

Vígszínház Nonprofit Kft.

Code of Conduct and Rules of Procedure

For Establishing an Environment Free From Any Abuse of Power

Effective date: 8 March 2021

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I. Purpose and Scope of the Policy, Definitions, Examples

Introduction

Vígszínház Nonprofit Kft. (hereinafter “**Vígszínház**”) rejects acts that violate human dignity, as well as any form of harassment at work and abuse of power in the work environment.

Vígszínház theatre has set the goal of providing a working environment that is safe, free from any abuse of power and harassment and grounded on mutual respect for human dignity for its employees and other contractors engaging in work in Vígszínház work areas under civil law contracts. To accomplish that goal, Vígszínház adopts this Code of Conduct and Rules of Procedure, thus ensuring that complainants and whistleblowers can seek and receive assistance at an appropriate forum.

This Code of Conduct and Rules of Procedure respects the presumption of innocence and its regulations were developed by building on the fundamental constitutional right to due process.

1 Purpose of the Policy

In devising its Code of Conduct and Rules of Procedure, Vígszínház theatre intends to create a safe workplace environment that is free of harassment.

By harassment-free and safe workplace environment, Vígszínház theatre means surroundings suitable for work that are free from any harassment of sexual nature or otherwise, as well as from any form whatsoever of abuse of power.

In order to realise the above purpose, Vígszínház theatre expects the following from its employees and contracted partner providing in-person services in Vígszínház theatre’s work areas:

- Make every effort while working to ensure that Vígszínház theatre can be an environment free from intimidation, hostility, offensive behaviour or other forms of harassment;
- Actively fight against any behaviour that undermines the dignity or integrity of another person, where they encounter such behaviour in the course of their work; cooperate when asked for information by the Ethics Committee or Vígszínház theatre management in the investigation of cases involving abuse of power and sexual or other harassment.

To implement the above goal, Vígszínház theatre management do everything in its power to permit develop a workplace environment at Vígszínház theatre where anyone concerned may freely raise awareness of conduct that may be classified as abuse of power, harassment or sexual harassment, and where the person concerned (complainant) can seek help from Vígszínház theatre without fear of sanctions.

The management of Vígszínház theatre will ensure that complaints are investigated on the basis of this Code of Conduct and Rules of Procedure, subject to the principle of due process and within an appropriate timeframe.

2 Scope of Policy

2.1 Personal Scope

The personal scope of this Code of Conduct and Rules of Procedure covers Vígszínház theatre employees who hold non-management jobs (hereinafter “**employee**”) and its contractual partners who provide in-person services in Vígszínház theatre’s work areas, i.e. where the place of performance under their civil law contract with Vígszínház theatre is Vígszínház theatre’s registered address or site of operations or its other off-site work location (hereinafter “**Contractual Partners**”).

Where a complaint is received against a Vígszínház theatre employee who holds a management job, the Vígszínház theatre Supervisory Board, acting in accordance with its own rules of procedure, will be authorised to investigate the complaint. Complaints levelled by a Vígszínház theatre employee who holds a management job against an employee who holds a non-management job must be investigated on the basis of this Code of Conduct and Rules of Procedure. At the time of the adoption of this Code of Conduct and Rules of Procedure, employees filling the position of General Director and Financial Director are considered to be employees who hold management jobs at Vígszínház theatre.

During their employment, employees will be subject to this Code of Conduct and Rules of Procedure, given that the employer will, as a rule, apply the same to all of its employees. Employees are therefore not entitled to exclude themselves from the scope of this Code of Conduct and Rules of Procedure.

Contractual Partners will accept to be bound by this Code of Conduct and Rules of Procedure either when signing their contract or by signing an amendment to the contract. Vígszínház theatre will contact its existing contractors at the time this Code of Conduct and Rules of Procedure is adopted, in order to amend the respective contracts.

2.2 Scope of Application

This Code of Conduct and Rules of Procedure will solely be applicable in relation to conduct (events) that

- A Vígszínház theatre employee demonstrates while working in Vígszínház theatre buildings, sites of operation, other off-site work locations (such as guest performances in the countryside or abroad, theatrical festival, ticket sales at external locations, etc.), including conduct that the employee demonstrates during the entire period of their assignment (i.e. while travelling, at accommodations and during time off while on assignment),
- Vígszínház theatre’s Contractual Partner demonstrates in Vígszínház theatre’s work areas while performing their valid and effective contract concluded with Vígszínház theatre, including guest performances in the countryside or abroad, theatrical festivals and rendering services to Vígszínház theatre at other external locations, with the proviso that events that occur during tours in the countryside or abroad, while on the road and during travel or while being off during guest performances or festivals, even at places of accommodation, will likewise be subject to this Code of Conduct and Rules of Procedure.

Any task performed on the basis of assignment through the rehearsal schedule will be considered

work regardless of its location, and therefore conduct demonstrated and events happening while performing tasks so will be subject to this Code of Conduct and Rules of Procedure.

Conduct that employees and Contractual Partners demonstrate during their free time or other work activities not related to Vígszínház theatre will not be subject to this Code of Conduct and Rules of Procedure.

2.3 Territorial Scope

The regulations of this Code of Conduct and Rules of Procedure must be applied to conduct that takes place in Vígszínház theatre work areas, which will be understood to mean Vígszínház theatre's registered address, sites of operation and other off-site work locations. Examples of off-site work locations include, but are not limited to, off-site box offices, guest performance in the countryside or abroad, theatrical festivals and travel to and accommodation locations while at such, provided that these are included in work time, moreover any location where employees and Contractual Partners may be present because the rehearsal schedule so requires.

3 Definitions of Terms Used in the Policy and Identification of Such Terms

3.1 Abuse of Power

For the purposes of this Code of Conduct and Rules of Procedure, the forms of conduct described below will constitute abuse of power:

Where the person engaging in the conduct

- Uses their position, professional or other status to achieve their own ends, including cases when someone engaging in such conduct presents their own ends as being in Vígszínház theatre's interests, or
- Makes or sets wrongful and/or unpredictable demands or expectations for others, or
- States clearly in words, or alludes, if not by speaking, then otherwise, that failure to comply with the wrongful and/or unpredictable demands they will have made or failure to meet such expectations, will (might) have adverse professional consequences for the other person, or
- Actually procures adverse professional consequences where the wrongful and/or unpredictable demands they will have made or such expectations are not met.

The general concept of abuse of power also includes the additional concepts described below, specifically harassment and sexual harassment.

