

KELER Group  
Regulation on the prevention of abuses,  
infringements and events compromising  
organisational integrity and the related  
whistleblowing system  
(Extract)

Effective from: 20 September 2021

## 1. General part

### 1.1. Introductory provisions

The purpose of this regulation is to enable KELER Central Securities Depository Ltd. (hereinafter: KELER) and KELER CCP Central Counterparty Ltd. (hereinafter: KELER CCP, KELER and KELER CCP jointly: KELER Group) to minimise the risk of different kinds of abuses and infringements, especially insider dealing and market manipulation, and to regulate the types of conducts that KELER Group employees and other persons contracted for work purposes shall refrain from as well as the procedure of the investigation of any abuses, infringements and irregularities and to set out their legal consequences.

During the creation of the regulation, KELER Group gave particular emphasis to the development and operation of a whistleblowing system complying with the community regulations serving the prevention of market abuses, especially insider dealing and market manipulation, potentially arising in relation to the transactions performed on the securities and energy markets covered by its services, as well as to the management of integrity risks relating to the operation of KELER Group. In relation to this, by taking actions against the abuses violating public confidence in securities, derivative financial instruments and benchmarks, KELER Group aims to maintain market integrity, to avoid any regulatory arbitrage, to ensure accountability in case of the attempts of manipulation, and to develop higher legal security for market participants.

When developing the regulation, based on the risk-sensitive approach, KELER Group considered the low risk exposure related to the limited institutional clientele primarily subject to prudential regulations, as well as the fact that the fulfilment of the obligations related to the management of market abuses is guaranteed at the majority of such clients.

### 1.2. Scope of the regulation

**Material scope:** this regulation is applicable to the breach of obligations contained in any internal regulations or in any law in connection with the activities of KELER Group and similar conducts, especially concerning the laws pertaining to this regulation and detailed in Chapter II, and to the investigation and management of internal and external frauds committed in relation to securities transactions. The scope of this regulation does not cover the IT frauds and abuses committed by using IT technology.

**Personal scope:** it shall cover KELER Group's executive officers, employees and persons employed within the framework of any other legal relationship established for work purposes - including the persons performing outsourced activities, the appointed experts and the employees of suppliers who have entered into a contractual relationship with KELER - and those persons who have a legitimate interest in reporting abuses, or remedying or terminating the conduct specified as the subject matter of the report.

#### Related legislation:

- Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices (Tpvt.) and Act V of 2013 on the Civil Code of Hungary (Ptk.)
- Act C of 2012 on the Criminal Code of Hungary (Btk.)
- Act CXX of 2001 on the Capital Market (Tpt.)
- Act CLXV of 2013 on Complaints and Public Interest Disclosures (Act on Complaints) and Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Hpt.)
- Regulation (EU) No 909/2014 of the European Parliament and of the Council of 23 July 2014 on Improving Securities Settlement in the European Union and on Central Securities Depositories and Amending Directives 98/26/EC and 2014/65/EU and Regulation (EU) No 236/2012 (CSDR)
- Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EMIR)
- Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (Market Abuse Regulation/MAR, hereinafter: MAR)
- Commission Implementing Regulation (EU) 2016/347 of 10 March 2016 laying down implementing technical standards with regard to the precise format of insider lists and for updating insider lists in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council
- Commission Delegated Regulation (EU) 2016/522 of 17 December 2015 supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council as regards an exemption for certain third countries public bodies and central banks, the indicators of market manipulation, the disclosure thresholds, the competent authority for notifications of delays, the permission for trading during closed periods and types of notifiable managers' transactions
- Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency (REMIT)
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR)

#### 1.3. Terms and abbreviations used in the regulation

<b>Anonymous box</b>	A channel for the <u>anonymous reporting</u> of abuses and infringements and for the communication of any other remarks. The Head of Security Management, the Head of Human Resources Management and KELER's Chief Compliance Officer will be notified of the incoming reports which, depending on their subject, will be investigated by the competent department. If the report is related to a KELER CCP employee, it shall always be forwarded to the CEO of KELER CCP and KELER CCP Compliance.
<b>BIM</b>	Security Management
<b>Compliance</b>	The responsible Compliance departments of KELER and KELER CCP.

