

**CODE OF ETHICS AND
BUSINESS CONDUCT**

4iG

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1. EXECUTIVE MESSAGE

Dear **Colleague!**

The business operations and success of the 4iG Group 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 employee conduct based on the values and vision of the 4iG Group, in order to establish and maintain the solid ethical foundation for the 4iG Group in the long term.

The responsibility of the 4iG Group does not stop at the limits of lawful operation. For one thing, corporate social responsibility is an integral part of the 4iG Group's operations; therefore, the Group consciously strives to communicate core values to the community and to enrich society through its activities. The 4iG Group is 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 its employees, customers, shareholders, business partners and other stakeholders and to safeguard the Group's reputation.

The cornerstone of the operations of the 4iG Group is to conduct its 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 IT industry.

The 4iG Group is committed to protecting the environment and reducing unnecessary use of resources. At all times, it seeks to organise its activities in such a way that they do not place a greater burden on its environment than is necessary.

The 4iG Group has a zero tolerance policy against the violation of corruption, cartels, human rights and human dignity, equal treatment, health protection, data protection, data security and environmental protection regulations, and further directives. Unethical or inappropriate behaviour, or even the appearance of such, may adversely affect the reputation of the 4iG Group, call into question the values that the Group believes in and thus undermine trust in the Group.

The 4iG Group faces a number of ethical challenges, legal and regulatory requirements and other societal demands in its activities. The purpose of this Code is to set provisions in most important areas of moral conduct. However, the Code does not provide guidance on all possible situations and problems. Therefore, all employees of the 4iG Group shall always act responsibly and with due care.



The 4iG Group believes that its ethical commitment must be expressed not only in words but also in deeds. The 4iG Group therefore encourages all its managers to set an example of ethical behaviour to all employees of the Group. 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, the ethical operation of the 4iG Group necessarily includes the enforcement of the Group's ethical values and standards among its employees. Therefore, the 4iG Group is 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.

The 4iG Group is counting on all stakeholders to join the Group's efforts and actively contribute to the achievement of our goals!

Gellért Zoltán Jászai
Chairman



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 constitute a breach of ethical standards. Additionally, it also provides guidance on what to do if there are questions about ethical conduct or if someone becomes aware of an ethical breach.

The practical examples (expected conducts and conducts to avoid) in the Code support the easy understanding of the Code. It is not intended to cover every topic in full depth and reading the Code does not substitute knowledge of the law and company regulations. If the Code sets out requirements that are more stringent than those set out in a particular country or regulations or customs, the provisions of the Code shall apply within the local legal framework.

The Code primarily regulates business conduct and compliance in relation to the activities of the 4iG Group, but also contains a number of provisions relating to the general conduct of employees, given that the 4iG Group expects all employees to act and communicate in accordance with the Code, both outside of work and as individuals.

2.1 COMPLIANCE

The 4iG Group's compliance programme aims to create a value-conscious and compliance-based corporate culture. The 4iG Group is committed to conducting its business in accordance with applicable laws, other rules, standards and ethical norms that do not constitute legislation. The 4iG Group does business in many countries and therefore recognises and analyses the differences in laws, regulations and practices in each country, while operating the Group in a legal and ethical manner.

The 4iG Group considers it important to comply with and enforce the requirements of international standards that are designed to promote the 4iG Group's compliance and

value-consciousness, in particular:

- measures to prevent corruption and bribery, including management commitment, integrity, transparency, openness and the implementation of measures to create a culture of compliance in accordance with ISO 37001:2019 standard,
- the enforcement of the quality management requirements of the ISO 9001:2015 standard in order to enforce the customer focus requirements,
- to ensure information security, data security and the protection of personal data, the 4iG Group applies the requirements set out in the ISO 27001:2014 standard,
- the requirements of the ISO 14001:2015 standard for environmental awareness, environmental considerations and the reduction of environmental impacts.

In order to ensure compliance and integrity, the 4iG Group operates a Group-wide compliance function (4iG Group Compliance), which is responsible for ensuring compliance and identifying, assessing, managing and following up on compliance and ethical risks related to the Group's operations.

The effort to systematically manage compliance and ethical risks is guided by the applicable guidelines of this Code and the same guide 4iG Group employees in their actions and value judgments.

