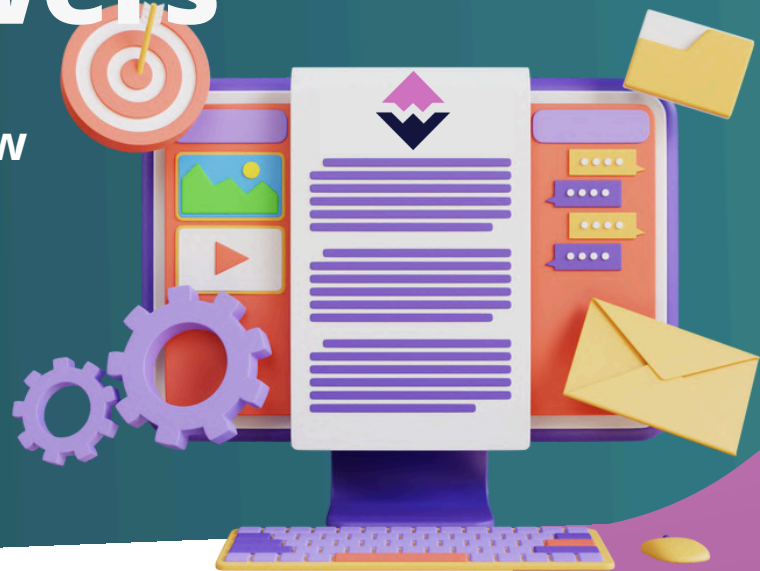


# Reporting abuse

## Information for whistleblowers

Everything you need to know  
about reporting abuse as a  
whistleblower



For COUNCIL ON GEOPOLITICS (hereinafter Council), it is of paramount importance to ensure its lawful, ethical and transparent operation and its proper reputation and to enforce the moral, ethical values and rules of conduct of the Council with its employees and business partners.

To ensure these objectives, the Council operates an internal whistleblowing system to comply with the law, as well as with its own policies and ethical values.



# ABUSE

## What is considered abuse?

Abuse is any unlawful or allegedly unlawful act or omission that deviates from the law applicable to the Council and from the rules of conduct established by the Council.

### Especially the following:

- all forms of corruption; breaches of confidentiality;
- (sexual)harassment or other abuse of colleagues;
- distortion of competition; fraud; money laundering.

By establishing an internal whistleblowing system, the Council aims to create a secure and accessible platform for anyone to report such abuse.

## Here are a few examples:

“I understand that one of our colleagues regularly asks for or accepts high-value gifts from partners to promote the selection of said partner during procurement, even though that partner is not usually the one that offers the best deal. Can I report this through the internal whistleblowing system?”

“I know of the same colleague that they used to have lunch with a representative of a competitor of the Council before the Council went to a public procurement procedure. Of course, I don't know what they were talking about, so I'm not sure whether to report this, they may just be having a friendly chat.”



In both cases, the answer is “Yes!”  
All actual or suspected abuse can be reported through the internal abuse reporting system.

# WHISTLEBLOWER

## Who can report an abuse?

People entitled to report an abuse are:

- employees of the Council;
- a former employee of the Council;
- a prospective employee of the Council, if the relevant contracting for employment is under way;
- sole entrepreneurs who are contracted by the Council;
- private companies contracted by the Council;
- the owner of the Council;
- the executives of the Council (e.g., C-level officials, supervisory board members);
- persons working at a Council with a former, current, or prospective contract with the Council;
- persons volunteering at the Council;
- interns of the Council.



“I am not an employee of the Council.  
May I still make a report?”



It is, of course, possible to make a report in such cases, e.g., if the partner has experienced irregularities during the contracting process of the contract fulfilment.

# REPORTING

## How can I make a report?

If you have noticed an abuse and wish to report it, the Council will provide you with the opportunity to report it orally and in writing, even anonymously.



## What does it mean to make a report “anonymously”?

The whistleblower has the possibility to report to the internal whistleblowing system without revealing their identity, such as name and email address. In this way the identity of the whistleblower remains unknown.

However, it is important to be aware that the investigation of anonymous reports may be waived.

# Written reports



In the case of a written reports, the following information should be provided so the Council has all the necessary information to carry out its investigation:

- In the case of a non-anonymous reporting, the identity and contact details of the reporter (name, email address).
- The data necessary to verify the right to make a report.
- Information on the report subject, i.e. the area in which the whistleblower has experienced the abuse.
- Information on the history of the report, i.e. whether the person has previously reported the same matter or reported the abuse to the Council or another organisation. If so, when, in what form and to which body.
- Details of the abuse, in particular
  - when the abuse was first detected,
  - where the abuse occurred,
  - whether the abuse is still ongoing.
- Who within the Council's organisation is affected by the report and which department.
- A detailed description of the abuse.
- Details of the other persons concerned, whether there are any natural or legal persons connected with the whistleblower who may be subject to retaliation in connection with the whistleblowing. If so, information on the relationship with this person and the details of this person may be provided by the reporting person.
- Attached documents.


