

CODE OF ETHICS AND BUSINESS CONDUCT

4iG



4iG

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MESSAGE FROM CEO

Dear Colleague,

4iG Group's business operations and success are based on ambitious objectives, excellent performance as well as fair business conduct in all circumstances, besides complying with all legal rules, internal regulations as well as professional and ethical rules. The aim of the present Code of Ethics and Business Conduct (hereinafter referred to as 'Code') is to set up the frame of conduct upon 4iG Group's values and vision to be followed by the employees so as to provide sound ethical basis for 4iG Group and make conditions for long-term sustainability.

4iG Group's responsibility goes beyond the boundaries of lawful operations. On one hand, corporate social responsibility forms the integral part of 4iG Group's operations, so the company group makes conscious efforts to communicate fundamental values to the community as well as to enrich the society by its activity. 4iG Group is convinced that this is the only way to face challenges of the competitive market in the long term and preserve the trust of its employees, clients, shareholders, business partners, other stakeholders, and protect good reputation.

On the other hand, the cornerstone of 4iG Group's operation is the development of business operations (development, sales, provision of services, marketing) in a way that it complies at all times with the strictest ethical standards, regulations and best practices of the IT sector.

4iG Group has zero tolerance of any person violating rules for corruption, prohibition of concerted practices, respecting human rights and human dignity, equal treatment, health protection, data protection, data security as well as environmental protection. Unethical, non-compliant conduct or even its appearance may have adverse impacts on 4iG Group's good reputation, question values shared by the company group, thus cause breach of trust towards the Group.

4iG Group faces many ethical challenges, legal and regulatory requirements as well as

other expectations raised by the society. The present Code aims to formulate provisions relating to the most important parts of ethical conduct. However, the Code doesn't contain guidance for all situations and problems that may potentially occur. That's why 4iG Group's employees are always obliged to act responsibly and upon careful consideration.

4iG Group believes that ethical commitment must be manifested both in words and by actions as well. 4iG Group thus impels its senior management to act in an exemplary manner by their ethical conduct towards their employees. As senior managers have key roles in the foundation, evaluation and permanent supervision of ethical environment based on the Code, the senior management staff is obliged to get familiar with the provisions of the Code as well as the principles contained therein, and properly communicate and enforce them during giving instructions, making decisions as well as in their daily operations.

Finally, enforcing all employees to observe all ethical values and provisions affirmed by the company group forms imperative part of the ethical operation of 4iG Group. 4iG Group is committed to calling those breaching provisions to account, remedying the situation as well as restoring its ethical operation in case of violation of standards of conduct and ethics laid down in the Code and internal regulations for its implementation. 4iG Group expects all stakeholders to join its efforts and be actively involved in achieving its common objectives.



Gellért Jászai
CEO

CHAPTER 01#

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Guide to THE CODE

The aim of the Code is to set out principles, basic standards for the establishment of proper ethical culture and operation compliant with legislation and internal regulations as well as the definition of expected business conduct. This helps to identify situations during work that may be considered as violation of ethical standards. It also provides guidance on what should be done if questions are raised regarding ethical conduct, or if someone detects any ethical offence.

There are several practical examples in the Code (conducts to be adopted and avoided) helping better understanding. Covering all issues comprehensively is not the purpose of the Code, reading it through doesn't mean the knowledge of statutory and company provisions. If the Code sets out stricter provisions or practices than that of applied in a given country or area, provisions of the Code must apply within the local legislative framework. Besides containing lots of provisions concerning the general conduct of employees, the Code primarily regulates business patterns of conduct and compliance related to 4iG Group's activities, having regard to the fact that 4iG Group expects all its employees to act and communicate according to those laid down in the Code both outside working hours and as a private person.

COMPLIANCE

Establishment of ethics and compliance structure

Setting up an Ethics Committee independent from the work organisation and employing a Compliance Officer under the direct control of the Security Director



Monitoring

Regular/ad hoc monitoring through targeted units or staff

Follow-up

Identification of reasons for problems, introduction of repairs, prevention of occurrence of the same problems /e.g. incorporating actual cases into training/

The aim of 4iG Group's compliance programme is the establishment of a compliance-based corporate culture. 4iG Group's business activities extends to many countries, so the company group acknowledges and analyses legal, regulatory and practical differences of the given countries, and operates the company group in a lawful and ethical way. In favour of protecting personal data at the highest level possible, each 4iG Group's member has its own internal privacy policy and applies those laid down for respecting the privacy of clients and employees as well as protecting their personal data.

Efforts made for managing risks of compliance and ethics systematically are driven by relevant guidelines of the present Code. The same guidelines have key roles in directing 4iG Group's employees in their actions and delivery of their value judgements.

APPLICABLE LEGISLATION AND REGULATIONS

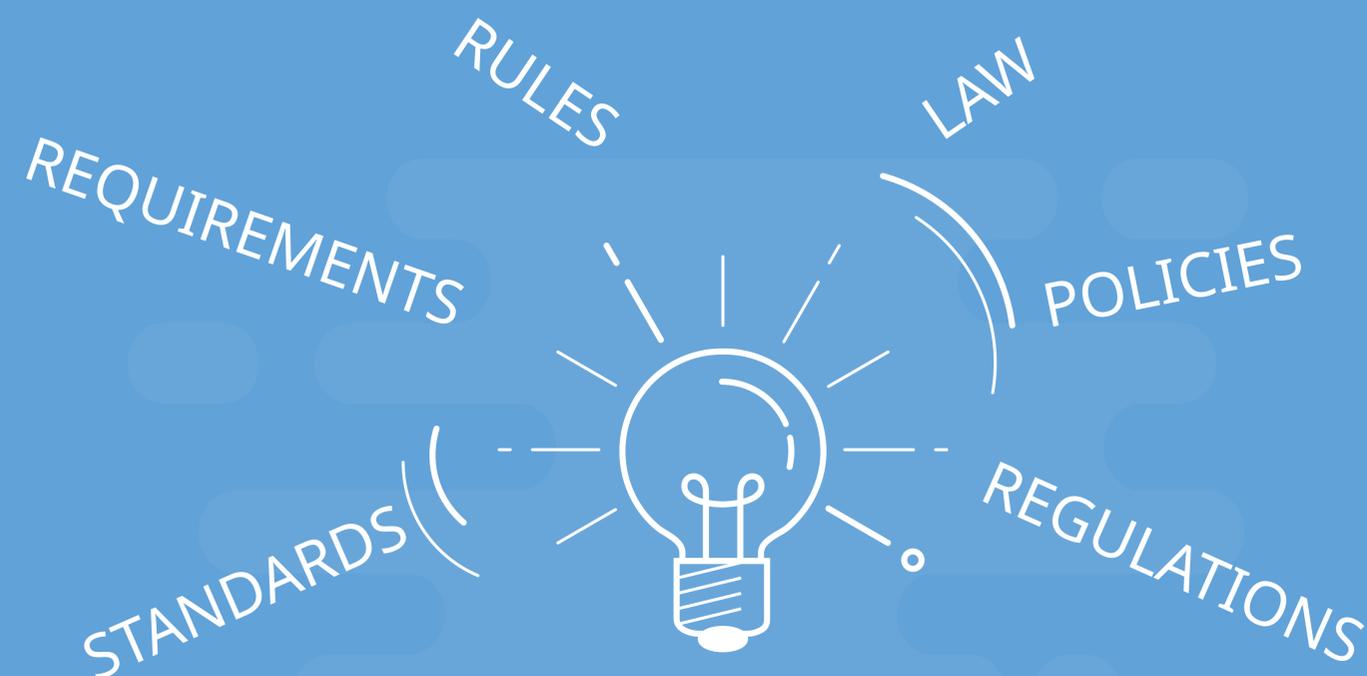
4iG Group and its partners are actively present in international markets as well, so legislation of countries, where they and their partners operate, also applies to 4iG Group's subsidiaries. If requirements of local legislation or partners differ from those specified in 4iG Group's regulations, stricter requirements apply. In case any legal provision or regulation happens to hinder employees from complying with the Code or any other compliance-related regulation, so they are obliged to consult with their own superior and the Chief Legal Officer of 4iG Plc or submit a notification to the Ethics & Compliance Hotline.



SCOPE OF THE CODE

Rules specified in the Code apply to all employees, including senior management as well, of 4iG Group, namely 4iG Plc as well as of subsidiaries under either direct or indirect decisive influence of 4iG Plc. In respect of companies – which do not belong to 4iG Group but 4iG Plc or its any subsidiary has some proportion in it – efforts shall be made to have the ethical norms of 4iG Group adopted or to make such respective companies follow equivalent regulations and culture.

Date of entry into force: 31 Dec 2019



COMPLIANCE

ETHICS ORGANISATION

A separate ethics organisation system, consisting of the Ethics Committee and Compliance Officers, has been established at 4iG Group for supervising compliance with those laid down in the present Code as well as fostering and maintaining ethical conduct. The Ethics Committee functions independently from 4iG Group's work organisation and reports directly to the Board of Directors of 4iG Plc. In addition to the Ethics Committee, there are Compliance Officers acting autonomously at each 4iG Group's member as well as a group-level Compliance Officer.

4iG Group's employees may as well put a face-to-face question to the Compliance Officers in case any question is raised concerning them personally either ethically or morally at the workplace.