3.2 Harassment

For the purposes of this Code of Conduct and Rules of Procedure, harassment is considered to be conduct that offends human dignity, and in relation to someone else, it is

- intimidating or
- hostile or
- humiliating or
- degrading or
- assaultive.

Segregating someone within the workplace environment is considered a special case of harassment or bullying if such behaviour results in a segregating (hostile) workplace environment coming about towards the person concerned.

Harassment can take place directly or indirectly, for example by displaying posters in the work environment that present a social group in an offensive way or through the regular voicing of prejudice against such groups.

3.3 Sexual Harassment

For the purposes of this Code of Conduct and Rules of Procedure, sexual harassment is considered to be any unwelcome physical, verbal or non-verbal conduct of a sexual nature that is humiliating, degrading or intimidating to the person concerned, and creates a threatening or hostile environment for the person concerned or someone else in contact with the person concerned, or such that compromises the dignity or physical integrity of the person concerned or someone else in contact with them.

Sexual harassment can be committed by people of the same or different sex.

Forms of sexual harassment being realised include (non-exhaustive list):

- Unwelcome “praise”—typically appearance-related or with sexual undertones—that is inappropriate for a given situation or is inappropriate in terms of how or the content with which it is communicated, potentially containing any kind of assessment or scoring, not including thoughtful, exclusively positive compliments or comments. That notwithstanding, even thoughtful compliments with nothing other than positive content may constitute sexual harassment if the subject has previously made it clear to the person making the compliment that such “compliments” make them uneasy and the person making the compliment fails to respect that.
- Typically, a derogatory comment referring to appearance or containing sexual undertones.
- Sexual harassment can be part of a behaviour pattern or may happen as a one-off event, and can be directed both at a specific person or a group.
- Sexual harassment can occur during face-to-face interaction, through messages sent by phone, text, email or messaging apps, as well as other social media platforms or in the form of letters.
- Sexual harassment can be effected directly or indirectly. Examples of the latter include displaying sexually explicit posters in the work environment or the offensive voicing of gender stereotypes.

3.4 Staff Member

The term staff member is considered to include all persons covered by this Code of Conduct and Rules of Procedure (Section 2.1).

3.5 Classification of Certain Behaviours Using the Concepts of Abuse of Power, Harassment or Sexual Harassment

In identifying specific conduct as harassment or sexual harassment, the starting point should be based primarily on its impact, as may be reasonably assumed, on the person(s) concerned or on (an) average person(s) in a similar situation, when already perpetrated cases are being

investigated.

The abuse of power is not conditional to a formal hierarchy existing between the involved parties. Position of power is also established by social context, which creates a power hierarchy among certain groups, even if not all of their members reinforce or exploit their position of power. Differences in power are typically tilted in favour of social majority groups, but such social power advantages can also evolve due to better financial position, individual popularity or reputation, etc.

The behaviours noted are harmful because there are reasonable grounds to assume that through them

- the workplace, community status or
- opportunity for professional promotion or
- opportunity for professional self-expression and self-actualisation or
- community respect or
- professional and personal confidence

of those affected is diminished, regardless of their talent, diligence or other circumstances.

Such behaviour is typically not one-off, rather regular or recurrent and systematic. While in its one-off form such behaviour typically does not require sanctions other than feedback and notice to cease and desist, it does poison the workplace environment when it is regular, recurrent and systematic, and in this form it is capable of creating a hostile environment.

Exceptions to this include behaviour that can cause more grave harm even if occurring only once: typically, the verbal, physical forms of the above behaviours or such that borders on or realises sexual violence.

In the interpretation of this Code of Conduct and Rules of Procedure, verbal abuse is considered to mean gross insult or threats.

Based on this Code of Conduct and Rules of Procedure, physical violence is considered to include, for example, any form of physical assault or physical violence against objects, where someone else can find that intimidating.

Based on this Code of Conduct and Rules of Procedure, sexual violence is considered—in addition to the provisions of the Criminal Code of Hungary applicable to sex crimes—to be any sexual act that

- Breaches the physical boundary of the person concerned or
- Forces the person concerned, whether directly or indirectly, to engage in sexual acts in which they do not expressly intend to engage or
- Discloses intimate images of the person concerned to others, without consent from the former or
- Otherwise infringes upon the sexual integrity and autonomy of the person concerned.

3.6 Statutory Definitions

The above definitions are not intended to serve in lieu of, rather, to complement the definitions in Section 10 of Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunity and the applicable factual definitions in Act C of 2012 on the Criminal Code of Hungary, as well as other statutory definitions, in the interest of the appropriate procedural rules being applied.

4 Examples of Forms of Abuse of Power, Harassment, Sexual Harassment

The examples below are intended to facilitate the practical application of this Code of Conduct and Rules of Procedure, and not to be an exhaustive list.

4.1 Examples of Abuse of Power

Abuse of power can occur, for example, when a workplace manager, line manager or other person who has no power over the person concerned according to the work hierarchy but has other positions of authority that determine their work

- a) Arbitrarily does not permit a subordinate to go on holiday
- b) Uses arbitrary and unwarranted prohibitive work assignments and accountability (e.g. allocates a subordinate's work time so that this makes it impossible for the subordinate to implement their lawful needs, e.g. to observe days off, to fulfil family obligations outside their work time)
- c) Fails to recognise a workplace accident as such, thereby causing material or other damage to the person concerned
- d) Creates an intimidating environment, e.g. creates and maintains unpredictability in the context of maintaining employment
- e) Sets unpredictable expectations for subordinates (e.g. to a large degree, also makes use of an employee outside working hours, expects permanent and continuous availability in jobs that do not involve such availability)
- f) Smothers a subordinate with unreasonably large amounts of communication (text messages, email, other communications)
- g) Seeks them out using a communication channel that is not recognized by Vígszínház theatre as a work communication channel and initiates or engages in communications there that the other staff member does not voluntarily agree to, or if they initially agree, do not wish to continue beyond a certain point
- h) Discriminates or threatens to discriminate against a staff member for refusing to use an external communication channel—i.e. one that is not recognised by Vígszínház theatre as a channel of employment communication
- i) Sets expectations for the employee that are not really necessary for doing their job (typically also humiliating) or are evidently unrealistic
- j) Whose leadership methods include intimidation or verbal abuse (shouting, threats and frightening by citing sanctions or punishments from superiors without any reason for such).

