

Code of Ethics

Interchange Group companies in Hungary

Date of entry into force: 24 July 2023.

Approved by: Krisztián Jánvári, Managing Director of Interchange Kft.

TABLE OF CONTENTS

Introduction	3
Subjects to this Code	3
Defining provisions	4
How to act ethically?	4
CHAPTER I: GENERAL RULES OF ETHICAL CONDUCT	5
1) The requirement of ethical conduct in general	5
2.) Ethical principles for customers and business partners	5
3) Ethical principles for members and investors	6
4) Fair competition	7
5) Social ethics	7
CHAPTER II: EMPLOYEE ETHICS	9
1) Basic BEHAVIOURAL requirements for employees	9
2) Healthy company culture and working environment	10
3) PHYSICAL PRESENCE IN THE workPLACE	10
4) Smoking, alcohol and drugs	11
5) Confidentiality obligations	11
6) Management and protection of Company assets	12
7) Bringing in and removal of personal belongings, and protection of personal property	12
8) Computer, email and internet use	12
9) Fair treatment on the basis of ability and achievements	14
10) Conflict of interest	14
11) Occupational safety and health responsibilities	14
CHAPTER III: WHISTLEBLOWING SYSTEM	16
1) Whistleblower	16
2) Protection of the Whistleblower	16
3) Anonymous notification (hidden, unidentified name)	17
4) Procedure for notifications	17
5) Register of notifications	19
6) Information on data processing related to notifications	19
CHAPTER IV: ENTRY INTO FORCE, REVIEW AND AMENDMENT	24

INTRODUCTION

This Code of Ethics (hereinafter: Code) is binding on the Hungarian members of the Interchange Group (Interchange Kft., Magyar Pénzváltó Kft., GYORSPÉNZVÁLTÓ Kft., INTERCASH Zrt., Europe Interchange B.V.'s Hungarian Branch, Interchange Brands Ltd.'s Hungarian Branch; hereinafter individually, collectively and generally referred to as the "Company(ies)"), and has been prepared in accordance with the Group's Conflict of Interests and Anti-Corruption Policy, subject to Hungarian legal requirements.

The Interchange Group provides financial services and complementary financial services to its clients. The purpose of this Code is to help ensure that the Companies provide their services to their customers in a professional manner, taking into account applicable laws and regulations, and to a high standard. This Code basically regulates the relations between the Companies and their employees, members, customers, business partners, competitors and society, and sets out the main rules and frameworks for ethical behaviour in these relations. However, this Code does not cover every rule and expectation related to corporate conduct. Instead, it merely lays down the general principles against which all activities should be assessed.

SUBJECTS TO THIS CODE

This Code applies to all employees of the Companies – including those in leadership roles – as well as any third parties who are in, or intend to establish, an employment or any other legal relationship with the Companies, or who seek to initiate such a relationship or a business partnership. The Companies require all third parties entering into contractual relations with them to read, acknowledge and comply with this Code.

After the introductory and interpretative provisions, the Code is divided into four chapters, of which Chapter I contains the general rules and expectations of ethical conduct applicable to all, including employees and business partners of the Companies. The Companies expect all persons having any legal relationship with them to be aware of, acknowledge and comply with the said rules and expectations.

Chapter II deals only with the rules of conduct applicable to employees of the Companies, and therefore knowledge, acknowledgement and compliance with these rules are expressly and only required of persons who have an employment or other legal type of working relationship with the Companies.

Chapter III contains information on the whistleblowing system. If any person subject to this Code becomes aware of a violation of law or of any provision of this Code, they have the right and obligation to report such violation as specified in Part III, and the Companies will act as set forth herein.

The provisions of this Code impose necessary and proportionate restrictions on certain personal rights of the Companies' employees. Given that Companies consider ethical behaviour to be fundamental and expect it not only from their employees but also from their partners, it is necessary to outline the rules of conduct applicable to employees. The Companies have carefully evaluated how the provisions of this Code affect the individual lives, privacy, and certain fundamental freedoms of their employees. This is counterbalanced by the Companies' commitment to ethical behaviour in all aspects, considered a cornerstone of both their short-term and long-term objectives.

Accordingly, the standards of conduct set out in this Code, while they may indeed restrict certain employee rights and freedoms, may be considered proportionate to the Companies' objectives. The standards of conduct set out in this Code thus constitute a restriction on certain personal rights of employees in the ways and under the conditions set out in this Code and, as a general rule, apply during the employment relationship; however, there may be exceptions which apply after the termination of the employment relationship (confidentiality obligations).

The current version of the Code is available at <https://interchangeafx.com/hungary/> and the Company will publish the Code for its employees in the usual local manner, so that the Code is publicly available to all.

DEFINING PROVISIONS

For the purposes of this Code, the following terms and expressions shall have the meanings given to them herein:

- (a) **natural and legal persons concerned:** employees, customers, business partners, members of the Companies, owners or subsidiaries of any of the foregoing, or other entities having a legal relationship based on influence, external partners performing outsourced tasks, state and municipal bodies, authorities, courts, which have a direct or indirect influence on the rights or interests related to the business operations of the Companies;
- (b) **employee(s):** persons working for the Companies in an employment relationship or any other type of working relationship (including, in particular, but not limited to, persons working for the Companies in the framework of temporary work or assignments);
- (c) **proprietary information:** any information relating to the Companies, their operations and activities, including in particular, but not limited to, the Companies' financial data, business plans and budgets, information on the Companies' current and future services, software in object and source code form, personnel information, and management and organisational changes;
- (d) **member:** a person who holds a share in the Company, or in the case of a branch, the founder; **minority member** (where applicable): a member who holds less than half of the voting rights in the Company;
- (e) **area:** includes the head office (the seat of the Companies), the safe deposit box and the exchange offices.

HOW TO ACT ETHICALLY?

The Companies expect all parties to whom this Code applies to fully comply with its provisions, yet the Code cannot provide comprehensive guidance for every situation. Therefore, if an ethical question or conflict arises that is unclear how to answer or resolve, thinking through and answering the following questions can help you decide how to act in accordance with the Code:

- Does the conduct comply with the law, other regulations and guidelines?
- Is it ethically acceptable?
- Is it consistent with the values and interests of the Company?
- Would your immediate superior or the management of the Company also consider this decision to be correct?
- How would you feel if the case were to be reported in the press or on social media?