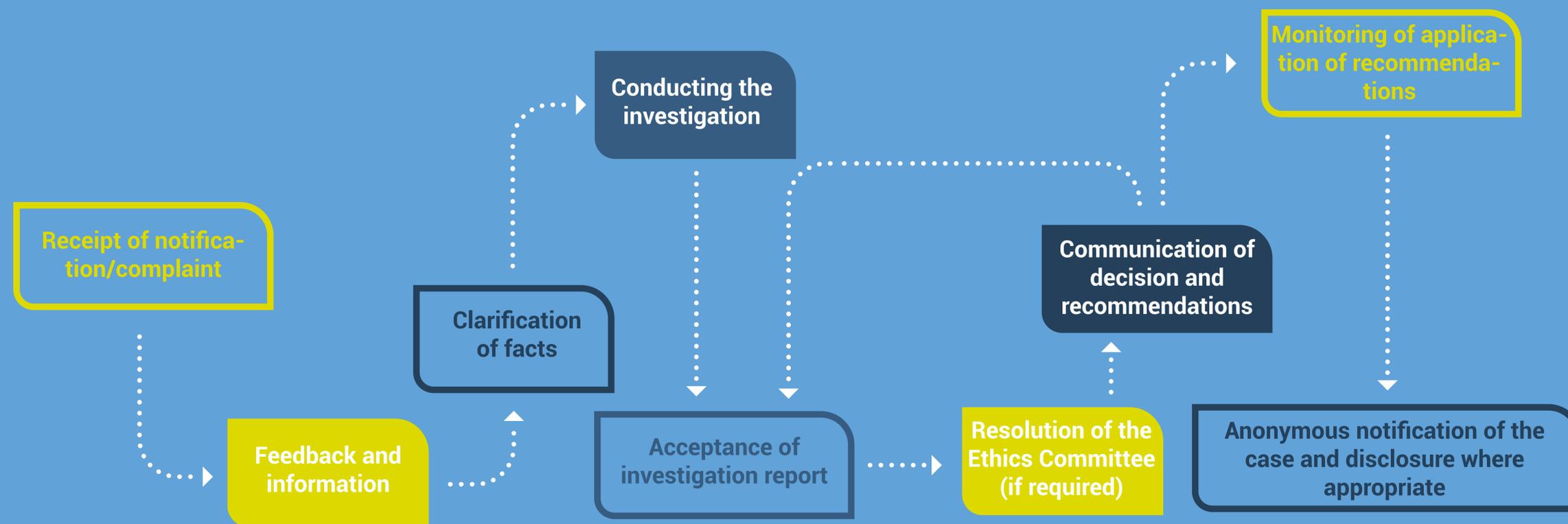
ETHICS PROCEDURE

Preventing and detecting ethical offences and infringements are of critical importance for 4iG Group's long-term success. **Any infringement of those laid down in the Code is a serious infringement which may result in the termination of the employee's employment relationship.** Not getting familiar with 4iG Group's provisions and legislation does not exempt from the consequences of their infringement.

4iG Group evaluates all non-compliance incidents, and if conditions are met, it conducts an investigation according to those specified in the Rules of Procedure of the Ethics Committee, as indicated above. Infringement of both the Code and statutory provisions may, depending on the circumstances of the case, lead to labour, civil or criminal accountability.

For the purpose of facilitating the submission of notifications, 4iG Group operates the Ethics & Compliance Hotline. Submitting any notification is possible via the Ethics & Compliance Hotline for (i) 4iG Group's employees, (ii) any person under contract to any 4iG Group's member, or (iii) persons with reasonable legitimate interest in submitting the notification or remedying or ceasing the conduct subject to the notification, if any conduct contrary to the provisions of the Code is detected.

Ethics & Compliance Hotline is thus a safe and accessible channel through which external and internal stakeholders can get advice and raise concerns.



NMV Figure – Ethics procedure

ETHICS PROCEDURE

Knowledge and compliance with the Code as well as 4iG Group's corporate provisions and regulations are obligatory for all employees. Of course, these cannot provide guidance in each decision-making situation. If you face any challenging ethical decision-making situation, answer the following questions to determine necessary steps:

WHAT CAN I DO

The Ethics & Compliance hotline is accessible:

- ✉ compliance@4iG.hu
- 🌐 <https://compliance.4iG.hu>
- 📍 1037 Budapest, Montevideo u. 8.



- Is the experienced situation or conduct legal?
- Is it acceptable ethically? Why does this situation embarrass me? Do I really not know what to do or I simply do what I actually think is the right decision with a bad grace?
- Is it consistent with 4iG Group's values? Who else might be concerned by my decision? What are the possible consequences of my decision on my direct superior and colleagues, shareholders and clients, suppliers as well as 4iG Group as a whole?
- Can I give reasons for my decision if required?
- Would you and your colleagues feel concerned if this appeared in the media?
- Would it be a right decision according to your superior or the senior management of 4iG Group's member company?

If you still have doubts, contact the Ethics & Compliance Hotline, which is completely confidential and appropriate for submitting anonymous notifications. Your data can only be made available to the Compliance Officers, members of the Ethics Committee as well as persons designated to investigate the notification, who keep data confidential and do not share such data with any other organisational unit or employee at 4iG Group. Anonymous notifications may be submitted but may not be investigated according to those laid down in the internal regulations on whistleblowing procedure. Everyone is responsible for raising voice if something is either accident-prone, unethical, potentially adverse or non-compliant with statutory or corporate provisions.

SENIOR MANAGEMENT'S SPECIAL RESPONSIBILITY

Based on the Code, the following falls within the scope of 4iG Group's senior management's responsibility:

- Setting a good example concerning ethical conduct and compliance;
- Acquaint the employees under his/her direct management with the Code, and make sure that colleagues have understood it as well as ethical provisions are respected in all their acts;
- Senior managers provide opportunities for ethical conduct to be presented and discussed and create an open work environment encouraging colleagues to address questions and problems to him/her; in case of experiencing any unethical conduct, they are expected to report it to the Compliance Officer as well as submit notification to the Ethics & Compliance Hotline.
- Senior managers ensure that employees who formulate problems or questions are not subject to any form of retaliation;
- Senior managers report any compliance issue requiring investigation without delay to the Compliance Officer.

4 iG Group considers intentional or grossly negligent non-observance or ignorance of compliance risks as the clear lack of management skills. In case of any question, the senior manager has the chance as well to request assistance from the Compliance Officers.

ZERO TOLERANCE AGAINST RETALIATION

4 iG Group uses best efforts to keep privacy and confidentiality of any data of any person submitting any notification referring to the provisions of the Code, the internal regulations for implementation or the conduct to the contrary of the legislation (hereinafter referred to as '**whistleblower**'). Nevertheless, the whistleblower's identity may be deducted from the circumstances.

4iG Group does not tolerate any retaliation against any bona fide whistleblower bringing up issues relating to compliance risks and concerns. In case the whistleblower feels he/she has suffered retaliation for submitting notification, either by the notified person or any third party, he/she is obliged to contact the Ethics & Compliance Hotline. Compliance Officers and the Ethics Committee investigate all such complaints and take appropriate measures for accountability. 4iG Group therefore applies legal consequences in accordance with regulations for employment to anyone responsible for retaliating against the whistleblower.

ZERO TOLERANCE

4iG GROUP'S CORE VALUES

Responsibility

4iG Group takes responsibility for the impact of its operations and considers the needs and expectations of its stakeholders, including its colleagues, shareholders, business partners, suppliers, customers, competitors, officials and persons with public function(s) as well as non-governmental organisations (NGOs).

Courage

Courageous stand for ideas, opinions, getting and giving feedbacks, questioning existing situation are all values that move 4iG Group forward day by day.

Respect

4iG Group respects rights and the interests of all to human dignity, autonomy, privacy. It observes the Golden Rule saying 'striving to treat others the way we would like to be treated'.

Honesty

4iG Group is convinced that honesty is the cornerstone of mutual trust, on which 4iG Group's good reputation and company morale is built.

Loyalty

4iG Group is loyal to the organisation and the people it works with, in line with such ethical standards.

Fairness

Compliance with the highest ethical standards, constructive dialogue with all stakeholders, even in competitive situations. 4iG Group wishes to achieve its aims fairly and responsibly, fully observing the legislative environment, professional ethics as well as contracts, agreements conducted by it.

Quality

4iG Group strives to develop excellence and proficiency as well as enhance confidence permanently in all circumstances by providing products and services of reliable quality. It is committed to complying with its agreements and it makes every reasonable effort to comply with the letter and spirit of its promises and commitments.

Integrity and transparency

4iG Group complies with legislative requirements, including industry codes and organisational standards relating to its business activities. 4iG Group's ethical standards go beyond legal compliance, and integrate standards of good corporate governance and best practice. 4iG Group has committed itself to considering transparency as the starting point of its activities, business communications and agreements to be able to provide possibility concerning independent decision-making supported by information.

CHAPTER 02#

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PRINCIPLES OF ETHICAL EMPLOYMENT



HUMAN RIGHTS

4iG Group is committed to respecting human rights of every stakeholder and it expects the same from its employees. 4iG Group's goal is not only to respect human rights, but to actively promote them throughout its value chain and contribute to a positive impact on society with respect to human rights. It supports the protection of human rights and condemn human rights abuses in any form. It places a special focus on its employees, suppliers as well as on vulnerable groups of women, national or ethnic, religious and linguistic minorities, children, persons with disabilities and their families.



Conduct to be adopted

- Always respect human rights and take steps to prevent human rights violations.
- In the course of risk management ensure the enforcement of human rights during business conduct, including but not limited to business development, exploration and production projects, selection of business partners suppliers or contractors, and in public affairs.
- Expect 4iG Group's business partners to respect human rights, too.
- Report any human rights violations within operations or any violations connected to 4iG Group's business.



Conduct to be avoided

- Never look the other way if any plan, action or conduct has possible adverse impact on human rights;
- Do not treat respecting human rights as solely the duty of government.

HEALTH AND ENVIRONMENTAL PROTECTION

4iG Group is committed to preventing personal injuries, damages and risks to the environment as well as minimising HSE risks arising from its activities.

4iG Group is about to improve its work environment permanently to operate it with the lowest possible risks concerning health and labour safety beside minimised impacts on the environment.

