



BÉTx Pénzügyi Zrt.

CODE OF CONDUCT AND BUSINESS ETHICS

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1. General Provisions

1.1. Introductory Provisions

BÉT x Pénzügyi Zrt. (hereinafter: BÉT x) is committed to transparent, fair, prudent and ethical operations; to ensure, and to safeguard its values, reputation and integrity arising therefrom, sets out in this Code of Conduct and Business Ethics (hereinafter: the Code) the fundamental standards of conduct and rules expected of its Employees and contractual partners.

BÉT x expects its Employees to conduct themselves in an ethical manner consistent with BÉT x's ethical standards, both at work and outside working hours. Employees must behave in such a way, both at work and outside work, that does not jeopardise BÉT x's positive reputation.

In order to uphold the professional reputation of its owners, BÉT x expects its staff to conduct themselves and carry out their work in accordance with the legislation in force, to follow internal instructions, and to adhere to ethical standards of conduct in line with generally accepted values. It is important to emphasise, however, that compliance with applicable legislation alone is not sufficient for ethical operation; Employees are expected to ensure, and to continuously assess, that their actions are correct and do not undermine the requirements of trust, reliability and ethics.

The Code provides guidance to BÉT x Employees and Other Stakeholders on the fundamental principles of ethical conduct and ethical expectations.

BÉT x endeavours to ensure that its contractual partners also comply with all laws and regulations applicable to BÉT x, including rules on business ethics, in particular, but not limited to, provisions relating to anti-corruption and anti-bribery, provisions relating to insider dealing, data protection, data security and information technology.

This Code has been prepared in Hungarian, together with an English translation for information purposes. In the event of any discrepancy, inconsistency or uncertainty of interpretation, the Hungarian-language version shall prevail.

1.2. Date of review

- Every two years.
- In the event of changes to legislation or regulatory requirements, by the date specified in the relevant legislation or regulatory provisions.

1.3. Scope of the policy

Material scope: covers all activities and conduct of BÉT x's senior officers, staff and contractual partners in which they act on behalf of, in its interests or on its behalf, or which affect BÉT x's public image or reputation, as well as all acts and conduct to which legislation or BÉT x's internal regulations attach adverse legal consequences.

Scope of application: covers the senior officers and all staff of BÉT x, as well as to the senior officers and employees of suppliers with whom BÉT x has a contractual relationship, and to those who have a legitimate interest in remedying or putting an end to an ethical breach arising from a violation of the Code.

Period of validity: The provisions of the Code must be observed by the aforementioned persons throughout the entire duration of their employment or contractual relationship, both during and outside working hours.

1.4. Version control

Version number of this policy: v1

Version number of the previous policy: -

Date of entry into force of the previous policy: -

1.5. Terms used in the policy

Report:	the provision of information, either verbally, by telephone or in writing, regarding ethical misconduct, a breach of the law or an incident compromising integrity;
Whistleblower:	a person who becomes aware of or observes an incident compromising integrity, misconduct or a breach of the law in their working environment, or who is affected by such an incident, and who reports it or provides information via the available channels.
Compliance:	The Compliance department of BÉT x.
Other relevant parties:	Senior officers, employees and subcontractors of BÉT x's business partners and suppliers with whom it has a contractual relationship.
Ethical conduct:	conduct, actions or expressions of opinion which enhance clients' trust in BÉT x, help to create an image that BÉT x and its staff provide services to a high standard, and are capable of reinforcing and enhancing BÉT x's reputation in addition to its sound business practices.
Ethical breach:	conduct that is likely to undermine the authority or reputation of BÉT x, or to shake clients' trust in BÉT x, or the trust that staff members have in one another. A breach of ethics is defined as a violation of the fundamental principles and ethical expectations set out in the Code, or any act which may lead to a breach of these expectations, or which, in the opinion of the party who has suffered the breach, is capable of doing so.
Integrity:	the proper functioning of BÉT x in accordance with the objectives, values and principles defined by BÉT x.
Integrity risk:	the possibility of misconduct, irregularities or other events that violate or jeopardise the BÉT x's objectives, values and principles.
Close relative:	a spouse, a relative in the direct line of descent, an adopted child, a stepchild or foster child, an adoptive parent, a step-parent or foster parent, a sibling or a partner.
Employee:	senior officers of BÉT x, persons employed by BÉT x under an employment contract or other legal relationship for the purpose of performing work, and commissioned experts.
Personal data:	any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological,



genetic, mental, economic, cultural or social identity of that natural person.

Senior officer: Members of the BÉTx Board of Directors and Supervisory Board.

2. Principles

2.1 Prudent operation

BÉTx considers compliance with laws and regulations, supervisory requirements, industry standards, and internal regulatory provisions relating to its services as a fundamental operational requirement, and expects its employees to conduct their activities in a prudent manner.

Prudence is a fundamental element of BÉTx's operations; its essence lies in ensuring the safe and responsible operation of BÉTx, thereby protecting the interests of its clients. The requirement for prudent operation must permeate the entirety of BÉTx's operations.

BÉTx strives to establish a reliable governance system comprising a clear organisational structure, well-defined, transparent and consistent areas of responsibility, effective procedures for identifying, managing, monitoring and reporting current or potential risks, as well as appropriate remuneration policies and internal control mechanisms – including sound administrative, operational and accounting procedures.

2.2 Transparency

BÉTx provides the public with all material information relating to its services and procedures in an open, transparent and timely manner.

BÉTx establishes business relationships exclusively with companies and organisations that are transparent in terms of both their finances and their ownership structure.

2.3 Integrity

BÉTx is committed to consolidating and developing a corporate culture based on integrity. Integrity requires Employees to comply with the professional rules governing BÉTx's services and ethical standards, and to align themselves with BÉTx's core values. Employees must recognise factors and situations that jeopardise integrity, and be aware of ways to mitigate them. In the course of their work and in their professional dealings, Employees are obliged to act in good faith, in accordance with the fundamental standards of honesty, decency, sincerity, prudence, reliability, respect and good manners, whilst bearing the public interest in mind.

2.4 The principle of zero tolerance

The BÉTx is committed to preventing and combating abuses and infringements of the law – in particular breaches of the relevant legislation – as well as money laundering, the financing of terrorism, cartel activity, violations of human rights and human dignity, insider dealing and market manipulation, as well as acts of corruption, and firmly expects its staff to refrain from any conduct that might in any way suggest their involvement in such misconduct. In relation to legal breaches, BÉTx cooperates unconditionally and proactively with the relevant authorities.

2.5 Anti-corruption, prevention of money laundering and fraud, sanctions

BÉTx condemns and does not tolerate any form of corruption. For the purpose of securing business, Employees are prohibited from directly or indirectly offering, promising, giving, requesting or accepting anything intended to obtain or confer an unfair advantage. Corruption, whether for the purpose of



securing business or obtaining any other economic advantage, constitutes a serious breach of duty. Similarly, accepting a bribe or permitting another person to accept a bribe is a serious offence.

BÉT x is committed to preventing money laundering, and Employees must pay particular attention to this. Contractual relationships may only be entered into and maintained with partners whose business activities are transparent and derive from lawful sources, and whose ownership structure is transparent.

