

## HUNGARY

This country-specific appendix is an integral part of Bridgestone's Speak Up Policy and describes the local procedures under national law for the reporting of Local Concerns in Hungary. The Speak Up Policy (including the protection from Retaliation) applies in full to the reporting under local procedures. In case of discrepancy, the rules set forth below shall prevail. Any capitalized terms not specifically defined in this sheet refer to the definitions in the Policy. Hungarian laws have extended the definition of "Local Concern" in Appendix 2 to the Speak Up Policy to include any other breaches, infringements, acts or omissions which are or may be unlawful.

### 1. Internal Reporting

Pursuant to applicable laws, Bridgestone has set up a local reporting channel in Bridgestone Tatabánya Kft.

Reporters can submit their Local Concerns using the local reporting channel on the BridgeLine ([bridgestone-integrityline.org](https://bridgestone-integrityline.org)), **in writing or orally** (via the BridgeLine's phone messaging system). The Reporter can request, in writing or orally through the BridgeLine, a meeting with the Speak Up Officer within 7 calendar days of the submission of the request. Local Concerns that are reported orally directly through BridgeLine's phone messaging system shall be documented through the recording of the message in a secure, durable and accessible format. Local Concerns that are reported orally during a meeting with the local Speak Up Officer shall instead be documented, with the consent of the Reporter, through a transcript. The Speak Up Officer shall give a copy of the transcript to the Reporter. The Reporter shall have the opportunity to review the transcript, request amendments, and accept the copy with signature, if necessary.

Reports can be made **anonymously**. Both identified and anonymous Reporters (identifiable or identified at a later stage) shall be fully protected from Retaliation under applicable laws and Bridgestone policies.

At the beginning of the investigation, the person(s) concerned by the report must be notified about the report and the rules and rights of data processing. Bridgestone must allow the person concerned to share their point of view on the report, even via a legal representative, and to supply evidence. The person(s) concerned by the report may exceptionally be informed at a later stage in duly justified cases, if immediate information would prevent the investigation of the report.

The appointed Investigator must investigate the Local Concern in the shortest possible period, but within 30 calendar days. If a period of 30 calendar days is not sufficient for the investigation, it can be extended to a maximum of 3 months in particularly justified cases. In this case the Reporter must be notified about the expected ending of the investigation and the reasons for extending. Following the investigation, and within above-mentioned period, the appointed Investigator shall provide to the Reporter (i) information on the outcome of the investigation (i.e., whether the Local Concern was found to be substantiated) and, to the extent applicable, (ii) an overview of the corrective actions defined, and the grounds for such actions.

A register of the Local Concerns received is maintained in the BridgeLine. Further requirements regarding the register and the data included in it may be defined by applicable laws in the future. This register (including the contents of the Concerns and investigation) shall be kept for at least five years from the receipt of the Local Concern and, regardless of such period, during any pending judicial or administrative proceedings relating to the reports. The details of the Local Concerns shall be destroyed if they are no longer necessary to meet the requirements of applicable laws.

Moreover, as per the terms of Hungarian law, the Local Speak Up Officer is required to take all necessary measures following the analysis of a Concern, including initiating criminal proceedings (if necessary). If it becomes apparent that the Reporter provided false information in bad faith, and circumstances of potential criminal offence emerged, the Reporter's personal data must be handed over to the competent authorities. If instead the bad faith provision of false information is likely to have caused damages or other infringement of rights, the Reporter's personal data must be handed over to the competent authorities upon request. A report is in good faith and justified if:

1) the Reporter has made the report through the internal reporting system of Bridgestone or one of the reporting systems under laid down in the relevant Act,

2) the Reporter obtained the information concerning the circumstances covered by the report in the context of his/her work-related activities, including negotiations on a future employment (including trainees and volunteers), and contract negotiations with individual entrepreneurs, individual firms, stakeholders, member of the administrative, management or supervisory body (including non-executive members) of Bridgestone, AND

3) the Reporter had reasonable grounds to believe that the reported information concerning the circumstances covered by the report was true at the time of report.

## **2. External reporting**

Reporters are always encouraged to report their Concerns internally first. Bridgestone is committed to address any reported Concerns and believes this can be done more effectively internally. However, external reporting remains possible.

The Hungarian laws identify the following competent authorities to investigate external reports:

- the Directorate General for Audit of European Funds (*Európai Támogatásokat Auditáló Főigazgatóság*)
- the Competition Authority (*Gazdasági Versenyhivatal*);
- the Integrity Authority (*Integritás Hatóság*);
- the Public Procurement Authority (*Közbeszerzési Hatóság*);
- the Hungarian Energy and Public Utility Regulatory Authority (*Magyar Energetikai és Közmű-szabályozási Hivatal*);
- the Hungarian National Bank (*Magyar Nemzeti Bank*);
- the Data Protection Authority (*Nemzeti Adatvédelmi és Információszabadság Hatóság*);
- the Hungarian Media and Infocommunications Authority (*Nemzeti Média és Hírközlési Hatóság*);
- the Hungarian Atomic Energy Authority (*Országos Atomenergia Hivatal*); and
- Regulatory Authority of Regulated Activities (*Szabályozott Tevékenységek Felügyeleti Hatósága*).

Breaches of laws and infringements can also be reported through the protected electronic system of public interest reports operated by the Commissioner for Fundamental Rights of Hungary. Additional competent authorities may be designated by Hungarian laws in the future.

External Reports may be submitted in writing and/or verbally, also anonymously. Both identified and anonymous Reporters (identifiable or identified at a later stage) shall be fully protected from Retaliation under the applicable laws.