In line with this commitment, 4iG Group:

- adheres to all applicable technological guidelines in all its activities;
- encourages its employees' leisure and sport programs focusing on health and nature;
- believes that human- and environment-centricity, use of recycled materials as well as introduction of technologies and procedures for minimising waste discharges are priorities on creating the work environment;
- is committed to assuring the security of individuals on its premises and secure its assets, including the protection of employees, technologies, physical assets and information related to 4iG Group's business and its reputation against security threats

4iG Group has zero tolerance towards drug usage and excessive alcohol consumption. Use of drugs as well as working under the influence of alcohol, drug and other psychotropic substances are forbidden at workplace.



Conduct to be adopted

- Always respect persons' rights to life and the highest attainable standard of health;
- Always take labour safety and physical security aspects into consideration in every decision you make;
- Always comply with HSE and security requirements at your workplace and take part in training;
- Cease any activity without delay that becomes unsafe or unsecure and immediately report it to your superior;
- Undertake work for which you are trained, competent, medically fit, sufficiently rested and alert to carry out;
- Promptly report any accident, injury, unsafe or unhealthy conditions, incident, potential incident or near-miss, release of substance harmful to the environment to your superior.



Conduct to be avoided

- Do not do harm to people or the environment!
- The allocated budget may not be more important than labour safety!
- Never perform work under the influence of alcohol or (legal or illegal) drugs as well as (prescribed or otherwise acquired) psychotropic substances!
- Do not ignore regulations concerning labour safety and private security, including but not limited to smoking restrictions or regulations on banned objects.



SAFETY FIRST



PROTECTION



REGULATIONS



HAZARDS



HEALTH



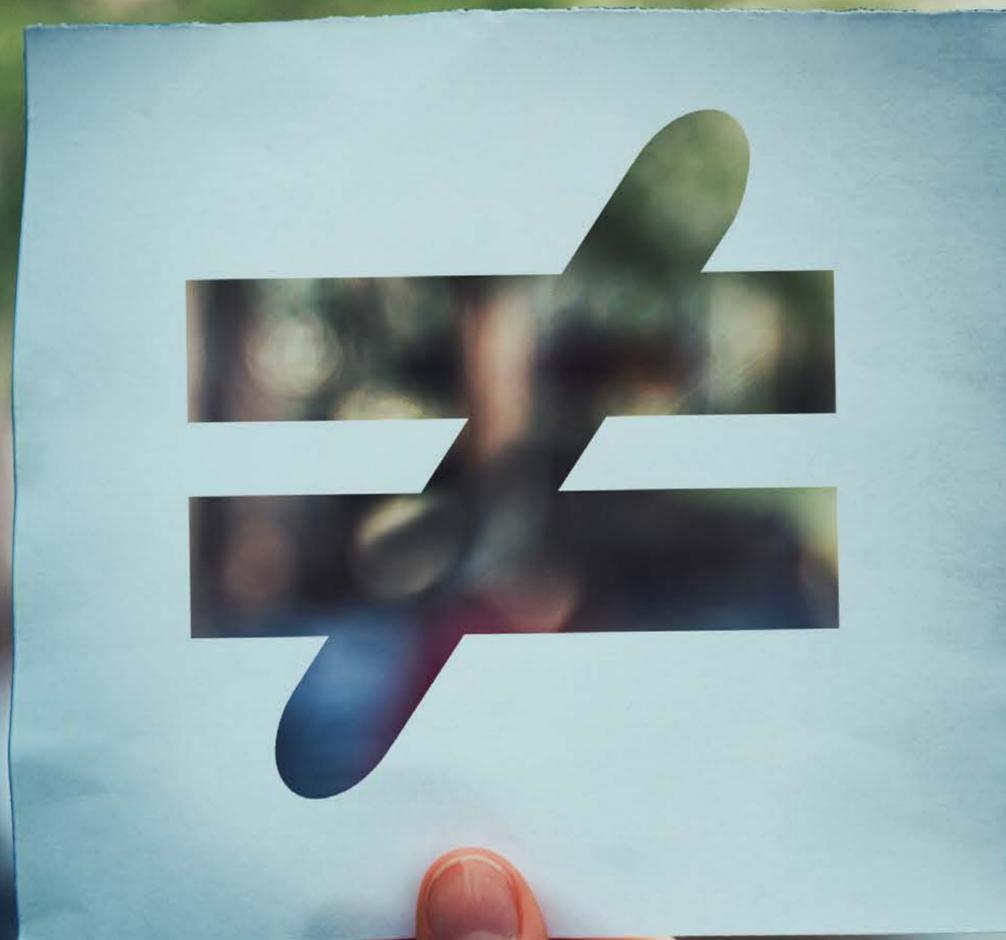
INSURANCE



EQUAL OPPORTUNITIES AND EQUAL TREATMENT

4 iG Group's aim is to ensure equal opportunities to everyone as well as provide equal treatment to applicants and its employees irrespective of their personal characteristics, e.g. race or ethnic origin, skin colour, religion, political opinion, origin, gender, sexual orientation, age, gender identity or its expression, nationality, marital status, pregnancy, childbearing, genetic characteristics, health and other status, property or characteristics protected by applicable laws (hereinafter together referred to as 'protected property'). 4iG Group is aware of the value of diversity.

PROHIBITION ON DISCRIMINATION



4iG Group expects all employees to refrain from every conduct, action, condition, failure, direction or practice realising (direct or indirect) discrimination, harassment, excommunication, unlawful separation or retaliation.

Direct discrimination means any action or conduct of which result a person or a group is treated less favourably due to a real or suspected protected property than any other person or group is, has been or would be treated in another comparable situation.

Indirect discrimination means any action or conduct apparently complying with the requirements of equal treatment but certain persons or groups with protected properties are discriminated in substantially higher proportion than any other person or group in another comparable situation.

Another prohibited type of discrimination is separation, which is an action separating persons or a group of persons based on their protected properties from those in comparable situation in any form (by designation of their place of work and resting place).



Conduct to be adopted

- Provide opportunities freely available to everyone irrespective of any individual or group characteristic unrelated to ability, merit, performance, qualification or business considerations;
- Base staff recruitment, evaluation, advancement, remuneration, compensation, discipline and termination decisions as well as business partner selection on qualification, merit, performance and business considerations only;
- Be open and respectful to cultural diversity and help people from other cultures to adapt to local circumstances;
- Be aware of local legislation and cultural factors that may impact your work.



Conduct to be avoided

- Never discriminate against anybody on the grounds of marital status, gender, , age, race, ethnic origin, nationality, skin colour, political conviction, religion or sexual orientation, disability, etc.
- Never discriminate against anybody, even if it is not prohibited by local legislation or it is permitted by local customs.

HUMAN DIGNITY, MUTUAL RESPECT

4iG Group is committed to providing a work environment based on mutual trust in which everyone working for and with 4iG Group is treated with dignity and respect.

There is a trust relationship between 4iG Group and all internal and external stakeholders having contact with 4iG Group, and 4iG Group therefore treats them with respect and expects its stakeholders to act in the same manner.

4iG Group will not tolerate harassment or any other humiliating, degrading, offensive, intimidating or hostile act, conduct or behaviour. Everyone at 4iG Group and its wider communities is entitled to be treated with courtesy and respect.

4iG Group expects its employees to act with respect and care to each other and settle issues in dispute in accordance with rules and customs of professional conduct and community living. Use of obscenities, or derogatory or hot-tempered tone is considered as verbal aggression by 4iG Group, which is incompatible with standards of professional communication. 4iG Group considers sexual harassment, defamation and slander as extremely serious violations of human dignity.

Harassment means any conduct undermining human dignity as well as of sexual or other nature, any arbitrary interference in other person's everyday way of life as well as systematic or permanent disturbance, which is intimidating, malevolent, humiliating, degrading or suitable for creating such an environment. Sexual harassment includes sexually determined, undesirable conduct such as physical contact and advance, sexually explicit comments, e-mails, texts or jokes with sexual content, undesired advance or physical contact, requests for sexual benefits.

Defamation is the allegation, rumour of a fact suitable for the damage to reputation or use of term directly referring to such fact. Slander is the use of term or any such act suitable for damaging to reputation in connection with performing other's duties, public services, public activity, or in general public.



Conduct to be adopted

- Always respect and uphold the dignity of others.
- Base workplace, business and community relations on openness, trust, mutual recognition and support.
- Make efforts to create and uphold an ambient and cooperative work atmosphere, even in the business and social relationships;
- Comply with the social norms of a community if they do not breach 4iG Group's ethical standards;
- If you are upset by someone's behaviour or expression, do not hesitate to speak up, explain to them, why you object and ask them to stop.



Conduct to be avoided

- Do not physically or verbally intimidate or humiliate others.
- Never act degradingly, offensively or in a hostile manner.
- Never make inappropriate jokes or comments of a racial, ethnic, religious, disability-related, age-related, or sexual nature.
- Do not distribute or share offensive, aggressive or derogatory materials or pictures.
- Never harass anyone sexually by making unwanted sexual offers, requesting sexual favours, making sexual remarks or gestures or behaving in any other sexually offensive way.
- Never make untrue statements about others or spread malicious or humiliating rumours or share derogatory or discriminatory information by any means.

FAIR EMPLOYMENT CONDITIONS



Human resources are the highest values at 4iG Group. 4iG Group is committed to respecting development of employees, ensuring a good work-private life balance as well as respecting employees' working hours during work- and employment-related communications. Moreover, legal and fair employment and respecting labour principles – including but not limited to the rights of employees to form and join trade unions as well as to elect works council – belong to 4iG Group's core values.

4iG Group does not tolerate any form of either forced labour and child labour, or unethical employment such as withholding wages, denying sick-leave or daily rest, or abuse of alternative employment forms.

4iG Group ensures that these forms of labour do not take place in connection with its business.

If local laws don't set a higher age limit, the minimum age for employment is 16 years.