BÉT x is committed to complying with international sanctions and the applicable import and export regulations.

2.6 Prevention of insider trading and market manipulation

The BÉT x is committed to the fair functioning of securities markets and the fair trading of publicly traded securities. In accordance with the relevant legislation, market abuse includes insider dealing and attempts thereof, the unauthorised disclosure of inside information, and market manipulation and attempts thereof. BÉT x staff may come into possession of inside information in the course of their daily work, which they are prohibited from using unlawfully. The unauthorised disclosure of inside information is prohibited; this occurs when a person in possession of inside information discloses it to any other person, unless the information is disclosed in the normal course of employment, a profession or the performance of specific duties. BÉT x condemns all forms of market abuse. In accordance with its internal regulatory documents, BÉT x takes all necessary measures to prevent and prohibit market abuse, insider dealing and market manipulation.

2.7 Sustainability and environmentally conscious operations

As part of its corporate social responsibility, BÉT x strives to establish best practice in the field of environmental protection, including responsibility towards both the natural and built environments.

BÉT x also places emphasis on preserving the natural environment; consequently, when designing its internal processes, it endeavours to implement digital solutions that reduce the ecological footprint associated with paper-based administration. It expects its staff to be environmentally conscious and, where possible, to take environmental considerations into account in their day-to-day work. Furthermore, BÉT x adheres to the principle of responsible care and pays particular attention to creating a healthy working environment.

2.8 Principle of equal treatment

BÉT x rejects all forms of discrimination, in particular on the grounds of gender, race, skin colour, nationality or ethnic origin, mother tongue, disability, health status, religious, philosophical, political or other beliefs, marital status, maternity (pregnancy) or paternity, sexual orientation, gender identity, age, social background, financial circumstances, the part-time nature or fixed-term nature of their employment relationship or other legal relationship for the purpose of performing work, membership of an interest group, or any other situation, attribute or characteristic, resulting from their differences or based on any other form of discrimination, and unjustified differentiation.

With regard to the protection of human rights, particular attention must be paid to:

- the prohibition of forced labour, slavery, human trafficking, child labour and debt bondage;
- the prohibition of treatment that violates human dignity or is humiliating or degrading;
- the requirement for equal treatment and the prohibition of discrimination.

It is the obligation of BÉT x to guarantee freedom of association and the right to represent interests, and it must respect these rights. Employees must not be intimidated, harassed or threatened with reprisals for exercising these rights.

BÉT x expects its business partners and suppliers to create a working environment based on mutual trust, where everyone is valued and their human dignity is respected. BÉT x expects its business partners



and suppliers to ensure that communication, whether verbal or written, meets the requirements of mutual respect. BÉT x regards sexual harassment, defamation and libel as particularly serious violations of human dignity.

All forms of harassment must be avoided; it is prohibited to display intimidating, hostile, humiliating or degrading behaviour towards any employee, or to condone behaviour that is likely to create such an environment.

2.9 The right to a healthy working environment

BÉT x is committed to creating a safe and healthy working environment that focuses on the safety and physical and mental wellbeing of its staff. It implements processes to ensure that employees comply with all relevant occupational health and safety laws and regulations, including regular training on workplace safety, emergency preparedness, workplace accidents and illnesses, occupational health, physically demanding work, machine safety, hygiene, catering and accommodation.

BÉT x pays particular attention to the prevention of personal injury, environmental damage and hazards, and to the reduction of health, safety and environmental risks. It always carries out its activities in compliance with the relevant health and safety and environmental regulations, and in such a way as to minimise its environmental impact and minimise health and safety risks.

2.10 Consistent corporate identity

Corporate identity encompasses not only the logo, business cards, company letterhead, envelopes, and email and Word templates, but also the website and printed materials. The main advantage of a consistent brand identity is that it sets us apart from others and ensures the recognisability of BÉT x; this consistent identity fosters a sense of unity, security and trust both within the organisation and with external partners.

BÉT x expects its employees, who are employed under a contract of employment, to use the corporate identity elements in their day-to-day work.

2.11 Cooperation

BÉT x is committed to honest, open communication both internally and in its relationships with business partners. BÉT x represents its position credibly in professional forums and in internal communications. In every situation, it strives for problem-solving, positive communication and cooperation.

2.12 Protection of assets

BÉT x takes great care of its property, which it uses exclusively for official purposes related to its business activities. Every employee is responsible for protecting this property and BÉT x's other tangible and intangible assets from loss, damage, theft or other misuse, and is also responsible for ensuring their proper and careful use.

2.13 Compliance with ethical standards

BÉT x shall take all necessary measures to ensure that its Employees are familiar with the rules applicable to them and act in accordance with them; however, it is also the individual duty of each person to familiarise themselves with and comply with the applicable legal obligations, internal regulations and instructions relating to their own duties and areas of responsibility. Nevertheless, when recruiting staff and formulating its remuneration strategy, BÉT x also pays particular attention to compliance with high ethical standards. To uphold ethical business conduct, BÉT x does everything in its power both in the course of its day-to-day activities and when establishing and maintaining business relationships.



3. Expectations of staff

3.1 Personal commitment

BÉTx expects all its staff – regardless of their position – to carry out their work with the appropriate professional competence and dedication, and to be committed to the values upheld by BÉTx and its owners. Work carried out to a high standard contributes to BÉTx's success, and this in turn benefits employees, as it is also their success.

In their external dealings and business negotiations, staff must represent BÉTx objectively, free from influence and in an ethical manner.

3.2 Integrity and accountability

In the course of their work, Employees must carry out the tasks assigned to them fairly, in accordance with professional standards, whilst taking clients' interests into account, and must do everything in their power to ensure that BÉTx's clients are satisfied.

Employees' work must be characterised by sincerity, integrity, respect for others (clients, colleagues) and courteous behaviour.

It is essential that Employees take responsibility for their work, even if they have made a mistake.

BÉTx expects Employees to conduct themselves in a manner befitting BÉTx, both at work and outside working hours. Employees must not, either at work or outside work, or during or outside working hours, engage in any conduct that is likely to reflect negatively on BÉTx.

BÉTx strictly requires that its Employees do not place themselves in compromising or ethically questionable situations which could increase the risk of bribery. BÉTx expects its Employees, even in their private lives, to strictly refrain from any conduct that is unlawful or morally and ethically questionable.

Employees must not influence decision-preparation or decision-making processes in a manner contrary to the interests and objectives of BÉTx.

BÉTx prohibits the unfair acquisition, use, unauthorised sharing, disclosure or publication of information relating to the business operations of others.

BÉTx is committed to fair market conduct and carries out its activities in accordance with the standards of fair competition and relevant legislation.

3.3 High standards of work

In order to ensure that its services are consistently provided to a high standard, BÉTx expects its staff to maintain their skills and knowledge at a high level, whether through professional development or self-study.

Every BÉTx employee – regardless of their position – represents the company in dealings with clients; therefore, their behaviour, knowledge and preparedness in personal interactions influence the image formed of BÉTx.

