

CODE OF ETHICS AND CONDUCT FOR BUSINESS PARTNERS

4iG

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CODE OF ETHICS AND CONDUCT FOR BUSINESS PARTNERS

Business operations and success of 4iG Plc as well as companies under the decisive influence of 4iG Plc (hereinafter referred to as 4iG Plc's subsidiaries; 4iG Plc and its subsidiaries hereinafter collectively referred to as 4iG Group) 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. 4iG Group thus expects all its business partners to join this commitment, adopt and follow ethics and compliance principles undertaken by 4iG Group as well as apply those in their own value chains.

4iG Group's business partners include every business organisation and natural person not employed by but in a contractual relationship with any 4iG Group's member company especially, but not exclusively, suppliers, subcontractors, distributors, intermediaries, representatives, customers, clients and joint venture partners.

The present Code of Ethics and Conduct for Business Partners includes expectations that 4iG Group enforces against its partners, arising from the principles laid down in its Code of Business Ethics and Conduct. 4iG Group's business partners are expected to take measures proportionate to the size, complexity and exposure to risks of their organisation for ensuring ethical operation and compliance. Should any information concerning any offence to 4iG Group's Code of Ethics and Conduct for Business Partners become aware of, 4iG Group expects its partners to inform 4iG Group of it, together with the outcome of internal procedure (self-monitoring) conducted on the basis of the suspicion of such offence, without delay by contacting Ethics & Compliance Hotline established for this special purpose.

Gellért Jászai

President and Chief Executive Officer

RESPECT OF HUMAN RIGHTS AND ETHICAL EMPLOYMENT

4 iG Group expects all its partners to respect human rights of every stakeholder, thus all 4iG Group's partners are obliged to refrain from any business practice violating human rights as well as act with due care when making business decisions, with special regard to how they concern the giving effect to human rights.

4iG Group's business partners are expected to engage in a fair employment practice as well as operate according to principles for exercising rights duly in their work relationships. 4iG Group does not tolerate either any form of forced and child labour or unethical employment such as withholding wages, denying sick-leave or daily rest, or abuse of alternative employment forms.

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HEALTH

and environment protection

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4iG group's business partners are expected to prevent personal injuries, environmental damages and hazards as well as mitigate health, security and environmental risks.

So, they are always obliged to carry out their activities by complying with regulations on labour and environmental protection as well as guaranteeing the least health and labour safety risks and the lowest environmental impacts possible.

4iG Group has zero tolerance for drug usage and excessive alcohol consumption, thus business partners' employees and other participants are prohibited from using drugs as well as working under the influence of alcohol, drug and other psychotropic substances at 4iG Group's workplaces.

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EQUAL OPPORTUNITIES, EQUAL TREATMENT AND PROHIBITION ON DISCRIMINATION

4iG Group is committed to ensuring equal opportunities to everyone and expects all its business partners to provide equal treatment to everyone according to applicable legislation, based on principles for equal treatment. 4iG Group expects all its partners to refrain from every conduct, action, condition, failure, direction or practice realising (direct or indirect) discrimination or unlawful separation

HUMAN DIGNITY, MUTUAL RESPECT

4iG Group's business partners are expected to establish a work environment based on mutual trust, where everyone is appreciated, and everyone's human dignity is respected. 4iG Group's business partners are also expected to ensure both oral and written communications in compliance with requirements of mutual respect.

4iG Group considers sexual harassment, defamation and slander as extremely serious violations of human dignity. 4iG Group's business partners and their representatives must refrain from all forms of harassment, in particular, they may not engage in any intimidating, hostile, degrading or humiliating conduct, or any conduct potentially suitable for creating such an environment.



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FAIR TRADE AND COMPETITION

4iG Group is committed to fair market behaviour, so it also expects its business partners to perform activities in accordance with standards of fair competition as well as in the letter and spirit of the applicable law. In particular, 4iG Group expects its business partners not to unfairly acquire, use and unduly disclose to others or make public any information relating to busi-

ness operations, as well as not to conclude any agreement with either 4iG Group's members or others and engage in any concerted action aiming at the restriction, prevention or distortion of competition.