4iG Group is committed to implementing a fair employment and remuneration policy in line with applicable laws. Moreover, 4iG Group is committed to supporting employees with special needs.

Redundancies are handled in a humane manner and wherever possible, process assistance is provided to former employees.



Conduct to be adopted

- Be alert to any sign of forced labour or child labour, human trafficking or any unethical employment practices, and report the occurrence of any such practice.
- Ensure that 4iG Group's suppliers, contractors, intermediaries, agents and others working on 4iG Group's behalf fully understand that no unethical labour can be used in their work for 4iG Group.



Conduct to be avoided

- Never have resort to child or forced labour, even it is the accepted local practice.
- Do not contract or do business with a partner hiring child, forced, compulsory or bonded labour, or even being suspected of doing so.
- Never allow or turn a blind eye to forced or child labour, slavery, servitude or human trafficking anywhere along the value chain.
- Do not infringe rights to payment for work, the freedom of religious belief and assembly, the right to rest, free time and regular paid leave.

CHAPTER 03#

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PRINCIPLES OF ETHICAL BUSINESS CONDUCT

4iG

SUSTAINABLE DEVELOPMENT

4iG Group acts knowingly and responsibly in respect of economy, society and environmental protection by applying sustainable development approach. Its sustainability efforts aim not only to create economic value by maximising profit and shareholder values but to take responsibility in favour of creating social values as well, while producing innovative products and introducing services at economic, social level.

4iG Group, as part of sustainable development, manages risks and opportunities proactively related to long-term economic, environmental and social issues. In this frame, it actively seeks and takes advantage of business opportunities contributing to the achievement of UN Sustainable Development Goals.

Conduct to be adopted



- Ensure integration of elements of sustainable development in making each strategic decision.
- If you see any best practice in connection with sustainable development, call the attention of 4iG Group's competent area to it.

Conduct to be avoided



- Do not treat sustainability as just a reputational issue.



FAIR TRADE AND COMPETITION

4iG Group is committed to fair marketing conduct. Its efforts in the market are conducted in accordance with standards of fair competition as well as in the letter and spirit of the law. Observing competition law rules and market regulations is not just a legal obligation, but it is core to the business culture as well. 4iG Group's employees are prohibited to acquire or use another business party's business secrets in an unfair manner, inform anybody of about them or disclose them. Acquiring any business secret assisted by any person being in a relationship of trust or in a business relation with it, without the proprietor's consent is also considered as acquiring in an unfair manner.

Competition provides the best incentive for efficiency, and the motive power for innovation at the same time. 4iG Group carries out its business activities in a competitive environment, in accordance with the norms of fair competition and in conformity with applicable competition laws.

4iG Group respects its competitors, it does not engage in any kind of unfair conduct which could wrongfully damage competitors' good will or reputation and it collects information on its competitors strictly as permitted by law.



Anti-competitive practices are unacceptable and are not tolerated. Competition laws prohibit a variety of practices that restrict free and fair competition, such as unlawful agreements among competitors or unfair conduct designed to achieve or maintain a monopoly.

4iG Group pays particular attention not to be involved in any kind of cartel agreements or undertake practices agreed in concert with competitors, directly or indirectly, especially with a view to price fixing, or sharing markets, or allocation of production or sales quotas.

4iG Group does not misuse its market position and is committed to creating equal conditions for all its business partners. 4iG Group considers membership in professional associations as a communication channel with regulators and authorities while respecting the legal obligations of competition law. Professional associations are not a forum for aligning strategies, dividing markets, harmonising pricing or doing anything that breaches anti-trust regulations. 4iG Group exclusively co-operates with its competitors only in the execution of their mutual social and environmental responsibilities.



INTEGRITY IN PROCUREMENT

4 iG Group may not attempt to influence ongoing source selection with other means than bidding and tendering procedure. It may occur that unintentionally it acquires another applicant's proposal or any other information referring either to its proposal or the selection of its supplier before completing the process for selecting the supplier. In this case, 4iG Group must notify the person or body calling for tender of the incident by drawing the group-level Compliance Officer in.

You may in no circumstances be engaged in discussions on employment with any official person or person with public service functions involved in pending procurement (e.g. person involved in decision-making related to the procurement, or in the evaluation of proposal), in which 4iG Group also participates.





Conduct to be adopted

- In case you get a message from any competitor to the contrary of the expectations of fair trade and fair competition, immediately inform your superior and legal area simultaneously with immediate distancing.
- Use only publicly or legally available information and sources to evaluate business, consumer, supplier and technological trends, collect information only in a legal manner.
- Make sure that there is a legitimate and lawful reason for any kind of discussion with competitors.
- Be aware of competition rules, be conscious. Contact with competitors when absolutely necessary.
- Make sure that terms, specifications and conditions set by 4iG Group enable fair competition and provide free opportunities to participate in 4iG Group tenders.
- Ask your questions at Ethics & Compliance Hotline if you have any doubt about the conduct to be adopted.



Conduct to be avoided

- Never spread false, malicious or damaging information or rumours about a competitor or their products and services. Never damage the competitors' reputation in any way.
- Never discuss pricing, future business or marketing plans, consumer related or other sensitive business information with competitors.
- Never agree on sharing markets, allocating territories or customers.
- Never draw up terms, specifications and conditions favouring just one or limited, pre-selected potential partner(s) in tendering procedure.
- Avoid bid-rigging, collusive tendering, never discuss whether/when/how to bid, never agree on bid rotation or compensation for the "losing" bidder.
- Do not fix distribution margins, do not sanction distributors' pricing (e.g. deviation from the recommended price).

SANCTIONS POLICY, COMPLIANCE WITH EXPORT AND IMPORT REGULATIONS

4 iG Group considers financial and economic restrictive measures emerging in international (e.g. European Union, the United Nations, the United States) and local regulatory environment.

Sanctions and import-export embargos mean trade restrictions against specified countries, territories, persons, groups or legal entities with the aim of maintaining or restoring international peace and security, ensuring human rights, democracy and the rule of law. Such sanctions are legal prohibitions or restrictions referring to the sale, purchase, transfer or disclosure of goods, funds, services, technological solutions (e.g. software) or information. It is extremely important to ask for professional advice if any planned transaction or conduct raises any question in this respect, or doubtful.

Based on related import and export control regulations, certain particular restrictions or mandatory reporting requirements may apply to some products of 4iG Group's partners. Licences and permits must be acquired which may be required by the use, transport, import, export or re-export of such partners' products, software, technology or service. It is strictly forbidden for 4iG Group to support any illegal foreign economic boycott arising from concluding contracts, providing information or taking measures.

4iG

4iG Group exercises due care in conducting a contract with third parties and is committed to exercising due diligence for all its suppliers in order to identify signs of compliance risks. 4iG Group operates an appropriate risk management system.

Breaking the rules of trade regulations and restrictions may result in severe consequences, including seizure of goods or funds involved, significant criminal and civil fines, loss of export privileges, void contract agreements and even imprisonment.



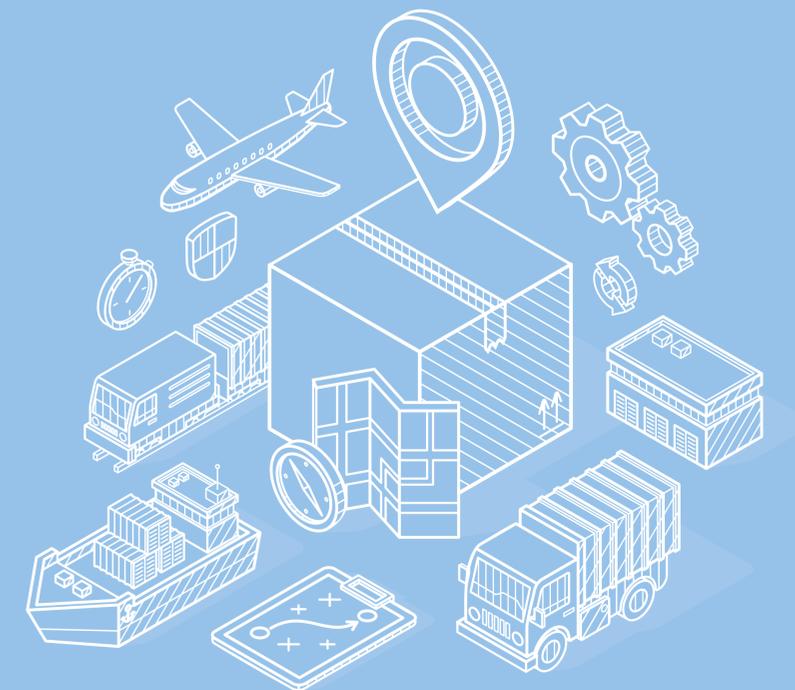
Conduct to be adopted

- Get acquainted with international trade regulations connected to your special field.
- Consult with your superior, the Chief Legal Officer of 4iG Plc or contact the Ethics & Compliance Hotline immediately if a country, natural or legal person, group you deal with or has any impact on your intended business may in any way be sanctioned.
- Contact the Chief Legal Officer of 4iG Plc or the Ethics & Compliance Hotline if you have any suspicion about the legality of a deal.
- Make sure that all necessary labeling, documentation, licences and approvals are properly obtained.
- Assess whether your business partners are affected by international trade restrictions ('Know Your Partner').



Conduct to be avoided

- Do not get involved in any aspect of business with a sanctioned country, person, group or organisation, without undertaking due diligence.
- Do not import or export prohibited goods
- Never bring restricted goods into a country without declaration.



