

4IG INFORMATIKAI ZRT.

CODE OF ETHICS AND BUSINESS CONDUCT



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COM7_4iGIT	1.0	02.01.2025	Code of Ethics for Business Partners	Internal accessibility: For all employees and agency partners of 4iG Informatikai Zrt. External accessibility: Public

RELEASE

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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
4iG Group	4iG Nyrt. and all member companies under the direct or indirect sole or majority control of 4iG Nyrt.
Group Legal and Regulatory Directorate	The Group Legal and Regulatory Directorate, operating at Group level at 4iG Nyrt.
Compliance / Compliance Officer	Function ensuring the compliance of 4iG Informatikai Zrt.
Ethics Committee	An independent and impartial body within the 4iG Group, whose task is to ensure that the 4iG Group operates in accordance with the law and its ethical commitments. Detailed rules governing the proceedings of the Group's Ethics Committee are set out in a separate policy.

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1. EXECUTIVE MESSAGE

Dear Employee,

The business operations and success of 4iG Informatikai Zrt. (4iG Information Technology Ltd. hereinafter referred to as “**our Company**”, “**we**” or “**us**”) are based on ambitious objectives, outstanding performance and fair business conduct under all circumstances, in compliance with the law, internal policies and professional and ethical rules.

The purpose of this Code of Ethics and Business Conduct (hereinafter: “**Code**”) is to set out a framework for the conduct of our employees and executive officers based on our values and vision, in order to establish and maintain in the long term a solid ethical foundation for our Company.

Our responsibility does not stop at the limits of lawful operation. For one thing, corporate social responsibility is an integral part of our operations; therefore, we consciously strive to communicate core values to the community and to enrich society through our activities. We are convinced that this is the only way to successfully face the challenges of the competitive market environment in the long term and the only way to maintain the trust of our employees, customers, shareholders, business partners and other stakeholders and to safeguard the Company’s reputation.

For another thing, a cornerstone of our operations is to conduct our business, including development, sales, service delivery, marketing and communications, in a manner that complies at all times with the highest ethical standards, regulations and best practices of the industries concerned.

We are committed to protecting the environment and reducing unnecessary use of resources. At all times, we seek to organise our activities in such a way that they do not place a greater burden on the environment than is necessary.

We have a zero tolerance policy for, among other things, corruption, the prohibition of restrictive practices, respect for human rights and human dignity, equal treatment, health protection, data protection, data and information security and environmental protection. Unethical or inappropriate behaviour, or even the appearance of such behaviour, may adversely affect the reputation of our Company, call into question the values that the Company believes in and thus undermine trust in our Company.

We face a number of ethical challenges, legal and regulatory requirements and other societal demands in our activities. The purpose of this Code is to lay down provisions on the most important areas of moral conduct. However, the Code does not contain guidance for every possible situation and problem that may arise, so all employees and executive officers of our Company shall always act responsibly and with careful consideration.

We believe that our ethical commitment must be expressed not only in words but also in deeds. We therefore encourage all our managers to set an example of ethical behaviour to all our employees. As line managers have a key role to play in the establishment, evaluation and ongoing monitoring of a culture of ethics under the Code, they shall be thoroughly familiar with the provisions of the Code and the principles it lays down, and shall communicate and enforce them appropriately in their instructions, decisions and daily activities.

Finally, our ethical operation necessarily includes the enforcement of the Company’s ethical values and standards among its employees. Therefore, we are committed to holding violators of the standards of conduct and ethics set out in the Code and its implementing internal policies accountable, remedying the situation and restoring ethical operations.

We are counting on all stakeholders to join our efforts and actively contribute to the achievement of our goals!

Chief Executive Officer

2. GUIDANCE ON THE CODE

The purpose of the Code is to set out the principles and basic standards necessary to create an ethical culture and operations that comply with the law and internal policies, and to define expected business conduct. This helps to identify situations that may arise in the course of work and may lead to the breach of ethical standards. Additionally, the Code also provides guidance on what to do if there are questions about ethical conduct or if someone becomes aware of an ethical breach.

The Code is intended to provide general guidance on expected business conduct. If you need more information on any of the core values set out in the Code, please refer to the detailed company policies. The numerous practical examples (expected conduct and conduct to avoid) in the Code support easy understanding.

If the Code sets out requirements that are more stringent than the regulations or customs set out in a particular country or region, the provisions of the Code shall apply within the local legal framework.

The Code primarily regulates business conduct and compliance in relation to our activities, but also contains a number of provisions relating to the general conduct of employees, given that we expect all our employees to act and communicate in accordance with the Code, both outside of work and as individuals.

2.1 COMPLIANCE

Our compliance programme aims to create a value-conscious and compliance-based corporate culture. We are committed to conducting our business in accordance with applicable laws, other rules, standards and ethical norms that do not constitute legislation. As the 4iG Group does business in many countries, we therefore recognise and analyse the differences in laws, regulations and practices in each country, while operating the Company in a legal and ethical manner.

To ensure compliance and integrity, we have a Compliance function. The Compliance function is responsible for ensuring compliance and identifying, assessing, managing and following up on compliance and ethical risks related to the Company's operations.

The effort to systematically manage compliance and ethical risks is guided by the applicable guidelines of this Code and the same guide our employees in their actions and value judgments.

2.2 APPLICABLE LAWS AND REGULATIONS

Our Company and its partners are also active in international markets, and therefore we our partners might be subject to the laws of the countries in which we and our partners operate. Where local legislation or partner requirements differ from those set out in this Code or in our policies, the stricter requirements shall apply.

If an employee has any doubts or questions as to whether any applicable law or regulation may prevent them from complying with the Code or any other compliance regulation we have put in place, they shall report this to the Compliance Officer, who will forward the issue and consult with the Group Head of Legal and Regulatory, or report such circumstances to the Ethics and Compliance Hotline.

2.3 SCOPE OF THE CODE

This Code applies to all employees and executive officers of our Company.

2.4 ETHICS ORGANISATION

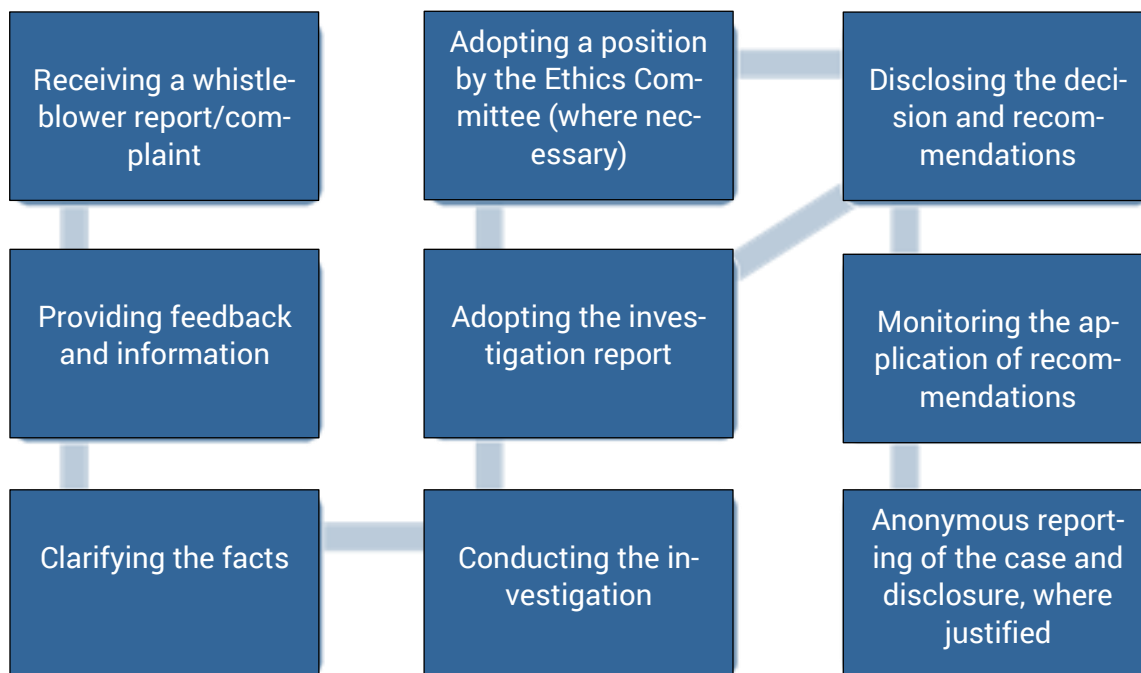
In order to monitor compliance with the provisions of this Code and to promote and maintain ethical conduct, our Company has established a separate ethics organisation, consisting of the Ethics Committee and the Compliance Officer of our Company. The professional governance of the Compliance Officer shall be provided by the Head of Group Compliance. The Ethics Committee operates independently of our Company's work organisation and reports directly to the Board of Directors of 4iG Nyrt.

