

ANTI-CORRUPTION POLICY OF INTELLIPOINT SYSTEMS KFT.

Intelliport Systems Kft. continuously monitors and develops its activities and services, as well as its management systems, and considers it its basic duty to comply with regulations. Our Company also considers it important to operate in a competitive, accountable, transparent and corruption-free manner. The management of Intelliport Systems Kft. and all its staff unanimously shares the position that corruption is such a phenomenon that causes serious social, moral, economic and political problems, hampers development, distorts competition, erodes legal certainty, undermines human rights, increases costs for businesses, causes uncertainty in commercial transactions, leads to property damage, degrades the quality of products and services and destroys trust in institutions, prevents the fair and efficient functioning of markets.

Corruption is considered the direct or indirect offering, promise, giving, acceptance or solicitation of any undue advantage (pecuniary or non-pecuniary) of any value, in violation of applicable law, which affects or rewards someone, who acts or refrains from acting in connection with the performance of his duties, regardless of the place where the offense was committed. Intelliport Systems Kft. rejects all forms of corruption in both the public and private sectors, be it kickbacks to officials, bribery, blackmail, redistribution, facilitation payments, abuse of power for personal gain, illegal benefits and gifts with intent to influence.

This Anti-Corruption Policy is in line with the vision, strategy and goals of Intelliport Systems Kft., and supports the introduction of reasonable and proportionate measures for the prevention, detection and treatment of corruption. The Anti-Corruption Policy also helps our Company avoid or at least reduce the costs, risks and damages caused by corruption, as well as increase the good reputation of Intelliport Systems Kft. and strengthen confidence in its business activities. Compliance with the rules of this Anti-Corruption Policy is the responsibility of all employees of our Company, however, the support of the anti-corruption organizational culture (including the communication and enforcement of the rules) is a priority task of the management. The scope of this Anti-Corruption Policy covers corruption and closely related activities that seriously violate organizational rules and values (e.g. fraud, cartels and other anti-trust or competition violations, as well as money laundering).

Our Company is responsible for complying with all applicable anti-corruption and anti-bribery laws and voluntary standards, including:

- ✓ Act C of 2012 on Criminal Code (hereinafter: the Criminal Code),
- ✓ Act CXLIII of 2015 on public procurement,
- ✓ Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices (Tpvt.),
- ✓ Act CLXV of 2013 on Complaints and Public Interest Disclosures,
- ✓ Act CIV of 2001 on Criminal Measures Applicable to Legal Entities,
- ✓ OECD guidelines
- ✓ MSZ ISO 37001:2019 Anti-Bribery Management Systems. Requirements with guidance for use,
- ✓ European Union regulations
- ✓ Foreign Corrupt Practices Act (FCPA),
- ✓ UK Bribery Act 2010,

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The management of the Company formulated the following expectations for employees in order to ensure that the anti-corruption efforts are effective: They should study, familiarize themselves with and comply with the anti-corruption legislation, the procedures introduced by our Company and avoid transactions and circumstances that may even give the appearance of an act that conflicts with any legislation (which may reasonably appear to be corruption to a third party). They should immediately report to compliance@intelliport.hu that they have become aware of or have concerns about corruption involving Intelliport Systems Kft. It is important, however, that no one be disadvantaged, no one shall be subjected to discrimination, disciplinary action (threats, isolation, demotion, prevention of advancement, transfer, dismissal, intimidation, retaliation, harassment) for making a report in good faith. Employees should exercise due care in selecting and supervising their business partners.

Employees should exercise due diligence in the selection and corruption risk control of business partners. It is an expectation and requirement that the business partners of Intelliport Systems Kft. understand that corruption is not acceptable. To this end, the employees of our company draw the attention of the partners to the relevant parts of the contracts and the applied rules. With regard to suppliers and subcontractors, it is necessary to make sure that they apply anti-corruption controls, and that their business activities are carried out fairly and responsibly, and to what extent they pose a risk in terms of compliance with anti-corruption legislation. The employees of our Company may neither directly nor indirectly offer, promise or give an unlawful financial or other advantage (gift, service, personal favour) to a public official (municipal officials, political party officials, candidates running for public office, state employees, officials of international organizations, employees of state-owned companies, relatives of officials and persons closely related to them) or an employee of a business partner, and they may not request, demand or accept unlawful financial or other benefits from the above persons in order to obtain or keep a business, or get any other unfair advantage. A business gift, hospitality or other service benefit can only be fair within the framework of general business customs, if there is no sign of the intention to influence, its giving or acceptance cannot affect decision-making and cannot suggest that we expect a favour in return from the recipient party. Our Company's employees ensure that charity and sponsorship activities do not become a tool to facilitate and hide bribery. It should be clean, transparent and fair, with adequate publicity in order to ensure that the grants reach the intended party and that the interest to be supported is realized as effectively as possible. Anti-corruption due diligence must be carried out prior to every merger or acquisition, which enables the identification and mitigation of risks. The employees of Intelliport Systems Kft. must never allow external parties acting on behalf of our Company to bribe anyone or not to act legitimately.

In order to meet these expectations, Intelliport Systems Kft. sets goals for the continuous development of its organizational integrity, strengthens its anti-corruption controls and reduces its corruption risks, and continuously monitors, measures, analyses and evaluates their fulfilment in order to increase results and efficiency.

Intelliport Systems Kft. provides employees with necessary and appropriate anti-corruption awareness and training (in the light of relevant new information, regularly, at least once a year). Such training should cover, inter alia:

- ✓ Risks of corruption affecting Intelliport Systems Kft. and the employees, as well as damages caused by corruption;
- ✓ The Company's Anti-Corruption Policy, rules, procedures and obligation to comply

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- with the law;
- ✓ How can an employee contribute to the prevention and avoidance of corruption and how can they recognize the risk of corruption?
 - ✓ Information on reporting suspected corruption.

Intelliport Systems Kft. is committed to supporting and encouraging other organizations in their anti-corruption efforts so that the approach of rejecting corruption becomes generally accepted as widely as possible.

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