<b>ÜZO</b>	IT Operations Department
<b>Infringement</b>	For the purposes of this regulation, infringement is the intentional or negligent (if this is sanctioned by laws or by internal regulations) action or omission that is committed by one or more employee(s) or executive officer(s) of KELER Group or by a third party, and that constitutes the breach of an internal regulation or of a law, especially of the laws related to this regulation.
<b>Close relative</b>	It shall mean spouses, direct ascendants, adopted children, stepchildren and foster children, adoptive parents, stepparents, foster parents, brothers and sisters.
<b>Abuse</b>	For the purposes of this regulation an abuse is an intentional action that is committed by one or more employee(s) or executive officer(s) of KELER Group or by a third party especially but not exclusively by way of deception to obtain undue benefits or prevent disadvantages. Abuses do not necessarily constitute a breach of an internal regulation (for example the Code of Conduct) or of a law, especially of the laws related to this regulation.
<b>Wholesale energy products</b>	<p>They shall mean the following contracts and derivatives, irrespective of where and how they are traded:</p> <p>Contracts for the supply and distribution of electricity or natural gas for the use of final customers are not wholesale energy products. However, contracts for the supply and distribution of electricity or natural gas to final customers with a consumption capacity greater than the threshold set out in the second paragraph of point (5) of Article 2 of REMIT, shall be treated as wholesale energy products.</p>
<b>Integrity</b>	It shall mean the operation of KELER Group in line with the rules and in compliance with the objectives, values and principles specified by KELER's and KELER CCP's senior management.
<b>Integrity risk</b>	It shall mean the possible occurrence of any abuse, infringement or other event violating or endangering KELER Group's objectives, values and principles.
<b>Risks associated with corruption</b>	It shall mean an integrity risk which implies the possible occurrence of an act of corruption.
<b>Events compromising organisational integrity</b>	It shall cover every event deviating from the rules applicable to KELER Group and the operation in accordance with the organisational objectives, values and principles specified by KELER's and KELER CCP's senior management within the legislative framework.

## 2. Types of abuses and infringements

The main types of various abuses and infringements are detailed in the laws in force, primarily in the Btk. and the Tpvt., as well as in Annex 1 to this regulation taking into consideration the community regulation on market abuse (MAD/MAR).

## 3. Prevention of abuses, infringements and acts compromising organisational integrity, the management of reports and other anonymous reports (anonymous box)

### 3.1. Whistleblowing system

KELER Group is committed to investigate suspicions concerning abuses and infringements, to manage risks associated with integrity and corruption relating to the operation of KELER Group and to take the necessary decisions and measures if the suspicion is found to be valid.

### 3.2. Reporting and data processing

In order to ensure its legitimate and prudent operation, KELER Group operates a whistleblowing system for the reporting of violations concerning laws and conducts set out in the Code of Conduct (hereinafter: whistleblowing system); within the framework thereof the employees of KELER Group, persons who have established a contractual relationship with any member of KELER Group or persons who have a legitimate interest in reporting, or remedying or terminating the conduct specified as the subject matter of the report (hereinafter: whistleblower) may report.

The report may be made in person, in writing, by telephone or electronically.

#### **KELER Group's contact details:**

KELER Ltd. / KELER CCP Ltd.

H-1074 Budapest, Rákóczi út 70-72.

[kelercompliance@keler.hu](mailto:kelercompliance@keler.hu)

+36 (1) 483 6100

Within the frameworks of the whistleblowing system, KELER Group shall process personal data absolutely essential for investigating the report and concerning the whistleblower, the person whose conduct or omission gave grounds for reporting or who may have relevant information on the subject of the report (hereinafter collectively: the person concerned by the report), including sensitive data and criminal personal data, exclusively for the purpose of investigating the report, and remedying or terminating the conduct set out as the subject matter of the report, and if necessary, may only transfer such data to the external organisation participating in the investigation of the report. The personal data included in the data processed within the frameworks of the whistleblowing system but not absolutely necessary for the investigation of the report will be erased without delay. By making the report and providing any personal data therein, the whistleblower consents to the processing of personal data concerning him or her.