2.2 APPLICABLE LAWS AND REGULATIONS

4iG Group and its partners are also active in international markets, and therefore 4iG Group member companies are subject to the laws of the countries in which they and their partners operate. Where local legislation or partner requirements differ from those set out in the 4iG Group's policies, the stricter requirements apply. If any law or regulation would prevent employees from complying with the Code or any other compliance regulation, they shall consult the 4iG Group Head of Legal and the Head of Group Compliance or report such circumstance on the Ethics and Compliance Line.

2.3 SCOPE OF THE CODE

The rules set out in the Code apply to all employees of the 4iG Group, i.e. 4iG Plc and its subsidiaries directly or indirectly under its controlling influence, including managers. For any company that, although not part of the 4iG Group, is partly or fully owned by 4iG Plc. or one of its subsidiaries, efforts should be made to ensure that the company adopts the ethical standards of the 4iG Group or follows an equivalent set of rules and culture.



2.4 ETHICS ORGANISATION

In order to monitor compliance with the provisions of this Code and to promote and maintain ethical conduct, the 4iG Group has established a separate Ethics Organisation, consisting of the Ethics Committee and the 4iG Group Compliance Organisation. The Ethics Committee operates independently of the 4iG Group's work organisation and reports directly to the Board of Directors of 4iG Plc. Group-wide Compliance Officers within the 4iG Group Compliance framework operate alongside the Ethics Committee.

Employees of the 4iG Group may ask questions to Compliance, 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 the long-term success of the 4iG Group. 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 the 4iG Group's requirements or of the law does not exempt any person from the consequences of breaching them.

The 4iG Group shall assess all non-compliance incidents and, if the conditions are met, conduct an investigation in accordance with the Rules of Procedure of the Ethics Committee (COM5_Group Policy), as set out in the above process. 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.



To facilitate whistleblowing, the 4iG Group operates an Ethics and Compliance Line through which whistleblower reports may be made by (i) employees of the 4iG Group, (ii) persons who have a contractual relationship with any member of the 4iG Group, 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 in relation to any member company of the 4iG Group.

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



The Ethics and Compliance Line is available:

by e-mail: compliance@4iG.hu

on the internet: <https://compliance.4iG.hu>

by post: 1037 Budapest, Montevideo u. 8.

While knowledge of and compliance with the Code, the 4iG Group's 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 4iG Group? 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 4iG Group 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 management of a 4iG Group member company?

If you are still in doubt, please use the Ethics and Compliance Line, which is completely confidential and can be used to make anonymous whistleblower reports. Your data will only be disclosed to the Compliance Officers and members of the Ethics Committee and to the persons appointed to investigate the whistleblower report, who will keep your data confidential and will not share them with any other organisational unit or employee of the 4iG Group. An anonymous whistleblower report may be made, but investigation may be waived in accordance with the internal rules of whistleblowing procedure. 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

Under the Code, the managers of the 4iG Group 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,
- Managers shall provide opportunities to demonstrate and discuss ethical conduct and create an open working environment that encourages employees to raise questions and concerns and, if unethical conduct is detected, to report it to Compliance or using the Ethics and Compliance Line,
- Managers shall ensure that employees who raise problems or questions are not subject to any retaliation for doing so,
- Managers shall report compliance issues requiring investigation to Compliance without delay.

The 4iG Group considers 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 Compliance if they have questions.

2.7 ZERO TOLERANCE TOWARDS RETALIATION

The 4iG Group shall make every effort to keep confidential and treat as confidential the details of any person (hereinafter: whistleblower) who reports to it any conduct that is in breach of the provisions of the Code, its implementing internal regulations or the law. However, it may be possible to deduce the identity of the whistleblower from 9

the circumstances. The 4iG Group does 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 and Ethics Committee shall investigate all such complaints and take appropriate action to ensure accountability. The 4iG Group will therefore 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 THE CORE VALUES OF THE 4iG GROUP

Liability The 4iG Group takes responsibility for the consequences of its actions and takes into account the needs and expectations of its 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 the 4iG Group forward every day.

Respect The 4iG Group respects everyone's rights and interests in human dignity, self-determination and privacy. It keeps in mind the golden rule that "you should strive to treat others as you would like to be treated".

Honesty The 4iG Group is convinced that honesty is the basis of mutual trust, and therefore it is the foundation of the 4iG Group's reputation and corporate ethics.

Loyalty The 4iG Group is loyal to the organisation and to its employees who work together in accordance with these ethical standards.

Fairness Adherence to the highest ethical standards and constructive dialogue with all stakeholders, including in competitive situations. The 4iG Group aims to achieve its objectives in a fair and responsible manner, in full respect of the legal environment, professional ethics and the contracts it concludes.