Employees must represent BÉTx objectively, free from influence and in an ethical manner in their external dealings and business negotiations. BÉTx expects all its staff to represent BÉTx appropriately through their personal conduct, behaviour and communication style, thereby fostering a favourable image of BÉTx.



High-quality work is only possible if all staff members fully comply with the provisions set out in the legislation applicable to BÉT x and in BÉT x's regulatory documents.

3.4 Conduct towards clients

BÉT x considers it important that its staff act in accordance with the following principles in the course of their daily activities:

- where necessary, draw the client's attention to the applicable legal provisions in force and provide the necessary information in good time to facilitate performance in accordance with the contract,
- provide balanced, comprehensive information covering both the advantages and disadvantages to support responsible trading decisions,
- in their dealings with clients, they shall endeavour to ensure that clients understand the contractual terms of the services provided by BÉT x, thereby enabling them to assess the risks involved and to be aware of the negative consequences of failing to fulfil their contractual obligations,
- their conduct towards clients should be characterised by professional awareness, integrity, helpfulness and a sense of responsibility,
- they demonstrate a cooperative and helpful attitude throughout the client relationship, at every stage.

3.5 Teamwork and creativity

BÉT x's activities are carried out through teamwork, even if clients may only come into direct contact with a single staff member when using the service. It is therefore important that all staff members are part of this teamwork and do everything in their power to ensure that client service runs smoothly. When working as a team, the independence and objectivity of internal control functions must always be taken into account.

All BÉT x staff members must be open to change, new ideas and information.

3.6 Other expectations

The owners and management of BÉT x expect all staff members to take due care of both the property of BÉT x and that of the staff members themselves.

All staff members are obliged to use BÉT x's equipment and resources sparingly.

It is prohibited to display or sell any goods at the BÉT x headquarters, and door-to-door trading is also prohibited – excluding advertisements posted by BÉT x staff on the intranet classifieds section – unless authorised by the Chief Executive Officer. It is also prohibited to engage in religious or political campaigning on the premises of BÉT x, or to display or distribute advertising materials for companies or political parties.

It is prohibited for anyone to use, display or distribute the name, logo, etc. of BÉT x, or to be involved in such activities, for the purpose of unlawful gain or advantage, or for personal gain.

BÉT x expects all its employees to cooperate with their colleagues in the course of their work, to assist them selflessly, and to provide the information necessary for their colleagues' work in a timely and complete manner, to strive at all times to be collegial with their colleagues, not to disturb their colleagues with their work or personal problems, and not to take advantage of their colleagues' patience.

It is also a fundamental requirement that employees must not harass their colleagues sexually or in any other way, and must refrain from any infringement of their colleagues' privacy.

Employees should bear in mind general ethical principles when managing their user accounts on the internet – particularly on social media platforms – which are capable of identifying them personally; in their public posts, they should refrain from using vulgar, defamatory or libellous language, from inciting hatred, from making statements that offend others' religious, national, ethnic, sexual, political or ideological affiliations, and from publishing false information or unlawful content.



BÉTx expects its Employees to behave courteously towards one another in accordance with social conventions, and for all Employees to help uphold BÉTx's good reputation through their overall lifestyle and conduct.

Employees must not be placed in a direct or indirect reporting, supervisory, decision-making, approval, control or remuneration relationship with a close relative or with another employee with whom they have a personal relationship that could reasonably impair, or appear to impair, their objectivity in the performance of their duties.

Any actual or potential conflict arising from such a relationship must be disclosed promptly to Compliance or Human Resources, and appropriate measures must be taken to prevent or mitigate the conflict.

As part of the day-to-day, routine business processes carried out at BÉTx, the venue for conducting standard meetings (client meetings) is the BÉTx headquarters. To this end, BÉTx has premises designated for client meetings. Where the execution of business processes requires the 'four-eyes' principle to be applied, the presence of two BÉTx employees is mandatory during client meetings and the conduct of negotiations, unless the meeting is recorded with the consent of the participants.

The integrity of financial and non-financial records and reports is of fundamental importance for sound decision-making and for maintaining public trust; therefore the BÉTx is committed to maintaining its financial (accounting) and non-financial records, preparing its reports and statements, and practising accounting that is lawful, ethical and provides a true and fair view of its financial position, in an honest, accurate and objective manner.

3.7 Public Statements

In any statement (whether in the print or electronic press, on the radio or on television) concerning matters relating to BÉTx, only the official position of BÉTx may be communicated at any time; the prior authorisation of the Chief Executive Officer of BÉTx is required for such a statement.

The prior consent of the BÉTx Chief Executive is required for delivering presentations relating to BÉTx's activities, or for publication in the press, in electronic form or in book form, where the subject matter concerns BÉTx's scope of activities as set out in its Articles of Association.

3.8 Quality requirements

BÉTx shall at all times endeavour to ensure that its services and the development of its services comply with the strictest quality standards, and shall carry out all its activities in accordance with the relevant statutory and regulatory requirements and its own strict internal quality requirements.

4. Requirements for managers

The foundation for establishing an ethical culture at an organisational level lies in managers setting an example. Managers are therefore subject to the additional requirement that, in the course of their work, they convey the importance of ethical conduct, demonstrate professionalism, accountability and transparency in decision-making, recognise ethical behaviour, and at the same time respond appropriately in cases where ethical principles are at risk. Accordingly, in addition to the general expectations, a senior staff member is required, in particular, to:

- to ensure the rapid and accurate flow of information within BÉTx,
- to communicate the interests and expectations of BÉTx to their subordinates – whilst respecting their human dignity – in a firm, fair and consistent manner,



- to be consistent, exacting, fair, helpful, equitable, patient and humane towards subordinates – without overstepping one's authority – and to recognise work well done,
- strive to create a positive and fair working atmosphere, and recognise when a subordinate is experiencing difficulties,
- to discreetly draw a subordinate's attention to their shortcomings or mistakes.

In the course of their duties, managers must conduct themselves in a polite, professionally appropriate and fair manner towards both clients and staff; they must always bear in mind the interests of BÉTx and set an example through their actions.

5. Supplier relationships and procurement

BÉTx expects external service providers with whom it has a contractual relationship to adhere to appropriate ethical standards and business practices, and to conduct their activities in a socially responsible manner, in compliance with legislation and international standards relating to human rights, environmental protection and working conditions; it also expects other stakeholders to take into account the ethical principles and provisions set out in this Code, and to comply with them in their conduct whilst carrying out work in connection with their contractual relationship with BÉTx.

A key objective in procurement is the efficient management of BÉTx's assets; that is, for BÉTx to select, through fair and transparent competition, the tenderer who has submitted the offer providing the best value for money in terms of the goods, services and investments necessary to perform the task or to create the conditions for its performance. The obligation to maintain the integrity of the competition rests equally on the contracting authority and the tenderer(s) participating in the procurement procedure; however, this obligation requires active conduct on the part of BÉTx, whilst in the case of tenderers it requires a form of abstention from conduct that would be deemed to breach competition law, whilst fully complying with the relevant legislation.

In addition to ensuring that participants in the procurement process act in compliance with the law and that the processes are transparent, another key consideration is the proper documentation and communication of necessary and sufficient information.