Employees of our Company may ask the Compliance Officer questions, even in one-to-one meetings, if any ethical or moral issues concerning their person arise in the workplace.

2.5 ETHICS PROCEDURE

The prevention and detection of ethical misconduct and violations is critical to our long-term success. **Any breach of the Code is a serious breach of regulations, which may lead to the termination of the employee's employment.** Lack of knowledge of our requirements or of the law does not exempt any person from the consequences of breaching them.

We shall assess all non-compliance situations and, if the conditions are met, the Ethics Committee shall conduct an investigation in accordance with the Rules of Procedure of the Ethics Committee. The sanctions that may be imposed for breaches of the Code and of the law are set out in the Rules of Procedure of the Ethics Committee; these breaches may give rise to liability under labour law, civil law or criminal law, depending on the circumstances of the case.



ETHICS PROCEDURE

To facilitate whistleblowing, we operate an Ethics and Compliance Line through which whistleblower reports may be made by (i) our employees, (ii) persons who have a contractual relationship with us, or (iii) persons who have a legitimate interest in making a whistleblower report or in remedying or stopping the

conduct that is the subject of the whistleblower report, if they become aware of conduct that is in breach of the provisions of the Code.

The Ethics and Compliance Line is a secure and accessible channel through which external and internal stakeholders can obtain advice and raise ethical concerns.



The Ethics and Compliance Line of 4iG Informatikai Zrt. is available:

by e-mail: compliance-itsi@4ig.hu
on the internet: <https://compliance.4ig.hu>
by post: 1037 Budapest, Montevideo utca 2/C. (addressed to "4iG Informatikai Zrt. Compliance")

In addition to the above Ethics and Compliance Hotline, the 4iG Group also operates a separate whistleblowing system, through which it receives reports about our Company's activities. Reports regarding investigations by the Group Compliance function of 4iG Nyrt. can be submitted via the 4iG Nyrt. Ethics and Compliance Hotline using one of the following channels:



The Group-level Ethics and Compliance Line is available:

by e-mail: compliance@4ig.hu
on the internet: <https://compliance.4ig.hu>
by post: 1013 Budapest, Krisztina krt. 39. (addressed to "4iG Compliance")

Breaches of the Code and of the law may give rise to liability under labour law, civil law or criminal law, depending on the circumstances of the case. The sanctions that may be imposed for breaches of the Code and of the law are set out in the Rules of Procedure of the Ethics Committee.

While knowledge of and compliance with the Code, our corporate requirements and policies are mandatory for all employees, they cannot provide guidance for all decision-making situations. If you face a challenging ethical decision, answer the following questions to determine the necessary steps to take:

- Is the situation or conduct you are encountering lawful?
- Is it ethically acceptable? Why does this situation bother me? Do I really not know what to do, or am I just reluctant to do what I really think is the right thing to do?
- Is it consistent with the values of the Company? Who could be affected by my decision? What are the possible consequences of my decision for my line manager and co-workers, shareholders, customers, suppliers and the Company as a whole?
- Can I justify my decision, if necessary?
- Would you and your colleagues be comfortable if it appeared in the media?
- Is it the right decision for your line manager or the manager?

If you are still in doubt, please use the Ethics and Compliance Line operated by us, which is completely confidential and **can be used to make anonymous whistleblower reports**.

We will do everything in our power to keep the details of any complaints received and the identity of the person making the complaint (hereinafter referred to as the “**whistleblower**”) secret and to treat them as confidential. However, it may be possible to deduce the identity of the whistleblower from the circumstances of the case, in particular the information contained in the whistleblower report and the specific characteristics of the case.

The details of the whistleblower may only be disclosed to the Compliance Officer and members of the Ethics Committee, as well as to persons who are absolutely necessary for the investigation of the report and who will treat the details as confidential.

Everyone has a responsibility to speak up if they see something that is unsafe, unethical, potentially harmful, not in line with the law or company standards.

2.6 THE KEY RESPONSIBILITY OF MANAGERS / ACTING AS A ROLE MODEL

As our executive officers represent our company to all stakeholders to a significant degree, they serve as particular role models for employees, business partners, government authorities, and the public.

Under the Code, our managers are responsible for

- setting a good example of ethical conduct and compliance;
- making the Code known to their colleagues under their direct supervision, ensure that their colleagues understand it and that all their actions reflect respect for ethical standards;
- providing opportunities to demonstrate and discuss ethical conduct and creating an open working environment that encourages employees to raise questions and concerns and, if unethical conduct is detected, to report it to the Compliance Officer or using the Ethics and Compliance Line;
- Ensuring that employees who raise problems or questions are not subject to any retaliation for doing so;
- Reporting compliance issues requiring investigation to the Compliance Officer without delay.

We consider the deliberate or grossly negligent disregard or failure to consider compliance risks as a clear lack of management skills. Managers may also rely on the support of the Compliance Officer if they have questions.

2.7 ZERO TOLERANCE TOWARDS RETALIATION

We do not tolerate any retaliation against a bona fide whistleblower who raises compliance risk or concerns. If a whistleblower feels that he or she has been retaliated against for making a whistleblower report, either by the person reported or by a third party, he or she shall report this on the Ethics and Compliance Line. The Compliance Officer and the Ethics Committee shall investigate all such complaints and take appropriate action to ensure accountability. Our Company will apply the legal consequences in accordance with the rules governing the employment relationship to anyone who is responsible for retaliating against the person who made the whistleblower report.

2.8 OUR CORE VALUES

Responsibility	We take responsibility for the consequences of our actions and take into account the needs and expectations of our stakeholders, i.e. employees, shareholders, business partners, suppliers, customers, competitors, officials and persons with public functions and non-governmental organisations.
Courage	Bravely standing up for ideas and opinions, receiving and providing feedback, and challenging the status quo are values that drive us forward every day.
Respect	We respect everyone's rights and interests related to human dignity, self-determination and privacy, keeping in mind the golden rule: "you should strive to treat others as you would like to be treated".
Diversity	As members of a group of companies operating on the international stage, our employees belong to different cultures and have different backgrounds. Therefore, we expect an unbiased attitude towards each other and the promotion of this diversity.
Honesty	We are convinced that honesty is the basis of mutual trust, and therefore it is the foundation of our reputation and corporate ethics.
Loyalty	We are loyal to the organisation and our colleagues, with whom we work in accordance with these ethical standards.
Fairness	We aim to achieve our objectives in a fair and responsible manner, in full respect of the legal environment, professional ethics and the contracts we conclude.
Quality	In all circumstances, we strive to develop excellence and expertise, and to continuously deepen trust by providing products and services of reliable quality. We are committed to honouring our agreements and will make every reasonable effort to fulfil our promises and commitments in letter and spirit.
Integrity and transparency	We comply with all legal requirements, including industry and organisational standards applicable to our business activities. Our ethical standards go beyond legal compliance and combine standards of good governance and good practice. We are committed to ensuring that transparency is the starting point for our activities, business communications and contracts, in order to provide all stakeholders with the opportunity for independent and informed decision-making.

3. PRINCIPLES OF ETHICAL EMPLOYMENT

3.1 HUMAN RIGHTS

Human rights are the inalienable rights of all people equally. On 10 December 1948, the United Nations General Assembly adopted and proclaimed the Universal Declaration of Human Rights, which summarises the most important human rights.