- How would you feel if your family found out about your procedure or decision?

If the assessment of a case is unclear on the basis of the above, or if any further questions arise in relation to a rule or provision of the Code or its application, the Company's HR staff will assist in the interpretation.

CHAPTER I: GENERAL RULES OF ETHICAL CONDUCT

1) THE REQUIREMENT OF ETHICAL CONDUCT IN GENERAL

The requirement of ethical conduct includes in particular the following principles:

- 1.1. The Companies shall make every effort to create and operate in an ethical corporate culture and environment by demonstrating due responsibility and ethical behaviour. As part of an international group of companies, the Companies also assume social responsibility for their operations.
- 1.2. All parties to whom this Code applies are obliged to respect and comply with the laws and regulations applicable to the activities of the Companies.
- 1.3. In all jobs and positions in the Companies, and in business relationships, you must always act with integrity, fairness and trust.
- 1.4. The Companies, the natural and legal persons concerned, and any other person associated with the Companies shall respect the requirement of equal treatment and shall comply with the provisions of international legal standards and Hungarian law on non-discrimination, in particular by not applying or tolerating unjustified, unjustifiable and unreasonable discrimination based on any protected characteristic, in particular, but not limited to, race, gender, religion, nationality, regional and educational background, age, disability, marriage and gender identity, in their relations and legal relationships and shall respect human dignity, diversity and human rights.
- 1.5. In the course of their activities, the Companies shall at all times lawfully process personal data relating to natural persons and protect the confidential information of all natural and legal persons concerned.
- 1.6. The Companies operate within a sound and transparent organisational structure, always striving to preserve their dignity and reputation - and expect the same from the natural and legal persons involved.

2.) ETHICAL PRINCIPLES FOR CUSTOMERS AND BUSINESS PARTNERS

2.1. Respect and appreciation of customers and business partners

- 2.1.1. The Company abstains from all forms of unfair market practice, including but not limited to unauthorised advertising and deceptive or aggressive commercial practices, which are considered as unfair competition. The Company respects the right of its customers and business partners to make rational, informed decisions about services based on their own informed choice.

2.2. The requirement of trust

2.2.1. In its activities, the Company takes into account the needs and reasonable suggestions of its customers and business partners and strives to satisfy them, provided that it has the legal possibility to do so, by providing the best services achieved through continuous technological development. However, the Company will reject and refuse to fulfil any demands, requests, or proposals that are in violation of the law or otherwise contrary to regulations.

2.2.2. The Company always provides clear and accurate information about the services it delivers.

2.2.3. In accordance with the standards of ethical conduct, the Company fulfils the obligations it has lawfully assumed.

2.3. Fair dealings with business partners

2.3.1. The Company endeavours to provide its business partners with fair opportunities and equitable terms for doing business, in line with market conditions. This aims to foster the development of mutually beneficial economic and business relationships, rooted in reciprocal respect and trust.

2.3.2. The Company works with its customers and communicates openly to ensure that its customers receive high quality services.

2.3.3. The Company expects all its business partners to comply with international regulations, standards and Hungarian legislation on the protection of human rights, the prohibition of child and forced labour, working hours, equal treatment and environmental protection.

2.3.4. The Company strictly protects and treats as confidential any information and trade secrets obtained through its relationships with business partners, in accordance with applicable contracts and laws. It also expects its business partners to apply the same level of protection and confidentiality to the Company's own information.

3) ETHICAL PRINCIPLES FOR MEMBERS AND INVESTORS

3.1. Protection of members and investors

3.1.1. The Company conducts commercial economic activities with the aim of generating a healthy level of profit. To achieve this, the Company utilises efficient corporate governance, transparent decision-making, and rational investment strategies.

3.1.2. Members of the Company may request key information regarding the management, organization, and operation of the Company from its management to assist in their decision-making. Such information will be provided by the Company's management promptly and accurately.

3.2. Equal treatment of members

3.2.1. All members, including minority members, shall be treated fairly and equally in the exercise of their membership rights and in the performance of their obligations. The management of the Company shall endeavour to take into account and give effect to legitimate requests and suggestions from the members of the Company in its activities and operations.

- 3.2.2. The members and management of the Company make rational decisions with the aim of ensuring that the rights related to dividends, as well as other rights of minority members, are not compromised in any way.

3.3. Internal audits and transparent financial information

- 3.3.1. Continuous internal audits are conducted at the Company with the aim of preventing and eliminating any form of corruption and irrational operations.
- 3.3.2. Information on financial operations is recorded and managed by the Company on the basis of accurate records of financial transactions, confirmations, vouchers, and by implementing appropriate processes and internal audits. Financial reports are prepared about the Company's lawful and transparent operations in accordance with international standards, as well as Hungarian accounting, bookkeeping, and corporate regulations. Furthermore, the Company regularly submits itself auditing procedures conducted by independent external parties.
- 3.3.3. The Company will seek to do business only and exclusively with legal and transparent partners and will not engage in or cooperate with others in illegal, fraudulent or sham legal transactions.

4) FAIR COMPETITION

- 4.1.1 The Company competes in the market in a transparent manner, in compliance with the relevant international standards and Hungarian legislation, and in compliance with market and industry standards.
- 4.1.2 The Company condemns all forms of unfair competition and will not engage in any conduct that restricts, distorts or excludes the market or free competition.
- 4.1.3 The Company considers any form of abuse of a dominant position unacceptable and, to the extent that it would have a dominant position in the relevant market, it does not engage in such conduct in any respect.
- 4.1.4 The Company will not take steps to unfairly obtain or use the trade secrets or other confidential information of its competitors. All business information about competitors must be obtained by the Company only by lawful, verifiable means and used only for the purpose of strengthening the business relationship.

5) SOCIAL ETHICS

5.1. Respect for human rights

- 5.1.1. The Company promotes and respects the human rights enshrined in, inter alia, the Universal Declaration of Human Rights and the European Convention on Human Rights, and strives not to violate them in any way in the conduct of its business.