### 3.3. The information of the whistleblower

When making the report, the whistleblower shall declare that the report is made in good faith on circumstances he or she is aware of or has reasonable grounds to believe that such circumstances are true. If the whistleblower is a legal person, when making the report, it shall provide its registered office and the name of the legal representative submitting the report. After the report is made, KELER Group shall draw the whistleblower's attention to the consequences of reports submitted in bad faith, the procedural rules applicable to the investigation of the report, the confidential treatment of his or her identity in each stage of the investigation if the data necessary for the establishment of identity are provided, his or her rights concerning the protection of his or her personal data and the rules on data processing. According to the requirement of due process, KELER Group shall enable the person concerned by the report to express his or her viewpoint on the report, even through his or her legal representative, and to support such viewpoint with evidence. If the report is submitted via email, the information on the above shall promptly, where possible, be provided by the department managing the email address via email on the day of receiving the report, until the end of the business day. In exceptional and justified cases the person concerned by the report may be informed later if immediate information would prevent the investigation of the report.

### 3.4. The investigation of reports

Regarding the reports, the primary investigation is conducted by KELER Compliance employees, or KELER CCP Compliance employees if KELER CCP is concerned. Accordingly, if KELER CCP is concerned, KELER Compliance forwards the incoming reports to KELER CCP Compliance after receipt, without delay. If necessary, Compliance also engages BIM. When conducting the investigation, Compliance may request information from each internal system or registry of KELER Group, use the information security tools with the involvement of BIM and ask the whistleblower or any participant in the case to present his or her viewpoint provided that a transcript is prepared. The hearing is always conducted by two persons with one person from BIM if BIM is concerned. The transcript of the hearing shall include the name of the persons present, the place, date and subject of the hearing, the questions asked and the answers, the name and legal relationship of the persons questioned, the fact that the whistleblower has become familiar with the content of the transcript and the declaration expressing agreement with those set out in the transcript.

Regarding the report, Compliance and BIM as the departments responsible for investigating the case, shall treat confidential the information on the content of the report and the persons concerned by the report until the investigation is closed, or if necessary, until the application of the legal consequences is initiated, and shall not disclose such information to any other organisational unit or employee of KELER Group with the exception of informing the person concerned by the report.

KELER Group may choose not to investigate the report if

- the whistleblower failed to reveal his or her identity when making the report,
- the report is a repeated report made by the same whistleblower with the same content as the previous report,

- the report was submitted six months after the whistleblower had become aware of the alleged activity or omission,
- the prejudice to public interest or overriding private interest would not be proportionate to the limitation of the rights of the person concerned by the report arising from the investigation of the report.

The content of the report shall be examined within the shortest possible time allowed by the circumstances, no later than within 30 days following the receipt of the report; with the exception of reports made anonymously or by an unidentifiable whistleblower, deviation from such deadline may only occur in duly justified cases with the simultaneous information of the whistleblower. The period of investigation shall not be longer than three months.

The report, the omission of the investigation of reports and the related reasons shall always be documented in writing, and such document shall be sent to the CEO of KELER or KELER CCP.

If presumably further measures are to be taken as a result of the investigation but labour-law consequences or involvement of the authorities does not seem necessary, then the Ethics Committee shall decide on such measures. The procedure of the Ethics Committee is regulated in the No. 6-49: KELER Group Code of Conduct.

If presumably further labour-law related measures or measures concerning the contractual relationship are to be taken as a result of the investigation, but the involvement of the authorities does not seem necessary, then the CEO of KELER or KELER CCP will decide on such measures in accordance with Chapter VII - Legal consequences.