We are committed to respecting the human rights of all stakeholders and expect our employees to do the same.

We aim to respect human rights, but also actively promote them in our value chain and strive to have a positive impact on society. We support the protection of human rights and we condemn all forms of human rights violations. We pay particular attention to our employees, suppliers, and vulnerable groups such as women, nationalities, ethnic, religious and linguistic minorities, children, people with disabilities and their families.

Conduct to follow

- Always respect human rights and take appropriate steps to prevent human rights violations.
- ✓ Ensure that human rights are upheld in business operations, including in business development and development projects, the selection of business partners and suppliers or subcontractors, and public relations matters.
- Expect our business partners too to respect human rights.
- Report any human rights violations that occur in the course of operations or in connection with the conduct of the Company's business.

Conduct to avoid

- Never turn a blind eye to a plan, action or conduct that could adversely affect human rights.
- Never regard respect for human rights as a state duty alone.

3.2 EQUAL OPPORTUNITIES AND EQUAL TREATMENT

We understand the value of diversity. Our employees come from different backgrounds, therefore, we expect an unbiased attitude towards each other and the promotion of this diversity.

We aim to provide equal opportunities for all and to recruit and employ people regardless of their personal characteristics, such as race, ethnicity, colour, religion, political belief or lack thereof, origin, gender, sexual orientation, age, gender identity or gender expression, nationality, marital status, pregnancy, childbearing, genetic characteristics, health status, or any other status, characteristic or feature protected by applicable law (hereinafter collectively: "**protected characteristic**").

3.3 NON-DISCRIMINATION

We expect all our employees to refrain from any conduct (whether a measure, condition, omission, instruction or practice) that discriminates (directly or indirectly), harasses, ostracises, unlawfully segregates or retaliates.

- **Direct discrimination** is any action or conduct which results in a person or group being treated less favourably than another person or group in a comparable situation is, has been or would be treated on the basis of an actual or perceived protected characteristic.
- **Indirect discrimination** is any measure or conduct which, while appearing to meet the requirement of equal treatment, puts persons with a certain protected characteristic at a greater disadvantage to a significantly greater extent than other persons or groups in comparable situations.

Another form of impermissible discrimination is segregation, a measure that, on the basis of a protected characteristic, separates persons or groups of persons from those in a comparable situation by any means, such as by designating their place of work or rest area.

Conduct to follow

- Provide opportunities for all, regardless of individual or group characteristics unrelated to skills, merit, performance, qualifications or business considerations.
- Make decisions on recruitment, assessment, development, reward, remuneration and termination of employment, and decisions on the selection of business partners based solely on professional competence, merit, performance and business considerations.
- ✓ Be open and respectful of cultural diversity, and support foreigners in adapting to local conditions.
- ✓ Be aware of local legal requirements and cultural factors that may affect your work.

Conduct to avoid

- Never discriminate against anyone on the grounds of marital status, gender, age, ethnic or racial origin or nationality, colour, political opinions, religion or sexual orientation, disability, being a member of an employee representation, etc.
- Do not discriminate even if it is not prohibited by law or permitted by local customs.

3.4 HUMAN DIGNITY AND MUTUAL RESPECT

We are committed to creating a working environment based on mutual trust, where everyone is valued, and their human dignity is respected. We have a relationship of trust with our employees and business partners, in which we show them the respect they deserve and expect the same in return.

We do not tolerate harassment or any other degrading, humiliating, offensive or intimidating acts, conduct or behaviour. Within our Company and its wider community, everyone is treated with courtesy and respect.

We expect employees to treat each other with mutual respect and to settle disputes in a manner consistent with the rules and customs of professional conduct and social interaction. We consider insulting language, belittling or aggressive tone of voice used towards other employees or business partners to be verbal aggression, which is incompatible with the standards of professional communication.

We consider sexual harassment, defamation and insults to be particularly serious violations of human dignity.

Harassment is any conduct that is offensive to human dignity, sexual or otherwise, arbitrary interference with the daily life of others, or regular or persistent troubling that is intimidating, hostile, humiliating, shaming or likely to create an intimidating, hostile, degrading, humiliating or shaming environment for the person concerned. Sexual harassment includes sexually defined unwanted behaviour such as physical

contact and advances, sexually explicit comments, sexually themed emails or text messages, jokes, requests for sexual favours.

Conduct to follow

- ✓ Always respect and protect the dignity of others.
- You base your work, business and community relationships on openness, trust, mutual recognition and support.
- Make efforts to create and maintain an appropriate working environment that is conducive to cooperation, including in business and community relations.
- Respect the community's rules of courtesy, as long as they do not violate the ethical standards of our Company.
- If someone's behaviour or actions upset you, let them know, explaining why you find it upsetting and ask them to stop.

Conduct to avoid

- Don't intimidate or humiliate others with actions or words.
- Never behave in a patronising, offensive or hostile manner.
- Never use jokes or comments that are inappropriate, racial, ethnic, religious, disability-related, age-related or sexual.
- Do not distribute or share offensive, violent or degrading material or images.
- Do not harass anyone with sexual advances, ask for sexual favours, make sexual comments or gestures, or engage in any other conduct of a sexual nature.
- Never make untrue statements or spread malicious or degrading rumours about others, or share offensive or discriminatory information in any way.

3.5 HEALTH AND ENVIRONMENTAL PROTECTION

We are committed to preventing personal injury, environmental damage and hazards, and to reducing the health, safety and environmental risks arising from our activities.

Health and safety at work are given the highest priority. This includes ensuring that we comply with the health and safety legislation that applies to us and that we meet these requirements. We design workplaces in accordance with legislation and generally accepted safety and occupational health regulations to ensure that work can be carried out safely and with minimal strain.

In order to ensure compliance with occupational health and safety requirements, all our executives are responsible for and obliged to be familiar with the relevant safety regulations and to provide employees with appropriate training.

We are constantly improving our working environment to ensure that we operate with the lowest possible environmental impact and the least possible risk to health and safety. We cooperate with the appropriate local authorities to ensure compliance with international, European, and national environmental regulations.

In line with this commitment,

- we comply with the relevant technological rules in all our activities;
- we support health and nature-focused recreational and sports programmes for employees;
- we strive to reduce the amount of hazardous and non-hazardous waste generated, to recycle it, and to dispose of it with the least possible environmental impact;
- we strive to use renewable energy as widely as possible in our activities;
- in the design of the working environment, we prioritise people and the environment, the use of recycled materials, and the introduction of technologies and procedures to reduce waste;
- we are committed to ensuring the safety and security of persons and company property on our premises, including the protection of employees, technology, tangible assets, information related to our operations and our reputation against security threats.

We have a zero tolerance policy on drug use and alcohol consumption.

The use of drugs or working under the influence of alcohol, drugs or other mind-altering substances is prohibited at the workplace.

Conduct to follow

- ✓ Respect people's right to life and the best health available.
- Always consider labour safety and physical safety when making decisions.
- Always comply with occupational health, environmental and safety regulations and attend training courses.
- Immediately suspend any activity that is no longer safe or dangerous and report it to your line manager immediately.
- ✓ Immediately inform your line manager of any accidents, injuries, unsafe or unhealthy circumstances, incidents that have occurred, are expected to occur or have almost occurred, or releases of substances harmful to the environment.
- ✓ In procurement, give preference to equipment and services produced in a less environmentally damaging way, where offers are identical.

Conduct to avoid

- ✗ Do not harm people's health or the environment!
- ✗ The budget shall never be more important than work safety.
- ✗ Never work under the influence of alcohol or drugs (legal or illegal), or any medication (prescription or otherwise) that affects or limits your state of mind.
- ✗ Do not ignore work safety and property security regulations, including smoking restrictions and rules on prohibited objects.
 - In their work, everyone should refrain from wasteful energy use and waste production that unnecessarily harm the environment.

- Use recycled materials where possible and strive to use electricity, water and other resources wisely.
- ✓ Try to use cars as economically as possible.