CORRUPTION AND BRIBERY

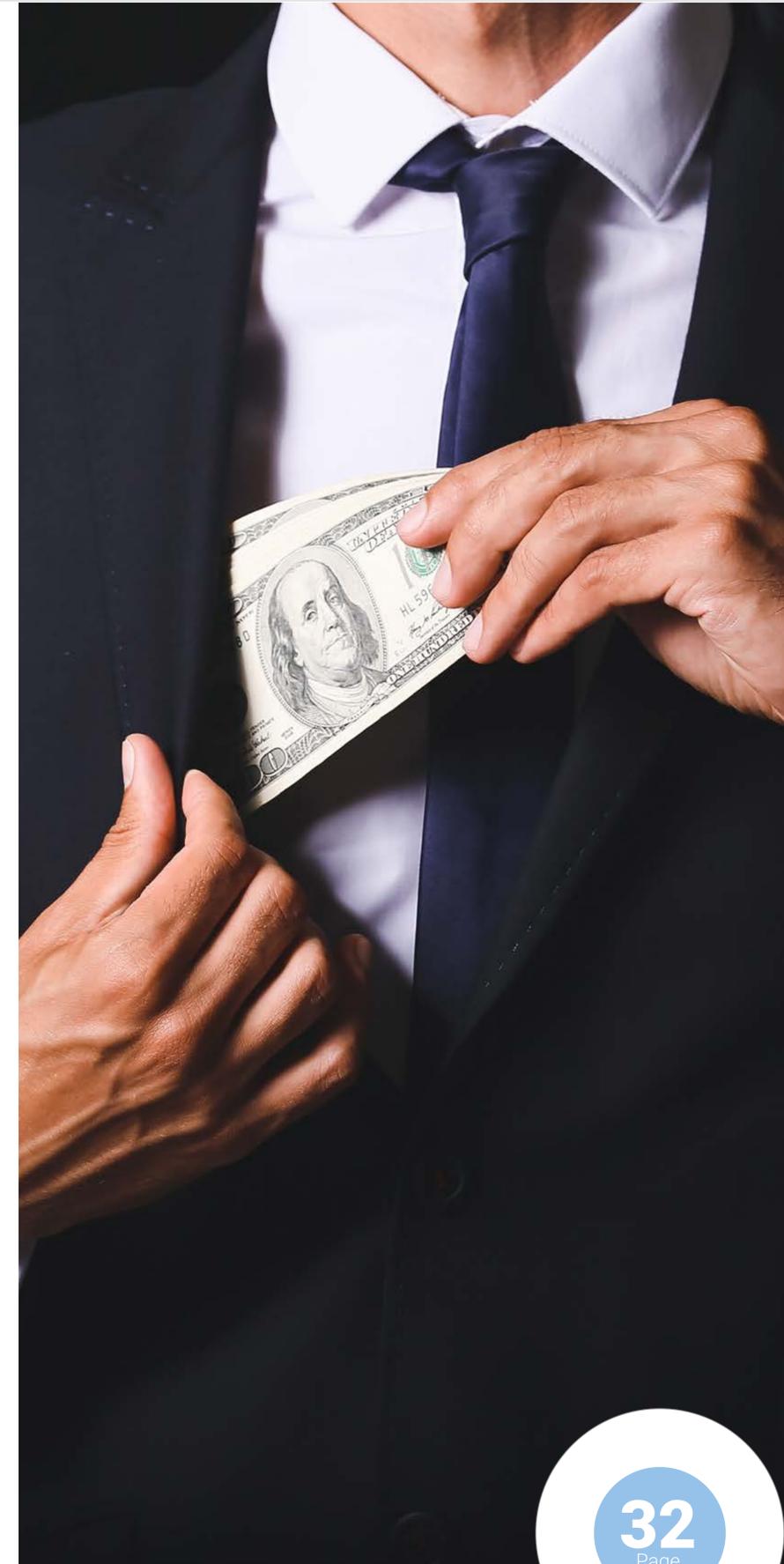
4 iG Group does not engage in and tolerate corruption in any form (including bribery, grease payment to an official, kickback, extortion, misuse of authority for personal gain, trade in influence, undue benefits or gifts with the intent to influence), either in the private or public, or municipal sector on any scale.

4iG Group strictly prohibits its employees and any person acting on behalf or in the representation of 4iG Group from offering, providing, requesting, accepting or receiving any undue advantage. Employees or any person acting on behalf or in the representation of 4iG Group may never offer or hand over money or any other advantage (and they may not authorise that) if its purpose is to exert undue influence on any official or to confer an unlawful business advantage (or even giving the appearance of them).

4iG Group maintains this view, even if its commitment to this policy places 4iG Group in a non-competitive business position, or if speaking up against such activity results in 4iG Group losing business. Within its social patronage, charity and sponsorship fields, 4iG Group is committed to a zero-tolerance policy when it comes to corruption and bribery. It is the collective responsibility of 4iG Group's employees to create and maintain a company culture that encourages people to act when bribery, corruption or fraud is suspected or observed, without fear and in an environment that does not tolerate retaliation. 4iG Group operates anti-corruption and anti-fraud processes aiming at reducing the risk of fraud and identifying prohibited conduct.

4iG Group exercises due diligence when selecting its partners. Prior to as well as during the cooperation, 4iG Group takes steps for the verification of (potential) partners' reputation, actual ownership, professional knowledge and experience, financial situation and credibility as well as compliance with national and applicable foreign legislation.

Detailed rules on corruption and bribery are included in 4iG Group's internal policy on anti-corruption and anti-bribery.





Conduct to be adopted

- Be aware of anti-corruption rules and avoid deals and circumstances creating even the impression of possible misconduct.
- Observe anti-corruption policies and all related procedures.
- Ensure all 4iG Group's business partners, including consultants, suppliers, subcontractors or other participants, understand that corruption is unacceptable.
- Ensure that all sourcing procedures, including but not limited to tendering processes are transparent and enable fair, unbiased competition.
- Immediately contact the Ethics & Compliance Hotline if you suspect or know of any corrupt practices in either 4iG Group or at any party within the value chain.



Conduct to be avoided

- Never offer, make, authorise, promise, pay, seek or accept directly or indirectly any unauthorised or improper payment (either in cash, mala fide expenditures or otherwise), gift or undue favour for preferential treatment, influencing a business outcome as well as gaining any business advantage or not fulfilling obligations.
- Do not attempt to induce (foreign or domestic) officials, persons with public functions or any private individual to do something illegal.
- Do not make or authorise any improper and undue payment to such persons.
- Do not refer to or create an impression to be able to influence anybody unlawfully.
- Never permit agents, consultants, representatives or other external parties acting on behalf of 4iG Group to take questionable actions or bribe anyone.



GIFTS AND BUSINESS INVITATIONS

4iG Group regards any item and service of value offered to or accepted by an individual or his/her family member as gift. A 'gift' may be a contribution in kind, e.g. an article for personal use, providing favourable terms or discounts on a product, service, loan, use of vehicles, covering travel expenses, use of recreational facilities, providing entry tickets or gift cards to the beneficiary. 'Entertainment' and 'hospitality', including business meals, recreational, cultural and sports events are also considered as gifts.

Business gifts or amenities are widely used either for expressing goodwill or strengthening bona fide working relationships between partners. Any gift, entertainment and hospitality in general may only be accepted or offered if it is not lavish or extravagant, unsolicited and occasional considering the given situation as well as employees. However, gifts may never be cash or cash equivalent. The gift-giving may never be meant to unduly influence a decision-making and never create the appearance of impropriety, as it would be opposed to anti-corruption rules represented by 4iG Group.

Any gift or hospitality provided to unduly influence is regarded as bribery irrespective of the value it represents and whether it is registered or not. If a gift cannot be rejected for reasons of courtesy or for practical reasons (e.g. it is already delivered and could not reasonably be sent back), the superior to the given employee receiving the gift should decide on whether to give permission to keep the gift or to offer it to charity or as a community benefit.

Detailed provisions applicable to 4iG Group in respect of gift-giving are included in the internal rules concerning gift-giving and business invitations adopted by 4iG Group.



Conduct to be adopted

- Get acquainted with and comply with regulations, internal policies concerning giving gifts and business invitations, and avoid transactions and circumstances possibly creating even the impression of any misconduct.
- Report to your superior if you or anybody, regarding you or your activity, receives any gift or hospitality falling under the scope of the present Code. The superior will then decide whether it can be kept, offered for charitable purposes or returned to the donor.
- Exercise increased caution when providing any gift or hospitality to officials and persons with public functions irrespective of its value.
- If you have doubts or questions concerning gifts, contact the Ethics & Compliance Hotline.



Conduct to be avoided

- Never allow a gift or hospitality to influence your business decisions or cause others to believe you have been or could be influenced.
- Do not request or encourage an actual or potential business partner to give any item or favour to you irrespective of its value, no matter how small it is, especially if you are in a position you may have the right to make decision on existing relation with the given partner, certificate of completion, authorising payments, related sales price and discount, or you may have an effect on such issues.
- Never offer, give, seek or accept any gift or entertainment that could be interpreted as unfair influence, kickback, bribe, payback or violation of any law or regulation (e.g. the invited otherwise could not afford or return on his/her own); cash or cash equivalent; any gift or entertainment which is solicited or offered in return for a favour; or any personal service.

FRAUD

Fraud includes all kinds of intentional and wrongful deception, including but not limited to the intentional and false representation or concealment of a material fact for the purpose of inducing another to act, to gain an advantage which causes damage. Fraud may also occur without personal deception, when persons or parties collude to circumvent due processes in order to create a false appearance of real business activity or a transaction, for personal gain.

4iG Group is committed to fighting fraud and does not tolerate fraudulent practices. In order to safeguard 4iG Group values, assets and good reputation, everyone is personally responsible for acting in good faith, pursuant to the relevant rules and regulations, being on the lookout for any indication of fraud. Even turning a blind eye to the suspicion of fraud may result in liability for any 4iG Group's subsidiary and for you personally.

