

**4IG INFORMATIKAI ZRT.**

# **ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**

| Identifier | Version | Effective  | Related regulation                                                          | Limited application                                                                    |
|------------|---------|------------|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| COM2_4iGIT | 1.0     | 02.01.2025 | Code of Ethics and Business Conduct<br>Code of Ethics for Business Partners | Internal accessibility:<br>Not restricted<br>External accessibility:<br>Not restricted |

## RELEASE

| Regulatory function      | Name              | Operation                                                          | Position                                                       | Date of approval / Signature |
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## DOCUMENT HISTORY

| Version | Date of entry into force | Short description of modification |
|---------|--------------------------|-----------------------------------|
| 1.0     | 02.01.2025               | Issue of new rules                |

## DEFINITIONS

| Definition                                 | Explanation of definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Official</b>                            | <p>A person specified in Point 11 of Paragraph (1) of Section 459 of Act C of 2012 on the Criminal Code, in particular:</p> <ul style="list-style-type: none"> <li>• the President of the Republic,</li> <li>• members of Parliament, Members of the European Parliament elected in Hungary,</li> <li>• the prime minister, ministers, state secretaries, administrative state secretaries, deputy state secretaries, government commissioners,</li> <li>• judges, public prosecutors and arbitrators,</li> <li>• political party officials,</li> <li>• persons standing for public office,</li> <li>• other persons defined as such in the Policy of the 4iG Informatikai Zrt.</li> </ul>                                                                                                                                                                                                                                                                                                        |
| <b>Corruption and bribery</b>              | <p>Direct or indirect offering, promising, giving, accepting or soliciting undue (financial or non-financial) advantage of any value by violating the applicable laws with the aim of influencing or rewarding any person who acts or refrains from acting in performing his or her obligations, regardless of the location(s) of the commitment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Foreign public official</b>             | <p>A person specified in Point 13 of Paragraph (1) of Section 459 of Act C of 2012 on the Criminal Code, in particular:</p> <ul style="list-style-type: none"> <li>• a person discharging legislative, judicial, public administration or law enforcement functions in a foreign state,</li> <li>• a person serving at an international organisation established with an international treaty promulgated in an act of Parliament, whose activities are part of the normal operations of that organisation,</li> <li>• a person elected to the general meeting or body of an international organisation established with an international treaty that was promulgated in an act of Parliament, including Members of the European Parliament who were elected abroad,</li> <li>• a member of an international court having jurisdiction in Hungary and/or over its citizens, a person serving an international court, whose activities are part of the normal operations of that court.</li> </ul> |
| <b>Person with public service function</b> | <p>A person specified in Point 12 of Paragraph (1) of Section 459 of Act C of 2012 on the Criminal Code, in particular:</p> <ul style="list-style-type: none"> <li>• any soldier serving the Hungarian Defence Forces,</li> <li>• any person enrolled in the organisation of civil defence and discharging civil defence services,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                 | <ul style="list-style-type: none"> <li>• any civil guard in discharging the activities specified in the Act on the Civil Guards and the Rules regulating the Activities of Civil Guards,</li> <li>• ecclesiastical persons and members of religious associations who deliver sermons as a profession,</li> <li>• the defence counsel, the legal representative, the expert and the non-public official service executive in judicial or other administrative procedures,</li> <li>• any healthcare worker and other persons in a relationship aimed at work with the healthcare provider, in the cases specified in the Healthcare Act,</li> <li>• any member of the public ambulance service and other organisations authorised to carry out ambulance functions, in relation to rescuing and patient transportation,</li> <li>• any member of the fire brigade of a local government or the dedicated fire brigade of a facility, any member of a voluntary firefighter association, in the course of firefighting and technical rescuing,</li> <li>• any teacher and employee directly assisting in education (in the cases specified in the National Public Education Act), any teacher (in the cases specified in the Vocational Training Act), any teacher and academic researcher of higher education institutions (in the cases specified in the National Higher Education Act),</li> <li>• any person employed in a position specified in the Act on Child Protection and Custody Administration and in the Act on Social Administration and Social Care, when discharging the activities pertaining to that position,</li> <li>• any member of the staff of a forest agency and the authorised staff of a forest agency, regarding the activities specified in the Act on Forests, Forest Protection and Forestry,</li> <li>• any professional hunter, regarding the activities specified in the Act on Game Protection, Game Management and Hunting,</li> <li>• any river keeper, regarding the activities specified in the Act on Fishing,</li> <li>• any person discharging executive functions at economic organisations operating public transport equipment, regarding the respective activities,</li> <li>• any person discharging customer care functions at the universal postal service, regarding the respective activities,</li> <li>• any school security guard, regarding the activities specified in the Police Act,</li> <li>• other persons defined as such in the Policy of the 4iG Informatikai Zrt.</li> </ul> |
| <b>Relative</b> | Close relatives, the partner, the spouse of relative in the ascending line, the relatives in the ascending line and the siblings of the spouse, and the spouse of the sibling.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Close relative</b>   | The spouse, the relatives in the ascending line, the adopted children, the stepchildren and the fostered children, the adopting parents, stepparents, and foster parents, and siblings.                                                                                                                                                                                                                                                                                                                  |
| <b>Protection money</b> | Money extorted with actual or alleged threats related to health, security or freedom.                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Business partner</b> | External partner with which the organisation has some kind of a business relationship, or with which the organisation plans to establish a business relationship in the future. The definition of business partner applies to, but is not limited to, clients, customers, joint ventures, partners in joint ventures, consortium partners, onsite service providers, contractors, consultants, subcontractors, supplier, vendors, experts, agents, distributors, representatives, brokers and investors. |
| <b>Affected party</b>   | Any person or organisation that could influence a decision or activity, or could be influenced or feel influenced by a decision or an activity. Relative to the organisation, affected parties can be internal or external.                                                                                                                                                                                                                                                                              |
| <b>4iG Group</b>        | 4iG Nyrt. and all member companies under the direct or indirect sole or majority control of 4iG Nyrt.                                                                                                                                                                                                                                                                                                                                                                                                    |