3.6 FAIR WORKING CONDITIONS

We consider human resources to be the greatest asset. We are committed to the development of our employees, to ensuring a good work-life balance and to respecting employees' working time in all work-place and employment-related communications. Our core values also include respect for lawful and fair employment and labour principles, including the right of employees to form and join trade unions and to elect a works council.

We do not tolerate any form of forced or child labour, or other forms of unethical employment, such as withholding wages, denying sick leave or daily rest time, or abusing alternative forms of employment.

We ensure that these forms of work do not occur in connection with our business activities.

Unless local law sets a higher age, the minimum age for employment is 16.

Our Company is committed to implementing a fair employment and remuneration policy that complies with the relevant legislation. Furthermore, we pay special attention to supporting employees with special needs.

We manage redundancies in a humane way and provide administrative support to former employees where possible.

Conduct to follow

- Be alert to and report any signs of forced or child labour, human trafficking or unethical employment practices.
- Ensure that suppliers, contractors, intermediaries, agents and others who perform work for our Company are fully aware of the expectation that they may not engage in unethical employment practices in the course of their work for our Company.

Conduct to avoid

- Never use child or forced labour, even if it is accepted local practice.
- Do not contract with or do business with a party that uses or is suspected of using child, forced, bonded or slave labour.
- Never allow or turn a blind eye to forced or child labour, slavery, servitude or human trafficking anywhere in the value chain.
- Do not infringe the rights to remuneration for work, religious and assembly leave, rest, leisure and regular paid leave.

4. PRINCIPLES OF ETHICAL BUSINESS CONDUCT

It is extremely important to us that our business decisions are based on objective criteria such as quality, reliability, and suitability. It is important to us that we always act transparently, impartially, and with the necessary professional distance toward our clients, regardless of the nature of the business relationship. To this end, it is important to us to apply the considerations set out in this chapter in our business relationships.

4.1 SUSTAINABLE DEVELOPMENT

Our Company acts in an economically, socially and environmentally conscious and responsible manner by applying a sustainable development approach. Our sustainability efforts aim not only to create economic value by maximising profits and shareholder value, but also to take responsibility for creating social value while developing innovative products and services on an economic and social level.

As part of sustainable development, we proactively manage risks and opportunities that affect long-term economic, environmental and social issues. In this context, we actively seek and exploit business opportunities that contribute to the achievement of the UN Sustainable Development Goals.

Conduct to follow

- ✓ Always apply the sustainable development perspective when making strategic decisions.
- ✓ If you see a good practice on sustainable development, please bring it to the attention of the relevant area of the 4iG Group.

Conduct to avoid

- ✗ Do not see sustainability as solely a reputational issue.

4.2 FAIR TRADE AND COMPETITION

Competition is the best driver of efficiency and innovation. We conduct our business in a competitive environment, taking care to do so in accordance with fair competition standards and applicable competition laws.

We are committed to fair market conduct, conducting our activities in accordance with fair competition standards and in compliance with the letter and spirit of applicable laws. Respecting competition and market rules is not only a legal obligation, but also a cornerstone of business culture. We believe it is important to act in compliance with both European Union and national competition rules.

In accordance with the above, we strictly reject any corporate conduct or business agreement that

- violates the prohibition of unfair competition (e.g., by calling for a boycott),
- violates the prohibition of unfair influence on business decisions (e.g., by misleading business partners in business communications),
- constitutes an agreement or concerted practice restricting economic competition,
- abuses its dominant position.

With regard to **agreements or concerted practices that restrict economic competition**, any collusion with **competitors** (i.e., other companies operating at the same economic level and in the same market) is strictly prohibited, in particular:

- setting sales or purchase prices and other business terms;
- restricting or controlling production, sales, technical development or investments;
- the allocation of markets, territories, customers, or products or the prevention of market entry;
- coordinating purchasing or sales quotas, concluding purchasing cooperation agreements with purchasing commitments;
- sharing information of strategic significance with competitors.

In addition to the above, agreements between companies operating at **different economic levels** that would restrict the establishment of business conditions with third parties (e.g., sales, price setting) are also prohibited.

This may include in particular:

- setting fixed or minimum resale prices;
- non-compete or restrictive clauses lasting 5 years or more;
- restrictions on the buyer's production, purchase, sale or resale after termination of the contract.

We constantly analyse our potential market position on the basis of publicly available information to regularly assess our own market position. If we conclude from such a market analysis that we would have a strong market position in a particular market, we will take further measures to prevent the exploitation or abuse of that strong position. Our Company does not abuse its market position and is committed to creating a level playing field for all its business partners.

We consider our membership in professional associations as a channel of communication with professional associations, organisations and authorities, while respecting competition law. Trade bodies were not set up to coordinate strategies and prices, divide markets or circumvent competition law.

4.3 INTEGRITY IN PROCUREMENT AND TENDERING

We also act in accordance with the requirements of fair competition in public procurement and tendering procedures. This fairness requires that persons acting on our behalf do not attempt to influence ongoing proceedings in any way. No employee shall attempt to influence the ongoing supplier selection process by means other than calls for tenders and the tendering process. However, it may happen that during such a process, our employee unknowingly obtains another applicant's offer or any selection information before the process is completed. In this case, the Compliance Officer and the Group Legal and Regulatory Affairs Department shall be involved in notifying the person who issued the call for tenders of the case.

We expect our employees not to engage in discussions with any official or person performing public duties who has an interest in a procurement in which we are involved. Under no circumstances shall you engage in employment-related discussions with any official or any person with a public function with an interest in a contingent procurement (such as a procurement decision making or offer evaluation) in which our Company is involved.

Conduct to follow

- If you receive a message from a competitor that is contrary to fair trading and competition, you should immediately inform your line manager, the Group Head of Legal and Regulatory and the Compliance Officer with an immediate disassociation.

Conduct to avoid

- Never spread false, malicious or harmful information, rumours, opinions about competitors or their products and services. Do not damage the reputation of competitors in any way.

- Use only publicly available or legally accessible information and sources to assess business, customer, supplier and technology trends, and collect information only in a lawful manner.
- ✓ Make sure that there is a legal and legitimate basis for any kind of coordination with competitors.
- Only discuss general, non-competitive issues with competitors and only share information that is public or available from public sources (e.g., information disclosed by executive officers in the press).
- ✓ Ask questions via the Ethics and Compliance Line if you have any doubts about the conduct to be followed.
- Only participate in meetings where the agenda is known in advance and where it is clear from the agenda that only non-competitive issues will be discussed.
- Only set recommended or maximum resale prices and do not apply contractual or actual penalties for non-compliance.
- ✓ If you participate in an event, meeting or conference or are a member of an association where you meet representatives of the Company's competitors, do not share with them any commercially sensitive information that is relevant to competition law (e.g., prices applied, pricing methods, costs incurred, future commercial policy, market position, non-public corporate objectives, market expansion potential).
- ✗ Never share pricing information, future business or market plans, customer information, and other confidential business information with competitors.
- Never agree on the allocation of markets, territories or customer groups.
- Never apply conditions, technical content and requirements that favour only one or a limited number of pre-selected potential partners in a call for tenders.
- Do not fix a reseller margin and do not penalise distributor pricing (for example, deviations from the recommended price).
- ✗ Never agree with competitors on the geographical division of markets or the division of actual or potential customers.
- ✗ Never agree with your competitor to exclude a third party from the market.

4.4 SANCTIONS POLICY, COMPLIANCE WITH EXPORT AND IMPORT REGULATIONS

We follow all financial and economic restrictive measures that appear in the international (e.g. European Union, United Nations, United States) and local regulatory environment.

Sanctions, import and export bans are trade restrictions imposed on specific countries, territories, individuals, groups or legal persons in order to maintain or restore international peace and security and to safeguard human rights, democracy and the rule of law. Such sanctions are legal provisions that prohibit or restrict the sale, purchase, transfer or making available of goods, funds, services, technology solutions (in particular software products) or information.

It is essential to seek professional advice if any proposed transaction or conduct raises questions or doubts in this respect.