BÉTx does not offer or solicit unlawful payments or favours, nor does it participate in unlawful agreements aimed at excluding certain partners. It does not withhold payments due to partners in bad faith, unlawfully or without justification.

BÉTx treats its contractual partners fairly and equally in all cases, and sets out its contractual terms and the subject matter of the contract by providing accurate information containing all relevant details.

Annex 1 to these regulations sets out the expectations that BÉTx intends to enforce vis-à-vis its business partners and suppliers, based on the principles set out in its Code of Conduct and Business Ethics. BÉTx expects its business partners and suppliers to take measures proportionate to the size, complexity and risk exposure of their organisations to ensure ethical operation and compliance.

6. Giving and accepting gifts

Any conduct that may give the impression that BÉTx or any Employee is seeking, receiving or offering preferential treatment in exchange for personal gain must be avoided. Nothing may be given or accepted that constitutes, or appears to constitute, an unfair business incentive, or that contravenes any legislation, regulation or the fundamental principles of this Code, or that otherwise gives rise to an awkward situation.

7. Data protection and confidentiality

In the provision of BÉTx's services, it is of critical importance to ensure the utmost protection of Clients' sensitive, legally protected data, in particular securities and trade secrets, as well as personal data. In this regard, BÉTx firmly expects its employees to handle information that comes to their knowledge in the course of their work responsibly and within the scope of their authority, and not to use such information in an unauthorised manner or disclose it to unauthorised persons.

BÉTx employees must not disclose to BÉTx or to third parties any information BÉTx and third parties, their commercial relationships, transactions, operations, financial position, investments, negotiations, economic performance and plans, scope of business, business partners, client base, suppliers, related documentation, data storage media, as well as data and information relating to solutions, facts, data, knowledge, ideas, concepts and other information created and collected in the course of their activities, as trade secrets and to safeguard them; they must not use or disclose them, or or make them publicly available.

BÉTx respects the work of others and their intellectual property rights, and expects the same from its Employees. Valuable, confidential ideas, strategies and other types of business data developed at BÉTx constitute company property and, in certain cases, are protected by law as intellectual creations. Intellectual property includes, for example, inventions, know-how, patents, trade marks, industrial design rights, copyright, domain names, scientific and technical knowledge, and all other rights relating to intellectual creations. All parties are obliged to comply fully with any agreements entered into in relation to intellectual property created or acquired on behalf of BÉTx or using BÉTx's resources.

Apart from public data, any data held by BÉTx may only be disclosed to third parties within a regulated framework and in compliance with the legal provisions applicable to the data in question.

Employees are bound by a duty of confidentiality in respect of all facts and data (including, in particular, securities secrets, trade secrets and non-public information) of which they become aware in the course of performing their professional duties or in connection with the fulfilment of their role. The duty of confidentiality of other data subjects extends to the extent set out in the provisions of their contractual partnership relationship with BÉTx.

The Employee is obliged to treat inside information as strictly confidential; under no circumstances may they disclose it, nor may they use the information that has come to their knowledge to gain an advantage in connection with their own transactions or those of their close relatives (including any economic transactions, with particular regard to stock market transactions). The Employee must, under all circumstances, bear in mind the good reputation of BÉTx and must not compromise it, even by creating the appearance of using inside information.

Employees are obliged to maintain the confidentiality of correspondence; in this context, it is prohibited, contrary to the internal rules in force at any given time, to destroy, to open, obtain or, for this purpose, hand over to an unauthorised person any such correspondence in order to ascertain its contents, or to intercept a communication transmitted to another person via an electronic communications network – including an information system.

'Inside information' means any information which is not publicly available and is material, relating directly or indirectly to the BÉTx or to another company involved in public securities trading, or to their securities, the disclosure of which would, in all likelihood, have a significant effect on the price of financial instruments.

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

'Market manipulation' means the dissemination or transmission of false information relating to any security or its issuer with the intention of influencing the price or market perception of that security for the purpose of obtaining financial gain.



Appropriate security measures must be taken to ensure the confidentiality, integrity and availability of data to authorised users. Given the nature of its activities, BÉTx is committed to promoting the development of a cyber security culture, which it encourages throughout its entire value chain. Ethical expectations regarding information protection

BÉTx takes great care to protect its IT systems and the data stored therein; therefore, in addition to the current information security principles and regulations, it expects all its staff to

- only run software on the workstation provided for work purposes that has been installed by their employer, i.e. software guaranteed by the employer to be legally compliant,
- not to attempt to illegally access, alter or destroy data stored on their workstation provided for work purposes, on other workstations or on a central server,
- must not attempt to unlawfully access or alter the system or security settings of programmes, workstations or central servers stored on another workstation or on a central server from the workstation provided for work purposes,
- keep your password and signature code safe, protect your workstation and user data from unauthorised persons, and bear the consequences of any unauthorised access resulting from culpable negligence,
- do not make unauthorised copies of the software available on your workstation,
- do not store or use any illegal software on your computer,
- help prevent the IT system from becoming infected with viruses by working with due care,
- not to store any text or images on the workstation or the central server that are offensive to public decency, abusive, obscene or pornographic, and not to forward such material via email, not to visit websites containing illegal content on the Internet, do not use BÉTx-related usernames during registration on any public websites other than those directly related to BÉTx or closely connected to your role.

8. Conflicts of interest

Conflicts of interest may arise in the course of work if the differing business interests of several parties must be taken into account simultaneously, or if a private interest conflicts with an obligation expected of BÉTx.

BÉTx fundamentally strives to prevent conflicts of interest. Should a conflict of interest, or the possibility thereof, nevertheless arise despite the utmost care being taken, the line manager and the Compliance department must be informed – whilst the situation is being investigated – in order to ensure that the conflict of interest is managed appropriately.

BÉTx also expects its staff to conduct themselves in such a way that their integrity is beyond question and that they perform their duties solely on the basis of objective, professional criteria.

Furthermore, in view of BÉTx's investment services activities, it has a conflict of interest policy in place to prevent, identify and manage conflicts of interest that are detrimental to its clients

9. Reporting ethical issues

The handling and investigation of ethics reports fall within the remit and responsibilities of the Compliance department. Reports must be forwarded to the Compliance department, which will then proceed in accordance with the provisions set out in a separate policy, on the understanding that, in the event of ethical breaches, the Ethics Committee is authorised to issue a ruling.

Where necessary, the Compliance Department may involve other departments, in particular members of the security organisation, in the investigation of reports. The Compliance Department is obliged to

investigate every report and to inform the Ethics Committee of the outcome within 15 working days of the report being made at the latest.

10. Ethics Committee

11.1 The composition of the Ethics Committee

The Ethics Committee is responsible for addressing ethical breaches, taking a stance on ethical issues and making recommendations.

The members of the Committee are: the Chief Executive Officer of BÉTx, the Head of Compliance and the Head of HR. Should any member of the Committee be unable to attend or have a conflict of interest in a particular matter, a substitute must be called upon to sit on the Committee. The substitute is appointed by the Chair of the Committee (or, if the Chair is unable to do so, by their designated deputy).