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# 1. SCOPE AND RESPONSIBILITIES

## 1.1 PURPOSE OF THE RULES

The 4iG Group and accordingly 4iG Informatikai Zrt. ( 4iG Information Technology Ltd. hereinafter referred to as **“our Company”**, **“we”** or **“us”**) expressly prohibit and are expressly against any form of corruption. To the 4iG Group, and thus to our Company, combatting corruption does not only mean the fulfilment of the obligations arising from the requirements set out in the national or EU laws, and is not only a moral stand-point. In Hungary and internationally alike, corruption is a threat to clean business and can, therefore, distort market competition; additionally, it could also cause significant damage to market reputation.

The purpose of this Anti-corruption and Anti-bribery Policy (hereinafter referred to as the **“Policy”**) is to ensure and specify in detail the ethical and expected conduct related to the prohibition of corruption and bribery, as set out in the Code of Ethics and Business Conduct of our Company (hereinafter referred to as the **“Code of Ethics”**), by applying the highest level of regulation among the Group-wide regulatory instruments applicable by the 4iG Group.

Additionally, this Policy aims to formulating basic principles for the identification, evaluation and ranking of corruption risks and for the prevention of potential acts of corruption.

This Policy also sets out the framework for and facilitates compliance with the anti-corruption provisions of Hungarian and international law.

The Policy also aims to set out, in a manner that is publicly available to clients, partners and investors, the criteria that the 4iG Group, and within that our Company, will apply to ensure its anti-corruption compliance.

## 1.2 RESPONSIBILITY

All employees shall be responsible for complying with the provisions of this Policy; the senior officers of our Company, however, bear special responsibility for communicating, complying with and enforcing the provisions.

Both the Standard and the Code of Ethics stress this special responsibility. This responsibility also implies that the leaders set a good example, ensure and encourage that every employee can learn the rules of ethics and the anti-corruption rules, support an ethical corporate culture, protect whistleblowers, and also blow a whistle if they come across any unethical act or suspicion of corruption.

## 1.3 SCOPE

### 1.3.1 Personal scope

The scope of this Policy is in accordance with the principles and rules set out in the Code of Ethics of our Company; its scope, therefore, covers all employees, supervisory board members and executive officers of our Company.

### 1.3.2 Term

This Policy enters into force after its adoption and publication by the Chief Executive Officer and remains in force until withdrawal.

### 1.3.3 Objective scope

The scope of this Policy explicitly covers corruption, and does not address any other forms of fraud, or cartels and other violations of antitrust or anti-competition laws, money laundering or other corrupt practices.