# geotan.whisly.io

Language selection

Making a report

Language:  English 

COUNCIL ON GEOPOLITICS



**COUNCIL ON  
GEOPOLITICS**

[New report](#)

[Previous reports](#)


Dear Visitor,

This interface was created by COUNCIL ON GEOPOLITICS in order to comply with EU and Hungarian legislation governing breach reporting. Via this interface, persons can easily report any incidents in a comprehensive way related to the operation of their organisation indicating a possible breach. Additional information can also be added to the reports using the interface by selecting to amend your previous report.

Our organization is committed to complying with applicable laws and ensuring lawful operation. All reports received will be investigated in accordance with the law, and if any breach is identified, we will take all reasonable steps to eliminate it and to avoid similar incidents in the future.

Please report any incident indicating breach to help us investigate the case and ensure safe operation.

Sincerely,  
COUNCIL ON GEOPOLITICS

 Whistleblowing Information

 Privacy Notice.pdf

Abuse reporting policy

Privacy notice

Viewing or amending an existing report  
(case number + password required)

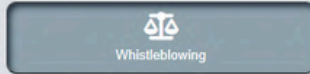
## Personal data

Name

E-mail

 Anonymous reporting

## Channel



## Report details

## What is whistleblowing?

Any event that deviates from the laws applicable to the organization and from the organizational objectives, values, and principles set by the owner and the leaders of the organization, as well as from the legal operation expected on the basis of the above, shall be considered an abuse.

An employee who intentionally, directly or indirectly, claims or accepts any advantage, whether for their own benefit or for the benefit of a third party, or accepts the promise of such advantage in order not to act or refrain from acting in accordance with their duties or in connection with the operation, commits an abuse.

You can submit a report through this interface if you experience any abuse or fraud in the operation of our organization.

Please answer the questions below including as many details as possible in order to provide us with all relevant information about the reported incident, thus facilitating the efficient conduct of the investigation.

## The reporter's relationship with the organization



What is your relationship with the organization?

## Subject of the report



In what areas did you experience abuse?

## Report history



Have you previously reported this abuse?

## Report details



When did you first encounter with the abuse?

 Don't know exactly

Where did the abuse take place?



Is the abuse still ongoing?



Within the organization, which organizational unit is affected by the report?



Please describe the abuse in detail.

## Information

Under the law, you, as a whistleblower, may not be disadvantaged for submitting the report.

Avoid making false allegations and statements in bad faith. If it becomes apparent that you have provided false information in bad faith, where allegations of criminal or petty offence arise, or is likely that you have unlawfully caused damage or other impairment of rights of another person, your personal data shall be supplied (upon request) to the body or person authorized to initiate or conduct the proceedings.

## Privacy Policy

I have carefully read and understood the Normbenz Magyarország Kft.'s privacy policy regarding its Whistleblowing reporting software, and by submitting this form, I consent to the processing of my data in accordance with the information contained therein.



I have read the privacy policy and I give my consent to the processing.

## Attached document(s)

Please attach any evidence in your possession in support of the report (max. size: 50 MB)

Send report

Cancel

# geotan.whisly.io

## Result of report upload

Your report has been uploaded. Report details:

- Report ID: WHSL-000206
- Report password: 1DZ9L0V3

Please retain the above information for future reference. Should you wish to add additional information to the report in the future, just refer to these data.

OK



New report

Previous reports

## Amendment of a report

Please enter the details of the report to be amended!

Report ID \*

Password \*

Open report

Cancel

## Additional information related to the report

Additional info

Additional document(s)

Send amendment

Cancel

## The reporter's relationship with the organization



What is your relationship with the organization?

Former employee



## Subject of the report



In what areas did you experience abuse?

Food and feed safety



## Report history



Have you previously reported this abuse?

# PROTECTION

## Protection of whistleblowers

The Council finds the protection of whistleblowers to be of utmost importance and ensures that:

- in the case of a legitimate whistleblowing, the whistleblower is not subject to any retaliation or discrimination on the basis of the whistleblowing;
- the whistleblower can make a lawful disclosure without being held liable for any breach of confidentiality.

However, this protection is subject to additional conditions, details of which are set out in our Policy.





**The making of a report is considered lawful if the following conditions are met.**

1. the whistleblower made the report through the Council's whistleblowing system in accordance with the rules set out in this Policy;
2. the whistleblower obtained the reported information concerning the circumstances to which the whistleblowing relates in the context of their employment-related activities;
3. the whistleblower had reasonable grounds to believe that the reported information concerning the circumstances to which the report relates was true at the time of the report. This requirement is a safeguard against malicious, frivolous or abusive reports.

If a lawful report is made, the whistleblower is exempted from the obligation of professional, commercial or other secrecy if the following conditions are met:

1. the protected information has been lawfully acquired;
2. they breached their obligation of professional secrecy in order to make a lawful disclosure;
3. they had reasonable grounds for believing that the disclosure was necessary to disclose the circumstances to which the disclosure related.

If the report is lawful, the whistleblower shall not be liable for obtaining or having access to the information contained in the report, unless their act constitutes as a criminal offence.