Moreover, 4iG Group expects its partners, who provide services to consumers, to conduct

themselves solely with all relating consumer protection provisions, perform activities in connection with spirits and principles of such consumer protection regulations, respect consumers' rights and interests in every case as well as always refrain from infringing or jeopardising such rights and interests.

The logo for 4iG, consisting of the number '4' followed by the letters 'iG' in a bold, white, sans-serif font.

PROTECTION OF GOOD REPUTATION

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4 iG Group's business partners are expected to protect 4iG Group's good reputation during as well as after the termination of business relationship between the parties. So, business partners may not engage in any conduct either in or out of their business activities, in public, or in a narrow circle which is capable of damaging or jeopardising, either directly or indirectly, 4iG Group's good reputation. Thus, business partners are particularly obliged to limit their right to express opinions so that under no circumstances it does

not lead to the damage of 4iG Group's good reputation.

In addition, 4iG Group expects all its business partners to enforce compliance with requirements specified in this section with all employees of the business partner as well as other third parties (e.g. subcontractors, business partners, suppliers) with whom they are in a contractual relationship.

SANCTIONS POLICY, COMPLIANCE WITH EXPORT AND IMPORT REGULATIONS

Sanctions as well as import and export prohibitions are trade restrictions against given countries, regions, natural persons, groups or organisations aiming at maintaining or restoring international peace and security as well as ensuring human rights, democracy and the rule of law. Such sanctions are legal requirements that prohibit or restrict the sale, purchase, delivery or disclosure of goods, funds, services, technological solutions or information.

4iG Group is committed to respecting international sanctions and expects the same from its business part-

ners. All 4iG Group's business partners are expected to comply with applicable import and export regulations, act with due care when contracting with third parties as well as disclose every information to 4iG Group, on which basis any risk of breaching sanctions arises due to the subject of a transaction, place of performance, forwarding direction of goods or services, nature of product or service, accounting currency of a transaction, parties involved (including applied intermediaries and financial service providers) or any other circumstance in connection with a business relationship with 4iG Group.

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CORRUPTION AND BRIBERY

4iG Group does not tolerate corruption in any form (including bribery, grease payment to officials, kickback, extortion, influence trading, misuse of authority for personal gain, undue benefits or gifts with the intent to influence), either in the private or public, or municipal sector on any scale, and expects the same from its business partners. 4iG Group strictly prohibits all persons acting on behalf of, representing or for it in any way to offer, provide, request, accept or receive any undue advantage. Business partners must not use payments and equipment from 4iG Group to unduly influence others. 4iG Group maintains this view and expects it from its business partners, even if its commitment to this policy places 4iG Group in a

non-competitive business position or results in 4iG Group losing business.

4iG Group acts with transparency and without undue influence when selecting its partners, so business partners are expected to act in accordance with such principles in all existing relationships with 4iG Group, particularly during business gift-giving and invitations, and refrain from any conduct that could even give the appearance of undue influence.



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COMBATING FRAUD AND MONEY LAUNDERING

4iG Group's business partners are expected to act in good faith and in compliance with applicable rules and regulations, support combating fraud and do not tolerate fraudulent business practices.

4iG Group's business partners are expected not to engage in any business aiming at supporting crimes, using any property deriving from such crimes, as well as covering such property and its origin, or financing terrorism as well as to comply with and apply relating anti-money laundering rules. In addition, 4iG Group expects all its business partners to take reasonable, appropriate measures proportionate to the size of organisation, available resources and exposure to risks for identifying its business partners and assessing their integrity.

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INSIDER TRADING AND MARKET MANIPULATION

4iG Group's business partners are obliged to keep confidential and safeguard information regarded as inside in respect of 4iG Group's member companies as well as comply with legal requirements referring to the prohibition on and prevention of insider trading, thus they are not allowed to use inside information unlawfully, disclose and share inside information improperly to/with any unauthorised person. Business partners may never disseminate false market information, rumour that may have an impact on financial instruments, particularly securities issued by 4iG Group's member companies.