The Chair of the Committee is the Chief Executive Officer of BÉTx.

In the event of a suspicion of an ethical breach involving senior executives employed under a contract of employment, the members of the Committee shall be: members of the Board of Directors appointed by the Chair of the Board of Directors, or members of the Supervisory Board appointed by the Chair of the Supervisory Board.

The Chair of the Committee is obliged to remove a member if a final criminal conviction has been handed down against them, or if ethical proceedings are to be initiated against them.

11.2 The duties and operating procedures of the Ethics Committee

The Committee's duties:

- to make recommendations, give opinions and adopt resolutions on ethical issues arising in connection with the regulation of the BÉTx's operations,
- to adopt positions on specific cases arising in connection with breaches of ethical standards.

Conducting the preliminary ethical investigations necessary for the Committee to carry out its duties is the responsibility of the Compliance department. The Compliance department shares the results of the preliminary ethical investigations (together with its recommendations) exclusively with the members of the Committee.

The Committee meets as necessary to resolve ethical issues that have arisen or to investigate specific incidents, and to take decisions in relation thereto.

The presence of all members, or their deputies, is required for a resolution to be adopted. The Committee adopts its resolutions by open vote, by a simple majority; in the case of resolutions adopted without a meeting, the written votes of all members are required.

The Committee is entitled and obliged, at the initiative of any of its members, to place matters falling within its remit on the agenda and, on its own initiative, to make proposals and observations to the BÉTx Board of Directors.

If the Committee considers the request submitted by a Committee member to initiate proceedings to be well-founded and decides to launch an ethics procedure, it is obliged to notify the BÉTx Employee subject to the ethics procedure of this in writing without delay.

In order to establish the facts, the Committee and the Compliance Department shall be entitled to hear any Employee, request information from them, and obtain the necessary documents and evidence.



During the proceedings, the Committee is obliged to provide the Employee concerned with the opportunity to state their position.

The Committee shall adopt a position (express an opinion) on the matters submitted to it. If the position is not adopted by unanimous agreement, the dissenting views must also be recorded in the minutes.

Minutes must be drawn up of the Committee's meetings, which are authenticated by the Compliance Officer acting as minute-taker.

The Committee's resolution (with reasons) shall be sent to the person who raised the matter, the person (or body) concerned, and the manager(s) of the person(s) concerned.

The Committee shall adopt its general resolutions within 30 working days of receipt of the report, where possible.

In proceedings initiated, the Commission may adopt the following decisions:

- it may terminate the proceedings on the grounds of lack of jurisdiction or competence;
- find that the person subject to the proceedings has not committed an ethical breach,
- find that the person subject to the proceedings has committed an ethical offence.

The Commission shall, within 5 working days of adopting its decision, inform

- the person who initiated the ethics proceedings,
- the person subject to the ethics proceedings,
- and the immediate superior of the person subject to the proceedings.

The ethics proceedings are a single-instance process.

Should the Commission's investigation reveal an act more serious than an ethical breach, the Commission shall refer the matter to the relevant legal department for further legal action, which shall be obliged to act on the matter without delay in accordance with the relevant legislation. In the case of a senior officer, the prior authorisation of the Board of Directors is required to initiate legal proceedings.

The Committee's proceedings are not public; all records and documents arising from the proceedings, including personal data, are handled confidentially by the Compliance department.

In order to support and encourage an appropriate corporate culture, BÉT x is entitled, for preventative purposes, to disclose the results of investigations to staff in anonymised form. The content and format of such communications are determined by the Ethics Committee.

The Compliance function reports on current ethical matters and the activities of the Ethics Committee in its quarterly reports submitted to the Board of Directors.

11.3 Protection of committee members; conflicts of interest

No one may instruct the Committee on its position or on the expression of opinions by individual members. No one may be subject to censure or suffer any disadvantage as a result of their activities on the Committee. Should such a possibility arise or be suspected, the Chair or a member of the Committee may refer the matter to the Chair of the Board of Directors.

A member of the Committee may not take part in the adoption of Committee resolutions concerning matters affecting themselves or their close relatives. The Chair of the Committee may appoint a member to act as their substitute; if the Chair of the Committee is the member concerned, the member delegated by the Chair of the Board of Directors shall take the place of the Chair of the Committee.



11. Legal consequences in ethical matters

Where, following an ethics procedure, it is necessary to impose sanctions of an employment-related nature or affecting a contractual relationship, the decision shall be taken by the Chief Executive Officer of BÉT x, based on the Ethics Committee's resolution or a recommendation from the Compliance department.

Legal consequences must in all cases be proportionate to the seriousness of the ethical breach.

Appendix:

- **Appendix 1:** Code of Conduct and Ethics for Business Partners and Suppliers



1. Annex

CODE OF CONDUCT FOR BUSINESS PARTNERS AND SUPPLIERS

OPERATIONAL AND CODE OF ETHICS



1. CODE OF CONDUCT AND ETHICS FOR BUSINESS PARTNERS AND SUPPLIERS

The foundation of BÉT x's business operations and success is built on ambitious objectives, outstanding performance, professional excellence and fair business conduct in all circumstances, whilst complying with legislation, internal regulations and professional and ethical standards. BÉT x therefore expects its business partners and suppliers to share this commitment, to familiarise themselves with and adhere to the ethical and compliance principles upheld by BÉT x, and to apply these within their own value chains.

The term 'business partners and suppliers of BÉT x' refers to all business organisations and natural persons that have a contractual relationship with BÉT x other than an employment relationship, including, in particular but not limited to, suppliers, subcontractors, distributors, intermediaries, representatives, buyers, customers and business partners.

This Code sets out the expectations that BÉT x intends to enforce vis-à-vis its business partners and suppliers, based on the principles set out in the BÉT x Code of Conduct and Business Ethics. BÉT x expects its business partners and suppliers to implement measures proportionate to the size, complexity and risk exposure of their organisations in order to ensure ethical operations and compliance. BÉT x expects its partners and suppliers to inform the BÉT x Compliance organisation without delay should they become aware of any information relating to a breach of the Code, and to report the results of any internal procedure (self-assessment) conducted on the basis of such a suspicion.

Through this document, and in accordance with its core values regarding social and environmental commitments, BÉT x requires its partners and suppliers to comply with the Principles set out in the Code, which the Parties shall attach to the contracts concluded between them. Business partners and suppliers are obliged to implement the principles set out in the Code throughout their entire supply chain. Business partners and suppliers shall endeavour to comply with and respect laws and regulations, and to ensure their accurate and effective implementation.

Business partners and suppliers are obliged to comply with the sanctions, embargoes and restrictions imposed by the United Nations Security Council, as well as the sanctions and embargoes imposed by the United Nations Security Council in relation to international trade, and the sanctions introduced by the European Union. Compliance with this Code forms part of the contractual obligations of business partners and suppliers. Business partners and suppliers shall require their subcontractors, contractual partners and/or suppliers to comply with this Code, to the extent that such subcontractors are involved in ensuring performance under the Contract.