5.2. Prohibition of child and forced labour

- 5.2.1. The Company complies with legislation and international standards on the age and working conditions of employees and does not employ workers in a way that violates the prohibition of child and forced labour.
- 5.2.2. The Company strongly supports and protects the right to work on a voluntary basis and does not use any form of coercion - mental or physical - against its employees.

5.2.3. The Company will not tolerate any violation of the prohibition of child and forced labour in relation to any of its business partners. Should the Company detect a violation of these prohibitions by any person or entity in association with it, the Company will promptly initiate the necessary measures with the appropriate authorities.

5.3. Anticorruption

5.3.1. The Company pays particular attention to acting honestly, fairly and ethically in its activities and to fully comply with international and Hungarian anti-corruption laws and regulations. If bribery or corruption is or may be involved, the Company will apply a zero-tolerance policy.

5.3.2. The Company, its employees and persons acting on its behalf shall not, directly or indirectly, seek or accept any undue advantage or promise or approve the acceptance or solicitation of any undue advantage from the Company's customers, business partners or any other party in order to breach their obligations or abuse their position. An unlawful advantage can take the form of any financial, personal, or moral advantage. This may include, but is not limited to, payment of money, giving or donating anything with monetary value, provision of any other service or benefit, or any other illegal activity that breaches laws, particularly those specific legal provisions aimed at preventing money laundering and the financing of terrorism. The Company's employees may not accept any remuneration (monetary or non-monetary) from third parties in respect of their activities in the course of their employment.

5.3.3. The Company maintains lawful, fair, and objective relationships with state and local government bodies, public service organizations, and authorities. Specifically, it does not influence, nor attempts to influence, officials or other relevant individuals for the purpose of gaining any undue advantage.

5.3.4. The Company does not prohibit the provision or acceptance of everyday hospitality or gifts within reasonable limits, as long as they are within the confines set by applicable laws.

- (i) Everyday examples for allowed, reasonable hospitality or gifts are items which:
 - a) are not given or accepted with the intent to influence unfairly;
 - b) are given on behalf of the Company, not on behalf of the employee;
 - c) do not include any monetary instrument (including gift vouchers);
 - d) are appropriate in the given circumstances, e.g. Christmas gifts of usual type and value;
 - e) are of a type and value appropriate to the occasion, taking into account the circumstances of the gift;
 - f) are given publicly and not secretly; *and*
 - g) are not given to political, public or municipal bodies, their representatives or officials.
- (ii) Examples of hospitality and gifts that are not acceptable and will not be tolerated:
 - a) are given with the expectation or hope of obtaining (or having already obtained) any undue advantage in return;
 - h) are given with the aim to "facilitate" or speed up a routine procedure; *or*

b) where the person giving it is known or suspected to be giving it for the purpose of obtaining for them or for others an undue advantage, in particular if the purpose of the benefit were to be in cash.

5.3.5. Under Hungarian law, the Company has an obligation to report corruption-related offenses. Therefore, if it becomes aware of any suspicious activities that could indicate corruption, the Company will take necessary measures to fulfill this obligation.

5.3.6. Some Companies are required to comply with specific legal requirements to prevent money laundering and terrorist financing. The Companies strive to provide services and establish and maintain business relationships solely with customers who are engaged in legitimate business activities, enjoy a good reputation, and possess financial resources from lawful sources.

5.3.7. In public procurement, when bidding for contracts with government (state) or municipal bodies, the Company will always act ethically, transparently, fairly and accurately, in compliance with all applicable laws and regulations.

What to do if you suspect corruption?

If you suspect or know that anyone has violated or is likely to violate the provisions of this section in the future, you, at all events, should inform your direct superior or the Company's management as soon as possible and without delay.

If an employee breaches the provisions of this chapter, it may be deemed a severe violation of the obligations arising from the employment contract, potentially leading to the termination of the employment relationship.

5.4. Social contribution

5.4.1. The Company operates within the framework of Hungarian rules of law and international and Hungarian business and financial culture and practice.

5.4.2. The Company fulfils its basic obligations to the community (society) by creating and maintaining stable jobs and by paying its taxes on time.

CHAPTER II: EMPLOYEE ETHICS

1) BASIC BEHAVIOURAL REQUIREMENTS FOR EMPLOYEES

- 1.1. The Company expects its employees to behave ethically throughout their employment. Employees should not engage in any conduct, either during or outside working hours, that, especially given the nature of their roles or their position within the Company's organization, could directly and tangibly jeopardize the Company's reputation, legitimate economic interests, or the purpose of the employment relationship.
- 1.2. The Company expects its employees to accept the management philosophy and principles of the Company and to agree with the objectives and values set and followed by the Company, to perform their individually assigned tasks to the best of their professional ability and conscience, in accordance with the rules and internal policies of the Company. The Company encourages its employees to go beyond their personal perspectives and interests, striving for

continuous self-improvement to always meet the aforementioned expectations of the Company at the highest possible level.

- 1.3. In addition to the above, all employees must carry out their duties in a fair and lawful manner in the performance of their work. The Company expects employees to act professionally, transparently and rationally in the performance of their duties.

2) HEALTHY COMPANY CULTURE AND WORKING ENVIRONMENT

- 2.1. The Company respects and supports cultural diversity, striving to establish a corporate culture where open communication fosters mutual trust both between the Company and its employees, and among the employees themselves.
- 2.2. The Company finds any form of harassment, abusive or otherwise offensive behaviour that could disrupt a balanced workplace atmosphere or impede employees' work, unacceptable and intolerable. Any conduct that could create an intimidating, hostile, humiliating, or offensive environment towards anyone, such as verbal, physical or demonstrative infringements of others' human rights, or through sexual harassment, is not tolerated.
- 2.3. The Company creates a working environment in which employees are free to make suggestions to solve the difficulties and problems they experience.
- 2.4. The Company sets wage conditions in accordance with international rules and Hungarian laws. Specifically, it takes into account current regulations concerning the compulsory minimum wage and guaranteed wage minimum, ensures that wage supplements are determined and paid in accordance with legal requirements and circumstances, and fulfils all other obligations related to wages. These include, but are not limited to, appropriately registering and reporting to the authorities the employment of its workers and paying all applicable taxes and social contributions associated with their employment.
- 2.5. The Company strives to improve the standard of living of all its employees by providing them with the means to maintain a stable livelihood, and to support them in achieving their individual goals by ensuring flexibility in working hours, jobs and methods.
- 2.6. The Company supports its employees through various training and education activities.