4.2 Examples of Harassment

Harassment may occur if any of the above behaviours is carried out by a person who—in terms of the workplace hierarchy—is in either the same or a superior position to the person concerned, and if someone in any official position relative to person concerned does the following to a staff member:

- a) Humiliates, shames or undermines their self-esteem publicly and in a way that could potentially affect the status of the person concerned
- b) Regularly humiliates, shames and undermines their self-esteem in private communication
- c) Segregates them
- d) Limits the professional self-expression or self-fulfilment of persons by making derogatory, humiliating or degrading statements or actions regarding persons in a similar situation (belonging to a similar group).

4.3 Examples of Sexual Harassment

The following actions are considered examples of sexual harassment:

- a) Intentional and unwanted sexual contact or unnecessarily close physical proximity
- b) Recurrent unwanted remarks or references of a sexual nature over any communication channel, even if they appear to be trivial on their own, but taken together may be deemed offensive or harassing
- c) Repeatedly transmitting or posting unwanted written or visual material of a sexual nature online or in print in the workplace, in other work environments related to the workplace, or in other physical or online environments related to the workplace
- d) Using crude or obscene language or gestures, telling obscene jokes and stories, making comments about someone's appearance, physical features or referring to such in a sexualised context
- e) Continuously inviting someone to joint social activities or "dates" after they have indicated that they do not wish to participate in such
- f) Recurrent remarks about someone's private life, intimate relationships, sex life
- g) "Revenge porn": Sharing with a third party or any broader public intimate image or sound recordings that the person concerned previously made available exclusively to the perpetrator
- h) Demanding, extorting or expecting sexual favours for professional promotion or avoiding dismissal or to facilitate or set as a condition for some other professional goal.

Abuse of power, harassment and sexual harassment are distinguished from physical and sexual violence by the seriousness of the act and the degree of harm caused by the attempted or actual act.

II. Rules of Ethics Proceedings

1 Principles of the Procedure

1.1 Presumption of Innocence

Presumption of innocence applies during ethics proceedings.

1.2 Principle of Due Process

As a fundamental constitutional right, the principle of due process is guaranteed during ethics proceedings, and pursuant to that, the competent Ethics Committee will conduct ethics proceedings under this Policy impartially, fairly and within a reasonable time limit. The Ethics Committee will furnish appropriate reasoning for decision that concludes proceedings.

1.3 Right to Counsel

Both the complainant and the person subject to a complaint have the right to retain legal representation, at their own expense.

1.4 Confidentiality, Protection of Secrets

During the investigation, the utmost care must be taken to maintain the confidentiality of the case, and the persons involved in the inquiry and the parties to the proceedings are bound by confidentiality. All parties involved, including the recipient of the complaint, the Ethics Committee and the parties, are required to sign a non-disclosure agreement. The non-disclosure agreement is attached as a standard form in Annex 1 to this Policy. Should a person subject to a complaint refuse to sign the non-disclosure agreement, this may not be an obstacle to conducting ethics proceedings, but the fact itself must be recorded.

Vígszínház theatre stores electronic and hard copy documents related to the ethics proceedings in a secure place, in compliance with effective data protection requirements. Vígszínház theatre management and those involved in investigating a case will use the reasonable efforts that may be expected of them to ensure that ethics proceedings are conducted with as little publicity as possible.

1.5 Privacy

In the course of ethics proceedings, the Ethics Committee will comply with then prevailing data protection requirements, and inform the parties about data processing in writing, in a privacy notice. The privacy notice is attached as Annex 2 to this Policy. Ethics proceedings are subject to Vígszínház theatre's data processing policy, and the Ethics Committee and all parties and their representatives involved in the ethics proceedings will be required to observe the same.

1.6 Reasonableness

To determine reasonableness, the usual (disabling, paralysing) impact of abuse of power, harassment or sexual harassment on the person concerned must be taken into account, in addition to the generally customary expectation or such that is consistent with established practice.

In the context of establishing the facts, a fact-finding inquiry will be considered reasonable if it does not require the discovery of details unnecessary for abuse being established by someone competent to do so. (This includes e.g. pushing for the complainant's sexual or other habits that are subject to the proceeding or exploring the professional accomplishments of the parties that are unrelated to the complaint.)

The parties may not be expected to submit evidence that Vígszínház theatre already possesses. At the request of the Ethics Committee, Vígszínház theatre will provide the Ethics Committee with the information at its disposal relevant to the subject of the inquiry, doing so in a timely manner.

1.7 Provision of General Information

Vígszínház theatre will promote the creation of a safe environment and the resolution of individual complaints referring to abuse of power by also widely informing employees and its Contractual Partners subject to this Policy about the said being possible.

Vígszínház theatre will disseminate information in a form readily accessible to everyone concerned, on the Vígszínház theatre website and its local notice board, as well as through the Trade Union, the Works Council, possibly by email circulars.

1.8 Relationship of Ethics Proceedings and Other Official, Judicial Proceedings, and Procedures of Vígszínház theatre as an Employer

The application of this Code of Conduct and Rules of Procedure within Vígszínház theatre will not be ruled out if criminal proceedings or other civil or regulatory proceedings are (have been) opened for the same incident.

However, the application of the Code of Conduct and Rules of Procedure is likewise not conditional to criminal or other civil or regulatory proceedings being opened in respect of conduct shown during abuse per the above definitions.

Where any employer procedure has been initiated in Vígszínház theatre, ethics proceedings may only be opened after the conclusion of the former.

After the conclusion of ethics proceedings, Vígszínház theatre, as the employer, will decide whether to initiate any employer procedure or to forego such, and take employer's action based on the Ethics Committee's decision.

2 Opening Proceedings, Rules for Lodging Complaints

2.1 How are proceedings opened?

Ethics proceedings start with a complaint being lodged. Vígszínház theatre does not open ethics proceedings on its own motion.

Where opening proceedings under the Code of Conduct and Rules of Procedure would be warranted on the basis of information available to Vígszínház theatre, as the employer, but no request for such proceedings is received by the Ethics Committee, Vígszínház theatre, as employer, will open an employer procedure against the respective employee consistently with applicable labour law requirements, if dereliction of duty within the meaning of labour law is suspected. This policy need not be applied to employer procedures.

2.2 Who May Lodge a Complaint?

Complaints may be lodged by anyone who is aware of an act that falls within the personal, application and territorial scope of this Policy. Accordingly, a complaint may not only be filed by the victim (hereinafter “**complainant**” or “**victim**”), but also by anyone else who is aware of conduct that is in breach of this Policy (hereinafter “**whistleblower**”). Complainant and whistleblower referred to collectively hereinafter as “**person lodging a complaint**”.