2. RESPECT FOR HUMAN RIGHTS AND ETHICAL EMPLOYMENT

BÉT x expects all its business partners and suppliers to respect the human rights of all those concerned; they are therefore obliged to refrain from business practices that violate human rights and must exercise due diligence when making business decisions, paying particular attention to how these may affect the realisation of human rights. In this regard, we consider it of paramount importance to

respect the human rights and fundamental values enshrined in key international conventions, in particular the rights set out in the United Nations Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights.

With regard to the protection of human rights, particular attention must be paid to:

- the prohibition of forced labour, slavery, human trafficking and debt bondage;
- the prohibition of treatment that violates human dignity or is humiliating or degrading;
- the requirement for equal treatment and the prohibition of discrimination.

BÉT x expects its business partners and suppliers to adhere to fair employment practices and to operate in accordance with the principle of the proper exercise of rights in employment relationships. BÉT x does not tolerate any form of forced or child labour, nor any other forms of unethical employment practices, such as the withholding of wages and statutory benefits, the denial of sick leave or rest periods, or the abuse of alternative forms of employment.

We also expect our business partners and suppliers to uphold the right to work and to comply with the fundamental requirements set out in certain conventions of the International Labour Organisation (ILO), in particular:

- According to Convention No. 138 on the minimum age for admission to employment, adopted at the 58th Session of the International Labour Conference, the prohibition of the employment of children below the age at which compulsory schooling ceases under the legal system applicable at the place of work, provided that the minimum age for employment shall not be less than 15 years;
- Convention No. 182, adopted at the 87th Session of the International Labour Conference, concerning the prohibition and immediate action for the elimination of the worst forms of child labour prohibitions, in particular the trafficking of children, the sale of children, debt bondage, servitude or forced labour;
- The prohibition on the use of forced labour, with the exception of work defined in Convention No. 29 on Forced or Compulsory labour, adopted at the 14th Session of the International Labour Conference, and work that is consistent with that Convention;
- Compliance with occupational health and safety requirements under the law applicable to the place of business of the business partner and the supplier.

Freedom of association and the right to collective representation are obligations of business partners and suppliers, which they must respect. Employees' rights to freedom of association, collective bargaining and peaceful assembly, including the right to refrain from the above activities, in accordance with local legal requirements and commitments, as well as international standards, such as those of the International Labour Organisation, whichever is the stricter. Employees must not be intimidated, harassed or threatened with reprisals for exercising these rights. Where local laws or circumstances restrict these rights, business partners and suppliers must find alternative ways to initiate meaningful dialogue on employment issues and workplace concerns.

3. HEALTH AND ENVIRONMENTAL PROTECTION

BÉTx expects its business partners and suppliers to prevent personal injury, environmental damage and hazards, and to minimise health, safety and environmental risks. They must therefore always carry out their activities in compliance with the relevant health and safety and environmental protection regulations, and in such a way as to minimise environmental impact and minimise health and safety risks.

Business partners and suppliers are obliged to develop and implement health and safety practices across all areas of their business activities.

They are required to:

- Introduce and adhere to processes that ensure employees comply with all relevant occupational health and safety laws and regulations, including regular training on workplace safety, preparedness for emergencies, workplace accidents and illnesses, occupational health, physically demanding work, machine safety, hygiene, catering and accommodation.
- A safe and healthy working environment must be provided for all employees, where risks are minimised and the implementation of measures to protect vulnerable groups is effectively monitored.
- An occupational health and safety management system must be established which, as a minimum, ensures that the management of occupational health and safety forms an integral part of business operations, and which enables participation in management and encourages employees' involvement in defining policies, roles and responsibilities, ensuring the identification and assessment of risks and hazards, and providing communication channels for employees to access health and safety information. This management system must include procedures for the recording and investigation of incidents and for corrective action.
- Training must be provided on the use of personal protective equipment supplied free of charge.
- In workplaces where hazardous substances are used, emissions must be controlled so that concentrations remain within the limits set by local health and safety regulations or, in the absence of such regulations, so that concentrations remain below the threshold at which long-term exposure would be harmful to health. Appropriate equipment must be made available to enable rapid intervention in the event of a spill of hazardous substances, a fire or contact with harmful substances.

With regard to natural resources and waste management, business partners and suppliers are obliged to limit the use of raw materials and resources during the production of goods, thereby minimising the relevant environmental impacts. The use of scarce resources must be limited and, where possible, avoided. During operations, the identification, monitoring and management of waste generated must be ensured. Business partners and suppliers are required to endeavour to reduce the volume of waste generated. These measures must be in accordance with the relevant environmental legislation.



4. EQUAL OPPORTUNITIES, EQUAL TREATMENT AND PROHIBITION OF DISCRIMINATION

BÉTx is committed to ensuring equal opportunities for all and expects all its business partners and suppliers to treat everyone equally in accordance with the principle of equal opportunities and applicable legislation.

BÉTx expects all its partners and suppliers to refrain from any conduct, action, condition, omission, instruction or practice which (directly or indirectly) constitutes discrimination or unlawful segregation.

5. HUMAN DIGNITY, MUTUAL RESPECT

BÉTx expects its business partners and suppliers to create a working environment based on mutual trust, where everyone is valued and everyone's human dignity is respected. BÉTx expects its business partners and suppliers to ensure that communication, whether verbal or written, meets the requirements of mutual respect. BÉTx regards sexual harassment, defamation and libel as particularly serious violations of human dignity. BÉTx's business partners and suppliers must refrain from all forms of harassment; in particular, they must not engage in intimidating, hostile, humiliating or degrading behaviour, or behaviour likely to create such an environment.

6. FAIR TRADE AND COMPETITION

BÉTx is committed to fair market conduct and therefore expects its business partners and suppliers to conduct their activities in accordance with the standards of fair competition and in compliance with the letter and spirit of the relevant legislation. In particular, BÉTx expects its business partners and suppliers not to unlawfully obtain, use, or unlawfully disclose or publish to others information relating to the business operations of others; nor shall they enter into any agreement with BÉTx or any other party, or engage in any concerted conduct, the purpose of which is to restrict, prevent or distort competition. Furthermore, BÉTx expects its business partners and suppliers who provide services to consumers to conduct themselves in accordance with all applicable consumer protection provisions, to conduct their activities in accordance with the spirit and principles of these consumer protection rules, and to respect consumers' rights and interests at all times, refraining at all times from infringing or jeopardising them.

7. PROTECTION OF REPUTATION

BÉTx expects its business partners and suppliers to protect the good reputation of BÉTx both during the term of the business relationship between the parties and after its termination. Business partners and suppliers must therefore not, whether in connection with their business activities or otherwise, whether in public or in private, engage in any conduct which, either directly or indirectly, is likely to damage or jeopardise the reputation of BÉTx. Business partners and suppliers are therefore specifically obliged to exercise their right to freedom of expression in such a way that it does not, under any circumstances, lead to damage to the reputation of BÉTx. Furthermore, BÉTx expects all its business partners and suppliers to ensure that the requirements set

out in this chapter are complied with by all employees of the business partner or supplier, as well as by any other third parties with whom they have a contractual relationship (e.g. subcontractors, business partners, suppliers).