3) PHYSICAL PRESENCE IN THE WORKPLACE

- 3.1. A fundamental obligation of an employee is to be present at the designated place and time, prepared and able to perform their work, and to be available to the Company during their prescribed working hours.
- 3.2. Criteria for being fit for work include:
 - 3.2.1. being free from the influence of alcohol and any other substances that may negatively affect performance, being well-rested, and maintaining personal grooming;
 - 3.2.2. working in compliance with the rules and regulations applicable to the work, with competence and due care;
 - 3.2.3. wearing the prescribed uniform for employees subject to the Company's uniform policy (where applicable);
 - 3.2.4. compliance with fire and safety regulations.
- 3.3. In addition to item 3.1, employees are obliged to carry out their work personally, in accordance with the rules, regulations, instructions and customs applicable to their work.

Employees are obligated to cooperate effectively with their colleagues, not put others' physical safety and health at risk, avoid interfering with others' work, and adhere to the instructions given. While performing their tasks, employees are obligated to exhibit behavior that promotes the fulfilment of the Company's obligations, advances its economic interests, and strengthens its business reputation and goodwill.

- 3.4. The Company publishes all applicable rules and regulations in a manner that is customary and generally known in the locality. All employees are obligated to adhere to these rules.

4) SMOKING, ALCOHOL AND DRUGS

- 4.1. Smoking is only permitted in designated open-air areas and at specific times.
- 4.2. It is prohibited to bring alcohol or drugs onto the premises or to work under the influence of these substances. With prior approval from the management, alcohol can be introduced to the premises for special occasions, such as presenting gifts to business partners or celebrants or during corporate events.
- 4.3. The Company has an alcohol breathalyser which can be used by the Company at any time. Inspections without good reason/suspicion should not be so frequent as to constitute harassment or to violate the employee's rights to dignity. If the employee has an alcohol level above 0 or is under the influence of drugs, their employment may be terminated with immediate effect.
- 4.4. An employee who is under the influence of alcohol is immediately exempted from work by their supervisor and sent home. In such cases, no remuneration is payable for the period of exemption.

5) CONFIDENTIALITY OBLIGATIONS

- 5.1. All employees are required to keep confidential any facts, data, information or solutions that they become aware of in connection with their employment, whether relating to the Company or its business partners, which constitute a trade secret or the disclosure of which or disclosure to third parties would harm the legitimate economic interests of the Company. In addition, employees may not disclose to any unauthorised person any information which has come to their knowledge in the course of their employment and the disclosure of which could have a detrimental effect on the Company or any other person.
- 5.2. All employees have a duty to protect and keep confidential any personal data that comes to their knowledge in the course of or in connection with their work.
- 5.3. The confidential information and personal data referred to above may be processed by the employees strictly only in the course of their work and for a purpose related to it, in compliance with Hungarian and EU law. To this end, all employees are required to comply with the organisational security rules, in particular those relating to the handling and protection of their own information. The Company implements security measures to prevent accidental or intentional disclosure of proprietary information and to avert data breaches. Employees are required to comply with these measures.
- 5.4. The obligation of confidentiality shall continue indefinitely after the termination of the employment relationship or any other legal relationship for the purpose of employment.
- 5.5. Photography or video recording on the premises is only allowed with the written permission of the management.

- 5.6. It is forbidden to take documents containing the Company's trade secrets or proprietary information out of the premises without the prior written approval of the management.

6) MANAGEMENT AND PROTECTION OF COMPANY ASSETS

- 6.1. The Company's lawfully possessed work tools, assets, and work-related premises – including all physical, financial, and intellectual property elements; communication systems; equipment; corporate bank cards; cash and other stock – may only be used for work-related purposes and in a manner approved by the Company's management. The Company will not tolerate theft, damage or unauthorized use of property or assets owned by it and prohibits the use of property or assets owned by the Company by external parties, such as friends or family members.
- 6.2. Items belonging to the Company may be removed from the premises only with written permission from the management. Failure to obtain such permit has serious consequences in terms of labour law.
- 6.3. If an employee becomes aware of any danger or problem threatening the Company's assets, or if the possibility of such a problem becomes apparent, they must immediately report it to their direct superior, who will take appropriate measures to protect the Company's assets.
- 6.4. Expenditures of the Company should be made judiciously and lawfully, in line with the Company's budget objectives, the provisions prescribed by Hungarian laws, the Company's internal authorization norms, and while adhering to the approval processes.
- 6.5. The Company respects intellectual property rights and acts at all times in accordance with the rules of law governing their protection, and requires its employees to do the same.
- 6.6. To protect the assets of the Company, camera surveillance is implemented on the premises, with the applicable rules outlined in a separate policy.

7) BRINGING IN AND REMOVAL OF PERSONAL BELONGINGS, AND PROTECTION OF PERSONAL PROPERTY

- 7.1. Items not necessary for regular work are not allowed to be brought into the workplace, excluding personal items of no significant value, but the Company shall not be liable for any damage caused to them.
- 7.2. Theft of or damage to another employee's property is prohibited. The Company considers any such case as theft/vandalism and will report it to the police.

8) COMPUTER, EMAIL AND INTERNET USE

8.1 Responsibility

- 8.1.1 All users are responsible for the entire computer network and in particular for the computer made available to them.
- 8.1.2 Information technology or computer equipment, systems, software belonging to the Company (hereinafter collectively: IT devices) may not be used for your own business or private purposes.
- 8.1.3 The Company protects its employees, business partners and itself from the use of illegal software and therefore employees should refrain from any behaviour that may

compromise the security of IT devices or that may make IT devices more susceptible to computer viruses when using the Internet.

8.1.4 The mobile phone provided by the Company for work purposes may be used in accordance with the provisions of the relevant Company management instructions.

8.2 Access to the computer network

8.2.1. All employees are obliged to use their assigned computers responsibly and carefully, to preserve their condition, and to switch them off after completing their work.