Quality In all circumstances, the 4iG Group strives to develop excellence and expertise, and to continuously deepen trust by providing products and services of reliable quality. It is committed to honouring its agreements and will make every reasonable effort to fulfil its promises and commitments in letter and spirit.

Integrity and transparency The 4iG Group complies with all legal requirements, including industry and organisational standards applicable to its business activities. The ethical standards of the 4iG Group go beyond legal compliance and combine standards of good governance and good practice. The 4iG Group is committed to ensuring that transparency is the starting point for its 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, for which every people equally entitled to. 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.

The 4iG Group is committed to respecting the human rights of all stakeholders and expects its employees to do the same.

The 4iG Group not only aims to respect human rights, but also actively promotes them in its value chain and strives to have a positive impact on society. It supports the protection of human rights and condemns all forms of human rights violations. It pays particular attention to its 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 the 4iG Group's business partners to respect human rights.
- Report any human rights violations that occur in the course of operations or in connection with the conduct of the 4iG Group'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.

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,
- Only do work for which you are qualified, medically fit, properly rested and alert,
- 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.
- Use recycled materials where possible and strive to use electricity, water and other resources wisely.
- Try to use cars as economically as possible.

Conduct to avoid



- Do not harm people's health or the environment!
- The budget should not 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.
- Don't 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.

3.2 HEALTH AND ENVIRONMENTAL PROTECTION

The 4iG Group is committed to preventing personal injury, environmental damage and hazards, and to reducing the health, safety and environmental risks arising from its activities.

The 4iG Group is constantly improving its working environment to ensure that it operates with the lowest possible environmental impact and the least possible risk to health and safety.

In line with this commitment, the 4iG Group shall

- comply with the relevant technological rules in all its activities,
- support health and nature-focused recreational and sports programmes for employees,
- in the design of its working environment, prioritises people and the environment, the use of recycled materials, and the introduction of technologies and procedures to reduce waste,
- be committed to ensuring the safety and security of persons and company property on its premises, including the protection of employees, technology, tangible assets, information related to the 4iG Group's operations and the 4iG Group's reputation against security threats.

The 4iG Group has a zero tolerance policy on drug use and excessive alcohol consumption. The use of drugs or working under the influence of alcohol, drugs or other psychotropic substances is prohibited in the work-place.



3.3 EQUAL OPPORTUNITIES AND EQUAL TREATMENT

The 4iG Group aims 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). The 4iG Group understands the value of diversity.

3.4 NON-DISCRIMINATION

The 4iG Group expects all its employees to refrain from any conduct, 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 or groups with a 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, which is 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, etc.
- Do not discriminate even if it is not prohibited by local law or permitted by local customs.

3.5 HUMAN DIGNITY AND MUTUAL RESPECT

The 4iG Group is committed to creating a working environment that is based on mutual trust, where everyone who works for the 4iG Group is valued and everyone's human dignity is respected.

There is a relationship of trust between the 4iG Group and the internal and external stakeholders that come into contact with it, and accordingly the 4iG Group gives them the respect they deserve and expects the same from them.

The 4iG Group does not tolerate harassment or any other degrading, humiliating, offensive or intimidating acts, conduct or behaviour. Within the 4iG Group and its wider community, everyone is treated with courtesy and respect.

The 4iG Group expects 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. The 4iG Group considers the use of obscene language and degrading or abusive language to be verbal aggression, which is not compatible with the norms of professional communication.

The 4iG Group considers 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, unwanted advances or physical contact, requests for sexual favours.

Libel is the statement, rumour or use of a phrase directly referring to a fact which is capable of defamation. Defamation means the use of any term or act of defamatory character against another person in relation to the performance of his or her duties, the exercise of his or her public functions, the exercise of his or her activities in the public interest or in public.

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 the 4iG Group.
- 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 your 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 sexually offensive conduct.
- Never make untrue statements or spread malicious or degrading rumours about others, or share offensive or discriminatory information in any way.



3.6 FAIR WORKING CONDITIONS

Within the 4iG Group, human resources are the greatest asset. The 4iG Group is committed to the development of its employees, to ensuring a good work-life balance and to respecting employees' working time in all workplace and employment-related communications. The 4iG Group's 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.

The 4iG Group does 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.

The 4iG Group ensures that these forms of work do not occur in connection with its business activities.