Under applicable import and export control laws, certain products of our partners may be subject to specific restrictions or mandatory reporting requirements. You shall obtain any licenses or permits that may be required to use, supply, import, export or re-export these partners' products, software, technology or services.

We are strictly prohibited from supporting illegal foreign economic boycotts resulting from the conclusion of contracts, the provision of information or the taking of measures.

We exercise due diligence when contracting with third parties and we are committed to screening all our suppliers to identify any indications of compliance risks. We operate a corresponding risk management system.

Violations of trade regulations and restrictions can have serious consequences, including the seizure of goods or funds, significant fines, loss of export rights, invalid contractual agreements and even imprisonment.

Conduct to follow

- ✓ Be familiar with the international trade rules in your area.
- ✓ Immediately contact your line manager, the Group Head of Legal and Regulatory and the Compliance Officer, or use the Ethics and Compliance Line, if you believe that sanctions may have been imposed against a country, a natural or legal person or group with which the Company does business or may affect any planned transaction.
- Contact the Group Head of Legal and Regulatory and the Compliance Officer, or use the Ethics and Compliance Line if you have any concerns about the legality of a transaction.
- Make sure you have all the necessary labels, documentation, permits and approvals.

Conduct to avoid

- Do not do business with a sanctioned country, person, group or organisation without due diligence.
- ✗ Do not import or export prohibited goods.
- ✗ Never bring restricted goods into a country without declaring them.

- ✓ Find out if your business partners may be affected by any international trade restrictions ("Know your partner").

4.5 CORRUPTION AND BRIBERY

We do not tolerate any form of corruption or acts indicating corruption (including bribery, facilitation payments to public officials, kickbacks, extortion, abuse of power for personal gain, influence peddling, undue advantages and gifts with the intention to influence) in the competitive (private) sector, the public sector or the municipal sector.

Please note:

Corruption and acts indicative of corruption within the meaning of this Code include not only criminal acts of corruption in the criminal law sense, but also any act that involves the offering, granting, soliciting, accepting, etc. any unlawful advantage, in violation of applicable laws and regulations, and which influences someone to act or refrain from acting in connection with the performance of their duties.

We strictly prohibit our employees and persons acting on our behalf or representing us from offering, giving, soliciting, accepting, or receiving any unlawful advantage (e.g., cash, personal benefits) in particular if the purpose is to exert undue influence on a public official or to secure an undue business advantage (or even to create the appearance of doing so). This prohibition covers so-called "acceleration payments" (i.e. small sums of money or benefits in kind to officials to simplify or speed up administrative procedures or acts) as well.

We act in this way even if this causes a competitive disadvantage to us or we miss a business opportunity for reporting such actions.

We are committed to zero tolerance of corruption and bribery for our social responsibility, charitable and sponsoring activities as well.

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. To this end, we have anti-corruption and anti-fraud processes in place to reduce the risk of fraud and identify prohibited conduct. Our employees, partners or other individuals can report concerns via the Ethics and Compliance Hotline.

We exercise due diligence as well 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.

The detailed rules against corruption and bribery are set out in our internal policy on anti-corruption and anti-bribery.

Conduct to follow

Conduct to avoid

- Learn the anti-corruption rules and avoid transactions and circumstances that could even appear as any irregular behaviour.
- ✓ Respect anti-corruption rules and procedures.
- Make sure that all business partners of the Company, including all consultants, suppliers, subcontractors and other contributors, understand that corruption is not acceptable.
- ✓ Ensure that procurement procedures, including but not limited to tenders, be transparent and make fair and unbiased competition possible.
- ✓ To promptly report via the Ethics and Compliance Line if you have become aware of any corrupt activities in the Company or the value chain or believe that you have found signs of such activities.
- Do not offer, employ, authorise, promise, pay, solicit, or accept, directly or indirectly, any unauthorised or improper payment (whether in cash, bad faith expense report, or otherwise), gift, or improper favour to obtain preferential treatment, influence the outcome of a business arrangement, or obtain business advantage or breach of duty.
- ✗ Do not try to convince (foreign or Hungarian) public officials, persons with a public service function or any individual to act illegally.
- Do not make and authorise any inappropriate and illegitimate payments to such persons.
- ✗ Do not give the impression to anyone that you can unlawfully influence anyone.
- Never allow agents, consultants, representatives or other external parties acting on behalf of the Company to act questionably or bribe anybody.

4.6 BENEFITS, GIFTS AND BUSINESS INVITATIONS

Business benefits as favours are widely used either as an expression of goodwill or to strengthen a bona fide working relationship between business partners. However, such benefits (which may include gifts, invitations to events or hospitality) may only be given or accepted if they are not given for the purpose of improperly influencing decision-making and do not give the appearance of doing so.

We consider as a gift any item or service of value that is offered to or accepted by a person or his or her family members. A "gift" can be a benefit in kind, such as an item of use, favourable terms or discounts on a product or service, a loan, use of a car, travel expenses, use of leisure facilities, tickets or gift vouchers for the recipient. Likewise, "entertainment" and "hospitality", such as business meals, leisure, cultural or sporting events, etc., are also covered by the concept of benefits.

Any benefits (gift or hospitality) given with the intention of undue influence is a bribe, regardless of its value and whether it is registered or not. Where, as a matter of courtesy or for practical reasons, a gift cannot be refused (for example, it has already been delivered and returning it is not reasonably practicable), it is for the manager with employer authority over the employee concerned to decide whether to allow the gift to be kept or whether it should be donated to a charity or to a community cause.

An important element in the fight against corruption is ensuring the transparency and enforcement of rules governing benefits, such as gifts, events, and hospitality. To this end, we have adopted a detailed gift-giving policy that define the procedure for giving and accepting certain benefits.

Conduct to follow

- ✓ Know and follow the rules and internal policies on gifts and business invitations and avoid transactions and circumstances that could create even the appearance of improper conduct.
- ✓ Report to your line manager if you or anyone else receives a gift or hospitality covered by this Code in connection with your activities. It is up to the line manager to decide whether the gift should be kept, donated to charity, or returned to the donor.
- ✓ Regardless of value, exercise increased caution when giving gifts or hospitality to officials or persons with public service functions.
- ✓ If you have doubts or questions about gifts, please use the Ethics and Compliance Line.

Conduct to avoid

- ✗ Never allow yourself to be influenced by gifts or hospitality, or even the appearance that you have been or could be subject to such influence.
- Do not ask or encourage an existing or potential business partner to give you anything or do you any favours, no matter how small the value, especially if you are in a position to decide or influence the relationship, certification of completion, authorisation of payment, sale price or discount for that partner.
- Never offer, give, solicit, or accept gifts or entertainment that could be construed as unfair influence, grease, bribery, kick-backs, or violations of law or regulation (for example, that the invitee could not otherwise afford or return); cash or cash equivalent; gifts or entertainment that are solicited or offered in exchange for favours; or personal services.

4.7 FRAUD

Fraud includes any intentional deception, including the intentional misrepresentation or concealment of facts or circumstances with the purpose of inducing others to act in order to obtain an advantage and thereby cause damage. Fraud can also occur without personal deception, when persons or parties collude to obtain unlawful gain by circumventing due process by creating the false appearance of a business or transaction.

We are committed to fighting fraud and will not tolerate fraudulent practices. In order to protect our core values, assets and reputation, it is everyone's personal responsibility to act in good faith and in accordance with the applicable rules and regulations, being vigilant for signs of fraud. There may be consequences even if a member of our Company or you personally overlook signs of fraud.

Conduct to follow

Conduct to avoid

- Always act in accordance with fraud prevention legislation, policies and procedures.
- Watch out for any signs, events or transactions that could indicate fraud involving the Company.
- ✓ Always document events and transactions in a factual manner.
- Ensure that business procedures, including procurement, completion certification and invoice acceptance processes, are transparent and allow fair and impartial competition.
- If you see signs of fraudulent activity or are aware of such activity, report it immediately to Compliance or via the Ethics and Compliance Line.
- Never falsify or copy any data, certificates or supporting documents, and never accept suspicious documents.
- ✗ Do not engage in any transaction that you believe may constitute or lead to fraud.
- Never circumvent regulations, procedures and controls just to make your job easier and faster.

