



4iG GROUP'S

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Identifier	version	Effective	Related regulation of higher level	Limited application
COM2_GROUP	4.0	24.03.2022.	Code of Ethics and Business Conduct, Code of Ethics for Business Partners	Not limited within the 4iG Group. External use is not limited.

RELEASE

Process owner		Signature for compliance	
Name	dr. Ágoston Tibor Csordás	Name	dr. Csaba Vezekényi
Area	Compliance	Area	Legal
Position	Compliance Officer DPO	Position	Head of Legal
Date of DOQ approval		Date of DOQ approval	

Signature for compliance		Signature for compliance	
Name	Eszter Katalin Forrai	Name	János Klincsik
Area	Quality Control	Area	Information security
Position	Quality Management and ISO Management Systems Manager	Position	Information Security Officer
Date of DOQ approval		Date of DOQ approval	

Signature for compliance		Signature for compliance	
Name	dr. Judit Lerch	Name	Tamás Nagy
Area	Corporate governance	Area	Corporate development
Position	Corporate Governance Director	Position	Business Development Manager
Date of DOQ approval		Date of DOQ approval	

Signature for compliance		Signature for compliance	
Name	Tamás Tápai	Name	Aladin Ádám Linczényi
Area	MB	Area	Office of the Chief Executive Officer
Position	General Deputy Chief Executive Officer for IT	Position	General Deputy Chief Executive Officer for building the holding and business development

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Approved by	
Name	Gellért Zoltán Jászai
Area	Office of the Chief Executive Officer
Position	Chairperson and Chief Executive Officer
Signature	

Document history

Version	Date of entry into force	Short description of modification
1.0	31.12.2019.	New policy issue
2.0	31.10.2020.	Amendment in compliance with the requirements of Standard No. MSZ ISO 37001:2019 (hereinafter: Standard)
3,0	01.03.2021.	Addition of the anti-corruption policy
4,0	24.03.2022.	Implementation of organisational changes, standardisation of the anti-corruption policy and regulations

DEFINITIONS

Definition	Explanation of definition
Public official	<p>All persons who, by way of appointment, election or succession, discharge legislative, public administrative or judicial functions, or who discharge public functions at public organisations or state enterprises, or who are officials or agents of public bodies or international organisations, or who stand for public office. They include, but are not limited to</p> <ul style="list-style-type: none"> • the President of the Republic, • members of Parliament, Members of the European Parliament elected in Hungary, • the prime minister, ministers, state secretaries, administrative state secretaries, deputy state secretaries, government commissioners, • judges, public prosecutors and arbitrators, • political party officials, • persons standing for public office, • other persons defined as such in the Policy of the 4iG Group.
Corruption and bribery	<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</p>

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	<p>person who acts or refrains from acting in performing his or her obligations, regardless of the location(s) of the commitment.</p>
Foreign public official	<ul style="list-style-type: none"> • a person discharging legislative, judicial, public administration or law enforcement functions in a foreign state, • 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, • 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, • 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.
Person with public service function	<ul style="list-style-type: none"> • any soldier serving the Hungarian Defence Forces, • any person enrolled in the organisation of civil defence and discharging civil defence services, • any civil guard in discharging the activities specified in the Act on the Civil Guards and the Rules regulating the Activities of Civil Guards, • ecclesiastical persons and members of religious associations who deliver sermons as a profession, • the defence counsel, the legal representative, the expert and the non-public official service executive in judicial or other administrative procedures, • any healthcare worker and other persons in a relationship aimed at work with the healthcare provider, in the cases specified in the Healthcare Act, • any member of the public ambulance service and other organisations authorised to carry out ambulance functions, in relation to rescuing and patient transportation, • 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, • 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), • any person employed in a position specified in the Act on Child Protection and Custody Administration and in the Act on Social

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	<p>Administration and Social Care, when discharging the activities pertaining to that position,</p> <ul style="list-style-type: none"> 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, any professional hunter, regarding the activities specified in the Act on Game Protection, Game Management and Hunting, any river keeper, regarding the activities specified in the Act on Fishing, any person discharging executive functions at economic organisations operating public transport equipment, regarding the respective activities, any person discharging customer care functions at the universal postal service, regarding the respective activities, any school security guard, regarding the activities specified in the Police Act, other persons defined as such in the Policy of the 4iG Group.
Relative	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.
Close relative	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.
Protection money	Money extorted with actual or alleged threats related to health, security or freedom.
Business partner	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.
Affected party	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.
Operational management	Operational Management Meeting as defined in the Organisational and Operational Regulations of 4iG Plc.
4iG Group	Total direct and indirect shareholdings (subsidiaries and sub-subsidiaries) of 4iG Plc.