## 2. PROHIBITION OF CORRUPTION AND BRIBERY

Our Company does not tolerate any form of corruption (including bribery, greasing the palms of public officials, returns, blackmailing, abuse of power for personal gains, undue advantages and gifts for influence) in the business sector, the public sector or the NGO sector. We apply zero tolerance for corruption and bribery. The detailed rules on gifts are in the Gifts Policy.

We strictly prohibit our employees and any persons acting in the name or on behalf of the 4iG Group or our Company to offer, promise, give, solicit, accept or take undue advantage. Employees and other persons acting in the name or representation of the 4iG Group or our Company may never offer or give monetary amounts or other advantages (and may not allow the same), if its purpose is undue influence on a public official or to secure undue business advantages (or even to appear as such).

We act in this way even if this causes a competitive disadvantage to us or we miss a business opportunity for reporting such actions. The 4iG Group, and within that our Company, is committed to zero tolerance of corruption and bribery for its social responsibility, charitable and sponsoring activities as well.

### 3. ANTI-CORRUPTION CULTURE AND COMMITMENT

All of our employees share the responsibility of creating and maintaining a corporate culture that encourages all to act if they come across corruption, bribery or fraud or the presumable evidence thereof, without fear of retaliation. The 4iG Group has an anti-corruption management system, in which our Company is involved as well, and the purpose of which is to reduce corruption risks and identify illicit conduct.

The 4iG Group and thus our Company and all its employees are committed to the fulfilment and continuous development of the requirements of the anti-corruption management system. As part of this commitment, they shall act with the level of caution appropriate for the risk level or strategic importance of their own areas in discharging the responsibilities of their positions. We continuously endeavour to establish good anti-corruption practices in compliance with industry norms and standards and to train our employees accordingly.

We attach great importance to the detection of all corruption incidents and the threat thereof as soon as possible, therefore, our Company operates a reporting channel (e.g. the Ethics and Compliance line available at [compliance-itsi@4ig.hu](mailto:compliance-itsi@4ig.hu)) through which employees, partners and clients of our Company, as well as other persons who are aware of an act of corruption, can report them, even anonymously.

We support, encourage and expect our employees and, in accordance with the anti-corruption provisions of its contracts, our contractual partners to report any corruption incidents of which they become aware. We believe that the employees, contractors and clients who first become aware of a possible act of corruption or the imminent threat of such an act are key to the detection and prevention of possible acts of corruption and we, therefore, consider it particularly important to facilitate the rapid and direct transmission of relevant information and potential evidence to the person competent and empowered to investigate the matter.

### 4. STRATEGY AND GOALS

This Policy is in accordance with the intentions, goals and strategy of the 4iG Group and our Company, and the anti-corruption management system shall be designed and implemented accordingly. Should the strategy of the 4iG Group or our Company change or a change of its strategy be under preparation, then the amendment of this Policy might also be reasonable.

Accordingly, the anti-corruption goals set out in the anti-corruption management system to be designed and implemented shall also be derived from the strategy of the 4iG Group, while the results of corruption risk assessment shall also be considered.

The anti-corruption goals shall reflect the areas classified as having higher than low risk. The goals shall be measurable and accomplishable, progress towards the goals shall be monitored, and the goals shall be updated as necessary.

An action plan shall be derived from the set goals, and this action plan shall appear in the documents describing the operation of the anti-corruption management system. Owners, deadlines and resources shall be assigned to the components of the action plan.



## 5. SPECIAL CORRUPTION RISKS DERIVED FROM THE STRATEGY

### 5.1 COOPERATION WITH PUBLIC OFFICIALS

The business success of our Company greatly depends on public sector orders. Cooperation with public officials, including government officials working in the public sector, implies high corruption risks in general. This cooperation could mean business partnerships (seller-customer relations) or the relations with regulatory and supervisory authorities.

Two methods are available to mitigate the risks implied by these forms of cooperation. The first method is reporting long-term relations with public officials to the Compliance Officer, who documents this and includes it in the risk assessment process. The second method is documenting ad hoc meetings to ensure the transparency of the relationship.

### 5.2 OPERATION AT GROUP LEVEL

The 4iG Group has developed its compliance framework at Group level, but each member company operates in a different market environment and faces different corruption risks. In view of this, the Group-level compliance operation shall develop an efficient compliance framework and anti-corruption compliance defined according to the same principles and methods and shall also enable the framework to adequately address the individual corruption risks of each member company, both at Group level and for the member company concerned. In this context, 4iG Informatikai Zrt. has a separate compliance function (Compliance Officer) responsible for assessing and managing anticorruption risks.