Conduct to be adopted



- Always act in compliance with legislation, rules, measures and processes aimed at preventing fraud.
- Be alert to any suspicious sign, event or transaction that might result in the defrauding of 4iG Group.
- Always document events and transactions as they really happened.
- Ensure that all business procedures, including but not limited to sourcing processes, performance verifications and invoice acceptance are transparent and enable fair, unbiased competition.
- If you suspect or are aware of any fraudulent activity, report it immediately to the Compliance Officer or contact the Ethics & Compliance Hotline.

Conduct to be avoided



- Never falsify or counterfeit any data, certificate or verification document and never accept any document that is suspicious.
- Do not engage in any dealing that you might think could be or could evolve into fraud.
- Never circumvent regulations, processes and controls to help yourself do your job more quickly or easily.

MONEY LAUNDERING

Though none of 4iG Group's subsidiaries falls within the scope of the Act on prevention and combating of money laundering and terrorist financing, 4iG Group is committed to complying with regulations prohibiting money laundering to the greatest possible extent. Money laundering is the process of concealing illicit funds or making them appear to be legitimate, so that the criminal origin or nature of the funds or assets is hidden by using them in legitimate business activities. It also comprises the use of legitimate funds for supporting crime or terrorism. Infringements in most countries also include the obstruction of an investigation or the failure to report the suspicion of money laundering. Money laundering is never condoned, facilitated or supported, that is:

- 4iG Group never engages in businesses aimed at financing or supporting crime or terrorism;
- 4iG Group seeks solutions to minimise risks through anti-money laundering processes;
- 4iG Group takes reasonable and appropriate measures to identify and assess the integrity of our business partners.





Conduct to be adopted

- Report any concerns and suspicious transactions or incident of possible money laundering to your superior or contact the Ethics & Compliance Hotline.
- Conduct appropriate due diligence about funds, goods and assets that 4iG Group receives.
- Be cautious with any attempt to make or request payments in ways deviating from normal or regular business practice.



Conduct to be avoided

- Never do business with suspected criminals or suspected proceeds of crime, unless your suspicions are appropriately reviewed and resolved.
- Never discuss suspicions of money laundering with a business partner.
- Never tip off the subject of an investigation you know of. Do not falsify, conceal, destroy or dispose of evidence.
- Never acquire, use or hold money or property that may be acquired with the proceeds of crime.
- Never hide the origin or nature of criminal property.
- Never become involved in an arrangement that may involve criminal property or the proceeds of crime.

INSIDER TRADING AND MARKET MANIPULATION

Insider trading is the unlawful use of inside information for material gain. Using inside information directly or indirectly in connection with share purchase, share sale or other share deal, whether for private or for third party's benefit, sharing it with any unauthorised third party or disclosing it is strictly prohibited.

All 4iG Group's employees are obliged to keep confidential and safeguard information regarded as inside in respect of 4iG Group's subsidiaries as well as comply with legal requirements referring to insider trading, market manipulation and unauthorised disclosure of inside information.

Former obligations apply not only to 4iG Group's employees, but persons as well considered as 'insider' regarding any 4iG Group's subsidiary according to the provisions of Hungarian and European Union legislation in force applicable at any time.

4iG Group generally prohibits insider trading, market manipulation and unauthorised disclosure of inside information.

'Inside information' means any information that is not public and is relevant, directly or indirectly related to 4iG Group or any other publicly traded company, their securities which, if made public, would most likely have a significant impact on financial instruments' prices.



'Financial instruments' include, but are not limited to transferable securities, money-market instruments, options, futures, swaps and forward rate agreements.

'Market manipulation' means the dissemination or forward of false information relating to any security or the issuer thereof, to influence the exchange rate, market perception of any security for financial gain.

'Unauthorised disclosure' means delivery of inside information to an unauthorised person.



Conduct to be adopted

- Be careful to protect insider information even from accidental disclosure.
- Report it if you believe someone is involved in insider trading or market manipulation.



Conduct to be avoided

- Do not buy or sell financial instruments while possessing relating insider information relating to those financials, and never instruct a third party to do so.
- Never disclose inside information to anyone unauthorised inside or outside 4iG Group, including family members, without prior approval.
- Never spread market rumours or false information to manipulate the price of financial instruments.
- Never leak inside information or give tips to someone based on inside information.
- Never use inside information to trade securities or recommend that someone else to do so.

FACTUAL RECORDS AND INTEGRITY OF BUSINESS PROCESSES

Records and reports are valuable company assets and must be made truly and comprehensively. 4iG Group prepares and manages the member companies' records and reports honestly, accurately and objectively. Records and reports include financial data (accounting) and non-financial information, such as project specifications and results, technological details, performance evaluations, HR records, information related to 4iG Group's sustainable performance and its impact on the society and human rights and all other information confirming business activity, which is required by law or is otherwise important for decision-making and to 4iG Group's corporate memory.

Falsifying records or misrepresenting facts may never be either justified or excused. 4iG Group does not tolerate any false reporting or concealment of facts in reports or even interpreting the same facts differently in different situations according to momentary goals.

Integrity of financial or non-financial records and reports is imperative for making good decisions, in favour of protecting 4iG Group's credibility and good reputation, meeting its legal and regulatory obligations, meeting its responsibilities to shareholders and all external stakeholders.

The failure to manage records and reports correctly, comprehensively and effectively poses significant business risks and may lead to legal consequences and reputational, financial and competitive disadvantages.



Conduct to be adopted

- Understand which information must be recorded and properly managed, and which could be discarded.
- Make every report, evaluation and proposal honestly and comprehensively.
- Ensure that all decisions are well-founded.
- Ensure that all transactions are properly authorised and recorded accurately and completely.
- Ensure all relevant stakeholders have appropriate authorisations and settings in the company's systems.
- Manage, verify and approve expenditures accurately and in accordance with regulations.



Conduct to be avoided

- Never mislead 4iG Group's decision-makers, persons by misinterpreting, concealing or falsifying any information.
- Never make a deliberately false or misleading entry in a system, report, document, record or expense report.
- Never falsify any document, report or record.
- Do not try to influence others to do anything that would jeopardise the completeness and integrity of records or reports.
- Never conceal, alter, destroy or otherwise manipulate company information or property relating to actual, pending, future or possible audit, litigation or government or regulatory investigations.
- Do not sell, transfer or dispose of assets without proper documentation and authorisation.
- Never enter into contractual obligations on behalf of 4iG Group unless you are authorised to do so.
- Do not remove or destroy records before the expiry of specified retention period without prior approval.

CHAPTER 04#

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PRINCIPLES OF ETHICAL WORK

4 iG Group is responsible for protecting shareholders' investments as well as ensuring return in the long term which is competitive even in comparison with other leading companies of the industrial sector. For this purpose, 4iG Group avoids conflict of interest. It protects 4iG Group's interests, assets, business secrets, intellectual property and ensures adequate protection of personal data as well as data security.

AVOIDING CONFLICT OF INTEREST

Employees are obliged to avoid every situation giving rise to or giving even the appearance of such rise to conflict of interest between the employee and 4iG Group. All employees are expected to seek advice in order to avoid any conflict of interest, and inform the competent senior manager of all potential conflicts of interest and request his/her approval. You may seek guidance from the Compliance Officers in order to judge conflict of interest.

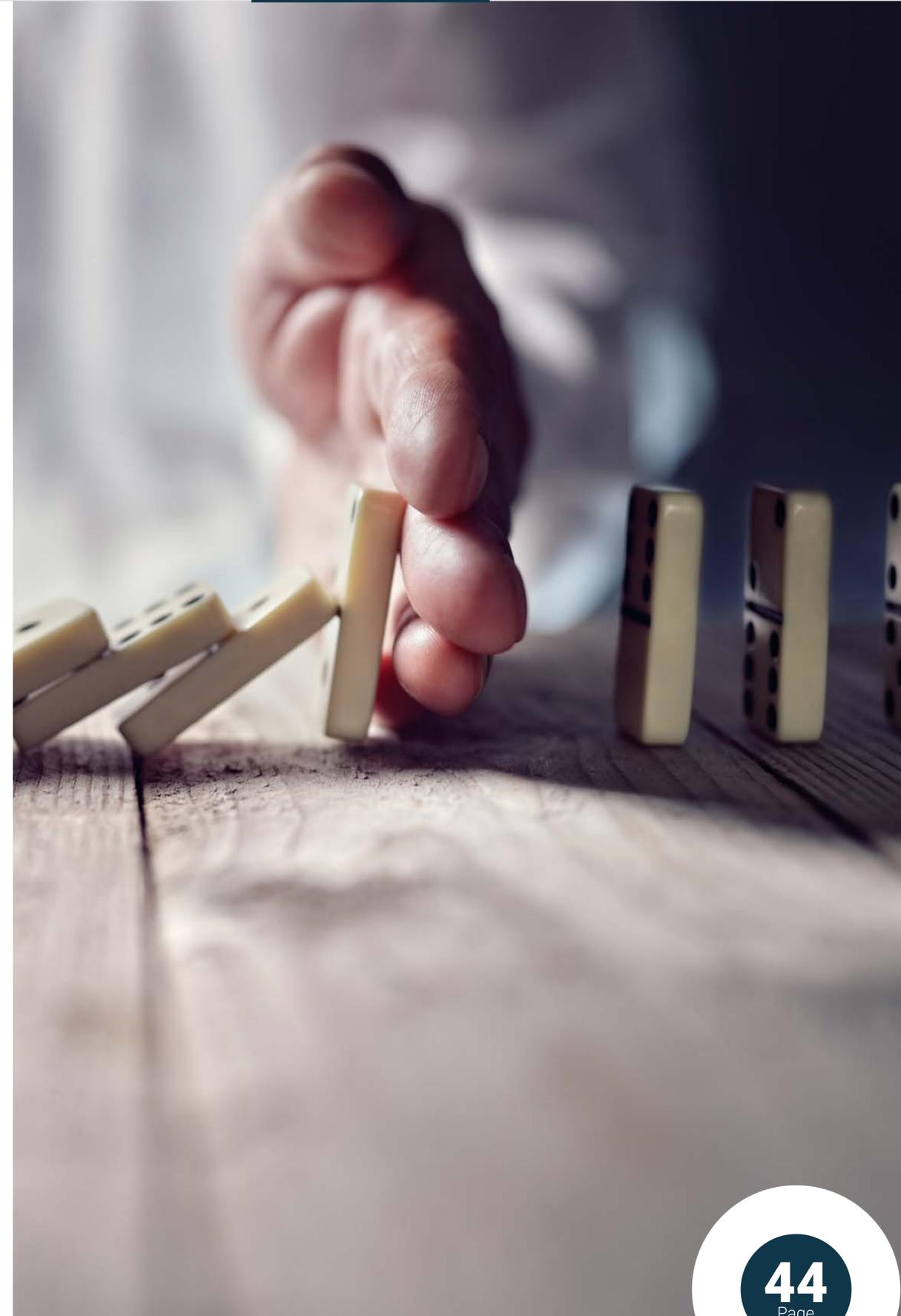
During employment, the employee may not engage in any business or other activity that creates a conflict of interest and thereby jeopardise 4iG Group's legitimate business interests.