Complaints may be filed anonymously or with the identity of the person lodging a complaint being revealed, with the proviso that only a whistleblower may remain anonymous, not the victim.

2.3 To Whom Can Complaints Be Addressed?

Complaints can be notified to:

2.3.1 If the person lodging a complaint is willing to reveal their identity:

- Vígszínház theatre’s General Director
- The Labour, Salary and Social Security Team Lead, the Head of HR (hereinafter “**Head of HR**”)
- The Local Chapter of the Theatre Workers’ Trade Union at Vígszínház theatre (hereinafter “**Union**”) (this right is exercised by the Chairperson of the Vígszínház theatre Local Chapter on behalf of the Union)
- The Works Council (this right is exercised by the Chairperson of the Works Council on behalf of the Works Council; pending election at the time of this Policy’s announcement)
- The Ethics Committee (by seeking out the Ethics Committee’s permanent lawyer member).

The above individuals are required to promptly forward complaints of which they are notified to the lawyer member of the Ethics Committee, as specified in Section 3.2, who is responsible for preparing proceedings.

2.3.2 Anonymously

- By e-mail (zoldvonal@vigszinhaz.hu, which can be accessed by the Head of HR)
- Or using Vígszínház theatre’s dedicated online interface (under construction at the time of issuing this Policy).

Only a whistleblower can remain anonymous during such procedures, and ethics proceedings can only be opened on the merits if the party that suffered the respective grievance (complainant) is willing to undertake ethics proceedings after being sought out by the Ethics Committee, and also accepts that their identity will be rendered ascertainable by the participants in the ethics proceedings.

When making an anonymous report by email, whistleblowers may use an email address created for this purpose, but not anyone else’s email address.

2.4 In what form and how can a complaint be filed, and with what content?

Vígszínház theatre provides the opportunity for the party concerned to report abuse of power, harassment or sexual harassment immediately or at a later date, within a reasonable time limit.

The reasonable time limit is considered to be up to no more than six months after the incident or learning about it.

A complaint reported after six months will also be considered a notification within reasonable time limit if the person lodging a complaint, given the specific nature of the respective grievance, will have defaulted on reporting within six months because they had reasonable grounds to assume that the report could compromise their professional work (e.g. participation in a particular production). Similarly, if a complainant fails to file their notification earlier because the incident(s) was (were) highly traumatising for them, that would likewise qualify as reasonable grounds, with the proviso that passage of time and any changes that may have occurred in the meantime may be taken into account during the applicable procedure and potential sanctions.

Claims asserted beyond the reasonable time limit will not be enforceable under this Code of Conduct and Rules of Procedure.

Complaints can be filed orally or in writing. With an eye to the inquiry being as effective as possible, submitting complaints is preferable in written form, either by email or by letter.

The content of an oral or written notification must be as follows:

- The exact description of the conduct against which the objection is being levelled, including the name of the person subject to the complaint, the place and date of the objected conduct, any witnesses (e.g. "... January 2021, at the Vígszínház theatre building, in the snack-bar, XY said that/did.....", etc.)
- The interpretation of the person lodging a complaint of the objected conduct (e.g. "I consider the conduct described to be an abuse of power, it is not acceptable for my superior to treat me or others this way", etc.)
- A simple, precise and firm statement of what the person lodging the complaint wants to achieve by opening ethics proceedings (e.g. "I would like XY to apologise to me (or the victim) and Vígszínház theatre's management to ensure that this never happens again...", etc.)

3 Composition of the Ethics Committee, Conflicts of Interest, Suspension and Removal of Committee Members

3.1 The Composition of the Ethics Committee

Complaints are investigated by the three-member Ethics Committee, which addresses cases brought before it subject to secrecy, impartiality, confidentiality and professional competence.

Members of the Ethics Committee:

- An expert with a degree in psychology who is not employed and has been invited by Vígszínház theatre (permanent member)
- An expert with a law degree who is not employed and has been invited by Vígszínház theatre (permanent member)
- An ad hoc member who is an employee holding a non-management job at Vígszínház theatre and is familiar with how Vígszínház theatre works, with particular reference to the rules and customs of rehearsals, performances and stage work. The ad hoc member is selected jointly by the two permanent Ethics Committee members from a list drawn up jointly by the Trade Union, the Works Council and the Arts Council, having regard to the nature and circumstances of the case in question.

Only ad hoc members who accept nominations from the organisations described hereunder may be delegated. No employee may be obligated to participate in the Ethics Committee, nor may they suffer any disadvantage whatsoever as a result of declining delegation.

The ad hoc member must be delegated within three business days. If the two permanent members of the Ethics Committee cannot agree on who the ad hoc member should be or prove unable to delegate an ad hoc member who accepts the nomination within the said period, the Chairperson of the Trade Union will have the right and be required to delegate the ad hoc member within two business days after the expiry of the three business day time limit.

Vígszínház theatre will conclude a specific contract of engagement with the members of the Ethics Committee for the remuneration of their participation. Having regard to that, the Ethics Committee's ad hoc member will be required to engage in their activities related to proceedings under this Policy outside their work hours, i.e. in their free time.

3.2 Conflicts of Interest for Ethics Committee Members

Those listed below cannot take part in case investigations and therefore cannot be members of the Ethics Committee:

- Those involved in a complaint (a whistleblower whose identity is known, complainant or person subject to a complaint)
- Direct or indirect subordinates of those involved in a complaint (a whistleblower whose identity is known, complainant or person subject to a complaint) or their subordinates otherwise under any professional hierarchy, and
- A relative or former relative of those involved in a complaint, as defined in item 2 of Section 8:1(1) of Act V of 2013 on the Civil Code
- A person against whom the complainant lodges an explicit objection and, in the opinion of Vígszínház theatre's Director, that objection is substantiated.

3.3 Conflict of Interest Related Objection

If a conflict of interest related objection is raised against a member of the committee, the General Director of Vígszínház theatre will investigate the objection. If they find the objection unsubstantiated, they will reject it.

If the General Director of Vígszínház theatre finds the objection substantiated, they will appoint another member to replace the member who is eliminated, by appointing a lawyer where the lawyer is eliminated, appointing a psychologist where the psychologist is eliminated, and appointing an employee familiar with Vígszínház theatre operations where the employee familiar with Vígszínház theatre operations is eliminated, from the list described above.

Vígszínház theatre's General Director shall be required to decide on the objection within three business days, and appoint the new member within an additional two business days.