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

The 4iG Group is committed to implementing a fair employment and remuneration policy that complies with the relevant legislation. The 4iG Group also pays special attention to supporting employees with special needs.

The 4iG Group manages redundancies in a humane way and provides 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 the 4iG Group are fully aware of the expectation that they may not engage in unethical employment practices in the course of their work for the 4iG Group.

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

4.1 SUSTAINABLE DEVELOPMENT

The 4iG Group acts in an economically, socially and environmentally conscious and responsible manner by applying a sustainable development approach. Its sustainability ambition is not only to create economic value by maximising profits and shareholder value, but also to take responsibility for creating social value. While creating innovative products and services, both at the economic and social level.

As part of sustainable development, the 4iG Group proactively manages risks and opportunities that affect long-term economic, environmental and social issues. In this context, it actively seeks and exploits 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



- Don't see sustainability as solely a reputational issue.

4.2 FAIR TRADE AND COMPETITION

The 4iG Group is committed to fair market conduct, conducting its 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. Employees of the 4iG Group 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.

Competition is the best driver of efficiency and innovation. The 4iG Group conducts its business in a competitive environment, taking care to do so in accordance with fair competition standards and applicable competition laws.

The 4iG Group respects its competitors, refrains from any unfair practices that would unlawfully harm the reputation or goodwill of its competitors, and collects data about its competitors strictly in a lawful manner.



Anti-competitive practices are unacceptable and not allowed, and competition regulations prohibit a number of practices that restrict free and fair competition, including unlawful agreements between competitors or unfair conduct aimed at obtaining or maintaining a monopoly position.

The 4iG Group pays particular attention not to be party to any cartel agreement, not to coordinate its market behaviour with its competitors, directly or indirectly, in particular with regard to price fixing, market sharing or the allocation of service and sales quotas.

The 4iG Group does not abuse its market position and is committed to creating a level playing field for all its business partners.

The 4iG Group considers its 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. The 4iG Group only cooperates with its competitors in the implementation of shared social and environmental re-sponsibility.

4.3 INTEGRITY IN PROCUREMENT AND TENDERING

4iG Group employees shall not attempt to influence an ongoing supplier selection process by means other than calls for tenders or bids and tendering or bidding process. In case somebody unknowingly obtain another bidder's offer or information about a bidding or supplier selection before the supplier selection process is completed. In this case, the incident shall be reported to the person who has launched the call for tenders or bidding by involving 4iG Group Compliance.

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 the 4iG Group 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 and Legal and Compliance, with an immediate disassociation.
- 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.
- Be aware of competition law and be purposeful. Only contact competitors if absolutely necessary.
- Make sure that the conditions, technical content and requirements set by the 4iG Group promote fair competition and provide a free opportunity to participate in calls for tenders launched by the 4iG Group.
- Ask questions via the Ethics and Compliance Line if you have any doubts about the conduct to be followed.

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.
- 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 engage in coordinated or collusive tendering: under no circumstances should you tell anyone whether, when, in what form or how you are preparing or submitting a tender, or enter into a partner rotation agreement or a compensation agreement with a losing tenderer.
- Do not fix a reseller margin and do not penalise distributor pricing (for example, deviations from the recommended price).

4.4 SANCTIONS POLICY, COMPLIANCE WITH EXPORT AND IMPORT REGULATIONS

The 4iG Group follows 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 soft-

ware 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 4iG Group 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.

The 4iG Group is strictly prohibited from supporting illegal foreign economic boycotts resulting from the conclusion of contracts, the provision of information or the taking of measures.

The 4iG Group exercises due diligence when contracting with third parties and is committed to screening all its suppliers to identify any indications of compliance risks. The 4iG Group operates 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.
- You should immediately contact your line manager, the 4iG Group Head of Legal 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 you do business or may affect any planned transaction.
- Contact the 4iG Group Head of Legal 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.
- Find out if your business partners may be affected by any international trade restrictions ("Know your partner").

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.

4.5 CORRUPTION AND BRIBERY

The 4iG Group does not tolerate any form of 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.

The 4iG Group strictly prohibits for its employees and any persons acting in the name or on behalf of the 4iG Group to offer, 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). 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.)

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.

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 anti-corruption and anti-fraud processes in place to reduce the risk of fraud and identify prohibited conduct.

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.

The detailed rules against corruption and bribery are set out in the 4iG Group's internal policies on anti-corruption and anti-bribery.





Conduct to follow



- To learn the anticorruption rules and avoid transactions and circumstances that could even appear as any irregular behaviour.
- Respect anti-corruption rules and procedures.
- 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 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 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 activities.