4iG Group respects the privacy of employees and does not normally keep count of what people do outside working hours. However, there is a trust relationship between 4iG Group and its employees and other partners, whereby conflict of interest may occur if an employee's private activities could potentially interfere with the expected loyalty to 4iG Group's interests.

No personal relationship, participation in external activities or interest in another business may actually or seemingly influence decisions. Employees must avoid conflict of interest situations and refrain from any action that could interfere in any way with their ability to take impartial and objective decisions on behalf of 4iG Group or jeopardise 4iG Group's interests.

Some typical influencing factors include, but are not limited to:

- Having a second job or mandate;
- Participation in business partnership or private enterprise;
- Jobs and affiliations of close relatives, and having a close relative or someone with whom you have private relationship as co-worker reporting to you or supervising you;
- Investments;
- Personal relationship actually or seemingly suitable for influencing professional decisions.





Conduct to be adopted

- Disclose any outside jobs, services performed and affiliations with competitors, customers, suppliers or contractors to your superior, and obtain written approval.
- Inform your superior if you may not be employed in a given function due to non-compete or confidentiality obligations.
- Obtain written approval before accepting any external board position.
- Notify your superior if you are about to invest in a competitor, customer, supplier or contractor, and obtain written approval except in case of obtaining shares in a publicly traded company.
- Notify your superior if you have any relationship that may result in actual or apparent conflict of interest.
- Contact the Ethics & Compliance Hotline if you are in any doubt or have questions.



Conduct to be avoided

- Do not supervise and influence the terms and conditions of employment or other contractual relationship of a relative or of a close private relation.
- Never work or provide services for any venture that you must deal with as part of your job for 4iG Group.
- Never invest in a supplier, contractor, customer or a client company if you have any involvement in the selection or evaluation of, or negotiations and dealings with those companies. This also applies if you supervise anyone with such responsibility.

PROTECTION OF COMPANY ASSETS

4iG Group has extensive tangible and intangible assets, financial and non-financial resources of significant value. It is the employees' duty to safeguard these assets and use them properly and reasonably in the course of achieving business objectives. 4iG Group considers the improper or negligent management of company property and resources of any kind as the abuse of shareholders' interests.

4iG Group's employees, suppliers, contractors and business partners must accept responsibility for ensuring the integrity as well as the expedient, economical and efficient use of 4iG Group's property. All employees and every authorised individual may exclusively use funds, assets and resources of 4iG Group's member companies for legitimate and authorised business purposes.

Portable or home business equipment (e.g. laptops and mobile phones, company car, fuel card, business credit card) provided for employees, remain the property of 4iG Group's member companies and must be used with due care.

Conduct to be adopted

- Report any theft, misuse or waste of assets or funds of 4iG Group's member company immediately when you become aware of it.
- During planning and executing activities, always strive for the economical, lean solution sparing member company resources in the long term.

Conduct to be avoided

- Never use corporate assets and facilities for private purposes, except if explicitly authorised to do so by the superior exercising employer's rights, in compliance with applicable rules.
- Do not perform personal activities in working hours.

The logo for 4iG, featuring the number '4' and the letters 'iG' in a white, bold, sans-serif font. The 'i' has a dot. The logo is positioned in the top left corner of the page, which has a background of blue and red curved lines.

4iG

PROTECTION OF BUSINESS SECRETS AND INFORMATION

4iG Group only collects information in a fair and strictly legal manner.

Employees shall manage and keep confidential every information, facts, data, opinion and information concerning 4iG Group's and its partners' issues obtained during their work referring to 4iG Group, its member companies as well as business partners, they may not use them for their own or any third party's interest, and may not disclose it to any third party. The employee is bound by the obligation of confidentiality even after the termination of employment.

The employee may not disclose or make available, directly or indirectly, any information related to trade relationships, transactions, operation, financial situation, investments, negotiations, economic effectiveness and plans, line of business, business partners, customerbase, suppliers, related documentation, storage media as well as solutions, facts, data, knowledge, ideas, concepts generated and collected during its work, of 4iG Group, as well as other economic operators belonging to 4iG Group's business circle, or any other information constituting a business secret to other persons than specified in writing by the person entitled to do so.

In addition, the employee may not even disclose data becoming aware of in his/her function to any unauthorised person, and of which disclosure would have adverse impact on 4iG Group's member company or other person, or classified as confidential by 4iG Group or its confidentiality had to be identified by the employee following from his/her function.

As information, data and knowledge are critical assets, all employees are responsible for protecting confidentiality, integrity and accessibility of data created, accessed, modified, transmitted, distributed, stored or used within 4iG Group or in business relationships with 4iG Group, regardless of the actual place and form they take (electronic, paper-based, other physical format, etc.)

Employees may not disclose facts, data or information related to 4iG Group to third parties without prior written approval, moreover it is prohibited to do anything that enables third parties to access to such facts, data and information.

Conduct to be adopted



- Exercise due care in both internal and external communications.
- Follow confidentiality and other relevant policies and use warning labels to classify and protect your confidential information. Limit access to business information on a need-to-know basis.
- Make all employees, external parties including potential business partners sign confidentiality agreements if they are to receive or have access to any business information, or make sure that they are legally bound to proper obligation of confidentiality by operation of law.

Conduct to be avoided



- Do not make any statement if you are not the person authorised to share the given information.
- Do not request or acquire secret information from any source especially in relation to business partners, competitors and do not attempt to access to restricted information.
- Do not disclose or make accessible customers', suppliers' or business partners' confidential business information to any third party.
- Do not disclose or use any confidential information that is owned by other third parties.

DATA PROTECTION AND DATA SECURITY

4iG Group respects people's right to privacy and the confidential processing of their personal data. According to the applicable law, 4iG Group's members are responsible for the protection of personal data as well as the compliance with relevant legislation, 4iG Group's regulations and processes during processing of such data.

Due to its activity, 4iG Group is committed to fostering a culture of cyber security as well as displaying it in its value chain. 4iG Group is committed to ensuring the confidential processing, as well as the integrity and availability of its member companies', customers' and partners' data stored electronically during the full lifecycle of data through the storage, processing by data processor and transfer of such data.

4iG Group takes preventive security measures for the protection of personal data stored in databases to avoid the risk of destruction, data loss and unauthorised access.

According to this:

- All users involved in the management, use or operation of 4iG Group's IT infrastructure are obliged to undertake information security awareness training regularly;
- Access rights to use the information infrastructure are only allowed for authenticated and authorised users on a "need-to-know" basis.

Devices provided for work and use to employees (especially IT devices) together with the installed programs as well as all data stored on 4iG Group's electronic systems and every information, data in connection with 4iG Group and work stored on IT devices, storage media used by employees are all considered as company property.

IT and telecommunications devices provided for work (computer, printer, scanner, telephone, photocopier, etc.) may exclusively be used for work-related purposes, unauthorised employee may not install and run software other than those provided by 4iG Group.

Internet usage in working hours for non-work-related purposes – except internet usage on company mobile phone – is not allowed. In order to ensure security, within the bounds of privacy and data protection laws, 4iG Group reserves the right to access and monitor devices and data stored therein for the purpose of maintenance or to meet business and legal requirements.



Conduct to be adopted

- Process personal data transparently and use them only for fair and lawful purposes (legality, fair procedure and transparency).
- Collect and process personal data exclusively which are necessary and adequate for performing your work and tasks (purpose limitation).
- Limit the access to personal data to the persons entitled to do this (data minimisation).
- Process personal data as long as it is required for achieving the objectives of data processing (storage limitation).
- Collect and process such data exclusively by applying given procedures, store them with protection against unauthorised access. All damage, misuse or other issue, in either information infrastructure, an element of the information infrastructure or electronically stored information belonging to 4iG Group's member companies must be reported without delay. (integrity and confidentiality).
- Always process accurate and – as required – up-to-date personal data, identify, manage and correct errors and deficiencies of data stored electronically in the possible earliest phase of the process (accuracy).



Conduct to be avoided

- Do not leave personal data unprotected, unattended (e.g. laptop in a parking car).
- Never seek access to personal data that you are not authorised to have.
- Never provide personal data to anyone inside or outside 4iG Group without ensuring that it is appropriate to do so.
- Do not misuse personal information.
- Do not keep personal data longer than it is necessary to accomplish the legitimate purpose of data processing (time limits for deletion related to certain data processing activities are laid down in internal regulations concerning data and records management).
- Never use company electronic communication systems for unauthorised purposes or for transmitting data without authorisation.
- Do not use unauthorised equipment (e.g. nonsecure private devices) for storing corporate information.