4.8 MONEY LAUNDERING

Although our Company is not subject to the Act on Preventing and Combating Money Laundering and Terrorist Financing, we are committed to the highest standards of compliance with the anti-money laundering rules.

Money laundering is the process of concealing or legalising unlawfully obtained assets by using the funds or assets in the course of legitimate business activities in such a way as to conceal their criminal origin or nature.

We never condone, enable or support money laundering, i.e.:

- We will never engage in criminal or terrorist financing business,
- We aim to minimise risks by applying anti-money laundering processes,
- We take reasonable and appropriate measures to identify and assess the integrity of our business partners. We apply the “Know Your Customer” principle to get to know the beneficial owners behind the company.

Conduct to follow

- ✓ Report all money laundering concerns, suspicious transactions and events to your line manager or use the Ethics and Compliance Line.
- Exercise due diligence on funds, goods and assets transferred to the Company.

Conduct to avoid

- ✗ Never deal with persons suspected of involvement in a crime, or with funds derived from a crime, until the suspicions have been investigated and found to be unfounded.
- ✗ Never share your suspicions about money laundering with business partners.

- Be wary of making payments or claims for payments that are not in accordance with normal or customary business practice.
- Never warn anyone you know is under investigation. Do not falsify, conceal, destroy or delete evidence.
- Never obtain, use or keep money or property suspected to be the proceeds of crime.
- ✗ Never conceal the origin or nature of criminal assets.
- ✗ Never be part of an arrangement involving criminal assets or proceeds.

4.9 INSIDER TRADING AND MARKET MANIPULATION

Insider trading is nothing more than the unlawful use and disclosure of insider information for financial gain. This includes information that:

- is not publicly accessible;
- is essential;
- is directly or indirectly related to the 4iG Group (in particular 4iG Nyrt.), its securities, financial instruments (e.g. money market instruments, options, futures);
- if disclosed, would in all likelihood have a significant effect on the price of the security.

Inside information in connection with the purchase or sale of shares or any other share transaction is strictly prohibited to be used directly or indirectly for the benefit of oneself or a third party, or to be shared with any unauthorised third party or disclosed without authorisation.

All our employees shall keep confidential and safeguard information that is deemed to be inside information and shall comply with the legal requirements on insider trading, market manipulation and unauthorised disclosure of inside information.

The foregoing obligations apply not only to our employees, but also to all persons who, under the provisions of current Hungarian and European Union law, are considered “insiders” of any member company of the 4iG Group.

As a general principle, we prohibit insider trading, market manipulation and unauthorised disclosure of inside information.

Conduct to follow

- ✓ If you are unsure whether information is insider information, contact the Compliance Officer or the Group Head of Legal and Regulatory.

Conduct to avoid

- Do not buy or sell financial instruments if you have inside information about them, and do not instruct a third party to do so.

- ✓ Be careful and protect inside information even from accidental disclosure.
- ✓ Report if you think someone is involved in insider trading or illegal market manipulation.
- Never share without prior approval inside information with any unauthorised person, including your relatives, inside or outside the Company.
- Never spread market rumours or false information to influence the prices of financial instruments.
- ✗ Never leak inside information or give tips to others based on inside information.
- Never use inside information to trade securities, and never suggest that anyone else do so.

4.10 SOUND RECORDS AND BUSINESS PROCESS INTEGRITY

Records and reports are an essential element of corporate operations and shall be prepared in a realistic and comprehensive manner. We keep and prepare company records and reports honestly, accurately and objectively.

Conduct to follow

- Find out which information should be recorded and properly managed and which should not.
- Prepare all reports, assessments and proposals honestly and in their entirety.
- ✓ Ensure that decisions are properly informed.
- Ensure that all transactions are properly authorised as well as accurately and fully recorded.
- Ensure that all stakeholders have the right authorisations and settings in company systems.
- Manage, check and authorise costs in accordance with the policies and accurately.

Conduct to avoid

- Never mislead the decision-making managers or persons of the companies by misrepresenting, concealing or falsifying any information.
- ✗ Never intentionally record or include false or misleading information in a system, report, document, record, or expense report.
- Never falsify any statement, report or record.
- ✗ Do not try to persuade others to do anything that could compromise the completeness and integrity of records and reports.
- Never conceal, alter, destroy or otherwise tamper with any corporate information or property relating to an ongoing or pending, future or anticipated audit, court proceeding, government or regulatory investigation.
- Do not sell, transfer or scrap company property without proper accounting documentation and authorisation.

- Never enter into contractual obligations on behalf of the Company without proper authorisation.
- × Do not remove or destroy accounting documents or records before the expiry of the applicable retention period without prior approval.

5. PRINCIPLES OF ETHICAL WORK

We are responsible for protecting shareholder investments and delivering long-term returns that are competitive with other industry leaders. To this end, we avoid conflicts of interest. We protect the corporate interests, tangible assets, trade secrets and intellectual property and ensure appropriate protection of personal data and data security.

Records and reports include financial (accounting) and non-financial information, such as project descriptions and project results, technology data, performance assessments, HR records, information on our sustainability performance, social and human rights impacts and any other information supporting the business operations, required by law and important for decision-making or for building the member company's knowledge base.

Falsification of records or misrepresentation of facts cannot be justified or accepted. We do not tolerate any misreporting, concealment of facts in reports and the alternative interpretation of the same data in other situations for momentary purposes.

The integrity of financial and non-financial records and reports is essential for good decision making, to protect our credibility and reputation, to meet legal and regulatory obligations, and to fulfil our responsibilities to shareholders and all external stakeholders.

Failure to manage records and reports in an orderly, comprehensive and efficient manner can pose significant business risks, legal consequences, financial and competitive damage and reputational harm.

5.1 AVOIDANCE OF CONFLICT OF INTEREST

Employees shall avoid any situation that creates or appears to create a conflict of interest between the employee and our Company or any member company of the 4iG Group. All employees are expected to seek advice where necessary to avoid a conflict of interest, and shall inform and seek approval from the relevant manager of any potential conflict of interest. They can also seek guidance from the Compliance Officer to assess a conflict of interest.

Throughout their employment, employees shall not engage in any business or other activity that creates a conflict of interest and thereby jeopardises the legitimate economic interests of our Company.

We respect the privacy rights of our employees and generally do not keep track of what they do outside working hours. However, there is a relationship of trust between us, our employees and our other partners, where a conflict of interest may arise if an employee's private affairs could be incompatible with our interests.

A personal relationship, involvement in outside activities or an interest in another business enterprise may not influence decisions in fact or in appearance. Employees shall avoid situations involving conflicts of interest and shall refrain from any activity that could in any way prevent them from making unbiased and objective decisions on behalf of us or that jeopardise our interests.

The influencing factors that may cause a conflict of interest include, but are not limited to the following:

- Second job or assignment,
- Participation in a partnership or sole proprietorship,
- Job titles and relationships of close relatives, your close relative or someone in a close relationship with you is your employee or line manager,
- Investments,
- A personal relationship that may influence or appear to influence professional decisions.

Conduct to follow

- Inform your line manager of any external work you do and any external services you provide, and of your relationships with competitors, customers, suppliers or contractors, and ask for written approval of these.
- ✓ Report to your line manager if you are not applicable for a particular job because of a non-competition or confidentiality obligation.
- Inform your line manager if you intend to invest in a competitor, customer, supplier or contracted partner and ask for written approval, except for transactions involving publicly traded shares.
- ✓ For any outside board position, ask for written approval before accepting it.
- Inform your line manager if any of your relationships may create a real or apparent conflict of interest.
- Use the Ethics and Compliance Line if you have any doubts or questions.

Conduct to avoid

- * You should not supervise or influence the employment or other contractual relationships of your own relatives or of a person who has a close relationship with you.
- Never work for or provide services to a business that you are required to deal with in the course of your work for the Company.
- Never acquire a shareholding in a supplier, contractor, customer or client if you are involved in any way in the selection or evaluation of or negotiation or transaction with that company. This also applies if you are the manager of a person with such responsibility.