If presumably further measures are to be taken as a result of the investigation that require the involvement of the authorities, then they shall be taken in accordance with the Chapter on Legal consequences.

If during the investigation it is established that the report is not grounded or no further measures are necessary, the data relating to the report shall be erased within 60 days following the closure of the investigation.

If, as a result of the investigation, measures are taken - including measures for legal actions or disciplinary procedures against the whistleblower -, the data relating to the report shall only be processed within the frameworks of the whistleblowing system until the final closure of the procedures initiated based on the report.

### 3.5. Anonymous box

In addition to the above, KELER Group also operates a communication channel, a so-called anonymous box, that may be used anonymously. The primary purpose of the anonymous box is to enable KELER Group employees and persons contracted for work purposes to send their remarks, recommendations, initiatives and other constructive feedback to KELER Group in an anonymous and untraceable way through the platform.

If the abuses and infringements are not reported through the channels specified in Section 3.2 but through the anonymous box, the report is managed and the personal data are processed in accordance with Section 3.2, also with regard to the fact that the investigation of the anonymous report may be omitted.

**The anonymous box application is available on KELER Group's intranet platform.**

### 3.6. Protection of the bona fide whistleblower

KELER Group warrants that the bona fide employee or person contracted for work purposes using the whistleblowing system and the anonymous box will be protected against any retaliation, discrimination or any other unfair treatment and from any other detrimental legal consequence of using the anonymous box.

## 4. Actions against insider dealing, unlawful disclosure of inside information and market manipulation

Inside information shall comprise in particular the following types of information:

- a) information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments;
- b) in relation to commodity derivatives, information of a precise nature, which has not been made public, relating, directly or indirectly to one or more such derivatives or relating directly to the related spot commodity contract, and which, if it were made public, would be likely to have a significant effect on the prices of such derivatives or related spot commodity contracts, and where this is information which is reasonably expected to be disclosed or is required to be disclosed in accordance with legal or regulatory provisions at the Union or national level, market rules, contract, practice or custom, on the relevant commodity derivatives markets or spot markets;
- c) in relation to emission allowances or auctioned products based thereon, information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more such instruments, and which, if it were made public, would be likely to have a significant effect on the prices of such instruments or on the prices of related derivative financial instruments;
- d) for persons charged with the execution of orders concerning financial instruments, it also means information conveyed by a client and relating to the client's pending orders in financial instruments, which is of a precise nature, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments, the price of related spot commodity contracts, or on the price of related derivative financial instruments.

The above shall comprise the information which, if it were made public, would be likely to have a significant effect on the prices of financial instruments, derivative financial instruments, related spot



commodity contracts, or auctioned products based on emission allowances shall mean information a reasonable investor would be likely to use as part of the basis of his or her investment decisions.

For the purposes of the above, information shall be deemed to be of a precise nature if it indicates a set of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, where it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the financial instruments or the related derivative financial instrument, the related spot commodity contracts, or the auctioned products based on the emission allowances. In this respect in the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information.

An intermediate step in a protracted process shall be deemed to be inside information if, by itself, it satisfies the criteria of inside information as referred to above.

Insider dealing arises where a person possesses inside information and uses that information by acquiring or disposing of, for its own account or for the account of a third party, directly or indirectly, financial instruments to which that information relates. The use of inside information by cancelling or amending an order concerning a financial instrument to which the information relates where the order was placed before the person concerned possessed the inside information, shall also be considered to be insider dealing. In relation to auctions of emission allowances or other auctioned products based thereon that are held pursuant to Regulation (EU) No 1031/2010, the use of inside information shall also comprise submitting, modifying or withdrawing a bid by a person for its own account or for the account of a third party. Furthermore, the use of the recommendations or inducements amounts to insider dealing where the person using the recommendation or inducement knows or ought to know, that it is based upon inside information. Insider dealing is committed if persons who possess inside information in relation to a wholesale energy product, use that information by acquiring or disposing of, or by trying to acquire or dispose of, for their own account or for the account of a third party, either directly or indirectly, wholesale energy products to which that information relates; disclose that information to any other person, unless such disclosure is made in the normal course of the exercise of their employment, profession or duties; or recommend or induce another person, on the basis of inside information, to acquire or dispose of wholesale energy products to which that information relates.