3.4 Suspension, Removal of Ethics Committee Member

In the event of the suspension or removal of an Ethics Committee member, Vígszínház theatre's General Director will promptly start the replacement of the disqualified member in compliance with the rules applicable to the procedure for conflict of interest objections under Section 3.3 above, and ethics proceedings may be adjourned for a maximum of three business days due to that.

3.5 No Abuse

The above rules, i.e. the requirements and powers aimed at conflict of interest related objections to, removals or suspensions of committee members cannot be construed and exercised in an abusive manner. Therefore, the appointment of an ad hoc member, the replacement of a permanent member or the suspension/removal of individual committee members cannot be treated in a way as to render ethics proceedings unworkable or pointless. If any party can be proven to have done so, that may constitute a breach of duty under labour law or a breach of contractual obligation. If the person who opens ethics proceedings does so, the abuse of process may lead to the immediate termination of ethics proceedings without completing the investigation of the merits of the case.

Whether the above privileges are exercised abusively will be decided by Vígszínház theatre's General Director.

4 Workflow of Procedure on the Merits of a Case

4.1 Preparation Phase

A procedure on the merits starts with the preparation phase, which is conducted by the lawyer member of the Ethics Committee.

First of all, it involves the lawyer member of the Ethics Committee contacting the person who filed the report—except in cases of anonymous reporting—and if the complainant is different from the whistleblower, the latter is also contacted, to inform all about the rules of the proceeding, and then check whether the procedural criteria for opening proceedings are met.

In situations demanding prompt action (e.g. a potentially traumatising event), the Ethics Committee's lawyer member will, within 24 hours of notification/becoming aware, contact Vígszínház theatre's General Director and propose that work by the complainant and/or person subject to the complaint be suspended or that they are sent to home office or paid leave and, if necessary, that the complainant report to the occupational physician. Vígszínház theatre's General Director will promptly take a priority decision on the motion, taking into account the interests of the persons concerned, but without disproportionately compromising the programme, work and operations of Vígszínház theatre.

In examining whether procedural criteria are met, the lawyer member of the Ethics Committee may terminate proceedings at the preparatory stage if:

- The complaint is filed late, i.e. not within the reasonable time limit established in the Policy (see Section II.2.4.)
- There is obviously no legal basis for opening the complaint on the merits, because the case is not subject to this Policy
- For so-called trivial cases subject to this Policy whose degree is so slight and which have such minimal negative consequences that permit their resolution even without ethics proceedings (for example, by an apology), provided that based on available data, such resolution has already occurred or will occur within a very short time
- If they are unable to contact the complainant within 15 calendar days of notification despite verifiable attempts (e.g. text message list, email).

The Ethics Committee's lawyer member will duly document termination of proceedings as described above by drafting a memo of proceeding materials, to include who lodged the complaint,

when and in what matter, moreover the section in this Policy on whose basis proceedings were terminated at the preparation stage. This memo may not include the name of the person subject to the complaint. The lawyer member of the Ethics Committee shall be required to hand the memo over to the Head of HR, who will retain it for the term of the statute of limitation under prevailing labour legislation, which is 3 years at the time of drafting this Policy. The lawyer member of the Ethics Committee must irrevocably destroy other relevant documents by the 30th day after terminating proceedings in the preparation phase.

If the criteria for opening ethics proceedings are met, the two permanent members of the Ethics Committee will select the ad hoc member of the Ethics Committee having regard to all the circumstances of the case. They will then inform the whistleblower, the complainant and the person subject to the complaint about the procedure workflow, about the right of the complainant and the person subject to the complaint to retain counsel at their own expense, have them sign the non-disclosure agreement and provide them with the privacy notice.

The person lodging a complaint must be informed that the procedure is not a legal proceeding and that the person subject to the complaint has the option to initiate legal proceedings due to the accusation levelled against them. With that event in mind, the Ethics Committee's lawyer member will inform the person lodging a complaint that, in order to avert or prepare for that, it would be expedient for them to consult a lawyer and/or a non-governmental organisation familiar with such matters before the inquiry is launched, and that they have the option to take a decision about opening proceedings under this Policy after obtaining such information. The person lodging a complaint must be given a reasonable time limit, that notwithstanding, a maximum of 5 business days, to avail themselves of such information and reach a decision.

The Ethics Committee's acting lawyer member must also ask whether the person lodging a complaint has indicated, in any manner whatsoever, to the person subject to the complaint that they perceive the latter's conduct as abuse of power/harassment/sexual harassment, and would like them to cease and desist. If this has not yet been done, and there are grounds to believe from the nature of the injurious conduct that it would lead to a result, the lawyer member of the Ethics Committee will suggest to the person filing the report that this should be their first step or will offer to do so. Even in this case, the person lodging the complaint must be informed about contact details of NGOs experienced in dealing with such confrontations effectively and safely. If the person lodging the complaint requests or accepts either of the said, the proceedings are terminated, with the proviso that the person lodging the complaint will have the option to repeatedly file a report at any time if the warning issued to the person subject to the complaint is to no avail. These facts must be indicated in the records.

The Ethics Committee's lawyer member will indicate the termination of proceedings in the records, and deliver the same, along with the documents related to the complaint, to Vígszínház theatre's Head of HR, which the Head of HR will retain for one year after the termination of proceedings.

After the above—if there is no situation requiring prompt action—the Ethics Committee's lawyer member will contact the General Director and inform them about opening the case so that any peremptory labour law time limits can be observed. Otherwise, if necessary, they will make a proposal to the General Director concerning work by those involved, in terms of suspension of work, home office, paid leave or otherwise. The General Director will decide on the proposal within 3 business days, taking into account the programme, work organisation considerations and operational processes of Vígszínház theatre.

In the next step, the Ethics Committee's lawyer member will contact the person subject to the complaint, inform them about the complaint, the procedure workflow, the rights due to those subject to a complaint and their right to retain counsel at their own expense.

The preparation phase should be completed as soon as possible, but within a maximum of 15 calendar days. This time limit is to be calculated from the day after notification.

If proceedings are not started or their preparation phase has not been completed within 15 calendar days after the notification of complaint, and the delay described hereunder cannot be excused, the person lodging a complaint and/or any member of the Ethics Committee will have the right to contact the Director of Vígszínház theatre and request immediate action.

4.2 Ethics Committee Hearing

The Ethics Committee will hear the parties and the witnesses indicated by the parties in order to clarify the facts, with the proviso that no one may be obligated to make a statement in person, i.e. statements can also be submitted in writing. If the Ethics Committee holds a hearing, where possible, it should do so once, on the same day. Confrontation of the parties will only be possible if everyone concerned agrees. Otherwise, the parties can be interviewed separately.