Conduct to avoid



- Never 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.
- 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.
- Do not claim or give the impression to anyone that you can unlawfully influence anyone.
- Never to allow that agents, consultants, representatives or other external parties acting on behalf of the 4iG Group act questionably or bribe anybody.

4.6 GIFTS AND BUSINESS INVITATIONS

The 4iG Group considers 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 gift.

Business gifts or favours are widely used either as an expression of goodwill or to strengthen a bona fide working relationship between business partners. Gifts, entertainment and hospitality may generally only be accepted or offered if they are not lavish or excessive in the circumstances and to the employees, and are voluntary and occasional. However, a gift shall never be cash, nor a means of payment substituting cash. Furthermore, the purpose of the gift should never be to influence decision-making unfairly, nor should it give the appearance of doing so to outside observers, as this would be contrary to the anti-corruption rules represented by the 4iG Group.

Any 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.

The detailed rules on gifts applicable to the 4iG Group are set out in the 4iG Group's internal policy on gifts and business invitations.

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.
- You should 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, kickbacks, 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.

4iG Group is committed to fighting fraud and will not tolerate fraudulent practices. In order to protect the core values, assets and reputation of the 4iG Group, 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 if a member of the 4iG Group or you personally overlook signs of fraud.

Practice to follow



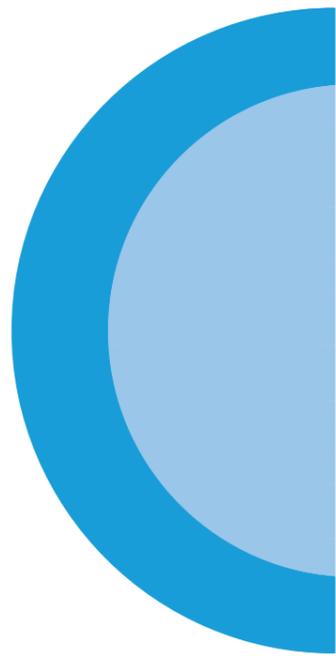
- Always act in accordance with fraud prevention legislation, policies and procedures.
- Watch out for any signs, events or transactions that could indicate fraud involving the 4iG Group.
- Always document events and transactions in a factual manner.
- Ensure that business procedures, including procurement, 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.

Conduct to avoid



- 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 none of the 4iG Group's member companies are subject to the Act on Preventing and Combating Money Laundering and Terrorist Financing, the 4iG Group is committed to the highest standards of compliance with the anti-money laundering rules. Money laundering is the process of concealing or legalising illegally 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. It also includes the use of lawfully obtained funds to support crime or terrorism. Violations in most countries include obstruction of money laundering investigations and failure to report money laundering. 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 4iG Group.
- Be wary of making payments or claims for payments that are not in accordance with normal or customary business practice.

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.
- 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 dealing is the unlawful use of inside information for financial gain. 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 employees of the 4iG Group shall keep confidential and safeguard information that is deemed to be inside information in relation to 4iG Group member companies 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 employees of the 4iG Group, 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, the 4iG Group prohibits insider trading, market manipulation and unauthorised disclosure of inside information.

"Inside information" means any information that is not publicly available and is material and directly or indirectly related to the 4iG Group or other publicly traded companies or their securities, the disclosure of which would in all likelihood have a material effect on the price of financial instruments.

"Financial instruments" include, among others, transferable securities, money market instruments, options, futures, swaps and forward rate agreements.

"Market manipulation" means the dissemination or transmission of false information about any security or its issuer in order to influence the price or market perception of the security for financial gain.

"Unauthorised disclosure" is the disclosure of inside information to an unauthorised person.

Conduct to follow



- Be careful and protect inside information even from accidental disclosure.
- Report if you think someone is involved in insider trading or illegal market manipulation.

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.
- Never share inside information with any unauthorised person, including your relatives, inside or outside the 4iG Group without prior approval.
- 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.

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, expenses and expenditures in accordance with the policies and accurately.

Conduct to avoid



- Never mislead the 4iG Group's decision-making managers or persons 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 4iG Group without proper authorisation.
- Do not remove or destroy accounting documents or records before the expiry of the applicable retention period without prior approval.

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. The 4iG Group keeps and prepares member company records and reports honestly, accurately and objectively.

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 the 4iG Group's 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 4iG Group member company's knowledge base.