'Inside information' means any information that is not publicly available and is rel-

evant, directly or indirectly related to 4iG Group or any other publicly traded company, or their securities which, if made public, would most likely have a significant impact on the exchange rates of financial instruments.

'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 the security for financial gain.



4iG

FACTUAL RECORDS, ACCOUNTS AND INTEGRITY OF BUSINESS PROCESSES

The integrity of financial and non-financial records and reports is essential for making good decisions and maintaining trust between business partners, therefore 4iG Group's business partners are obliged to keep financial (accounting) and non-financial records and complete reports, accounts fairly, accurately and objectively, and engage in lawful, ethical accounting practice, presenting the true view of their management. Falsifying records or misrepresenting facts may never be either justified or acceptable.



AVOIDING CONFLICT OF INTEREST

4iG Group's business partners are expected to avoid every situation that may result in or give the appearance of a conflict of interest in connection with the fulfilment or maintenance of an agreement or a business relationship with any member of 4iG Group or may jeopardise 4iG Group's legitimate economic interests in any other way.

Thus, 4iG Group's business partners are expressly expected not to establish contacts with employees of 4iG Group's member companies or other third parties that jeopardise 4iG Group's legitimate economic interests, result in a conflict of interest or give the appearance of influencing business decisions.

Typically, but not exclusively, the employment of employees of 4iG Group's companies in any other legal relationship (except dual employment based on the agreement concluded with 4iG Group) as well as – except the acquisition of ownership of publicly traded shares – the acquisition of any investment, share or quota by 4iG Group's employee in the business partner's partner company may result in a conflict of interest. 4iG Group's partners are expected to avoid and disclose every situation resulting in or possibly giving the appearance of a conflict of interest in connection with any position held at 4iG Group.



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PROTECTION OF COMPANY ASSETS

4iG Group's business partners must take responsibility for the soundness, expedient, economic and effective use of 4iG Group's assets and resources they have been entrusted with and have access to and are obliged to use 4iG Group's assets and resources exclusively for legal and approved business purposes.

BUSINESS SECRET and protection OF INTELLECTUAL PROPERTY

4iG Group's business partners are obliged to treat as business secret and preserve data and information becoming aware of during their operations and related to 4iG Group, its member companies, third parties, trade relations, transactions, operations, financial situation, investments, negotiations, economic effectiveness and plans, line of business, business partners, customer base, suppliers, related documentation, storage media as well as solutions, facts, data, knowledge, ideas, concepts and other information generated and collected during their work, they are not allowed to use, transfer, disclose, make them accessible outside the scope of persons specified by the person entitled to do so for their own or any third party's interest.