8. SANCTIONS POLICY AND COMPLIANCE WITH EXPORT AND IMPORT REGULATIONS

Sanctions and import and export bans are trade restrictions imposed on specific countries, territories, individuals, groups or organisations, the purpose of which is to maintain or restore international peace and security, and to safeguard human rights, democracy and the rule of law. Such sanctions are legal provisions that prohibit or restrict the sale, purchase, transfer or provision of goods, funds, services, technological solutions or information. BÉTx is committed to complying with international sanctions and expects the same from its business partners and suppliers.

BÉTx requires all its business partners and suppliers to comply with the applicable import and export regulations and to exercise due diligence when entering into contracts with third parties. They are also required to bring to the attention of BÉTx any information on the basis of which the subject matter of a transaction, the place of performance, the direction of the transfer of goods or services, the nature of the product or service, the currency of settlement of a transaction, the parties involved (including intermediaries and financial service providers used) or any other circumstances, may give rise to a risk of breaching sanctions in connection with the business relationship with BÉTx

9. CORRUPTION AND BRIBERY

BÉTx does not tolerate any form of corruption (including bribery, bribes paid to public officials, kickbacks, blackmail, trading in influence, abuse of power for personal gain, unlawful advantages and gifts provided with the intention of exerting influence), whether in the (private) sector or in relation to those operating in the state or local government sectors (public sector), and expects the same of its business partners and suppliers. BÉTx strictly prohibits any person acting on its behalf, in its representation or in any way in its interests from offering, giving, soliciting, accepting or receiving any unlawful advantage. Business partners and suppliers must not use any payments or assets originating from BÉTx in any form for the purpose of exerting undue influence. BÉTx acts in this manner, and expects the same from its business partners and suppliers, even if this results in BÉTx suffering a competitive disadvantage or missing out on a business opportunity. BÉTx acts transparently and free from undue influence when selecting its partners; and therefore expects its business partners and suppliers to act in accordance with these principles in their dealings with BÉTx – with particular regard to business gifts and invitations – and to refrain from any conduct that might give even the appearance of undue influence.

Business partners and suppliers are obliged to refrain from any form of corruption or from any activity that could potentially be regarded as corruption. Business partners and suppliers must not offer, promise or provide any unlawful advantage to persons holding public office at national or international level, or to other decision-makers operating in the competitive sector, with a view to receiving favourable treatment or benefiting from a particular decision; the same rules apply to donations, gifts, hospitality



and invitations to business events. Business partners and suppliers must not accept or offer benefits with a view to influencing business decisions, nor must they give even the appearance of doing so. Similarly, business partners and suppliers must not solicit benefits.

Business partners and suppliers are obliged to avoid situations of conflict of interest that carry a risk of corruption. If a business partner or supplier is also a client of BÉTx, they must not derive any unfair advantage from this circumstance and must keep their procurement and sales activities separate. The business partner or supplier undertakes to do the following, and requires the same of its directors, officers, employees, contractors, subcontractors, subsidiaries and representatives (hereinafter: Third Parties):

- to comply with the anti-corruption provisions of the above section, as well as with the requirements set out therein for their implementation and maintenance, and to provide the necessary tools and a compliance framework;

- ensures that Third Parties involved in the performance of the Contract likewise comply with the requirements of the framework set out above, and provides the Third Parties with the tools necessary for such compliance.

10. COMBATING FRAUD AND MONEY LAUNDERING

BÉTx expects its business partners and suppliers to act in good faith, in accordance with the relevant rules and regulations, to support the fight against fraud, and not to tolerate fraudulent business practices. BÉTx expects its business partners and suppliers never to participate in any business that supports criminal offences, or that involves the use of assets derived from such offences, the concealment of their origin, or the financing of terrorism, and to comply with and apply the anti-money laundering rules applicable to them. Furthermore, BÉTx expects all its business partners and suppliers to take reasonable and appropriate measures, commensurate with the size of their organisation, the resources at their disposal and their risk exposure, to identify their business partners and suppliers and to assess their integrity.

11. INSIDER TRADING AND MARKET MANIPULATION

The business partners and suppliers of BÉTx are obliged to treat as confidential and safeguard any information relating to BÉTx that constitutes inside information; furthermore, they are obliged to comply with the regulations concerning the prohibition and prevention of insider dealing, and may not unlawfully use inside information, nor may they disclose or share inside information with unauthorised persons without authorisation. Business partners and suppliers must never disseminate false market information or rumours that may affect financial instruments, in particular securities managed and issued by BÉTx. 'Inside information' means any information which is not publicly available and is material, relating directly or indirectly to BÉTx or any other company involved in public securities trading, or to their securities, the disclosure of which would, in all likelihood, have a significant effect on the price of financial instruments. 'Financial instruments' include, amongst others, transferable securities, money market instruments, options, futures, swaps and forward rate agreements. 'Market manipulation' means

the dissemination or transmission of false information relating to any security or its issuer with the intention of influencing the price or market perception of that security for the purpose of obtaining financial gain.

12. EFFECTIVE COMPLAINT HANDLING PROCEDURES

Business partners and suppliers must provide employees with effective complaint-handling procedures so that workplace issues – including those relating to harassment and discrimination – can be brought to the attention of company management to ensure an appropriate resolution. A safe environment must be created for employees in which they can raise their complaints and provide feedback. The business partner or supplier is obliged to regularly review reporting procedures and to monitor the current status of the resolution of complaints received. Complaints-handling procedures must be accessible and culturally appropriate, and, where possible, must allow for anonymous reporting. Employees and/or their representatives must be given the opportunity for open communication and the chance to share with company management their views and concerns regarding working conditions and management practices without fear of discrimination, retaliation, intimidation or harassment as a result. The business partner or supplier is obliged to regularly inform employees of all complaint-handling procedures. Any form of retaliation against employees for raising workplace issues is strictly prohibited. Business partners and suppliers must not resort to personal attacks, intimidation or other threats against employees who raise workplace issues, including violations of employees' rights under local legislation or international standards.

13. ACCURATE RECORDS, REPORTS AND THE INTEGRITY OF BUSINESS PROCESSES

The integrity of financial and non-financial records and reports is essential for sound decision-making and for maintaining trust amongst business partners and suppliers; therefore, BÉT x's business partners and suppliers are obliged to maintain their financial (accounting) and non-financial records and prepare their reports and financial statements honestly, accurately and objectively, and to follow accounting practices that are lawful, ethical and provide a true and fair view of their financial position. Falsifying records or misrepresenting the facts is neither justifiable nor acceptable under any circumstances .

14. AVOIDING CONFLICTS OF INTEREST

BÉT x's business partners and suppliers are expected to avoid any situation which, in connection with the performance or maintenance of an agreement or business relationship with a member of BÉT x, could result in a conflict of interest, give the appearance of one, or jeopardise BÉT x's legitimate economic interests in any other way. BÉT x therefore expects its business partners, and suppliers, in particular, not to enter into any relationship with employees of BÉT x or any other third party that jeopardises the legitimate economic interests of BÉT x, gives rise to a conflict of interest, or creates the appearance of influencing business decisions. A conflict of interest may typically, but not exclusively, arise from the further employment of employees of BÉT x companies in any legal relationship for the purpose of performing work (except for dual employment based on an agreement concluded with BÉT x),



as well as – with the exception of the acquisition of publicly traded shares – the acquisition by an employee of BÉT x of an investment, shareholding or business interest in a business partner's or supplier's company. BÉT x's business partners and suppliers are required to avoid and disclose any situation which, in connection with a position held at BÉT x, gives rise to a conflict of interest or may create the appearance of one.