8.2.2. Access to the computer network by external parties (including software and hardware suppliers and external maintenance personnel) is only permitted after prior consultation with the Company's IT department or external IT service provider.

8.2.3. IT systems, software, as well as passwords of individual users and all information about the computer structure, require strict confidentiality.

8.2.4. It is forbidden to connect to the IT devices your personal or other foreign media (e.g. pendrive, CD, DVD, etc.). If this is indeed necessary, it can only be done with the prior approval of the Company's IT department or an external IT service provider. It is the responsibility and obligation of the Company's IT department or the external IT service provider to ensure that the device or media to be connected does not contain viruses harmful to the device or cause damage to the device.

8.2.5. Users are not allowed to install new software on the system or change system settings.

8.3 Internet access

8.3.1. Individual users also have the possibility to use the internet in connection with their work. Access to the Internet is determined by the user's direct superior. The Internet may be used solely and exclusively for the purposes of the Company's business.

8.3.2. All users are prohibited from accessing any website that contains obscene or illegal content or that may compromise the Company's system data.

8.3.3. It is forbidden to download music or movies from the Internet, to use social media platforms or various chat programs, to place an order online if it is not in the interest of the Company.

8.3.4. All users must acknowledge that all Internet-related activities may be automatically recorded and monitored in the system.

8.4 Email

8.4.1. The company email address should only be used for company business and should only be given to business partners.

8.4.2. It is FORBIDDEN when using email:

- sending pornographic mail/content;
- sending letters containing trade secrets to external parties (except for letters resulting from the employee's job duties, such as: quotation, invoice, etc.);
- sending letters that interfere with the work of others;
- sending audio or video files that are not in the best interests of the Company or that could harm or compromise the interests of the Company.

- 8.4.3. A user who receives such forbidden mail from an internal or external user must notify the Development and Investment Manager.
- 8.4.4. All users should be aware that email traffic may be subject to routine and detailed review as a general rule and in justified cases. However, computer network supervisors are not allowed to open the revised email on their own. Such emails can only be opened in the presence of the individual in question, as well as a designated representative from both the Company management and the IT Department.

9) FAIR TREATMENT ON THE BASIS OF ABILITY AND ACHIEVEMENTS

- 9.1. The Company does not apply or tolerate any form of unjustified, unfounded, and unreasonable discrimination in any area – especially but not limited to areas such as employment, advancement, compensation, and disciplinary actions. This policy applies to all protected characteristics, including but not limited to: sex, skin colour, race, ethnic or minority affiliation, religion, age, marital status, sexual preference, gender identity, social status, disability, pregnancy, military status, protected genetic information, or political sympathies.
- 9.2. The Company provides equal employment and occupational opportunities to all those who have the qualifications and skills to perform a specific job.

10) CONFLICT OF INTEREST

- 10.1. A conflict of interest arises when the personal activities, interests, or relationships of an employee or a person acting on behalf of the Company interfere with or conflict with their responsibilities in their position at the Company. This conflict may also occur when these factors prevent or obstruct the individual from acting in the best interests of the Company or create an appearance of such conflict or obstruction.

For example, the following situations may constitute a conflict of interest in relation to currency exchange activities:

- the employee gains a financial benefit or avoids a financial loss to the detriment of the Company;
- the employee has an interest in the exchange rate other than that of the Company;
- the employee also performs currency exchange activities on behalf of another market operator;
- the employee receives or expects to receive a benefit from a person other than the Company in connection with the currency exchange activity (see also Chapter I, point 5.3).

- 10.2. Considering the above, the Company's employees – including those in managerial positions – are not allowed to acquire shares in, or hold executive roles in, any company that carries out activities identical or similar to those of the Company, thus directly or indirectly competing with the Company. An employee who accepts such an assignment or begins to perform such an activity shall immediately inform the Company in writing.

11) OCCUPATIONAL SAFETY AND HEALTH RESPONSIBILITIES

- 11.1. Protecting the health and safety of employees and communities is a top priority for the Company and we will create a safe working environment to reduce potential risks for all employees.

- 11.2. The Company strictly adheres to international standards and Hungarian laws related to the improvement of occupational safety and health for workers. Upon identification of any risk factors, immediate steps are taken to implement appropriate measures.
- 11.3. In accordance with legal requirements, the Company provides safety trainings (such as those addressing electric shocks, fire, etc.) to ensure that employees comply with safety rules and regulations. Employees are obliged to attend training courses organised by the Company.

CHAPTER III: WHISTLEBLOWING SYSTEM

The Company is committed to fair, efficient and transparent business operations, and has established and operates an ethical whistleblowing system to maintain and safeguard this. The whistleblowing system is governed by Act XXV of 2023 on complaints, disclosures in public interest, and related rules on notification abuses (hereinafter: "**Act**").

1) WHISTLEBLOWER

1.1. In cases where there is a breach of laws in general, specifically laws related to the operation of the Company, professional ethics, behavioural rules outlined in this Code, standards, other Company policies (collectively referred to as "**Rules**"), or any other form of misconduct, the following individuals are authorized to make a notification via the system of notifying ethical misconduct or abuse (hereinafter: **Whistleblowing System**), in accordance with the provisions of this section:

- a) persons employed by the Company¹, as well as trainees, volunteers, including persons who have ceased to be employed or who are seeking to become employed and have started the process of becoming employed, (hereinafter collectively referred to as "**Employees**");
- b) persons who have a contractual relationship with the Company (business partners, suppliers, subcontractors, etc.) or sole traders, sole proprietorships, including in the case of the latter, those whose contractual relationship has already ended or who wish to enter into a contractual relationship and the procedure for the establishment of such a relationship has already begun (hereinafter collectively referred to as "**External Persons**");
- c) the members of the Company, persons belonging to the Company's administrative or management body, including persons who have ceased to have such a relationship or who wish to enter into such a relationship and the procedure for the establishment of such a relationship has already begun;
- d) those who have a legitimate interest in notification or in remedying or stopping the conduct which is the subject of the notification.

(All the above persons are hereinafter collectively referred to as "**Whistleblower**" and "**Whistleblowers**".)

1.2. Whistleblowers are expected to report suspected violations of the Rules to the Company promptly so that the Company can take appropriate action without delay.