5.2 PROTECTION OF CORPORATE PROPERTY

We have significant tangible resources and assets. Employees shall protect and properly and reasonably use the resources and assets. Employees may only use company resources and assets for our company's benefit.

Our employees, suppliers, contractors and business partners shall take responsibility for the integrity and the proper, economical, responsible and efficient use of our assets. Our employees and authorised persons may use our funds, tangible assets and resources only for lawful and approved business purposes.

Portable and home-use business equipment issued to employees (e.g. portable computers and mobile phones, company cars, fuel cards, business bank cards) are our property and shall be used with due care.

Conduct to follow

- Report immediately if you become aware of any misuse, theft or waste of property or funds of our Company or of a member company of the 4iG Group.
- When planning and implementing various activities, always strive for economical and cost-saving solutions that will save the member company resources in the long run.

Conduct to avoid

- Never use company property and facilities for private purposes unless expressly authorised to do so by the manager exercising the employer powers in accordance with the relevant rules.
- * Do not carry out personal activities during working hours without the prior permission of your line manager.

5.3 PROTECTION OF BUSINESS SECRETS AND INFORMATION

We only collect data in a fair and strictly lawful manner. As information, data and knowledge are critical assets, all employees are responsible for protecting the confidentiality, integrity and availability of data created, received, modified, transferred, shared, stored or used within the Company or in the course of a business relationship with the Company, regardless of their actual location or form (electronic, paper, other formats, etc.).

Employees shall treat and preserve as business secrets any information, facts, data, and opinions concerning us, the 4iG Group, its member companies, and our business partners, as well as any information obtained about the affairs of the 4iG Group, our company and our business partners in the course of their work and shall not use such information for their own or another person's benefit nor disclose it to third parties. The Employee shall remain bound by this obligation of confidentiality even after termination of the employment.

We expect our employees to keep as business secrets all information to which they have access in the course of their work and which relates, for example, to commercial relationships, transactions, operations, financial situation, investments, or collected solutions, knowledge and ideas.

Employees shall not disclose or make available, directly or indirectly, information about the commercial relationships, transactions, operations, financial situation, investments, negotiations, financial perfor-

mance and plans, businesses, customers, clients, suppliers, related documents, data carriers of the Company or of any other entity within its business scope or information about the solutions, facts, data, knowledge, ideas, concepts and other information or information constituting business secrets created and collected in the course of its work, outside the scope of persons designated in writing by the authorised person on a case-by-case basis.

Moreover, the employees shall not disclose to any unauthorised persons any data that he or she obtained in connection with his or her job and the disclosure of which would be detrimental to us or to another person, or which is classified as confidential or the confidential nature of which should have been recognized by the employee due to his job position.

Our employees are prohibited from improperly obtaining or using, disclosing or divulging trade secrets of another company. It is also considered to be an unfair acquisition of a trade secret if the trade secret is obtained without the consent of the right holder and with the assistance of a person in a confidential relationship or business relationship with him or her.

Employees may not disclose any other facts, data or information concerning the Company to third parties without prior written approval, nor may they do anything that would allow third parties to have access to such facts, data or information.

Conduct to follow	Conduct to avoid
✓ Exercise due care in both external and internal communication. • Comply with confidentiality and other relevant policies, use warning signs to classify and protect confidential information. Restrict access to business information on a need-to-know basis. • Ensure that all employees and external parties with access to confidential information, including potential business partners, have signed confidentiality agreements or are legally bound by appropriate confidentiality obligations.	• Do not make any statement if you are not the person authorised to disclose a specific piece of information. • Do not request or access confidential information from any source, especially regarding business partners and competitors, and do not attempt to obtain restricted information. • Do not disclose or make available to outside parties confidential business information of customers, suppliers, business partners. • Do not disclose or use confidential information owned by a third party.

5.4 DATA PROTECTION AND DATA SECURITY

Everyone has the right to the protection of personal data. We recognise people’s right to privacy and protection of their personal data. Under applicable law, our Company is responsible for the protection of personal data and for ensuring that personal data are processed in accordance with the respective legal requirements.

Given the nature of our activities, we are committed to fostering a culture of cyber-security, which we promote throughout our value chain. Furthermore, we are committed to maintaining the confidentiality,

integrity and availability of the electronically stored data of the 4iG Group member companies, customers and partners throughout the entire lifecycle of the data, their storage, processing and transmission.

We take preventive security measures to protect personal data stored in databases to avoid the risk of destruction, loss of data and unauthorised access.

Accordingly:

- All users involved in the management, use and operation of the IT infrastructure owned or used by us are required to regularly attend information security awareness training;
- Only authenticated users with appropriate authorisations may access the information infrastructure, subject to the “need to know” principle.

Equipment (in particular computer equipment) and programs installed on equipment provided for work purposes and made available to employees, as well as all data stored on our electronic systems and all information and data relating to our Company and work on computer equipment and data carriers used by employees are considered company property.

The IT and telecommunication equipment provided for work (computer, printer, scanner, telephone, photocopier, etc.) may only be used for the purpose necessary for the work, and no unauthorised employee may install or run any software product(s) other than our software.

During working hours, non-work-related corporate Internet use is not allowed, except for Internet use on company mobile phones. To ensure appropriate security, within the limits of privacy and data protection legislation, we reserve the right to access workplace equipment and the data stored on it in order to meet maintenance, business and legal requirements.

Conduct to follow

- Process personal data in a transparent manner and use it only for fair and lawful purposes (lawfulness, fairness and transparency).
- Collect and process only personal data that are necessary and appropriate for the performance of your work and tasks (purpose limitation).
- ✓ Limit the scope of personal data processed to the information strictly necessary for the purpose (data economy)!
- ✓ Process the personal data for as long as necessary to achieve the purposes for which they are processed (limited storage).
- Collect and process such data using only defined procedures, store them in a way that protects them against unauthorised access, report without delay any incidents of damage, improper use or other problems affecting the

Conduct to avoid

- Do not leave personal data without supervision or unattended (e.g. a laptop in a parked car).
- Never try to access personal data to which you are not authorised.
- You should never disclose personal data either within or outside the Company before you are satisfied that you are doing the right and lawful thing.
- ✗ Do not misuse personal information.
- ✗ Do not keep personal data for longer than is necessary for the legitimate purposes for which they are processed (the erasure deadlines for specific processing activities are set

information infrastructure, any element of the information infrastructure or data stored in any form owned by the Company (integrity and confidentiality).

- Always process accurate and, where necessary, up-to-date personal data, and identify, manage and correct errors and incompleteness of electronically stored data at the earliest possible stage of the relevant process (accuracy).
- Restrict access to personal data to the authorised persons (access control).

out in the internal policies governing data or document management).

- Never use a corporate electronic system for unauthorised purposes or to transmit data without authorisation.
- Never use unauthorised equipment (such as unsecured own equipment) to store company information.

5.5 PROTECTION OF INTELLECTUAL PROPERTY

Intellectual property is one of our most valuable assets, as it is essential to maintain our competitive advantage. Intellectual property includes, for example, inventions, know-how, patents, trademarks, industrial designs, copyrights, domain names, scientific and technical knowledge and all other intellectual property rights.

We expect our employees to protect our intellectual property, which they must not disclose or make available, directly or indirectly, to others. Intellectual property created or acquired using our resources becomes the property of the Company or the member company and is not considered private or personal property.

Intellectual property protection allows

- us to prevent anyone from using it without permission;
- us to charge a fee for their use.

In this spirit, we respect the work of others and take care not to infringe the intellectual property rights of others, and expect others to do the same.

Conduct to follow

- ✓ Make clear in contracts with business partners who the holder of the intellectual property is.
- In the case of complex projects involving several intellectual property right holders, hire a lawyer to draft the confidentiality agreements.

Conduct to avoid

- Do not copy products or services without the permission of the right holder.
- Do not download or install programs without the appropriate permission (licence).