Witnesses may not be obligated to make a statement and can choose between oral and written forms in furnishing statements.

If one hearing is not sufficient due to the complexity of the case or the number of persons making a statement, the Ethics Committee may hold several hearings, but it will be required to hold those hearings within as short a time as possible.

A written record of the oral hearings will be drawn up by the Ethics Committee's lawyer member and signed by all three members of the acting Ethics Committee.

A duplicate counterpart of the drafted record must each be given to the party making a statement in the record, the person lodging the complaint, the person subject to the complaint, as well as the legal representatives of the parties.

The record must indicate the date and place of the meeting, who the participants were and the statements made by the participants.

In the case of individual ethics proceedings, the Ethics Committee will take its decision within no later than 30 calendar days after the date of the notification. In the case of group ethics proceedings, i.e. where at least three persons lodging the complaint open ethics proceedings against a person subject to a complaint, the Ethics Committee will take its decision no later than 45 calendar days after the date of the notification. A procedure opened by a particular person lodging the complaint may be joined by another person or multiple additional persons during the preparation phase of proceedings, i.e. prior to the hearing held by the Ethics Committee. Individual ethics proceedings thus can also be transformed into group ethics proceedings if the number of persons lodging the complaint increases to at least three.

The time limit for case processing (i.e. both the 30 calendar day and the 45 calendar day time limit) may be extended once, by up to 15 calendar days, if the complexity of the case, the number of interviews or the collection of evidence make this necessary and inevitable. Any extension of the time limit will be at the discretion of the Ethics Committee.

4.3 The Rights and Obligations of the Parties

4.3.1 Rights of the person lodging the complaint

All persons lodging a complaint in the context of abuse of power/harassment/sexual harassment will have the right to have their complaint investigated in accordance with this Code of Conduct and Rules of Procedure without risk of exposure or retribution. Therefore, regarding persons lodging the complaint, Vígszínház theatre will

- Ensure the opportunity of a confidential interview
- Provide the option of including legal counsel
- Provide full information further to this Policy
- Make it possible to revoke the complaint or consent necessary for opening proceedings at any time, without any retribution, excluding the case of a knowingly made false report, which will be subject to negative legal consequences
- Inform them that—if proceedings are not terminated at the preparation phase (Section 5.1)—the documents relating to proceedings will be transferred to the confidential archives of Vígszínház theatre for the statute of limitation under prevailing civil law (5 years at the time of issuing this Policy) and that no other documents will be retained.

4.3.2 Obligations of the person lodging the complaint

The person lodging the complaint is obliged to provide sufficient details of the case to allow the complaint to be investigated. This obligation may not be construed expansively, and neither the Ethics Committee nor the person subject to the complaint will have the right to demand from the person lodging the complaint details that are not reasonably necessary to consider the complaint. The person lodging the complaint may not be required to provide documents or data that Vígszínház theatre possesses.

4.3.3 Rights of the person subject to a complaint

The person subject to a complaint will be due the presumption of innocence and the right to due process, and in that context, particularly, but not exclusively,

- Vígszínház theatre will provide them the opportunity of a confidential interview and/or written statement
- They will have the right to be informed of the allegations in the complaint and, if necessary, to request written information about them and to respond to them in the form of their choice, provided that if notification by a whistleblower was anonymous, then the complaint may only be released in a form that does not compromise anonymity
- They will have the right to include legal counsel at any time during ethics proceedings
- They must be informed in advance and in sufficient depth about how ethics proceedings will be conducted and the possible steps and action following the incident
- They must be informed that—if proceedings are not terminated at the preparation phase (Section 5.1)—the documents relating to proceedings will be transferred to the confidential archives of Vígszínház theatre for the statute of limitation under prevailing civil law (5 years at the time of issuing this Policy) and that no other documents will be retained.

4.3.4 Obligations of the person subject to a complaint

The person subject to a complaint shall be obliged to cooperate during ethics proceedings and thus facilitate their being conducted. Any breach of the cooperation obligation will be considered a grave breach of the obligation arising from employment or other legal relationship intended for work, and, as such, may be grounds for termination of the employment contract or civil law contract, even with immediate effect, or for the removal of the respective person subject to a complaint from the workplace environment using other means.

4.3.5 Rights due to all parties during the inquiry

Every party will have the right to access the record(s) during proceedings, and to request a copy thereof free of charge or to request that the record is sent using electronic means.

The parties cannot be obligated to provide data that Vígszínház theatre itself possesses. The parties will not have the right to use any means of evidence (email, text message, other electronic messages) containing statements of third parties who have not consented to take part in the ethics proceedings as witnesses, unless the person concerned has consented in writing to a Party using the respective statement as evidence in the ethics proceedings. By providing the evidence to the Ethics Committee, the Party using the given evidence in the proceedings will warrant that it has obtained the statement of the third party referenced hereunder. The Ethics Committee will not investigate the obtaining of such consent.

Where they detect any procedural error, the Parties shall be required to promptly report it to the Ethics Committee, that notwithstanding, within no later than 5 business days of the procedural action allegedly subject to a procedural error or the delivery of the record with incorrect content. If that time limit is missed, the respective procedural error may not be cited in the context of proceedings being conducted under this Policy.

4.4 Conclusion of the Inquiry, Potential Consequences

At the end of the inquiry, the Ethics Committee may come to the following conclusions:

- The fact of abuse/harassment/sexual harassment could not be proven credibly, therefore Vígszínház theatre is not in a position to take further action. The Ethics Committee will record that in a written decision.
- The fact of abuse/harassment/sexual harassment has been credibly proven. The Ethics Committee will record that in a written decision and make a proposal to Vígszínház theatre's General Director regarding further conduct expected from and/or any sanctions to be levelled against the person subject to the complaint.
- It was proven that the complaint was a false report made by mistake (Section 6.1). The Ethics Committee will record that in its written decision.
- It was proven that the complaint of abuse/harassment/sexual harassment was a deliberate false report (Section 6.2). The Ethics Committee will record that in its written decision and make a proposal to Vígszínház theatre's General Director regarding sanctions to be levelled against the person lodging the complaint.
- If it appears that opening criminal proceedings in connection with the case may also lie, the Ethics Committee will be obliged to inform everyone concerned about that possibility. The provision of information to that effect must also be recorded in the Ethics Committee's decision. Where the person lodging the complaint so requests, documents generated in connection with the case must be made available to them, in full.