2) PROTECTION OF THE WHISTLEBLOWER

2.1. The Company will provide the Whistleblower with a high level of protection in accordance with the law, unless the Whistleblower has made the report anonymously, and will ensure that the Whistleblower will not suffer any retaliation, disadvantage or other negative consequences for making the report.

¹ See definition under Section 16(3) of the Act.

2.2. Whistleblowers are not protected in the cases listed in the Act², in the case of bad faith, malicious, frivolous or abusive whistleblowing, and also if they knowingly and intentionally provide false information or misrepresent a true fact in their report.

2.3. A report shall be deemed lawful if

- a) the Whistleblower has made the report in accordance with the relevant legislation,
- b) the Whistleblower, as an employee, obtained the information reported in the context of his/her work-related activities, and
- c) the Whistleblower had reasonable grounds to believe that the information reported was true at the time of notification.

2.4. The protection of the Whistleblower also applies if, in the course of an investigation following a bona fide notification by the Whistleblower, the investigators find that the notification is unfounded. This means that notifications made in good faith by a Whistleblower, but subsequently found to be unfounded or incorrect following an investigation, cannot have negative consequences for the Whistleblower.

2.5. After making a notification, the Whistleblower has the right to raise a concern to the Company if they believe they have experienced any disadvantage as a result of their notification.

3) ANONYMOUS NOTIFICATION (HIDDEN, UNIDENTIFIED NAME)

The Whistleblower is also entitled to make the notification anonymously (without giving their name or personal data). The Company warrants that it will not reveal the identity of the Whistleblower in this case, however, the Company will consider the Whistleblower's notification in its entirety and is not obliged by law to investigate the anonymous notification.

4) PROCEDURE FOR NOTIFICATIONS

4.1. Making a notification

- 4.1.1. Please send your notification to whistleblowing@interchange.hu. Anonymous notification is also possible, e.g. by using a service that provides single-use email addresses.
- 4.1.2. Notifications can be made on paper, in writing and orally (by telephone or other voice messaging system) or in person to a Company HR colleague.
- 4.1.3. When making a report, the Whistleblower must assert that they are doing so in good faith about circumstances that they either know to be true or have reasonable grounds to believe are true. When a notification is made by a legal person, it is obliged to provide its registered address and the name of its statutory representative submitting the report.
- 4.1.4. Where it has become apparent that the Whistleblower has communicated false information in bad faith or false information of key importance and
 - there are indications that a criminal offence or irregularity has been committed, or
 - there are reasonable grounds to believe that the Whistleblower has caused unlawful damage or other harm to another person,

² See the provisions of Section 48(2) of the Act.

the personal data of the Whistleblower shall be disclosed by the Company to the body or person entitled to initiate or conduct the investigation, upon request.

4.1.5. Except in the case of anonymous notification, when making a notification, Whistleblowers shall explicitly consent to the processing of their personal data.

4.2. Follow-up and investigation of the notification

4.2.1. The body authorised to investigate

A notification received in the whistleblowing system is followed up and investigated by a committee set up to investigate notifications (hereinafter "the Committee").

Within 7 (seven) days of receipt of the written notification, the Company will send an acknowledgement of receipt of the notification to the Whistleblower, except in the case of anonymous notifications. The confirmation will provide the Whistleblower with general information on the procedural and data management rules under the Law.

4.2.2. Dismissal of investigation

The Committee may consider the examination of the notification and as a result may dismiss the investigation in the following cases:

- (i) a notification made by an anonymous (unidentified or with hidden name) Whistleblower or concerning an unidentifiable case,
- (ii) a repeated notification with the same content from the same Whistleblower,
- (iii) where the harm to the public or overriding private interests is not proportionate to the restriction of the rights of the person concerned by the notification,
- (iv) the notification was not made by a whistleblower as referred to in points 1.1(a)-(c).

The Company may only dismiss the investigation of a notification with well-founded justification. If there is any possibility of a breach or abuse of the Rules, an investigation cannot be dismissed, except as provided in point (iv).

4.2.3. Procedure for investigation

In the procedure initiated following a notification, the principle of fair trial must be upheld. In this context, the persons concerned by the notification, irrespective of their position or legal status, shall be treated equally and shall be informed in detail of this when the investigation is opened, unless this cannot be expected in the circumstances of the investigation at the time of the opening of the procedure, including information on their rights, the processing of their personal data, the protection of their privacy and the option to designate a legal representative. In accordance with the requirement of a fair trial, it should be ensured that the person concerned by the notification can express their views on the notification through their attorney at law and that they can provide evidence in support of those views. The individual implicated in the notification may be informed at a later stage, in exceptional and justified circumstances, if immediate information would hinder the investigation of the notification.

In the course of the procedure, the Committee may hear witnesses, request or obtain evidence (e.g. correspondence, contracts, other documents, etc.), invite the Whistleblower, any employee of the Company or other notifying party or third parties to supplement or clarify the notification and the facts, and provide additional information. The Committee is required to keep confidential information on the content of the notification, the Whistleblower and the persons concerned by the notification until the investigation is closed or until formal charges are brought as a result of the investigation, except in cases provided for by law.

Individuals conducting the investigation of this kind of notifications are expected to demonstrate independent, objective, and impartial judgement, and to avoid conflicts of interest.

Members of the Committee and individuals participating in the investigation as required and warranted, are obligated to maintain confidentiality regarding the content of the notification and the individual implicated in the notification until the conclusion of the investigation or until formal liability actions are initiated as a result of the investigation. Except for notifying the implicated individual, they must not share these details with any other organizational unit or colleague within the Company who are not involved in the investigation, except when it is absolutely necessary for conducting the investigation.

Under the Law, data may be transferred to an external body assisting in the investigation.

The investigation shall be carried out within the shortest time possible under the circumstances, but not later than 30 (thirty) days after the notification, and the Whistleblower shall be given feedback. An exception to the above requirement – excluding notifications made by anonymous Whistleblowers – may be made in particularly justified cases, and therefore extending the investigation period, with the Whistleblower being informed concurrently. In the case of an extension, the investigation shall not exceed 3 (three) months. The reasons for the extension must be properly documented.

