.

(3) If the report is received by the relevant local Ethics Officer, he/she shall immediately forward the report - in encrypted form - to the Group Ethics Officer.

16. Deficiencies, dismissing a report

(1) Proceedings beyond 6 months of the Reporter becoming aware of an act or omission to violate the Codes, and beyond 3 years from the time of its commission, may be instituted only in particularly justified cases if they are proportionate to the seriousness of the alleged violation.

(2) An investigation of a suspected violation or omission of the Codes may be dismissed if:

- a) the report has the same content as a report submitted beforehand;
- b) the same Reporter has made a repeated report regarding the same case, if the report contains no substantially new information;
- c) the report has been submitted 6 months after becoming aware of the conduct or omission complained of;
- d) the report made by an anonymous or unidentifiable reporter is incomplete to such an extent that no result can be expected from its investigation;
- e) the report is manifestly unfounded;
- f) the conduct complained of does not manifestly violate the Codes;
- g) the prejudice to the public interest or overriding private interest is not proportionate to the restriction of the rights of the person concerned in the report resulting from the investigation of the report.

(3) If the report does not comply with Chapter 14. (4), it shall be returned by the Group Ethics Officer or the local Ethics Officer to the initiator of the procedure, indicating the deficiencies, for the purpose of rectifying the deficiencies with a short deadline of up to 3 days.

(4) The Preparatory Committee shall, on the proposal of the Group Ethics Officer, decide not to examine incomplete reports.

(5) The Group Ethics Officer is obliged to inform the Ethics Council on a quarterly basis of all reports, including those that have been forwarded to another organizational unit for action or on the basis of which proceedings have not been initiated.

17. Immediate action proposal

(1) If the Group Ethics Officer or the local Ethics Officer finds, on the basis of a report or feedback received, that:

- a) the breach of the Codes and the liability arising therefrom are clearly identifiable; and
- b) supporting evidence is available; and
- c) the necessary measures do not require significant consideration either,

he/she shall immediately prepare a simplified report (e-mail summary) to the Preparatory Committee, on the basis of which the Preparatory Committee may decide to establish the violation of the Codes and make recommendations directly to the manager, who is entitled to decide on the necessary measures to be taken.

Communication of the resulting recommendations and follow-up Consequence management as set forth in Chapter 22. is arranged by the Group Ethics Officer.

18. Preliminary investigation

(1) If based on the report, it is not possible to adopt a conclusion to initiate the procedure, to decide on the appropriate procedure or on dismissing the investigation, a preliminary

investigation collection shall be ordered. The deadline for preliminary investigation collection is 30 days, which can be extended once only with 15 days.

(2) During the preliminary investigation, the Group Ethics Officer may contact any person relevant to the investigation, ask them questions, inspect documents or hear the Reporter.

(3) The Group Ethics Officer may also submit the report to the local Ethics Officer for preliminary investigation.

(4) The Group Ethics Officer conducting or coordinating the investigation (in consultation with the local Ethics Officer or other organizational unit involved in the investigation) shall prepare a short, concise investigation plan/concept outlining the issues to be investigated, planned investigation steps (means of investigation, witness hearings, etc.), and the planned deadline for the investigation. The Chairperson of the Ethics Council may supplement or amend the investigation plan before approving it.

(5) Following the completion of the preliminary examination, the Group Ethics Officer shall make a proposal to the Preparatory Committee to determine:

- whether the matter falls within the competence of the Ethics Council, whether it is justified to initiate an investigation of merits, in which case the Group Ethics Officer provides an investigation plan – as already approved by the Chairperson of the Ethics Council;
- whether the examination of the report can be concluded with a proposal for action by the Preparatory Committee;
- whether the dismissal of the investigation is justified.

(6) If after completing the preliminary investigation the Preparatory Committee orders the ethics procedure to commence, the preliminary investigation shall be included within the deadline of the procedure.

