

Rules and Procedure of the Ethics Committee of the CSFK

2023/1. General Director's Decree on the Procedure of Handling Harassment, Intimidation, and Discrimination

At any point during the procedure outlined below the Ethics Committee (EC) member(s) who was(were) first asked to be contacted can decide (after asking the approval of the complainant) if to proceed alone or approach other members of the EC for any help needed, e.g., advice, presence at meetings, etc.

1. First step

The complainant approaches the EC via an anonymous Google form (in Hungarian and English) located on the internal CSFK webpage <https://csfk.org/intranet/ethics-committee/>. The form must include an email address (any) to which the complainant can be reached and the name of the EC member(s) they would like to be contacted by.

Regulations of meetings

- 1.1. The selected EC member(s) have separate meetings with the people involved. A meeting with all the involved parties together is also possible if needed, requested and/or useful, necessarily with the permission of both parties and the complainant's approval. Besides the separate meetings with the involved parties there is opportunity to have a joint meeting together, even in the case when more than two people are involved.
- 1.2 In order to secure accuracy, all meetings should be either audio recorded (any recording can be used later with the previous consent of all involved parties) or have an additional person from the EC present as a witness. Such audio recordings do not replace the formal record of any meeting but may assist with the accuracy of the formal record or if there is dispute over what was said. Written notes need to be taken during the meeting to prepare the hearing report (Point 1.4 below). Those attending meetings or hearings must be informed in advance of the intention to record the proceedings. Advanced notification will allow all parties to raise objections in a timely manner. Any objections to recording must be considered by the EC, which will ultimately decide whether the recording is appropriate in light of any objection. The CSFK's regulation on data management must be met at all time in relation with the audio and written notes (preparation, use, etc).
- 1.3 During the meeting each person has the opportunity to talk for the needed time (up to 20 minutes) without being interrupted. After that they need to be available to answer questions from the EC member(s). A meeting generally should not last more than 1 hour. In case of a meeting with all the involved parties together, the people involved can ask questions to each other only via the EC member(s). This meeting may end with the agreement of the parties/resolution of the case. This agreement should be written down, and it composes part of the hearing report (Point 1.4), which must be signed by all parties.
- 1.4 According to the CSFK "Szervezeti integritást sértő események kezelésének rendje" a hearing report needs to be prepared for each meeting. The hearing report should be finalized by the end of the meeting (within five workdays) and signed by all parties confirming that the contents are consistent with what was presented verbally. Everyone involved should obtain a copy of the report. If anyone is not willing to sign the report this should also be recorded.

2. Second step

2.1 After all the meetings described above have been held, the EC also holds a meeting within 20 working days. If an EC member attended the meetings above alone, here they report on how/if the case has been solved. If more people from the EC were involved in the previous meeting(s), they share their impressions and decide how to proceed if the situation is not resolved via the agreement (of Points 1.3 and 1.4) . The options are (A) have another round of meetings (following Points 1.1 to 1.4 above) with the possibility to interviewing witnesses named by the parties (up to two rounds of meetings in total) or (B) suggest an Action to the Director General (within Point 2.2 below).

2.2 According to the CSFK "Szervezeti integritást sértő események kezelésének rendje" the Ethics Committee will provide a summary report to the Director General including the description of the agreement or the suggestion of further Action.

2.3 Disciplinary actions are also listed in the CSFK "Szervezeti integritást sértő események kezelésének rendje" document (II. 2.7)

3. Handling breaches and incident reports

The Financial Department keeps a register of integrity breach events. The "Szervezeti integritást sértő események kezelésének rendje" regulation requires documenting all types of data about any incidents, including the names of the people involved in the reported incident/case/integrity breach, written documents, etc. For incidents that are investigated by the EC we will keep all such data anonymized, with names or other personal identifications removed (it will be recorded that the persons asked confidential handling of their names), and any related documents should also be anonymized. Original documents can only be provided to anyone not involved in case there is an external investigation of the authorities (e.g., by the police). Original, non-anonymized documentation will be locked away and stored securely in the safe deposit box in the Director General's office, and only the members of the EC will have access to them.