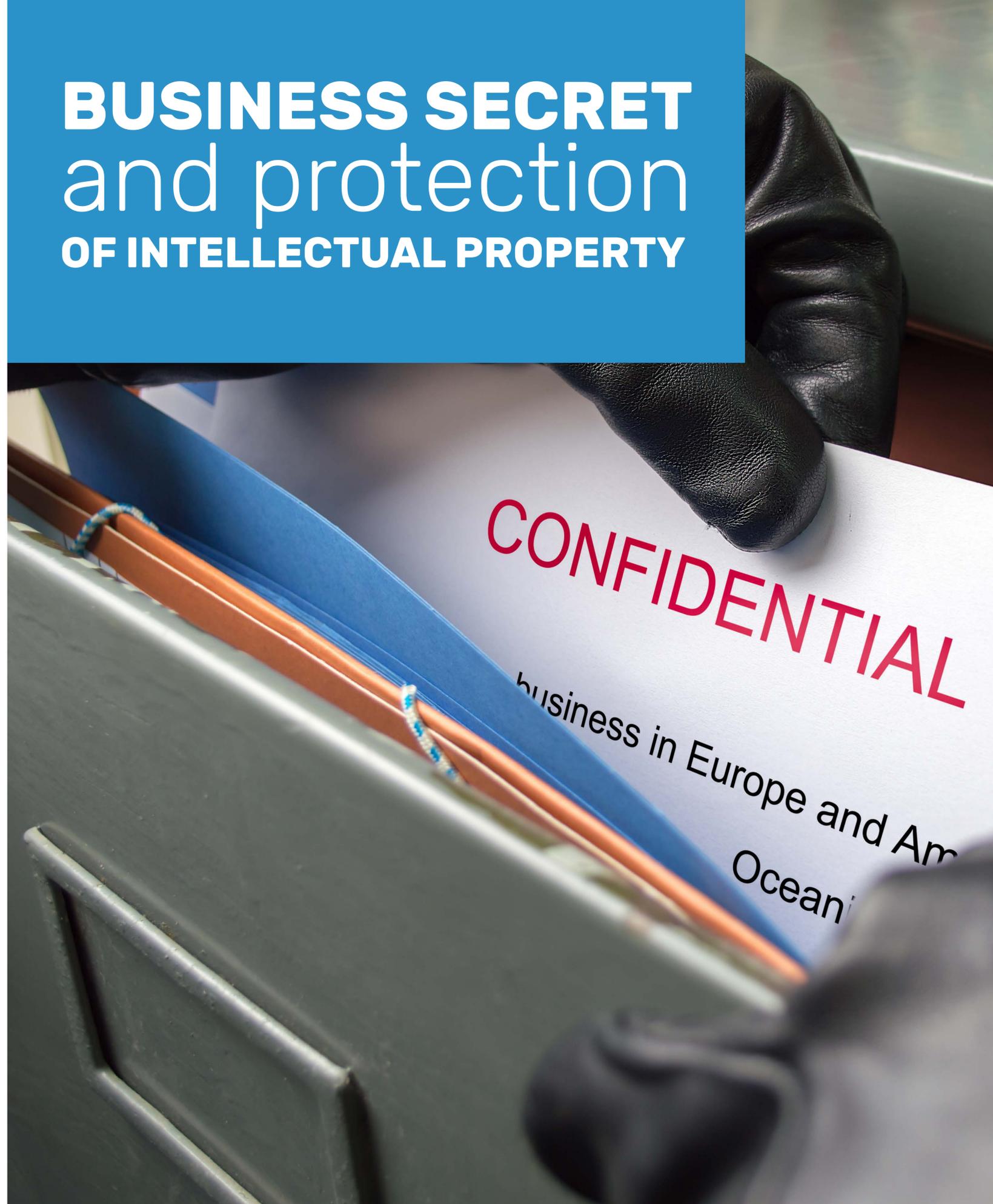
In addition, business partners may not even disclose information that have become aware of in connection with their relation and activity with 4iG Group to any unauthorised person, and of which disclosure would have adverse impact on 4iG Group or third parties or was classified as confidential by 4iG Group or its confidentiality had to be identified by the partner.

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

4iG Group expects its business partners to destroy confidential information, business secrets that have become aware of in connection with performing the contract without delay as agreed by the parties, after the termination of business relationship, contract between any 4iG Group's member and the business partner, or return them to 4iG Group.

4iG Group respects others' work and rights to intellectual property and expects the same from its partners. Valuable and confidential ideas, strategies and other types of business data developed by 4iG Group belong to the company, and in certain cases they are protected by law as intellectual properties. 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. 4iG Group's business partners are obliged to respect all intellectual properties and rights to such properties. Everyone is obliged to comply with agreements concerning any intellectual property created or acquired on behalf of 4iG Group or by using 4iG Group's resources.