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1 SCOPE AND RESPONSIBILITIES

1.1 PURPOSE OF THE ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

The 4iG Group expressly prohibits and is expressly against any form of corruption. To the 4iG Group, 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 standpoint. 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 4iG Plc (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 the anti-corruption management system of the 4iG Group according to Standard No. MSZ ISO 37001:2019 (hereinafter: anti-corruption management system) and facilitates compliance with the anti-corruption provisions of Hungarian and international law. This documented Policy constitutes the **anti-corruption policy** under the Standard.

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 will apply to ensure its anti-corruption compliance.

1.2 LIABILITY

All employees shall be responsible for complying with the provisions of this Policy; the managers of 4iG Plc., 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.

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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 the 4iG Group; its scope, therefore, covers all employees of the 4iG Group.

1.3.2 Term

This Policy enters into force after its adoption and publication by the Board of Directors of 4iG Plc. and remains in force until withdrawal. An appropriate implementation period will be set for the members of the 4iG Group to apply and comply with the Policy.

1.3.3 Subject matter

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

The 4iG Group and its management 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. The 4iG Group applies, therefore, zero tolerance for corruption and bribery. The detailed rules on gifts are in the Gifts Policy.

The 4iG Group strictly prohibits its employees and any persons acting in the name or on behalf of the 4iG Group to offer, promise, give, solicit, accept or take undue advantage. Employees and other persons acting in the name or representation of the 4iG Group 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).

The 4iG Group acts in this way even if this causes a competitive disadvantage to the 4iG Group or it misses a business opportunity for reporting such actions. The 4iG Group 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 employees of the 4iG Group 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, the purpose of which is to reduce corruption risks and identify illicit conduct.

The 4iG Group and all its employees are committed to the fulfilment and continuous development of the requirements of the anti-corruption management system, and, as part of this commitment, they shall act

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with the level of caution appropriate for the risk level or strategic importance of their own areas in discharging the responsibilities of their positions. The 4iG Group continuously endeavours to establish good anticorruption practices in compliance with industry norms and standards and to train its employees accordingly.

The 4iG Group attaches great importance to the detection of all corruption incidents and the threat thereof as soon as possible, therefore the 4iG Group operates reporting channels (e.g. the Ethics and Compliance line available on compliance.4ig.hu) through which employees, partners and clients of the 4iG Group, as well as other persons who are aware of an act of corruption, can report them, even anonymously.

The 4iG Group supports, encourages and expects its employees and, in accordance with the anti-corruption provisions of its contracts, its 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 the anti-corruption management system was also designed accordingly. Should the strategy of the 4iG Group change or a change of its strategy be under preparation, then the amendment of this Policy might also be reasonable.

Accordingly, the anticorruption goals set out in the anti-corruption management system 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.

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5 SPECIAL CORRUPTION RISKS DERIVED FROM THE STRATEGY

5.1 COOPERATION WITH PUBLIC OFFICIALS

The business success of the 4iG Group 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 ACQUISITION

The strategic toolset of the 4iG Group includes acquisitions. Acquisitions imply two different types of risks. The first one is that an acquisition could take place through or with the use of corruption, while the second one is that the acquired company could have past transactions subject to corruption, for which the legal successor will bear liability after the acquisition. Because of these risks, special attention shall be paid to the due diligence of acquisition targets in legal, financial and compliance terms. An additional important step is extending the anti-corruption management system, already implemented at the 4iG Group, to the acquired company during the post-acquisition integration.

In the acquisition transactions it shall also be guaranteed that the corruption risks of third parties and experts involved in the transactions (consultants, legal and accounting experts, etc.) are kept at a minimum level.

The above rules shall apply even if the 4iG Group does not acquire controlling interest in a company or makes any other significant investment.

5.3 CHAIN TRANSACTIONS

Software and hardware distribution are important activities of the 4iG Group. A frequent corruption risk factor of this business model is chain transactions, where the goods get to the end user through several players. The 4iG Group 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

The 4iG Group does not enter into a business relationship with third parties that do corruption activities and ends its business relationships with business partners that do the same. Nobody may be reassigned

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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 anticorruption 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.