In each case, the acting Ethics Committee will take a written decision based on full consensus, i.e. all three members of the Committee must agree. The Ethics Committee is required to state the reasons for its decision and to send the written decision, complete with reasoning, to the complainant and the person subject to the complaint, their legal representatives and Vígszínház theatre's General Director. The decision must indicate the possibility and the time limit for potential recourse to the courts, and must include information for those concerned that the present proceedings do not constitute an obstacle to or a substitute for any other regulatory or judicial remedy or employer procedure. The case file must be made available to any of the parties upon request.

4.5 Appeal

No appeal will lie against the Ethics Committee's decision. Employer's decisions taken on the basis of an Ethics Committee decision can be challenged before the competent labour court if they contain legal consequences detrimental to the person subject to a complaint. Otherwise, the decision of the Ethics Committee may be challenged before an authority or ordinary court, by means of filing a report, a complaint or a statement of claim, and in each case, on the basis of effective legal regulations.

4.6 Request for Supplementing the Decision

The parties have the right to request that the Ethics Committee supplement the decision if they believe that it does not contain a satisfactory list or assessment of evidence they consider important. The Ethics Committee may also comply with such requests by attaching the evidence indicated to the decision by means of a formal record and by repeatedly delivering the decision thus supplemented, together with this record, to the applicant.

The Ethics Committee will be required to decide on the request, by way of a decision complete with reasoning, within 8 business days.

Vígszínház theatre's General Director may also request that a decision be supplemented if they consider that information or documentary evidence is missing for the employer to take action.

5 False Report, Unproven Complaint

5.1 False Report Made by Mistake

A report notified may prove to be false without any malicious intent to levelling false accusation (e.g. in a situation that may be evidently and reasonably deemed a misunderstanding). If it is proven that a complaint was thus unsubstantiated, the person accused of harassment will be entitled to a written and/or oral apology from the whistleblower. In such cases, no records or documentation of the incident may be retained which would reveal the identity of the person subject to the complaint.

The notion of "being proven" is not equivalent to a decision taken after considering the fully gathered facts and evidence in a judicial proceeding, but rather a value judgment of certainty adopted by the members of the Ethics Committee, to the best of their knowledge and based on evidence they have collected, i.e. a "certainty" arising in the Ethics Committee's members.

5.2 Knowingly Made False Report

A report may also be proven as false if it was knowingly made under false pretences. Lodging such complaints is unacceptable and may incur disciplinary action by the employer, ethics proceedings or other measures or sanctions. The case file should be treated similarly as in investigated cases, and must be released upon request by any of the parties, subject to observing the prevailing data protection requirements.

5.3 Unproven Complaint

A report that could not be satisfactorily investigated because there is insufficient evidence to establish or rule out abuse of power/harassment/sexual harassment cannot be declared or considered false. In such cases, the inquiry documentation should be handled consistently with the requirements of this Policy, and must be released to any of the parties upon request, subject to

observing the prevailing data protection requirements.

In the case of unproven complaints, no sanction may be imposed, whether against the whistleblower or the person subject to the complaint.

6 Sanctions and Measures Based on the Ethics Committee Decision

In its decision, the Ethics Committee may only propose sanctions under labour law.

The enforcement of sanctions, conducting any further employer proceedings or other employer action, as formulated in the Ethics Committee decision, falls in the scope of the Vígszínház theatre General Director's powers.

Accordingly, Vígszínház theatre's General Director:

- May call upon the person subject to a complaint to discontinue their injurious conduct.
- May call upon the person subject to a complaint to apologise to the complainant (this may solely be proposed at the complainant's request).
- May monitor whether the person subject to a complaint complies with the request or obligation and, if not, may take further action (employer's warning, other employer measures), as may be appropriate, without conducting any additional proceeding.
- May issue the person subject to a complaint with a verbal or written employer's warning.
- May initiate an employer procedure against the person subject to a complaint (for persons subject to a complaint who are employed by Vígszínház theatre, which may also result in termination of employment).
- May terminate the contractual relationship of the person subject to a complaint if the case does not involve employment.
- May, depending on the circumstances of the case, take such other steps as Vígszínház theatre has at its disposal, based on the complainant's request.
- May take necessary and sufficient action against someone who has knowingly notified a false report in bad faith.

7 Procedure in the Event of the Complainant's Intention to Leave

If the complainant is employed by Vígszínház theatre and wishes to terminate their employment due to abuse of power/harassment/sexual harassment instead of, during or after but in connection with their complaint being investigated, they must be given the opportunity to leave subject to mutual agreement, excluding the case when the complainant filed a deliberate false report or if there are reasonable grounds developed during the proceedings to suspect this.

If the complainant leaves or resigns from their post in Vígszínház theatre or terminates their employment, Vígszínház theatre's right to initiate or conduct any further proceedings in relation to the specific case will expire, and proceedings are closed upon that being concluded. The exception to this is if Vígszínház theatre, in order to preserve or restore its own reputation, credibility and integrity, decides to take action against the person subject to a complaint because of their conduct intended as abuse of power/harassment/sexual harassment (whether in the past or demonstrated elsewhere).

8 Right to an Environment Free From Abuse of Power/Harassment/Sexual Harassment, and No Retribution

Any retribution against a person lodging a complaint or a complainant—with the exception of cases of proven deliberate false reporting—that is related to the complaint, whether directly or indirectly, will be prohibited for Vígszínház theatre, the person subject to a complaint or any other

staff member. If such retribution is encountered by the person lodging the complaint or anyone else, that can in itself constitute the factual definition of abuse of power/harassment, and as such, may be investigated under this Policy.

9 Miscellaneous Rules

9.1 Review of the Policy

With an eye to verifying the implementation and effectiveness of this Policy, Vígszínház theatre will conduct a review as necessary, but at least annually, and present the results to the Union, the Works Council and the Arts Council.

9.2 Underlying Legal Regulations

The main underlying legal regulations of this Policy include Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunity; the relevant provisions of Act C of 2012 on the Criminal Code of Hungary, Act I of 2012 on the Labour Code, as well as the applicable provisions of Act V of 2013 on the Civil Code of Hungary.

9.3 Privacy

The parties will be provided detailed written information on the data protection requirements, principles and processing-related rules applicable on the basis of this Code of Conduct and Rules of Procedure, with the proviso that Vígszínház theatre's Data Processing Policy is binding on all persons involved in ethics proceedings and that its personal scope also covers all persons involved in proceedings and the members of the Ethics Committee.

9.4 Promulgation

This Code of Conduct and Rules of Procedure will be published on the Vígszínház theatre intranet site and website, and its hard copies are available from the Head of HR and the Union (Mrs László Hodány, Trade Union steward).