4.2.4 Investigation results

The Committee shall in any case draw up a report on the follow-up to the notification, the outcome of the investigation, summarising its findings and, if it considers the allegations in the notification to be substantiated, a plan of action to prevent similar breaches or abuses in the future and, if necessary, a decision to impose sanctions on the violators of the Rules, the employees who committed the abuse or other legal action against third parties. The decision could be a warning, or another adverse legal consequence specified in the employment contract, or depending on the severity of the violation, it could be the termination of the employment contract with notice or with immediate effect, or a recommendation for the application of other legal consequences.

The Committee shall inform the Whistleblower in writing about the decision to investigate or dismiss the notification and the reasons for such dismissal, the results of the investigation, and any actions taken or planned as a result. The requirement for written communication can be waived if the Committee has verbally informed the Whistleblower, and they have acknowledged the information.

If, in the course of the investigation, the Committee detects and concludes that criminal proceedings are justified, it will report the matter to the competent authority. If the notification is the subject of an administrative procedure, the Committee will notify the competent authority.

5) REGISTER OF NOTIFICATIONS

The Company shall keep a record of the notifications received, in full compliance with the requirements of confidentiality and data processing.

6) INFORMATION ON DATA PROCESSING RELATED TO NOTIFICATIONS

In alignment with the provisions of the Law, the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as "GDPR"), and Act CXII of

2011. on the Right of Informational Self-Determination and Freedom of Information (hereinafter referred to as “**Privacy Act**”), the Companies provide the following information regarding the processing of personal data of involved individuals (Whistleblower and the person implicated in the notification):

6.1 Identity of the data controllers

6.1.1 In relation to data processing according to the present Code of Ethics, data are processed by the registered Hungarian companies of Interchange Group Companies (Interchange Kft., Magyar Pénzváltó Kft., GYORSPÉNZVÁLTÓ Kft., INTERCASH Zrt., Europe Interchange B.V. Magyarországi fióktelepe, Interchange Brands Ltd. Magyarországi Fióktelepe, hereinafter individually, jointly and generally referred to as: ‘Joint Data Controllers’ or ‘Companies’).

6.1.2 Information about the essential content of the agreement on joint data processing

Based on Article 26 of the GDPR, if the purposes and means of data processing are determined jointly by two or more data controllers, they are considered joint data controllers. With regard to Article 26 of the GDPR, the Joint Data Controllers inform the data subjects as described below about the essential content of the agreement on joint data processing concluded between them.

In order to investigate the violations, ethical violations and abuses indicated in the reports made within the frame of the whistleblowing system, as well as statements and reports that violate or contradict the internal rules of the Joint Data Controllers, as well as in the event of errors, and to prevent and/or to sanction them accordingly, the Joint Data Controllers jointly process the personal data processed in this context. The subject of the agreement between them is the definition of frame, rights and obligations, as well as liabilities for this joint data processing.

The data subjects can directly exercise their rights mentioned in Article 15-22 of GDPR towards all Data Controllers involved in joint data processing. The Joint Data Controllers are obliged to mutually cooperate in order to take action regarding the request.

Joint Data Controllers have agreed that they will not transfer personal data to a third country outside the European Union during the data processing covered by the present Code of Ethics.

According to the agreement, Joint Data Controllers have implemented and are implementing appropriate technical and organizational measures in order to guarantee the appropriate level of data security during joint data processing.

The Joint Data Controllers may only engage a data subprocessor who provides adequate guarantees for the implementation of appropriate technical and organizational measures ensuring compliance with the GDPR requirements for data processing and the protection of the rights of the Data subjects.

The data of those involved in the report based on the Code of Ethics is only processed to the extent of the agreement, which is absolutely necessary for the investigation of the reported case.

In the agreement the Joint Data Controllers appointed Interchange Kft. and personally Viktor Pocsai as the data protection officer, as a joint contact person, who is responsible for the effective implementation and coordination of communication between the Joint Data Controllers and for answering the inquiries of the affected parties.

6.1.3. Contact details of the Joint Data Controllers:

1027 Budapest, Kacsá utca 11.

Tel: +36 1 411 3580

6.1.4. Data Protection Officer: Viktor Pocsai (postal address: 1027 Budapest, Kacsá utca 11., email address: privacy@interchange.hu),

6.2 Scope of the data processed

6.2.1 Within the framework of the internal whistleblowing system, the personal data required for investigation of the following persons

- a. the whistleblower,
- b. the person whose behaviour or omission gave rise to the notification, and
- c. the person who may have substantial information about the issues reported,

can only be processed to the extent necessary for investigating the notification and rectifying or ceasing the behaviour being reported. Personal data not belonging to the above-mentioned persons must be deleted immediately from the data processed under the Whistleblowing System.

6.3 The purpose of data processing

6.3.1 The primary purpose of processing personal data is to investigate breaches of law, ethical infractions, abuses reported within the framework of the Whistleblowing System, as well as to probe claims that contradict the Companies' internal rules and regulations. Furthermore, it serves to address and/or appropriately sanction any identified irregularities. The Committee will delete without delay personal data not covered by points 6.2.1(a), (b) and (c), data relating to third parties not concerned by the notification and not necessary for the investigation of the notification (except as provided for in point 6.4.2 of these Rules), and data which cannot be processed under the Law. The personal data of the Whistleblowers shall not be disclosed without their explicit consent.

6.4 Legal basis for data processing

6.4.1 The Companies are required by law to operate a Whistleblowing System and to investigate reports received through it. Under Section 26(1) of the Law, the Companies are entitled to process the personal data essential for investigating the report, pertaining to the individuals listed in paragraph 6.2.1 (this represents the fulfilment of a legal obligation incumbent upon the Companies – as per Article 6(1)(c) of the GDPR).

Concerning the personal data of the individual(s) implicated in the notification, which are not absolutely necessary for the investigation, but which the Joint Data Controllers intend to process for a clearly defined, explicit, and lawful purpose (such as enforcing legal claims after the investigation of the notification) - and thus, will not be deleted - the legal basis for processing is the legitimate interest of the Joint Data Controllers. In this regard, the Joint Data Controllers shall carry out the balancing of interests test to ensure that the legitimate interest exists and is lawfully used.