Falsification of records or misrepresentation of facts cannot be justified or accepted. The 4iG Group does 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 the credibility and reputation of the 4iG Group, to meet legal and regulatory obligations, and to fulfil its 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. PRINCIPLES OF ETHICAL WORK

The 4iG Group is responsible for protecting shareholder investments and delivering long-term returns that are competitive with other industry leaders. To this end, the 4iG Group avoids conflicts of interest. It protects the interests, tangible assets, trade secrets and intellectual property of the 4iG Group and ensures appropriate protection of personal data and data security.

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 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 Compliance 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 the 4iG Group.

The 4iG Group respects the privacy rights of its employees and generally does not keep track of what they do outside working hours. However, there is a relationship of trust between the 4iG Group and its employees and other partners, where a conflict of interest may arise if an employee's private affairs could be incompatible with the loyalty expected in relation to the interests of the 4iG Group.

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 the 4iG Group or that jeopardise the interests of the 4iG Group.

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.
- For any outside board position, ask for written approval before accepting it.
- 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.
- 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 4iG Group.
- 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

The 4iG Group has tangible and intangible assets, financial and non-financial resources of significant value. Employees shall protect and properly and reasonably use company assets in the pursuit of business objectives. The 4iG Group considers the improper or negligent management of corporate assets and resources a violation of shareholder interests.

The employees, suppliers, contractors and business partners of the 4iG Group shall take responsibility for the integrity and the proper, economical and efficient use of the assets of the 4iG Group. All employees and authorised persons may use the funds, tangible assets and resources of 4iG Group member companies 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 the property of 4iG Group member companies 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 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.

5.3 PROTECTION OF BUSINESS SECRETS AND INFORMATION

The 4iG Group only collects data in a fair and strictly lawful manner.

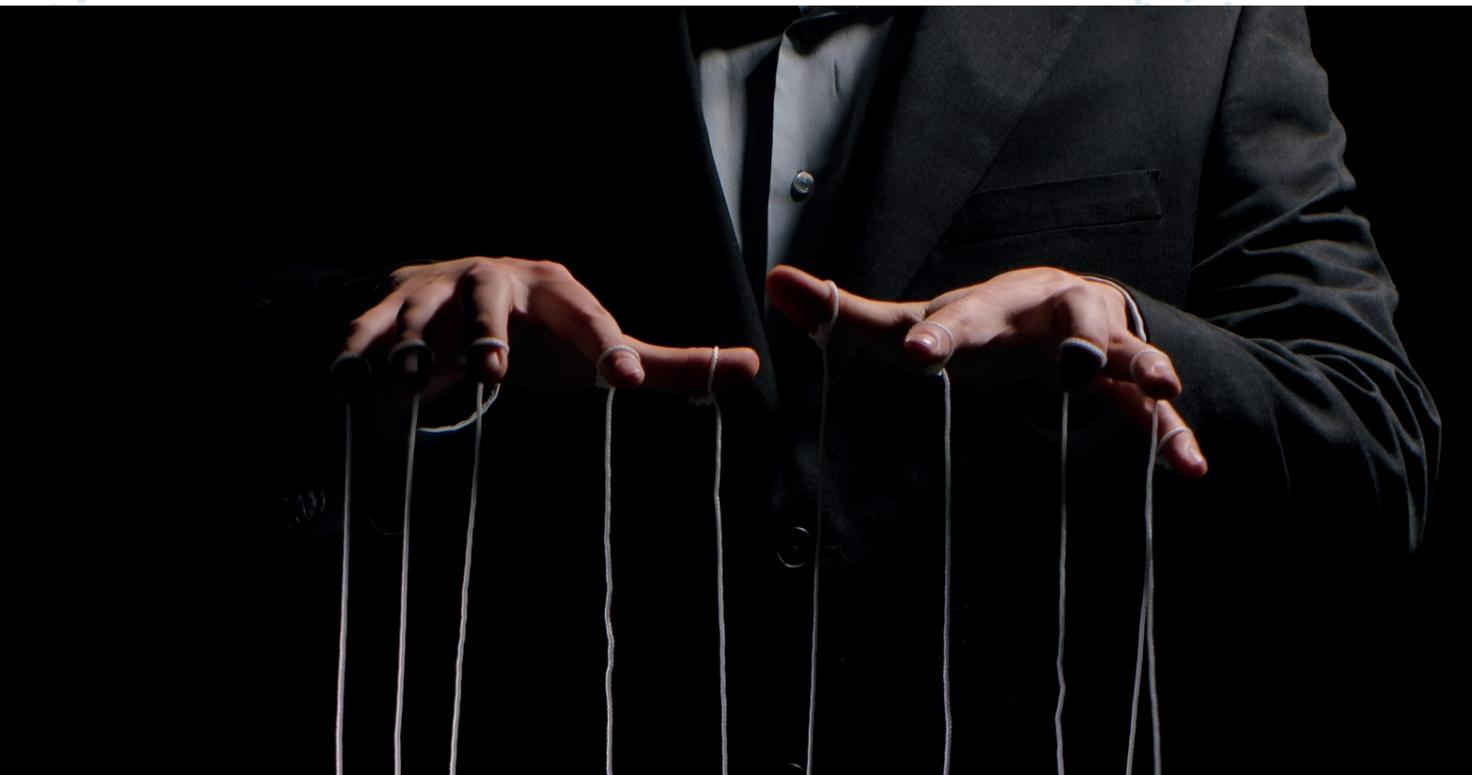
Employees shall treat and preserve as business secrets any information, facts, data, opinions and knowledge of the affairs of 4iG Group, its member companies and business partners, which they obtain in the course of their work, and shall not use or disclose to third parties any such information, facts, data, opinions or knowledge for their own benefit or for the benefit of third parties. The Employee shall remain bound by this obligation of confidentiality even after termination of the employment.