IV Annexes

Annex 1: Non-Disclosure Agreement

DECLARATION

I, the undersigned

Name:

Place and date of birth:

Permanent address:

as a participant in the internal ethics proceedings of Vígszínház theatre Nonprofit Kft.

hereby make the following declaration:

I undertake the obligation to treat all information, personal data and any documentation I will learn during and in connection with the ethics proceedings as confidential, without any limitation in time.

In the context of the confidential processing of information and data referenced above, I undertake

- Not to disclose to any unauthorised (third) parties, whether orally or in writing,
- Not to publish,
- Not to disclose publicly,
- Not to copy or otherwise reproduce,
- Not to photograph,
- Not to contribute to information, data or documents that I come to know or possess during or in connection with the ethics proceedings being allowed to be transferred to unauthorised third parties in any other way whatsoever, not even indirectly.

I explicitly commit to not disclosing, to the press, whether directly or indirectly, any information, in the form of interviews or other statements or information disclosure, about ongoing ethics proceedings, their subject matter or the persons involved, in any form whatsoever, while ethics proceedings last.

I commit to the above obligation with particular reference to the fact that ethics proceedings comprise an internal procedure in a sensitive matter, concerning which all participating parties, witnesses, potential experts and those conducting the inquiry will be subject to confidentiality obligations, in the interest of the inquiry being possible to be conducted without bias and any external pressure, in the framework of due process, subject to the presumption of innocence and observing the prevailing data protection requirements.

I acknowledge that only the General Director of Vígszínház theatre Nonprofit Kft. at the time may grant a waiver of the above non-disclosure obligation for maintaining confidentiality, and solely in writing. This non-disclosure obligation for maintaining confidentiality does not apply to official proceedings before public authorities and courts.

I acknowledge that in the event of a breach of my above obligation, I will be subject to criminal and complete material liability under the applicable legal regulations.

Budapest, 2021

.....

Witnesses:

Witness 1:

Name:

Home address:

.....

Signature:

Witness 2:

Name:

Home address:

.....

Signature:

This declaration was made in two original counterparts, one counterpart to be attached to the respective case file by the permanent lawyer member of the Ethics Committee, and one counterpart due to the person making the declaration.

Annex 2: Privacy Notice

PRIVACY NOTICE Concerning Personal Data Processed in the Course of Conducting and Documenting Proceedings Related to Vígszínház theatre's Code of Ethics

Please be informed that your personal data will be processed according to the provisions of this notice in the course of proceedings subject to the Vígszínház theatre Code of Conduct and Rules of Procedure (hereinafter "Code of Conduct").

- (i) **Controller:** Your personal data is controlled by Vígszínház Nonprofit Korlátolt Felelősségű Társaság (registered office: 1137 Budapest, Szent István krt. 14., Phone: +36 1 329 23 40; email: adatvedelem@vigszinhaz.hu – "**Controller**")
- (ii) **Data Protection Officer:** The Controller has a Data Protection Officer, who, based on applicable legal regulations, may be contacted directly regarding data protection matters. The Data Protection Officer is Dr Antal Horváth (address: 1137 Budapest, Szent István krt. 14., email: adatvedelem@vigszinhaz.hu, Phone: +36 1 329 3918).
- (iii) **Purpose of processing:** Receiving and handling complaint reports, conducting and documenting proceedings subject to the Code of Ethics.
- (iv) **Legal basis for processing:** Legitimate interest under Article 6(1)(f) of the General Data Protection Regulation ("GDPR"), linked to the prevention of actions violating human dignity, as well as workplace harassment and abuse of power in the working environment.
- (v) **Recipients (of transfers) of personal data:** The Controller will not transfer personal data generated in connection with proceedings under the Code of Conduct to any third parties.

Supplementary information pursuant to GDPR Article 13(2)

- (vi) **Duration of storing personal data:**
 - 3 years in the case of memos drafted by the Committee after the end of proceedings terminated during the preparation phase of proceedings under the Code of Conduct
 - A maximum of 30 days after the conclusion of proceedings under the Code of Conduct during the preparation phase for other applicable documents
 - If proceedings under the Code of Conduct are not terminated in the preparation phase (Code of Conduct Section 5.1) – the retention period for documents relating to the proceedings is 5 years.
- (vii) **Information on the data subject's rights in relation to processing:** You, as the person entitled to the personal information processed by the Controller, may request the Controller to

provide you with access to your personal data, request a copy of your personal data processed by the controller, request their rectification, request—in the cases and subject to the exceptions provided for in GDPR Article 17—the erasure or restriction of the processing of your data, and may object to the processing of your personal data, moreover, you have the right to what is known as “data portability”, as specified in GDPR Article 20.

(viii) **Right to lodge a complaint with a supervisory authority or seek judicial remedy:** You may lodge a complaint about the processing of your personal data with the competent supervisory authority:

Name of supervisory authority: Hungarian National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa utca 9-11.

Email/Mailing address: ugyfelszolgalat@naih.hu, 1363 Budapest, Pf.: 9.

Phone: +36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391 1400

Fax: +36 (1) 391-1410

You may bring action against the Controller in relation to the unlawful processing of your data before the competent court:

Competent regional court: Budapest-Capital Regional Court

Address: 1055 Budapest, Markó utca 27.;

Mailing address: 1363 Bp. Pf. 16;

Phone: +36/1-354-6000.

Please be advised that instead of the Budapest-Capital Regional Court, you also have the right to apply to the competent court according to your permanent address or place of residence, where you can also bring the case instead of the Budapest-Capital Regional Court.

(ix) **Sources of personal data:** Your personal data processed by the Controller are obtained from sources you provide in the course of proceedings under the Code of Conduct. The Controller will not process data relating to you from publicly available sources during proceedings under the Code of Conduct.

Your personal data processed in the course of proceedings under the Code of Conduct

The data subject's name, email address, date and place of birth, mother's name at birth, statements made by the parties and members of the Ethics Committee and other stakeholders during proceedings, the data content of record documents, memos, decision preparation documents, evidence provided by the parties.

Having regard to the definition of personal data under GDPR—“*any information relating to an identified or identifiable natural person*”—your personal data is considered to mean any data arising in the course of proceedings that can be associated with you as the data subject.

I, the undersigned

Name:

Place and date of birth:

Mother's maiden name:

hereby declare that I have been made aware of the content of the information provided above, and that I have acknowledged the information concerning the processing of my personal data.

In Budapest, on this day of the month of in year

.....
Signature