19. Directing a non-ethics report for action

(1) Provided that the legal protection of the bona fide reporter and the fair and impartial investigation of the report are not jeopardized, and the notified ethics violation

- a) also violates the obligation arising from the employment relationship, the Group Ethics Officer, based on the decision of the Preparatory Committee shall provide the necessary information to the manager exercising the employer's rights for further action and inform the senior manager exercising the employer's rights thereof;
- b) engages in other breach of contract that may be related to a specific contractual relationship, the Group Ethics Officer shall, upon the decision of the Preparatory Committee, provide the necessary information to the head of the organisational unit managing the contract violated for further action;
- c) also constitutes an ethics violation of a specific obligation regulated by law or internal rules (e.g. competition law, health-safety-environment, property security, data

protection incident², non-ethics related retail report, etc.), the Group Ethics Officer shall, upon the decision of the Preparatory Committee, provide the necessary information to the trade organisation overseeing the given field for further action;

- d) it is a criminal offense and there is a reasonable suspicion that it had been committed, the Group Ethics Officer shall, upon the decision of the Preparatory Committee, provide the necessary information to the Security Organization for the purpose of conducting the investigation, taking further action and initiating official proceedings.

(2) The organization conducting an investigation pursuant to the previous paragraph shall inform the Preparatory Committee through the Group Ethics Officer of the outcome of its proceedings within a maximum of 20 days. The Preparatory Committee may accordingly decide to initiate a further ethics investigation or to conclude the procedure.

(3) The Group Ethics Officer or the local Ethics Officer shall inform the Reporter of any other non-ethics investigation of the report and shall monitor the progress of the further proceedings.

(4) The Group Ethics Officer reports to the Ethics Council on the preliminary examination of non-ethics related reports in its quarterly report.

20. Decision of the Preparatory Committee

(1) The Preparatory Committee shall, on the proposal of the Group Ethics Officer, take one of the following decisions within 5 days at the latest:

- a) establish on the contents of the report that the Ethics Council of MOL Group has no competence to investigate or adjudicate the notified act or omission, however, if in the opinion of the Preparatory Committee any MOL Group organisation unit is entitled to investigate the report, it will, with the consent of the Reporter, order the transfer of the case;
- b) terminate the proceedings after the preliminary investigation, if no further data or information is expected from the initiation of the investigation of merits, based on which a well-founded decision on the violation of the Codes can be made;
- c) establish on preliminary investigation, that the act or omission notified is not in breach of the provisions of the Codes;
- d) decide on dismissing the investigation of merits in accordance with Chapter 16. (2);
- e) decide that the information and evidence contained in the report justify the investigation of merits and move to initiate the ethics procedure.

21. Investigation of merits

21/A. Initiation of an investigation of merits, notifications

(1) The initiation of the investigation of merits is ordered by the Preparatory Committee on the proposal of the Group Ethics Officer. In the event of the initiation of the investigation of merits,

² The Ethics Officer must immediately forward the case to databreach@mol.hu, while also informing the Reporter and the Chairperson of the Ethics Council

the Group Ethics Officer or on his/her behalf, the local Ethics Officer shall inform the Reporter of the initiation of the ethics procedure and if necessary, forward it to the relevant local Ethics Officer competent to attend to the implicated person.

(2) A copy of the present Regulation of procedure and the ethics data protection notice must be sent to the Reporter and to the persons heard during the investigation (witness, implicated person, etc.).

(3) The identity of the Reporter may be communicated to the implicated person only if this is expressly justified by the nature of the case or if this is necessary for the procedure to be conducted successfully.

21/B. Conducting an investigation of merits

(1) The Group Ethics Officer (or the local Ethics Officer designated by him/her to conduct the investigation) carries out an evidentiary procedure to obtain the data and evidence for the Ethics Council's decision to be based upon.

(2). In the investigation of merits, all means of proof listed in Chapter 12. (1) may be used to clarify the facts.

21/C. Suspending the ethics procedure

The Group Ethics Officer shall suspend the ethics procedure if

- a) the conduct of the proceedings requires the examination of a preliminary issue falling within the competence of another external or MOL Group organization, pending the conclusion of that examination; or
- b) official or judicial proceedings have been instituted in respect of the same or a related matter, pending its final conclusion.

The Ethics Council may not interfere with ongoing official or judicial proceedings.

21/D. Termination of the ethics procedure

(1) The Group Ethics Officer, in agreement with the Preparatory Committee shall terminate the ethics procedure if:

- a) it has become apparent that the conduct under investigation does not conflict with the Codes;
- b) the investigation does not reveal any conduct in breach of the Codes and no result is expected from the continuation of the proceedings;
- c) the conduct under investigation has already been given final judgment by a public authority or court or it has already received a resolution by the Ethics Council.