Employees shall not disclose or make available, directly or indirectly, information about the commercial relationships, transactions, operations, financial situation, investments, negotiations, financial performance and plans, businesses, customers, clients, suppliers, related documents, data carriers of the 4iG Group or of any other entity within the business scope of the 4iG Group 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.

In addition, an employee may not disclose to an unauthorised person any information which has come to his or her knowledge in the course of his or her employment and the disclosure of which would have a detrimental effect on a member company of the 4iG Group or another person, or which the 4iG Group has classified as confidential or the confidentiality of which the employee must have realised given his or her job description.

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 4iG Group or in the course of a business relationship with the 4iG Group, regardless of their actual location or form (electronic, paper, other formats, etc.).

Employees may not disclose any other facts, data or information concerning the 4iG Group 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



- 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.

Conduct to avoid



- 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

The 4iG Group respects people's right to privacy and the confidentiality of their personal data. Under applicable law, 4iG Group members are responsible for the protection of personal data and for ensuring that personal data are processed only in accordance with applicable law and 4iG Group policies and procedures.

Given the nature of its activities, the 4iG Group is committed to fostering a culture of cybersecurity, which it promotes throughout its value chain. The 4iG Group is committed to maintaining the confidentiality, integrity and availability of the electronically stored data of its member companies, customers and partners throughout the entire lifecycle of the data, their storage, processing and transmission.

The 4iG Group takes 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 the 4iG Group 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 the 4iG Group's electronic systems and all information and data relating to the 4iG Group 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 the 4iG Group's software.

During working hours, non-work-related 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, the 4iG Group reserves the right to access 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).
- Restrict access to personal data to the authorised persons (data minimisation).
- 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 information infrastructure, any element of the information infrastructure or electronically stored data owned by 4iG Group member companies (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).

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 4iG Group 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 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

The intellectual property of the 4iG Group is one of its most valuable assets, as it is essential to maintain its 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.

Employees shall not disclose or make available, directly or indirectly, any information relating to solutions, applications, systems, software products, software components, intellectual property, copyrights or related documentation, data carriers, etc., or any other information constituting a business secret, concerning the 4iG Group or used by the 4iG Group, other than to persons designated in writing by the respective right holder.

Intellectual property created or acquired using the resources of the 4iG Group becomes the property of the 4iG Group member company and is not considered private or personal property.

Intellectual property protection allows

- the 4iG Group to prevent anyone from using it without permission,
- to charge a fee for their use.

In this spirit, the 4iG Group respects the work of others and takes care not to infringe the intellectual property rights of others, and expects 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.
- 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.

Conduct to avoid



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

The 4iG Group is committed to extending the ethos and practices of responsible and sustainable business to the entire value chain. The 4iG Group strives to build trust-based business relationships and responsible communication with all stakeholders.