The 4iG Group exercises due diligence in selecting its partners. Before and during the cooperation, the 4iG Group takes 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, the 4iG Group is responsible for monitoring the ongoing joint activities.

The members of the 4iG Group could be held liable for violations committed by its partners if it is demonstrated that the member of the 4iG Group ignored the signs of bribery by the Partner. It is, therefore, important that all employees of the 4iG Group 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 of the 4iG Group or the provisions of this Policy,
 - lack of interest in quality, contractual securities, etc.

7 REGULATIONS

The 4iG Group complies 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 CLXV of 2013 on Complaint and Public Interest Disclosures,
- 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 CXLIII 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 Argentine, Brazil, Bulgaria, Chile and Slovakia

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- 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).

The 4iG Group conducts its procurement procedures in a fair and transparent way and dispenses with the principle of requiring at least three bids only where justified. In assessing its suppliers, constructors and subcontractors, it does legal and financial due diligence as necessary, making sure whether they efficiently combat corruption and apply anticorruption rules, and assessing risk they pose to the compliance with anticorruption laws. 4iG Plc. keeps record of the results of its due diligence in the Supplier Qualification System to document the compliance of its business partners. The implementation of the BMR system will be carried out according to a specific schedule for each member company.

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 the 4iG Group.

Any contract to be concluded with a partner shall be subject to the prior approval of the 4iG Group as provided for in a specific policy, and all parties concerned shall be informed of the 4iG Group'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 a business partner of the 4iG Group lay down more stringent provisions than this Policy, the business partner shall make those provisions available to the 4iG Group and the 4iG Group shall consider itself bound by those provisions in the legal relationship between the parties.

8 RESPONSIBILITIES

8.1 RESPONSIBILITIES OF THE OPERATIONAL MANAGEMENT

The Operational Management, led by the General Deputy Chief Executive Officer for IT, ensures the integration of the anti-corruption management system into the 4iG Group's processes. The Operational Management fosters the development and prevalence of the general risk culture and anticorruption culture in the 4iG Group and among its business partners. In this regard, the Operational Management does not only expect compliance with the letter of this Policy, but also with the relevant norms. In addition, the Operational Management discharges all other responsibilities set out in the Standard. The Operational Management shall confirm these responsibilities in a declaration.

8.2 RESPONSIBILITY OF THE BOARD OF DIRECTORS

The Board of Directors is responsible for designing, implementing, maintaining and continuous development of the anti-corruption management system. To this end, it allocates the necessary resources (see Resource Plan), approves the anti-corruption policy, ensures the coherence of the strategy and the anti-corruption management system, receives and reviews annually the report on the content and

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methodology of the anti-corruption management system, and supervises the implementation, development and effectiveness of the anti-corruption management system.

Additionally, the Board of Directors shall discharge all other responsibilities set out in the Standard. The Board of Directors shall confirm these responsibilities in a declaration.

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

The person responsible for anti-corruption compliance at the 4iG Group is the Compliance Officer of 4iG Plc. 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 Operational Management and the Board of Directors.

The Compliance Officer is appointed by the CEO. The competence of the Compliance Officer includes the overseeing of the design and implementation of the anti-corruption management system. He or she shall advise and guide the employees of the 4iG Group on issues related to the anti-corruption management system and corruption. The Compliance Officer prepares a report once a year to the Board of Directors on the current status of the anti-corruption management system. The role of the Compliance Officer is set out in detail in the current Organisational and Operational Regulations.

9 EXPECTATIONS FROM EMPLOYEES

Regarding the rules set out in this Policy, the 4iG Group expects its employees

- To learn and respect the anticorruption 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 of the 4iG Group.
- To make sure that all Business partners of the 4iG Group, including all consultants, suppliers, subcontractors and other contributors, understand that corruption is not acceptable. To this end, the attention of business partners is drawn to the relevant parts of the partnership agreements 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 anticorruption 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 the 4iG Group or the value chain or believe that they have found signs of such

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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 the 4iG Group act questionably or bribe anybody.

9.1 SANCTIONS

The 4iG Group pays special attention to the compliance with and enforcement of the rules of this Policy. It shall be regarded as violation of this Policy if an employee of the 4iG Group 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.

The 4iG Group 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 employees in the 4iG Group 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, the 4iG Group wishes to ensure anticorruption training for the employees; it, therefore, organises various trainings on anticorruption 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. Members of the 4iG Group shall provide such training within the scope of their own organisation and powers in the year of entry into force of this Policy.

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