(2) The termination of the ethics procedure shall be communicated to the Reporter or the manager overseeing the operations concerned by the procedure, as well as to the competent local Ethics Officer.

21/E. Investigation report

(1) The investigation report of the Group Ethics Officer shall describe the used means of investigation, the established facts, the proposal for a decision by the Ethics Council and the proposed recommendations for action and shall describe the background and reasons for the proposal.

(2) If the investigation is carried out by a local Ethics Officer or another person, he/she shall forward his/her findings to the Ethics Council through the Group Ethics Officer, who will decide on any ethics misconduct accordingly. The local Ethics Officer prepares his/her report in accordance with the rules for the Group Ethics Officer's report.

(3) The reports of the Group Ethics Officer and the local Ethics Officers are approved by the Chairperson of the Ethics Council based on the opinion of the Preparatory Committee and submitted to the Ethics Council for decision. If requested by the Chairperson of the Council, the Ethics Officer shall attach to the investigation report the documents used, the relevant correspondence relating to the case and any other evidence obtained.

21/F. Decision of the Ethics Council

(1) The decision of the Ethics Council in any individual case can basically be the following:

- a) it finds that the conduct under investigation has violated a provision of the Codes; in this case it establishes individual responsibility and proposes to apply the appropriate legal consequences;
- b) it finds that the conduct under investigation does not violate the Codes;
- c) it finds that the conduct subject to the investigation of merits violates any provision of the Codes and identifies a misconduct that in addition to individual liability constitutes a potential and serious ethics violation of MOL Group's ethics values. In this case, it will notify the relevant decision-maker of MOL Group of the findings.

(2) In the decision, the Ethics Council may formulate a proposal (recommendation) for the employer, the head of the business area and the supporting departments to remedy the violation of ethics norms, to take appropriate corrective measures and to take appropriate measures to avoid and prevent violations of the Codes and reduce risks.

(3) If required by law, if the conditions contained therein exist, the Ethics Council shall initiate the proceedings of the competent authority instead of establishing an ethics violation.

If a criminal report appears to be justified, it should be done in consultation with the organization responsible for security investigations, the one designated for communication with the authorities in case of criminal matters.

(4) The decision of the Ethics Council must be in writing and justified.

(5) The decision of the Ethics Council shall be communicated by the Group Ethics Officer to the parties concerned within 5 days (the Reporter and the implicated person, the local Ethics Officer concerned, and if necessary to the manager exercising the employer's rights over the implicated person).

(6) In ethics violation proceedings, the decision of the Ethics Council is not public.

IV. CONSEQUENCE MANAGEMENT, REPETITION AND SUPPLEMENTING OF THE PROCEDURE

22. Consequence management

(1) If the Ethics Council makes a recommendation to promote a culture and behaviour in accordance with the Codes, to improve processes and to reduce the risk of conduct in violation of the Codes, it shall inform the Group Ethics Officer concerned by setting an appropriate deadline.

(2) Based on the decision of the Ethics Council, the manager managing the area concerned or exercising the employer's rights over the person involved in the proceedings, shall immediately, but not later than within 15 days, decide on the necessary additional measures, possible sanctions and consideration of ethics misconduct in performance evaluation, which shall immediately be brought to the attention of the Group Ethics Officer.

(3) If the manager concerned does not take action in accordance with the proposal of the Ethics Council, the Group Ethics Officer shall notify the manager exercising employer's rights over the manager, who shall decide on any necessary additional measures, possible sanctions or consideration in performance evaluation, which shall immediately be brought to the attention of the Group Ethics Officer.

23. Request for a review (repetition and supplementing of an investigation)

(1) In light of the decision of the Ethics Council, interested parties may, within 15 days after receiving notification about the decision, but not later than 6 months initiate a review of the decision with the Group Ethics Officer, especially if unknown, relevant new information becomes available after the decision of the Ethics Council.

(2) The Preparatory Committee shall decide on the initiation of repeating or supplementing an ethics investigation.

V. FINAL PROVISIONS

24. Registry of ethics issues

The Group Ethics Officer maintains - anonymized - records and statistics on ethics reports and actions related to the provisions of the Codes.

25. Procedure amendment

Any member of the Ethics Council is entitled to initiate amendments and supplements to these Regulation of procedure.

26. Transitional rules

The amended version of the procedure shall apply to proceedings and measures initiated on the basis of reports received after its entry into force.