Market manipulation shall comprise the following activities:

- a) entering into a transaction, placing an order to trade or any other behaviour, which:
  - i. gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of, a financial instrument, a related spot commodity contract or an auctioned product based on emission allowances; or
  - ii. secures, or is likely to secure, the price of one or several financial instruments, a related spot commodity contract or an auctioned product based on emission allowances at an abnormal or artificial level;

unless the person entering into a transaction, placing an order to trade or engaging in any other behaviour establishes that such transaction, order or behaviour have been carried out

for legitimate reasons, and conform with an accepted market practice as established in accordance with Article 13 of MAR;

- b) entering into a transaction, placing an order to trade or any other activity or behaviour which affects or is likely to affect the price of one or several financial instruments, a related spot commodity contract or an auctioned product based on emission allowances, which employs a fictitious device or any other form of deception or contrivance;
- c) disseminating information through the media, including the internet, or by any other means, which gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of, a financial instrument, a related spot commodity contract or an auctioned product based on emission allowances or secures, or is likely to secure, the price of one or several financial instruments, a related spot commodity contract or an auctioned product based on emission allowances at an abnormal or artificial level, including the dissemination of rumours, where the person who made the dissemination knew, or ought to have known, that the information was false or misleading;
- d) transmitting false or misleading information or providing false or misleading inputs in relation to a benchmark where the person who made the transmission or provided the input knew or ought to have known that it was false or misleading, or any other behaviour which manipulates the calculation of a benchmark.

Furthermore, the following behaviour shall also be considered as market manipulation:

- a) entering into any transaction or issuing any order to trade in wholesale energy products, which:
  - i. gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of wholesale energy products;
  - ii. secures or attempts to secure, by a person, or persons acting in collaboration, the price of one or several wholesale energy products at an artificial level, unless the person who entered into the transaction or issued the order to trade establishes that his reasons for doing so are legitimate and that that transaction or order to trade conforms to accepted market practices on the wholesale energy market concerned; or
  - iii. employs or attempts to employ a fictitious device or any other form of deception or contrivance which gives, or is likely to give, false or misleading signals regarding the supply of, demand for, or price of wholesale energy products; or
- b) disseminating information through the media, including the internet, or by any other means, which gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of wholesale energy products, including the dissemination of rumours and false or misleading news, where the disseminating person knew, or ought to have known, that the information was false or misleading.

**Attempt to manipulate the market:**

- a) entering into any transaction, issuing any order to trade or taking any other action relating to a wholesale energy product with the intention of:
  - i. giving false or misleading signals as to the supply of, demand for, or price of wholesale energy products;
  - ii. securing the price of one or several wholesale energy products at an artificial level, unless the person who entered into the transaction or issued the order to trade

establishes that his reasons for doing so are legitimate and that that transaction or order to trade conforms to accepted market practices on the wholesale energy market concerned; or

- iii. employing a fictitious device or any other form of deception or contrivance which gives, or is likely to give, false or misleading signals regarding the supply of, demand for, or price of wholesale energy products; or
- b) disseminating information through the media, including the internet, or by any other means with the intention of giving false or misleading signals as to the supply of, demand for, or price of wholesale energy products.

**KELER Group's employees and persons employed within the framework of any other legal relationship shall immediately report the data, facts and circumstances indicating insider dealing, market manipulation or the preparation for these to KELER or KELER CCP Compliance department, which shall forward the report within three business days to the competent authorities, after having investigated and having prepared the report for authority investigation. Employees of KELER IT department and Security Management shall report to KELER Compliance if they reveal any actions indicating insider dealing, market manipulation or any other abuse in the IT systems.**

For coordinating the group-level risks arising from market abuse, KELER CCP Compliance shall inform KELER Compliance department of the received reports and the results of their investigations. Members of KELER Group may involve the Compliance department of the other member in the investigation of the reports.