6.1 QUALITY REQUIREMENTS

The 4iG Group strives at all times to ensure that the services it provides, the products it offers, and the development and delivery of its own products meet the highest quality standards. 4iG Group shall conduct all its activities in compliance with the applicable legal and regulatory requirements and its own strict internal quality standards. All members and employees of the 4iG Group shall carry out their duties at all times in accordance with the 4iG Group's unwavering commitment to quality and compliance, and to 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, the 4iG Group listens to the needs of its customers, suppliers and business partners. It continuously monitors, evaluates and improves its products, services, technology solutions and business processes in order to provide quality, security and innovative solutions to its customers and clients in all areas of the value chain.

The 4iG Group's relationships with customers, clients, suppliers and other business partners are based on mutual trust and respect. The 4iG Group is committed to meeting all its contractual obligations.

Employees should bear in mind not only that their communications will be interpreted in relation to the 4iG Group as a whole, 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 4iG Group's activities, products and services.
- 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

The 4iG Group does not seek to engage directly in political activities, does not set political goals and strictly complies with the legal requirements for corporate political engagement and political contributions.

The 4iG Group encourages its employees to participate in politics by exercising their right to vote, recognises the right of its employees to engage in politics and does not prohibit them from engaging in political activities. However, they may not engage in political activities on behalf of the 4iG Group, with its assets and during its working hours.

Conduct to follow



- Please note that your own political statements are not those of the 4iG Group, nor can they even appear to come from the 4iG Group.
- You are not speaking on behalf of the 4iG Group, so please make it clear that your political views and activities are personal and have nothing to do with the 4iG Group.
- 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 4iG Group or any 4iG Group member company in your political activities.
- Never give the impression that the 4iG Group is committed to any political party or movement.
- Never use your working time or 4iG Group resources to support political activities.
- Do not engage in political activities at work (e.g. campaigning, fundraising, etc.).
- Do not use your position with a 4iG Group company to influence others or to support a politician, political party or movement.

Conduct to follow



- 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 4iG Group Compliance and seek their advice before providing information in the context of any non-routine official procedure.

Conduct to avoid



- 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 should you prevent another employee from providing accurate information.

6.4 GOVERNMENT RELATIONS

The 4iG Group conducts its business in good faith and honestly, in accordance with applicable laws and regulations, using only permitted methods.

The 4iG Group strives 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.

4iG Group lobbies in accordance with local laws and regulations in the countries where it operates. In some countries, specific legislation limits the value and nature of gifts and hospitality that may be accepted by officials or persons with public functions, so special attention should be paid to this (for further details, please refer to the 4iG Group's internal policies on gifts and business entertainment).



6.5 SOCIAL RESPONSIBILITY

The 4iG Group is committed to being part of, supporting and developing the community and environment in which it operates.

The 4iG Group reports regularly, openly and transparently on its donation and sponsorship activities. Accordingly, it only cooperates with and participates in regulated and transparent businesses that operate according to the principles of good business practice.

The 4iG Group expects all sponsored and supported individuals and organisations to act in accordance with the ethical values and principles of the 4iG Group. The 4iG Group reserves the right to terminate or withdraw support if the beneficiary acts contrary to its 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 the 4iG Group'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 4iG Group.
- 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

4iG Plc 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.

The 4iG Group aims to publish regular, complete, comprehensive and reliable information about its activities and ambitions through all media. It strives to develop positive and high-quality professional relations with the media. 4iG Group member companies have an open, transparent and balanced two-way communication with external stakeholders.

Any communication to the media on behalf of the 4iG Group is considered a public announcement, which requires caution and a thorough knowledge of legal and media issues and is therefore only allowed with the approval of the Communications area and the 4iG Group Head of Legal.

The 4iG Group's social media presence is coordinated by the Communications area. Employees' presence on social media is a private matter and is respected by the 4iG Group. However, employees may not act on behalf of the 4iG Group or 4iG Group member companies on social media, publish, share or disclose in any form any corporate information, in particular proprietary business information, or refer to the 4iG Group or present the 4iG Group in a manner that is contrary to its values.

The 4iG Group expects its employees to use elements of the Company Image Manual in their daily work. All documents that represent the 4iG Group or any of its member companies and are sent to an external partner must comply with the requirements of the Company Image Manual.



Conduct to follow



- Before giving any information, even informally, to media representatives on company matters, you should inform the relevant communications area and seek their advice and approval.
- Ensure that all communications that constitute public announcements, such as presentations at professional forums, are approved by the relevant communications area and the 4iG Group Head of Legal.
- 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 the 4iG Group and take into account that your statements may be interpreted as a communication from the 4iG Group and may therefore affect the overall perception of the 4iG Group.

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.