- Ensure that employment contracts, licences, sales contracts and technology transfer agreements include terms and conditions to ensure adequate protection of intellectual property.
- Where appropriate, indicate if the material is protected by copyright and, unless otherwise agreed or required by law, the name of the author and the year of publication.
- ✓ Ensure that the development or sale of new or modified products and services does not infringe the intellectual property rights of others.
- ✗ Do not use copyrighted material or third-party trademarks or logos in the production of materials without the express permission of the intellectual property rights holders.

6. BUSINESS RELATIONS AND RESPONSIBLE COMMUNICATION

We are committed to extending the ethos and practices of responsible and sustainable business to the entire value chain. We strive to build trust-based business relationships and responsible communication with all stakeholders.

6.1 QUALITY REQUIREMENTS

We strive at all times to ensure that the services we provide, the products we offer, and the development and delivery of our own products meet the highest quality standards. We shall conduct all our activities in compliance with the applicable legal and regulatory requirements and with our own strict internal quality standards. All our employees shall carry out their duties at all times in accordance with our unwavering commitment to quality and compliance, and shall report quality complaints and concerns through the appropriate channels.

6.2 BUSINESS PARTNER RELATIONS

An honest and fair approach with customers, suppliers, subcontractors and other business partners is the foundation for successful and lasting business relationships. Accordingly, we listen to the needs of our customers, suppliers and business partners. We continuously monitor, evaluate and improve our products, services, technology solutions and business processes in order to provide quality, security and innovative solutions to our customers and clients in all areas of the value chain.

Our relationships with customers, clients, suppliers and other business partners are based on mutual trust and respect. We are committed to delivering on our contractual obligations.

Employees should bear in mind not only that their communications will be interpreted in relation to our Company, but also that such communications may be used in the event of a dispute or investigation by a public authority. Communication must always be accurate and appropriate, and not misleading in any way.

Conduct to follow

- ✓ Follow the strictest rules of conduct in oral and written communication.
- Provide real, up-to-date, appropriate, accurate and understandable information about the activities, products and services of the Company.
- Provide factual and accurate information when communicating.
- Keep all business-related information confidential if disclosure is not authorised.
- ✓ Be careful when communicating and avoid misleading language.

Conduct to avoid

- ✗ Never provide false or misleading information.
- ✗ Do not give any presumed opinions or personal views on any business matter.
- ✗ Do not joke about confidential information and serious matters.
- ✗ Never deliberately misrepresent information or give incorrect interpretations for the sake of momentary goals.

6.3 POLITICAL ACTIVITIES

We do not seek to engage directly in political activities, do not set political goals and strictly comply with the legal requirements for corporate political engagement and political contributions.

However, we encourage our employees to participate in politics by exercising their right to vote, recognise the right of our employees to engage in politics and do not prohibit them from engaging in political activities. However, they may not engage in political activities on behalf of the Company, with its assets and during working hours.

Conduct to follow

- ✓ Please note that your own political statements are not those of the Company, nor can they even appear to come from the Company.
- ✓ You are not speaking on behalf of the Company, so please make it clear that your political views and activities are personal and have nothing to do with the Company.
- ✓ Inform your line manager if you have any potential conflicts of interest in relation to your political activities.

Conduct to avoid

- ✗ Never use the name, brand name, or branding of the Company or any other member company in your political activities.
- ✗ Never give the impression that the Company is committed to any political party or movement.
- ✗ Never use the resources of the Company to support political activities.
 - Do not engage in political activities at work (e.g. campaigning, fundraising, etc.).
 - Do not use your position with the Company or any member company to influence others or to support a politician, political party or movement.

6.4 GOVERNMENT RELATIONS

We conduct our business in good faith and with integrity, in accordance with applicable laws and regulations, using only permitted methods.

We strive to develop good and transparent relations with government and EU officials and other external stakeholders, including representatives and members of national and international professional organisations.

We lobby in accordance with local laws and regulations in the countries where we operate. In some countries, specific legislation limits the value and nature of gifts and hospitality that may be accepted by officials, foreign officials or persons with public functions, so special attention should be paid to this (for further details, please refer to the Company’s internal policy on gifts).

Conduct to follow	Conduct to avoid
• Know and always comply with legal and regulatory requirements. ✓ Cooperate openly but carefully with officials or persons with public functions. ✓ Notify your line manager and the Compliance Officer and seek their advice before providing information in the context of any non-routine official procedure.	✗ Never break the legal rules on taxation. ✗ Never mislead the person conducting the proceedings or authorities in criminal or other official proceedings. • Do not in any way prevent authorised law enforcement or supervisory officials from collecting information, data, evidence or statements. • Never conceal, alter or destroy documents, data or records that are the subject of a procedure. • Under no circumstances shall you prevent another employee from providing accurate information.

6.5 SOCIAL RESPONSIBILITY

We are committed to being part of, supporting and developing the community and environment in which we operate.

We report regularly, openly and transparently on our donation and sponsorship activities. To ensure transparency, we only cooperate with and participate in regulated and transparent businesses that operate according to the principles of good business practice.

We expect all sponsored and supported individuals and organisations to act in accordance with our ethical values and principles. We reserve the right to terminate or withdraw support if the beneficiary acts contrary to our values.

Conduct to follow

- Seek to create partnerships that support social innovation and social entrepreneurship.
- Remember that all corporate sponsorship and donation activities must be in line with our Company's policies, principles and standards.

Conduct to avoid

- Do not provide support or donations to any natural person or organisation that violates the principle of zero tolerance towards corruption and cartel agreements, human rights, health and safety violations, or seriously or repeatedly violates the ethical values of the Company.
- Do not give support or donations to any natural person or organisation that discriminates in any way or identifies its name or activities with discriminatory practices.
- ✕ Do not sponsor events or individuals who disproportionately damage the environment or have a negative impact on society and do not have effective measures in place to mitigate the impacts of their activities.

6.6 PUBLIC ANNOUNCEMENTS, SOCIAL MEDIA AND PRESS RELATIONS

Within the 4iG Group, 4iG Nyrt. shall fulfil its disclosure obligations in connection with the admission of its shares to trading on a regulated market and the trading of its shares on such market in accordance with the applicable laws, the listing and trading regulations of the Budapest Stock Exchange and its internal regulations. As part of the 4iG Group, this disclosure obligation may also affect our Company.

We aim to publish regular, complete, comprehensive and reliable information about our activities and ambitions through all media we use. We strive to develop positive and high-quality professional relations with the media. Our Company has an open, transparent and balanced two-way communication with external stakeholders.

Any communication directed at the media in our name that does not qualify as advertising is considered a public statement, which requires caution, thorough knowledge of legal and media issues, and is therefore only permitted with the approval of the 4iG Group Corporate Affairs and Communication Directorate and the 4iG Group Head of Legal and Regulatory.

Our social media presence is coordinated by the 4iG Group Corporate Affairs and Communication Directorate.

Employees' presence on social media is a private matter and is respected by our Company. However, we remind our employees to exercise the necessary caution on social media to ensure that the Company's reputation is not tarnished. To this end, employees are not allowed to appear on social media on behalf of our Company, make untrue statements about their activities, evaluate company matters based on criteria that cannot be objectively verified, or use IT tools in violation of our policies.

Conduct to follow

- ✓ Before giving any information, even informally, to media representatives on company matters, you should inform the 4iG Group Corporate Affairs and Communication Directorate and seek their advice and approval.
- Ensure that all communications that constitute public announcements, such as presentations at professional forums, are approved by the 4iG Group Corporate Affairs and Communication Directorate and the 4iG Group Head of Legal and Regulatory.
- Ensure that all information provided is true, correct, complete and accurate.
- ✓ Act responsibly on social media.
- In all cases, you should comply with the ethical standards of our Company and take into account that your statements may be interpreted as a communication from our Company and may therefore affect the overall perception of the Company.

Conduct to avoid

- Do not disclose information about company affairs without proper authorisation.
- Never provide misleading or untrue information.
- Never post any misleading, aggressive, offensive, exclusionary, harmful or in any way unethical advertisements, opinions or promotions.