

Corporate Compliance Policy

Our Company is committed to complying with all legal regulations applicable to its activities and owner's expectations, while also ensuring the identification, proper management and prevention of potential integrity risks arising during its operations.

To this end, when adopting measures related to organizational compliance, the following is considered:

- compliance with the legal requirements and ethics of operation are aligned with the Company's objectives.
- a risk-based approach is applied to specific compliance measures and across all areas of activity and levels of management within the Company.
- the top executive of the Company is informed about the remarks of individuals reporting integrity risks, the measures necessary to reduce such risks, the organizational units concerned, and the implementation of these measures.
- potential violations of legal regulations identified during the Company's operation are addressed at an organizational level.

The above are implemented within the framework of the internal control system established and operated in accordance with the Government Decree No. 339/2019 (XII. 23.) on the internal control system of publicly owned business companies, as well as the relevant internal control guidelines.

The Company's employees and organizational units perform their duties in a regulated manner. The Company's internal regulatory instruments, controls built into processes, and established control functions ensure compliance with legal requirements, owner's and management expectations, and the protection and enforcement of the Company's interests.

To ensure the proper functioning of the internal control system, the Company operates a Compliance Department and Internal Audit Department, whose independence is ensured.

As a publicly owned company, the Company applies zero tolerance for all forms of corruption. It defines its business ethics and rules of conduct in the form of a Code of Ethics and Conduct, developed jointly with the direct involvement of employees, and ensures that the Code is regularly reviewed. The Company operates a whistleblowing system and ensures that investigations into integrity violations are conducted impartially and in compliance with applicable legal requirements.

The Company makes every effort to comply fully with the provisions of this Compliance Policy and to ensure that, during the pursuing of its corporate objectives, negative consequences shall be mitigated, and the occurrence of similar events shall be avoided in the future.

The provisions of this Compliance Policy shall be interpreted and applied in accordance with the Company's Code of Ethics and Conduct and its Compliance Program.

Paks/Budapest

Chief Executive Officer

Gergely Jákli