# What is considered retaliation, or detrimental measure?

- Suspension, termination or equivalent measures;
- demotion or refusal of promoting said person;
- reduction of pay, change of working hours;
- coercion, intimidation, harassment or ostracism;
- discrimination, unfavourable or unfair treatment;
- premature termination or cancellation of a contract for goods or services constitutes as an adverse action.

The use of adverse action is considered an offence under the legislation in force, and the Council pays particular attention to compliance with these rules.

## Confidentiality



The administrator in charge of investigating the report may share information on the content of the report and the persons concerned with other departments or employees of the Council to the extent strictly necessary for the investigation until a decision is made to close the investigation, and shall keep such information confidential.

# BAD FAITH

## REPORTING IS NOT FOR REVENGE

In the case of a report made in apparent bad faith (false data or information), both the content of the report and the data of the reporter may be transmitted to the competent authorities if:

- the report reveals circumstances indicating that a criminal offence or irregularity has been committed,
- the report has caused unlawful damage or other harm to another person.



Such report can have civil, criminal and labour law consequences.

In the case of reports made in good faith but found to be unfounded during the procedure, the investigation will of course be closed without informing the authorities.

# INVESTIGATION

## What happens after a report is made?



### Proof of receipt

The Council will inform the whistleblower of the receipt of the report within 7 days of the reporting. As part of the acknowledgement, the whistleblower will receive general information on the procedural and data management rules.



### Report dismissed without investigation

The Council is not in a position to investigate the merits of the report and may disregard it in the following cases:

- the report was made anonymously, without revealing the identity of the whistleblower;
- the report was not made by an eligible person;
- the report is a duplicate by the same applicant with the same content as the previous report;
- the harm to the public interest or to an overriding private interest would be disproportionate to the restriction of the rights of the whistleblower
- resulting from the examination of the application, or it is clear from the content of the report that the investigation can be waived.



## Informing the report's subject

### **The subject of the report may not receive information regarding the whistleblower**

The subject of the report is informed by the Council in detail about the following:

- the reporting;
- their rights of privacy;
- their rights and obligations during the investigation;
- that they are entitled to elaborate their views regarding the report even through a legal representative and provided evidence is present.



## The investigation of the report

Based on the report, the Council is obliged to carry out an investigation procedure and to investigate the facts.

In particular, the following investigative tools may be used:

- interviews with the whistleblower and persons with relevant information on the abuse;
- obtaining further documents and information related to the report; inspecting or copying documents;
- inspection of relevant sites;
- requesting an expert opinion.

The Council shall have a maximum of 30 days to investigate the report, but in exceptional and justified cases, this period may be extended further by 60 days.

(Exceptional cases e.g.: if an expert opinion is requested, the expert is unable to provide an expert opinion within 30 days, or the witness who has information in relation to the report is temporarily unavailable/hospitalised, etc...)

After investigating the report and establishing the facts of the case, the administrator assesses the validity of the report on the basis of the available documents, data and evidence. They shall prepare an investigation report on the facts of the abuse report and the outcome of the investigation in the shortest time possible under the given circumstances.

The Council shall inform the whistleblower in writing about the investigation or non-investigation of the report and the reasons for the non-investigation, the result of the investigation of the report, and the measures taken or planned.



Closing the investigation



Information about the investigation



## Consequences

Informing the authorities to initiate criminal or administrative proceedings on the basis of a report

Employer's sanctions  
Imposition of adverse legal consequences on the person reported, proportionate to the seriousness of the breach of their obligations, as laid down in their employment contract



# PUBLICITY

## In which cases can the report be made public?

The whistleblower may lawfully make their report public if at least one of the following conditions is met:



the whistleblower has first used the internal whistleblowing system operated by the Council and then the separate whistleblowing system provided for in the relevant Act or the protected reporting system operated by the Commissioner for Fundamental Rights, and the Council or other body or authority entitled to take action has not taken the substantive measures within the time limit;



the whistleblower has made direct use of a separate whistleblowing system or a protected reporting system operated by the Commissioner for Fundamental Rights and the body responsible for the procedure has not taken substantive action within the time limit;



the whistleblower had reasonable grounds for believing that the circumstances of which the report relates manifestly endanger public interest, in particular where there is a risk of irreparable damage;



the whistleblower had reasonable grounds to believe that, if the separate abuse reporting system is used, there is a clear risk that, due to the characteristics of the circumstances of the case to which the whistleblowing relates, adverse action will be taken against them or that the substance of the whistleblowing will not be dealt with.

Although the above conditions are in the alternative, it is still a mandatory element of defence that the information is obtained by the whistleblower in the context of their employment and that there are reasonable grounds to believe that it is true.

In the case of disclosure, it is for the whistleblower to prove or demonstrate that the necessary conditions for disclosure are met.

A lawful disclosure shall also be deemed to have been made if the whistleblower makes the disclosure to the European Union institutions, bodies, offices or agencies with authority and if the conditions for lawful disclosure are fulfilled.



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**Reporting abuse**

**Information for  
whistleblowers**



**Whisly**

**Reporting system**