15. PROTECTION OF CORPORATE ASSETS

BÉT x's business partners and suppliers must take responsibility for the integrity of BÉT x's assets and resources, and for their proper, economical and efficient use, which have been entrusted to them or to which they have access, and are obliged to use BÉT x's assets and resources exclusively for lawful and approved business purposes.

16. PROTECTION OF TRADE SECRETS AND INTELLECTUAL PROPERTY

BÉT x's business partners and suppliers must treat as confidential and protect as trade secrets all non-public information obtained or generated in connection with their business relationship with BÉT x, including information relating to commercial relationships, transactions, operations, financial position, investments, negotiations, economic performance and plans, business activities, business partners, clients, suppliers, related documentation and data storage media, as well as any solutions, facts, data, know-how, ideas, concepts and other information created or collected in the course of their activities. Such information may not be used, disclosed to any third party or otherwise made publicly available, except where disclosure is required by applicable law, a competent authority or a binding court order, or has been expressly authorised in writing by BÉT x.

BÉT x respects the work of others and their intellectual property rights, and expects the same from its partners. Valuable, confidential ideas, strategies and other types of business data developed at BÉT x constitute company property and, in certain cases, are protected by law as intellectual creations. Intellectual property includes, for example, inventions, know-how, patents, trade marks, industrial design rights, copyright, domain names, scientific and technical knowledge, and all other rights relating to intellectual creations. BÉT x's business partners and suppliers are obliged to respect all intellectual property and the rights associated with it. Everyone is obliged to comply fully with any agreements concluded in relation to intellectual property created or acquired on behalf of BÉT x or using the resources of BÉT x .

17. DATA PROTECTION AND DATA SECURITY

BÉT x's business partners and suppliers must respect the privacy of others and are responsible for complying with legislation on the protection of personal data; in particular, they may collect and process personal data solely for lawful purposes and only for as long as is necessary to achieve the purpose of the data processing; furthermore, they must provide data subjects with the information required by the relevant legislation regarding their data processing. BÉT x also expects all its business partners and suppliers to act in accordance with the provisions of the contract concluded with BÉT x in



relation to the processing of personal data. BÉT x's business partners and suppliers must implement appropriate security measures to ensure the confidentiality, integrity and accessibility of data to authorised persons. Given the nature of its activities, BÉT x is committed to promoting the development of a cyber security culture, which it encourages throughout its entire value chain; and therefore BÉT x's business partners and suppliers are obliged to implement appropriate data security measures, including programmes aimed at raising cyber security awareness. Accordingly: All users involved in the management, use and operation of any IT infrastructure owned or used by BÉT x are required to regularly attend training designed to deepen information security awareness; they are also required to ensure that their own employees, subcontractors and agents participate in such training. BÉT x's business partners and suppliers are obliged to ensure that only identified users with appropriate authorisation have access to the information infrastructure, in accordance with the 'need-to-know' principle. With regard to the IT equipment provided by BÉT x, BÉT x reserves the right to monitor and control its operation and use through technical solutions in order to ensure data security.

Guidelines on data security, data protection. Data processing, and the use of data must be documented in a clear and comprehensible manner and, where necessary, provided to BÉT x. This activity is subject to the relevant legislation and regulations, in particular data protection and security provisions, as well as the data protection and security provisions agreed in the Contract. The business partner and the supplier are obliged to comply with all relevant data protection legislation, as well as the data protection and security requirements set out in the contract.

18. QUALITY REQUIREMENTS

BÉT x always strives to ensure that its services, the products it distributes, and the development and delivery of its own products meet the most stringent quality standards. BÉT x conducts all its activities in accordance with the relevant legislation and regulatory requirements, as well as its own strict internal quality standards, and expects the same from its business partners and suppliers. BÉT x's business partners and suppliers must provide the highest possible level of quality and product and service safety that can be expected based on the nature of the product or service. They must fulfil their obligations in a timely manner and provide all their business partners with truthful, reliable, accurate and unambiguous information about their products and services. Should any business partner or supplier of BÉT x, or any party acting on behalf of or in the interests of such a business partner or supplier, persistently or significantly breach the provisions of this Code in connection with their business relationship with BÉT x, BÉT x reserves the right, in order to clarify the circumstances and to take the necessary measures to remedy any proven breaches, to conduct an investigation and, based on the results of such investigation, to terminate the contract(s) and the business relationship in accordance with the applicable rules of law governing the relationship in question. BÉT x adheres to a zero-tolerance policy with regard to corruption, the prohibition of cartels, respect for human rights and human dignity, equal treatment, health protection, data protection, data security and environmental protection; and therefore BÉT x does not consider a business relationship with partners who materially breach these obligations to be sustainable. Furthermore, business partners and suppliers must not disclose to unauthorised persons any information which has come to their knowledge in connection with their relationship with BÉT x or the performance of their activities, and the disclosure of which would have adverse consequences for BÉT x or third parties, or which BÉT x has classified as confidential, or which



the partner should have recognised as confidential. As information, data and knowledge are assets of critical importance, every business partner and supplier is responsible for safeguarding the confidentiality and integrity of any data created, modified, transferred, shared, stored or used during their business relationship with BÉT x, regardless of its actual location or form (electronic, paper-based, other formats, etc.). BÉT x expects all its business partners and suppliers to ensure that, following the termination of the business relationship or the business partner or supplier shall, in accordance with the agreement between the parties, immediately destroy any confidential information or trade secrets that came to their knowledge in connection with the performance of the contract, or return such information to a member of BÉT x. Should any information arise concerning a breach of this Code, the business partners and suppliers of BÉT x are obliged to cooperate with BÉT x in clarifying the circumstances.

In this context, BÉT x expects cooperation primarily in the following areas:

Provision of information: the business partner or supplier undertakes to notify BÉT x's Compliance department without delay of any information that comes to its attention in connection with a breach of this Code.

Conducting internal investigations: the business partner or supplier undertakes to investigate any suspected breaches of the Business Partner and Supplier Code of Ethics by the business partner or supplier, and to inform BÉT x's Compliance department of the results of such internal investigations. BÉT x shall notify the business partner or supplier of any suspicions arising in connection with a breach of this Code by the business partner or supplier, and of the investigation relating thereto.

Cooperation: the business partner or supplier undertakes that, should BÉT x have any further questions or concerns in connection with the results of the internal investigation, they will cooperate with BÉT x (e.g. by completing a questionnaire, making a statement, providing the requested documents, etc.).

Submission of a certificate or declaration: e.g. submission of a certificate or declaration attesting to compliance, or submission of data from a third party (data provider or official register) attesting to compliance.