### 5.3 CHAIN TRANSACTIONS

Software and hardware distribution are important activities of our Company. A frequent corruption risk factor of this business model is chain transactions, where the goods get to the end user through several players. Our Company seeks to avoid this type of sales and is committed to sell to end users directly or through the lowest possible number of intermediaries whenever the relevant business opportunity makes that possible so that it can reduce corruption risks.

## 6. THIRD PARTIES

We do not enter into a business relationship with third parties that do corruption activities and end our business relationships with business partners that do the same. Nobody may be reassigned to a lower position or receive retaliation, punishment or suffer any other negative consequences for refusing the payment or acceptance of bribes, even if this entails the missing of business opportunities.

The violation of anti-corruption laws is a serious criminal offence. Fines or other sanctions could be imposed on companies that violate the relevant legal requirements, and the individuals involved could expect criminal prosecution.

We exercise due diligence in selecting our partners. Before and during the cooperation, we take steps to verify the reputation, actual ownership structure, technical knowledge and experience, financial situation

and credibility of the (potential) partner as well as their compliance with the Hungarian and relevant international laws.

During the cooperation with the business partner, we are responsible for monitoring the ongoing joint activities.

Our Company could be held liable for violations committed by its partners if it is demonstrated that our Company ignored the signs of bribery by the Partner. It is, therefore, important that all of our employees comply with the following rules in cooperating with third parties:

- Employ companies or representatives that are properly prepared and have good reputations,
- Contact the relevant Compliance Officer or use the Ethics and Compliance Hotline if they come across any of the following red flags for a third party:
  - doubtful reputation and questionable operations based on official sources,
  - the received offer implies bribery,
  - ignorance of the Code of Ethics and Business Conduct of our Company or the provisions of this Policy,
  - lack of interest in quality, contractual securities, etc.

## 7. REGULATIONS

We comply with the legal requirements prohibiting bribery and corruption and facilitating the detection of corruption, including in particular:

- Act C of 2012 on the Criminal Code (hereinafter: Criminal Code),
- Act XXV of 2023 on Complaints, Public Interest Disclosures, and the Rules Relating to Whistleblower Reports
- Act CIV of 2001 on Criminal Measures Applicable to Legal Entities,
- Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices (hereinafter: Unfair Market Practices Act),
- Act CXLI of 2015 on Public Procurement.
- Act XXXVII of 2000 on the promulgation on the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, signed in Paris on 21 November 1997 by the Member States of the Organisation for Economic Co-operation and Development (OECD) and Argentina, Brazil, Bulgaria, Chile and Slovakia
- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and other regulations of the European Union,
- (General Assembly resolution 58/4 of 31 October 2003 United Nations Convention against Corruption)
- the relevant requirements of the United States (Foreign Corrupt Practices Act, FCPA)
- the regulations of the United Kingdom (UK Bribery Act).

We conduct our procurement procedures in a fair and transparent way and dispense with the principle of requiring at least three bids only where justified. In assessing its suppliers, constructors and subcontractors, we do legal and financial due diligence as necessary, making sure whether they efficiently combat corruption and apply anti-corruption rules, and assessing risk they pose to the compliance with anti-corruption laws. The Compliance Officer shall keep record of the results of the due diligence to document the compliance of business partners.

Even turning a blind eye to signs of corruption can result in corporate or personal criminal liability and employment law consequences for an employee of our Company.

Any contract to be concluded with a partner shall be subject to our prior approval as provided for in a specific policy, and all parties concerned shall be informed of our Company's position against corruption and bribery in the contract to be concluded, and this Policy shall be made available to business partners. If the internal regulations of our business partner lay down more stringent provisions than this Policy, the business partner shall make those provisions available to our company, and our company shall consider itself bound by those provisions in the legal relationship between the parties.

## 8. RESPONSIBILITIES

### 8.1 RESPONSIBILITIES OF THE BOARD OF DIRECTORS

Within our Company, the Board of Directors is responsible for locally designing, implementing, maintaining and continuously developing the anti-corruption management system. This includes checking the availability of the necessary resources, contributing to the implementation of the anticorruption policy adopted by the 4iG Group within the company, and ensuring consistency between the strategy and the anticorruption management system.