PROTECTION OF INTELLECTUAL PROPERTY

4iG Group's intellectual property is one of its most valuable tools as it is indispensable for maintaining its competitive advantage. Intellectual property includes e.g. inventions, know-how, patents, trademarks, industrial design rights, copyrights, domain names, scientific and technical knowledge as well as other intellectual property rights.

No employee may disclose or make accessible, directly or indirectly, information concerning the adopted solutions, applications, systems, software, software elements, intellectual properties, copyrights, or related documentation, data media, etc. related to or used by 4iG Group, or other information constituting a business secret to any person other than those specified by the entitled person in writing.

Any intellectual property either developed or acquired by using 4iG Group's resources becomes the property of 4iG Group's member company and may not be considered as either private ownership or personal property.

Protecting intellectual property allows 4iG Group:

- to stop others using it without authorisation;
- to charge others for the right to use.

In this spirit, 4iG Group respects the work of others and pays attention not to infringe the intellectual property rights of others and expects the same in return from everyone else.



Conduct to be adopted

- Clearly state who owns the intellectual property in contracts with business partners.
- Ask a lawyer to draft non-disclosure agreements if your project is complex and involves many different parties with intellectual property.
- Make sure that employment agreements, licenses, sales contracts and technology transfer agreements all include conditions for protecting intellectual property adequately.
- Where appropriate include that the respective material is copyright protected and - unless otherwise provided for in agreements and statutory provisions - a notice stating the name of the author and the year when the material was published.
- Make sure that development or marketing of any new or modified products or services is not infringing the intellectual property rights of others.



Conduct to be avoided

- Do not imitate a specific product or service.
- Do not download and install any unlicensed software.
- Do not use copyright protected materials or trademarks, logos of third parties in materials being produced without the express authorisation of the intellectual property right holders.

CHAPTER 05#

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BUSINESS RELATIONS AND RESPONSIBLE COMMUNICATIONS

4 iG Group is committed to extending the spirit and practice of responsible and sustainable business to the entire value chain. 4iG Group strives to have business relations based on trust and responsible communications with all stakeholders.

QUALITY REQUIREMENTS

4iG Group always strives to ensure that its services, distributed products, development and transport of its own products comply with the highest quality standards. 4iG Group performs all its activities in conformity with applicable legal and regulatory provisions as well as its own, strict internal quality requirements. Every member company of 4iG Group as well as their employees are obliged to perform their tasks in accordance with 4iG Group's unwavering commitment to quality and legal compliance at all times and report every arising quality complaints and concerns through appropriate channels.

Requirements

BUSINESS PARTNERSHIPS

An honest and proper approach to customers, suppliers, contractors and other business partners is the basis for successful and long-lasting business relationships. To this end, 4iG Group is attentive to customers', suppliers' and business partners' needs. It permanently monitors, assesses and develops its products, services, technological solutions and business processes to deliver quality, safety and innovative solutions to its customers and clients at every stage along its value chain.

In 4iG Group, relations with customers, suppliers and other business partners are based on mutual trust and respect. 4iG Group is committed to complying with every contractual obligation.

Employees must keep in mind that any communication from them is not only a reflection on 4iG Group as a whole but could also be used in a legal dispute or official investigation. Accurate and appropriate communication without being misleading in any way, is a must.

Conduct to be adopted



- Follow the highest behavioural standards when communicating verbally or in written form.
- Provide true, up-to-date, adequate, accurate and understandable information on 4iG Group's activities, products and services.
- Provide true and correct information in all communications.
- Treat all business-related information as confidential if disclosure is not approved.
- Be careful with communication and avoid using misleading wording.

Conduct to be avoided



- Never provide false or misleading information.
- Do not communicate speculative opinions or personal views about any business matter.
- Do not joke with confidential information and about serious matters.
- Never misinterpret any information intentionally or present misinterpretations for momentary goals.

POLITICAL ACTIVITY

4iG Group does not seek to engage directly in political activities, nor pursue any political agenda while strictly observing all laws regulating companies' involvement in political activities and making political contributions.

4iG Group encourages its employees to get involved in politics by using their voting right, recognises its employees' right to freely decide whether they get involved in politics and does not prohibit employee involvement in politics. However, political activities are not to be undertaken by employees on behalf of 4iG Group, using its devices and in working hours.

Conduct to be adopted



- Keep in mind that your political statements are not those of 4iG Group and should never appear to be 4iG Group statements.
- You do not speak up on behalf of 4iG Group so make it clear that individual political views and actions are personal and have nothing to do with 4iG Group.
- Inform your superior if your political activities could create a conflict of interest.

Conduct to be avoided



- Never use 4iG Group's or any 4iG Group companies' name, brand or brand elements when conducting political activity.
- Never make people believe that 4iG Group has committed itself to any political party or movement.
- Never use working time or any 4iG Group's equipment to support political activity.
- Do not carry out political activities (e.g. campaigning, fundraising, etc.) at the workplace.
- Do not use your position in 4iG Group to influence any other person to support any politicians or political parties or movements.

GOVERNMENT RELATIONS

4iG Group acts in good faith and in an honest manner in its operations, in compliance with all applicable laws and only uses permitted methods. 4iG Group strives to develop good and transparent relations with governmental and EU officials and any other external stakeholders, including representatives and members of national and international associations.

Lobbying activity of 4iG Group always must be in compliance with local legal provisions and rules in all countries in which it operates. As some countries have special limitations on the value and nature of gifts and hospitality their officials and persons holding public office can accept, so special care must be given to this (further details are laid down in internal regulations concerning gift-giving and business invitations adopted by 4iG Group.)

Conduct to be adopted



- Be aware of and comply with laws and legal regulations all the times.
- Co-operate openly but with caution with officials or persons holding public office.
- Notify and ask for advice from your superior and the Chief Legal Officer of 4iG Plc before you provide information in the course of any non-routine administrative procedure.

Conduct to be avoided



- Never breach tax regulations.
- Never mislead any person or authority conducting the procedure either in criminal or in administrative procedures.
- Never attempt to obstruct, in any manner, the collection of information, data, evidence or records by law enforcement or supervisory officials duly authorised to do so.
- Never conceal, alter or destroy documents, data or records that are subject to an investigation or enquiry.
- Never attempt to hinder other employees from providing accurate information

CORPORATE SOCIAL RESPONSIBILITY

4iG Group is committed to being a part of the community and environment in which it operates, as well as supporting and developing it. 4iG Group regularly reports on its corporate giving and sponsorship in an open and transparent manner. Accordingly, it only co-operates with and participate in well-regulated and transparent enterprises operating in line with principles applied in business practices. 4iG Group expects every sponsored and supported entity and organisation to act in accordance with the ethical values and principles of 4iG Group. 4iG Group reserves the right to terminate or withdraw any sponsorship from a beneficiary acting contrary to its values.

Conduct to be adopted



- Make efforts to create partnerships supporting social innovation and social enterprises.
- Always take into consideration that all corporate sponsorship and donation activities must be in line with 4iG Group's policies, principles and standards.

Conduct to be avoided



- Do not support or give donations to entities or organisations that breach zero tolerance policies against corruption, cartel agreements, human rights violations and breach of regulations concerning health, safety environment as well as labour, or breach of 4iG Group's ethical values either seriously or repeatedly.
- Do not support or donate to any entities or organisations that discriminate on any basis, or whose image or activities are associated with discriminatory practices.
- Do not sponsor events or persons that damage the environment disproportionately or have an adverse impact on the society and do not have effective measures for mitigating impacts arising from their activity.



CSR

PUBLIC STATEMENTS, SOCIAL MEDIA AND PRESS RELATIONS



4iG Group performs its disclosure obligations referring to admission to trading of shares issued by itself to the regulated market as well as trading on such a market in compliance with legislation in force, regulations concerning admission to trading and regulations for 'listing, continued trading and disclosure' of the Budapest Stock Exchange Ltd. as well as its internal regulations.

4iG Group aims to provide the general public with regular, complete, comprehensive and trustworthy information about its activities and intentions, through all relevant media. It aims to develop positive and highly professional relationships with the media. 4iG Group's member companies maintain open, transparent, balanced, two-way communication with external stakeholders.

Any communication made publicly on behalf of 4iG Group towards media is a public disclosure requiring care and a good understanding of legal and media issues, and thus may be authorised only with the approvals of the Marketing area and the Chief Legal Officer of 4iG Plc.

4iG Group's social media publications are managed by the Marketing area. Employees' social media activity falls into the private sphere, which is respected by 4iG Group. However, employees are not entitled to act on behalf of 4iG Group or any 4iG Group's member companies on social media and are not allowed to post, share or otherwise disclose company information especially protected business information, they are not permitted to refer to or indicate 4iG Group in any way that is contrary to its values.

4iG Group expects its employees to use elements consistent with the Brand Style Guide in their daily work. All documents representing 4iG Group or its member company and getting to an external partner, must be consistent with the Brand Style Guide.



Conduct to be adopted

- Inform and get advice from the Marketing organisation and ask for advice and approval before providing any information about company matters to any media personnel, even off the record.
- Ensure you have the appropriate approval from the Marketing organisation and the Chief Legal Officer to make any external presentation qualifying as a public disclosure, including those given at professional forums.
- Make sure that every information provided is true, correct, complete and accurate.
- Act responsibly on social media.
- Always comply with 4iG Group's ethical standards and take into consideration that your statements can be recognised as 4iG Group's communication which can reflect on 4iG Group.



Conduct to be avoided

- Do not make public disclosure about company matters if you are not authorised to do so.
- Never provide misleading or untrue information.
- Never publish misleading, aggressive, insulting, discriminatory, harmful or any form of unethical advertisement, opinion or commercial.

Should you have any further questions relating to the Code of Ethics and Conduct for Business Partners please, do not hesitate to contact us at any of the below contact details.

4iG PLC:



H-1037 Budapest, Montevideo St. 8.



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