6.5 Transfer of personal data

- 6.5.1 Apart from the exceptions provided for by the Law, the personal data of the Whistleblower may not be disclosed and may only be processed by the members of the Committee and the persons in charge of the investigation of the notification. If the Whistleblowers disclose their identity, the Companies will treat the Whistleblowers' personal data confidentially at all stages of the investigation, subject to the provisions of the GDPR and the Privacy Act, in accordance with the provisions of the Law.
- 6.5.2 The personal data of the Whistleblowers may be disclosed only to the body competent to conduct the procedure initiated on the basis of the notification, if that body is entitled to process the data by law or if the Whistleblowers have consented to the disclosure of their data.
- 6.5.3 The personal data of the Whistleblowers shall not be disclosed without their consent.
- 6.5.4 The Joint Data Controllers will not transfer personal data affected by the present Code of Ethics to a third country or international organisation.

6.6 External data processors

- 6.6.1 The Companies use the following third-party data processor for the IT support of its electronic mail system:
Company name: HUNET Kft.
Address: 1124 Budapest, Apor Vilmos tér 25-26.

6.7 Duration of storage of personal data

- 6.7.1 The Joint Data Controllers shall process personal data as long as, and in accordance with, the purpose and legal basis for their collection, and for as long as their storage is mandatory by law.
- 6.7.2 If the investigation reveals that the notification is unfounded or that no further action is required, the Companies shall delete the data relating to the notification within 60 (sixty) days of the completion of the investigation.
- 6.7.3 If actions are taken based on the investigation, including initiating legal proceedings against the Whistleblower, the Companies shall process the data relating to the notification within the frame of the Whistleblowing System, but not beyond the final resolution of the proceedings initiated based on the notification.

6.8 Rights of the data subjects in relation to data processing

You can ask the Companies under the GDPR provisions:

- 6.8.1 **to allow access to your personal data**, i.e., you can request information about what data we process about you. You may also request a copy of your data, provided that the rights of other parties are not adversely affected; or you may request
- 6.8.2 **the correction of your personal data**, if, for example, your bank account number changes;
- 6.8.3 **the erasure of your personal data**, except, inter alia, where the processing is necessary for the establishment, exercise or defence of legal claims;
- 6.8.4 **the restriction of processing your personal data**. If any personal data is subject to restriction, we will solely store such data. Other processing can only take place with your consent, or for the establishment, exercise or defence of legal claims, or to protect the rights of another natural or legal person, or for significant public interest of the European Union or a Member State.

- 6.8.5 You **may object to the processing of your personal data at any time** on grounds relating to your particular situation. In such instances, the employer cannot continue to process personal data, unless the processing is justified by compelling legitimate reasons that take precedence over your interests, rights, and freedoms, or which are connected to the establishment, execution, or protection of legal claims.
- 6.8.6 You will receive your personal data you provided to your employer in a structured, commonly used, machine-readable format and you have the right to transmit these data to another data controller (**right to data portability**). The exercise of this right is subject to the condition that the processing is based on your consent or the intention to enter into a contract and that the processing is carried out by automated means.

6.9 Information on automated decision-making, including profiling

- 6.9.1 The Companies do not use automated data processing.

6.10 Information on data security

- 6.10.1 The Companies have implemented and are implementing appropriate technical and organisational measures to ensure an adequate level of data security.
- 6.10.2 The Whistleblowing System has been designed in such a way that the identity of the non-anonymous Whistleblower cannot be known to anyone other than those involved in the investigation.
- 6.10.3 The Joint Data Controllers shall ensure that appropriate data security measures are in place to protect the personal data of the data subjects concerned by the notification, including against unauthorised access or unauthorised alteration. The Joint Data Controllers have taken measures to ensure that personal data are secure by setting appropriate levels of access and authorisation for electronically stored data.
- 6.10.4 The Joint Data Controllers shall ensure that the data subjects concerned by the notification are treated fairly and are subject to the presumption of innocence and the principle of proportionality in respect of any sanctions imposed.
- 6.10.5 The Joint Data Controllers shall inform the individuals implicated in the notification about the processing of their data and their associated rights without undue delay, as long as this does not jeopardise the execution and effectiveness of the procedure.
- 6.10.6 If the investigation necessitates the initiation of administrative proceedings, then the Joint Data Controllers may process the data related to the notification until the final disposal of the proceedings initiated based on the notification. If the investigation reveals that the notification is unfounded or that no further action is necessary, the Joint Data Controllers shall delete the data relating to the notification immediately after the investigation is closed.
- 6.10.7 The data of the data subjects concerned by the notification will only be processed to the extent strictly necessary for the investigation of the notified abuse. This processing objective cannot be achieved by alternative means or means involving the processing of less personal data, or by other means of processing personal data, given that the anonymisation of personal data or the processing of less personal data would make it impossible to carry out the investigation or any administrative procedure to be initiated on the basis of the notification.

6.11 Legal remedies in relation to data processing

If you have any complaints related to our data processing, you may lodge a complaint to the:

- 6.11.1 Data Protection Officer of the Joint Data Controllers: Viktor Pocsai (postal address: 1027 Budapest, Kacsá utca 11., email address: privacy@interchange.hu),
- 6.11.2 supervisory authority (NAIH - National Authority for Data Protection and Freedom of Information; address: 1055 Budapest, Falk Miksa utca 9-11.; email: ugyfelszolgalat@naih.hu; postal address: 1363 Budapest, Pf.: 9.; tel.: +36-30 683-5969; +36-30 549-6838; +36-1 391 1400; fax: +36-1 391-1410);
- 6.11.3 or you may initiate a court proceeding (at the Regional Court with general jurisdiction regarding your claim). The list of regional courts and their contact details can be found at the following link: <https://birosag.hu/torvenyszekek>.

CHAPTER IV: ENTRY INTO FORCE, REVIEW AND AMENDMENT

This Code shall enter into force on 24 July 2023.

The Company reserves the right to revise or amend this Code at any time for any reason. The Company will publish the amended Code on its website and make it known to employees in the usual local way.

This Code may fall under the category of "rules of conduct" as defined in the Law, violations of which may be reported through the Whistleblowing System.