KELER Group's employees or persons employed within the framework of any other legal relationship shall submit their reports on the suspected market abuses primarily through the dedicated data sheet, and in justified cases they may report the suspicious act in other ways, in particular by means specified in Section 3 herein.

Compliance shall record the reports and the documents available in relation to the investigation thereof in a traceable manner, and shall ensure that no unauthorised persons may access them during safekeeping.

The reporting obligations shall apply to any orders and transactions related to financial instruments or Wholesale energy products in relation to which KELER Group performs settlement or provides clearing services, irrespectively of:

- a) whether the transactions were executed on the securities market, on the wholesale energy market related to electricity or natural gas supply or on the commodity market;
- b) the capacity in which the order is placed or the transaction is executed;
- c) the type of the client concerned;
- d) whether the orders were placed or transactions executed on or outside a trading venue.

Compliance employees shall fulfil the reporting obligation with the data content corresponding to the dedicated data sheet filled out by the employee or person employed within the framework of any other legal relationship detecting the suspicious act towards the competent authority through the communication channels established for this purpose.

If the data required for the report are not completely available at the date of the report, it shall contain at least the reason why the whistleblower suspected any infringement. All other information - as soon as available - shall be sent to the supervisory authority without delay.

The supervisory authority may request Compliance to specify the information or to provide additional information, and they are entitled to request further information from the reporting employee or the person employed within the framework of any other legal relationship for data reporting purposes.

## 5. Insider list

Upon the request of the issuer or a person acting on behalf or for the benefit of the issuer, KELER Group compiles a list of the persons who may have access to the given inside information, and who, on the basis of their employment contracts or otherwise, perform work as a consequence of which they have access to inside information.

In such cases, especially if a member of KELER Group is added to the own insider list of an issuer, as an external insider person, the Compliance department shall arrange the preparation of the insider list, shall order any trading prohibition for the concerned insider persons, and shall inform such persons. For collecting all persons required for compiling the insider list, the Compliance department may request data from BIM, which shall support the compilation of the registry of persons having access to inside information by collecting the data recorded in the authorisation management system.

The insider list shall contain at least the following:

- a) the personal identification of the persons having access to inside information;
- b) the reason why such persons were added to the insider list;
- c) the date and time when such persons accessed inside information; and
- d) the date when the insider list was compiled.

## 6. Legal consequences, reporting obligation

KELER Group applies a **zero tolerance** policy concerning abuses, infringements and acts of corruption.

**KELER Group's employees and contractual partners are obliged to report any abuses, infringements and events compromising organisational integrity observed during their activity.**

If the abuse or the infringement may qualify as a misdemeanour or felony, then KELER Group will immediately file a police report.

If the abuse or the infringement may qualify as a breach of an obligation based on another law, especially on the laws related to this regulation, then KELER Group will immediately report the same to the competent authority.

The Compliance department is responsible for reporting the abuses and infringements to the competent authorities, for filing any police reports, and for reporting these to the current (market) supervisory authority, with the involvement of the competent legal department and BIM.

Otherwise, the CEO of KELER or KELER CCP shall be entitled to make a decision concerning the application of labour-law consequences against the employee concerned, and in the case of (a) contracted person(s) and partner(s) concerning the application of legal consequences included in the relevant contract.

If it is the CEO of KELER or KELER CCP or a member of the Board of Directors who is suspected of the abuse or the infringement, then the Board of Directors is entitled to make a decision on the legal consequences applicable with regard to the employment contract, with the exclusion of the person concerned from decision-making.

If it is a member of the Supervisory Board who is suspected of the abuse or the infringement, then the Supervisory Board is entitled to make a decision on the legal consequences applicable with regard to the legal relationship, with the exclusion of the member concerned from decision-making.