The Board of Directors of 4iG Informatikai Zrt. shall confirm these responsibilities in a declaration.

### 8.2 COMPETENCE AND INDEPENDENCE OF THE PERSON(S) RESPONSIBLE FOR ANTI-CORRUPTION COMPLIANCE

The person responsible for anti-corruption compliance in our Company is the Compliance Officer. The Compliance Officer shall discharge his or her responsibilities according to his or her job description and without influence and conflict of interests. In discharging his or her responsibilities, he or she shall have direct and prompt access to the CEO.

The Compliance Officer is appointed by the CEO with the prior approval of the Head of Compliance of the 4iG Group. The competence of the Compliance Officer includes the overseeing of the design and implementation of the anti-corruption management system. He or she shall advice and guide the employees of our Company on issues related to the anti-corruption management system and corruption. The Compliance Officer prepares a report once a year to the Head of Group Compliance and to the Board of Directors on the current status of the anti-corruption management system.

## 9. EXPECTATIONS FROM EMPLOYEES

Regarding the rules set out in this Policy, we expect our employees

- to learn and respect the anti-corruption rules and avoid transactions and circumstances that could even appear as any irregular behaviour.
- to exercise due diligence in selecting and supervising the business partners.
- to make sure that all our business partners, including all consultants, suppliers, subcontractors and other contributories, understand that corruption is not acceptable. To this end, the attention of business partners is drawn to the relevant parts of the partnership agreements, in particular the anti-corruption clause, and the applicable rules, as well as to this Policy.

- to ensure that procurement procedures, including but not limited to tenders, be transparent and make fair and unbiased competition possible.
- to minimise the number of exclusive suppliers, because their contracts could have hidden conflicts of interests and return arrangements.
- to ensure that the remuneration for agents, consultants and other intermediaries be appropriate and proportional to the services received, and to pay them through lawful channels.
- to ensure that social responsibility, charitable and sponsoring activities be fair, clean and transparent so that the grants get where they are should and are not used for unclear or other purposes.
- to conduct anti-corruption due diligence for any planned merger, acquisition or other transactions involving business partners.
- to promptly report via the Ethics and Compliance Hotline if they become aware of any corrupt activities in our Company or the value chain or believe that they have found signs of such activities. Nobody may be reassigned to a lower position or receive retaliation, punishment or suffer any other negative consequences for reporting in good faith using the Ethics and Compliance Hotline or any other channel.
  - never to offer, apply, allow, promise, pay, solicit or accept, either directly or indirectly, unauthorised or irregular payment (in the form of cash, or cost accounting in bad faith or in any other way), gifts, or undue favours for preferential treatment, influence on the results of business consultations, or gaining business advantages.
  - not to keep hidden accounts.
  - never to make favours by violating their obligations.
  - not to try to convince (foreign or Hungarian) public officials, persons with a public service function or any individual to act illegally.
  - not to make and authorise any inappropriate and illegitimate payments to such persons.
- never to allow that agents, consultants, representatives or other external parties acting on behalf of our Company act questionably or bribe anybody.

## 9.1 SANCTIONS

We pay special attention to the compliance with and enforcement of the rules of this Policy. It shall be regarded as violation of this Policy if one of our employees becomes aware of any bribery or corruption that is inconsistent with the rules of this Policy, but fails to inform the persons authorised to investigate the case or makes the violation of the rules possible, either through failure to act or violating them by himself or herself.

Our Company does everything to investigate the corruption in the above cases of violation of this Policy and to impose sanctions in line with the relevant rules.

# 10. RAISING ANTI-CORRUPTION AWARENESS

## 10.1 DISSEMINATION OF THIS POLICY

This Policy shall be made available to all of our employees as well as to all business partners and other important affected parties that pose a corruption risk.

## 10.2 ANTI-CORRUPTION TRAINING

Beyond developing this Policy, we wish to ensure anti-corruption training for the employees; we, therefore, organise various trainings on anti-corruption matters. Employees who are invited to the training sessions and/or work in areas classified as having high risk are obliged to attend these trainings. This is particularly applicable to areas in direct contact with suppliers, subcontractors, clients or public officials. The trainings are organised in a differentiated form and with a differentiated contents according to the corruption exposures of the employees. The affected employees shall retake the relevant training at regular intervals or in the event of considerable changes in the training content.