BUSINESS SECRET and protection OF INTELLECTUAL PROPERTY



DATA PROTECTION AND DATA SECURITY

4iG Group's business partners must respect others' private sphere and are responsible for complying with legislation referring to the protection of personal data. In particular, they may collect and process required personal data exclusively for legitimate purposes and for the period required to achieve the objectives of data processing. Moreover, they must provide information on data processing to stakeholders according to the applicable law. In addition, 4iG Group expects all its business partners to act according to those laid down in the agreement concluded either with 4iG Group or any of its members concerning processing of personal data. 4iG Group's business partners must take appropriate security measures for enabling the confidentiality and completeness of data as well as accessibility for the entitled persons.

4iG Group, arising from its activities, is committed to fostering a culture of cyber security as well as displaying it in its value chain, so 4iG

Group's business partners are obliged to apply adequate data security measures, including awareness-raising programs concerning cyber security. According to this:

- All users involved in the management, use or operation of IT infrastructure owned or used by 4iG Group are obliged to undertake information security awareness training regularly, where participation must be ensured for all its employees, subcontractors and delegates;
- 4iG Group's business partners are obliged to ensure that only identified users with appropriate entitlements have access to the IT infrastructure on a "need-to-know" basis.

As for IT devices provided by 4iG Group, 4iG Group reserves the right to monitor and control operation and use of such devices with technical solutions for ensuring data security.

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, and expects the same from its business partners. 4iG Group's business partners must provide the highest quality as well as product and service safety available, which is expected upon product and service specifications. They must fulfil their commitments in due time, provide real, reliable and unambiguous information on their products and services for all business partners.

Should any of 4iG Group's business partners or entity acting on behalf of it or in its round of interest infringe those laid down in the present Code of Ethics and Conduct for Business Partners permanently

or significantly in connection with existing business relationship with 4iG Group, 4iG Group reserves the right to take measures for clarifying circumstances and redressing proven offences, conduct proceeding laid down in the procedures of the Ethics Committee, which is Annex ... to the present Code, as well as even terminate the contract and the business relationship based on the outcome of such proceeding according to governing rules of law applicable in the given relationship.

4iG Group has zero tolerance for regulations on corruption, prohibition of cartels, respect for human rights and human dignity, equal treatment, health protection, data protection, data security as well as environmental protection. So 4iG Group does not regard any business relationship as sustainable with those partners who breach such related obligations substantially.

The logo for 4iG, featuring the letters '4iG' in a bold, white, sans-serif font. The '4' is significantly larger than the 'i' and 'G'. The background of the logo area is a dark blue, textured surface that looks like water or a stone surface.