## 7. Closing provisions

KELER Group expects its employees and partners contracted for work purposes to become familiar with this regulation and to comply with the same. By undertaking to comply with this regulation, the employees of KELER Group facilitate the maintenance of the reputation of their employer on the market, its successful operation and the successful performance of its activities as a service provider.

### **Annex:**

Annex 1: Types of abuses and infringements

## Types of abuses and infringements

This annex contains a list of abuses, infringements and events compromising integrity that are relevant especially but not exclusively to KELER Group. The current text of each law is available at the National Legislation Database (<https://njt.hu/>).

### A. Prohibition of transactions involving internal information

It is forbidden to conclude transactions by using internal information or to conclude transactions with persons with internal information within the scope of the internal information or to give orders to such transactions or to provide investment consulting based on which the person with internal information or his or her close relative or any third party receives monetary advantages or causes harm to third parties. (For details please refer to No. 3-08: KELER's Regulation on investments of executive officers and employees, conflict of interest rules and management of conflicts of interest and No. 3-07: KELER CCP's Regulation on investments of executive officers and employees, conflict of interest rules and management of conflicts of interest.)

### B. Crimes specified in Act C of 2012 on the Criminal Code

<b>I. MONEY LAUNDERING</b>
<ul style="list-style-type: none"> <li>• Money laundering</li> </ul>
<ul style="list-style-type: none"> <li>• Failure to comply with the reporting obligation related to money laundering</li> </ul>
<ul style="list-style-type: none"> <li>• Violation of the restrictive measures ordered by the UN or the EU</li> </ul>
<b>II. CRIMINAL OFFENSES AGAINST ECONOMIC SANCTIONS IMPOSED UNDER INTERNATIONAL COMMITMENT FOR REASONS OF PUBLIC SECURITY</b>
<ul style="list-style-type: none"> <li>• Violation of international economic restrictions</li> </ul>
<b>III. OFFENSES AGAINST PUBLIC SECURITY</b>
<ul style="list-style-type: none"> <li>• Terrorist financing</li> </ul>
<b>IV. OFFENSES AGAINST PROPERTY</b>
<ul style="list-style-type: none"> <li>• Theft</li> </ul>
<ul style="list-style-type: none"> <li>• Embezzlement</li> </ul>
<ul style="list-style-type: none"> <li>• Fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Economic fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Information system fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Misappropriation of funds</li> </ul>
<ul style="list-style-type: none"> <li>• Defalcation</li> </ul>
<b>V. ILLICIT ACCESS TO DATA AND CRIMES AGAINST INFORMATION SYSTEMS</b>
<ul style="list-style-type: none"> <li>• Illicit access to data</li> </ul>
<ul style="list-style-type: none"> <li>• Breach of information system or data</li> </ul>
<ul style="list-style-type: none"> <li>• Compromising or defrauding the integrity of the computer protection system or device</li> </ul>

<b>VI. CRIMES OF CORRUPTION</b>
• Active corruption
• Passive corruption
• Active corruption of public officials
• Passive corruption of public officials
• Active corruption in court or regulatory proceedings
• Passive corruption in court or regulatory proceedings
• Indirect corruption
• Abuse of a function
<b>VII. ECONOMIC AND BUSINESS RELATED OFFENSES</b>
• Breach of accounting regulations
• Fraudulent bankruptcy
• Concealment of assets for avoiding a liability
• Impairment of own capital
• Unauthorised financial activities
• Failure to comply with the obligation to supply economic data
• Insider dealing
• Unauthorised disclosure of inside information
• Prohibited market manipulation
• Breach of trade secrecy
<b>VIII. CRIMINAL OFFENSES AGAINST PUBLIC FINANCES</b>
• Budget fraud
<b>IX. CRIME AGAINST CONSUMER RIGHTS AND ANY VIOLATION OF COMPETITION LAWS</b>
• Breach of trade secrecy
• Breach of business secrecy

**C. Acts violating competition laws based on TpvT.**

• Prohibition of unfair competition
• Prohibition of unfair manipulation of business decisions
• Prohibition of agreements restricting economic competition
• Prohibition of abuse of a dominant position