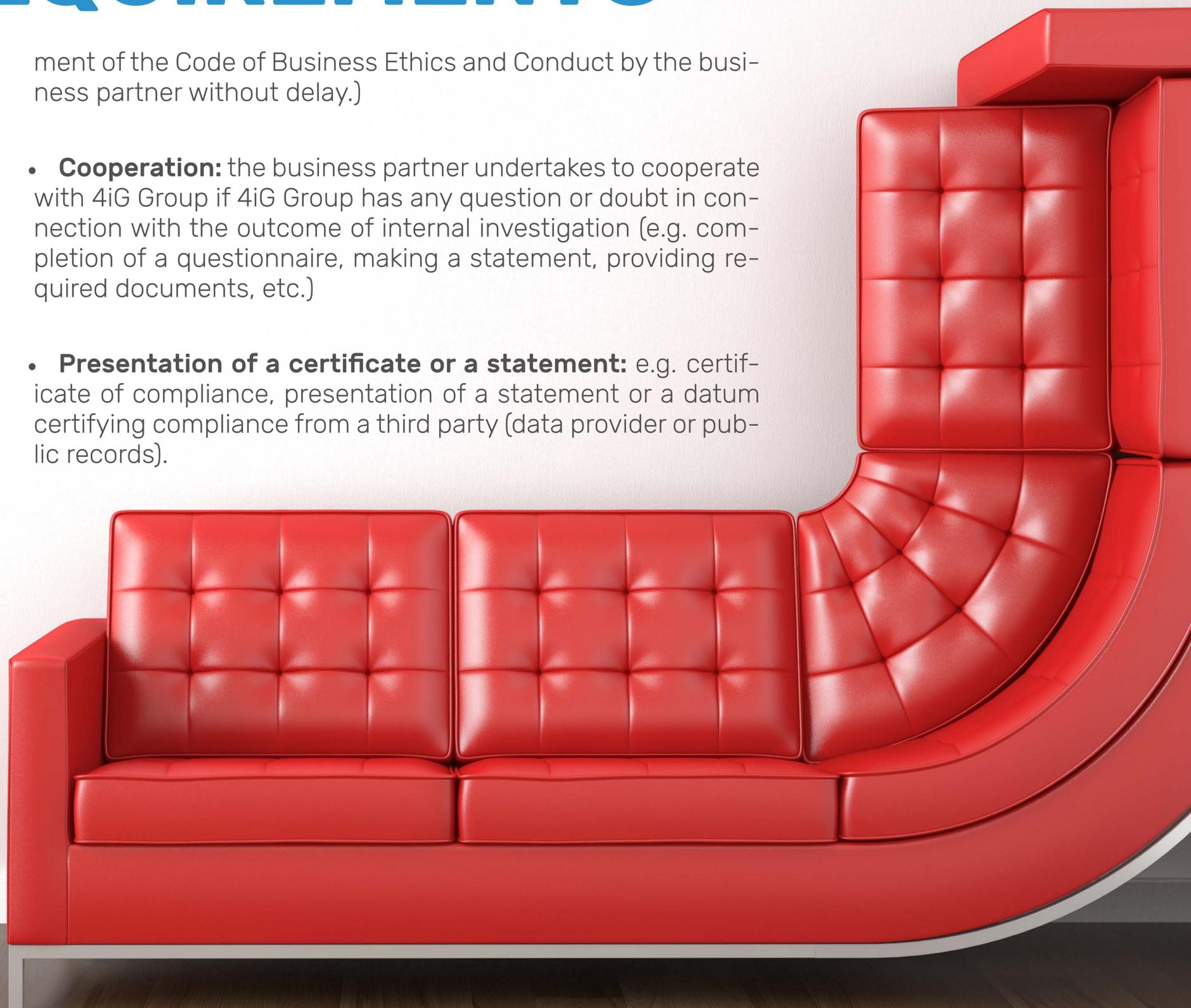
QUALITY REQUIREMENTS

Should any information arise in connection with the infringement of the Code of Business Ethics and Conduct, 4iG Group's business partners are obliged to cooperate with 4iG Group for clarifying circumstances. In this frame, 4iG Group primarily expects cooperation in the following:

- **Notification:** the business partner undertakes to notify 4iG Group of any information it encounters in connection with the infringement of the Code of Business Ethics and Conduct by contacting the Ethics & Compliance Hotline set up by 4iG Group for such purposes, without delay.
- **Conducting self-monitoring:** the business partner undertakes to investigate any suspicion incurred in connection with the infringement of the Code of Business Ethics and Conduct by the business partner, and it notifies 4iG Group of the outcome of such internal investigations by contacting the Ethics & Compliance Hotline without delay. (4iG Group notifies the business partner of any suspicion incurred at any of its members in connection with the infringe-

ment of the Code of Business Ethics and Conduct by the business partner without delay.)

- **Cooperation:** the business partner undertakes to cooperate with 4iG Group if 4iG Group has any question or doubt in connection with the outcome of internal investigation (e.g. completion of a questionnaire, making a statement, providing required documents, etc.)
- **Presentation of a certificate or a statement:** e.g. certificate of compliance, presentation of a statement or a datum certifying compliance from a third party (data provider or public records).



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.

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The Code of Ethics and Conduct for Business Partners shall establish obligations in respect of 4iG Plc.'s business partners, thus its content does not qualify as financial, investment, accounting, legal advice and shall not serve as an exclusive basis for the financial and business decisions of the users. 4iG Plc. therefore excludes its liability in respect of any consequences, losses, damages arising therefrom. 4iG Plc. reserves its right to unilaterally supplement or modify the Code of Ethics and Conduct for Business Partners.

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