

The management of the **FORNAX COMPANY GROUP*** makes a commitment to its business partners that the Group will identify and eliminate any opportunities for corruption in accordance with the requirements

MSZ ISO 37001:2019

To this end, it establishes, maintains, and develops an Anticorruption Management System. It furthermore regularly reviews the system to prevent all possible forms of corruption from occurring in the organisation and in the business processes related to the activities of the group. It regularly reviews compliance with anticorruption legislation, sets anticorruption targets and implements programs, and is committed to achieving the targets and meeting the requirements of the system. For this reason, the company group

- encourages staff to express good faith or valid concerns in confidence without fear of reprisal;
- defines the responsibilities and authority of the co-workers responsible for anticorruption compliance and ensures their independence in all circumstances;
- conducts regular education and training on the operation of the system, the identification of risks and the consequences of non-compliance with the rules of the anticorruption system.

We bring this Anticorruption Policy to the attention of interested business customers, business partners and all employees of the Fornax Company Group and we also make it available to them.

The management of the **FORNAX COMPANY GROUP*** declares its commitment and active support to the full implementation of the principles and requirements set out in the Anticorruption Policy in order to acquire and keep the trust of our business partners. Compliance with these principles and requirements is expected from our employees, contractors, suppliers and subcontractors.

The management of our Group is actively involved in the development and continuous improvement of our commitment to anticorruption activities and takes responsibility for the high quality and integrity of the service it provides. By applying and fully complying with the principles and requirements set out in our policy, we can ensure that our efforts to achieve this are carried out to the best of our ability.

Budapest, 31st of March, 2021

VISIONERS ZRT
1123 Budapest, Táltos u. 1.
Adószám: 24111362-2-33


Fornax company group

Represented by: Visioners Zrt.
Balásy Bulcsú, CEO

* This Anticorruption Policy applies to the following members of the Fornax Company Group:
Fornax Zrt. / Fornax SI Kft. / Fornax ICT Kft. / EnterSoft Kft. / Alpha Machine Kft.

Our Group has previously introduced and is currently implementing an integrated management system in accordance with ISO 9001 (Quality Management System) and ISO 27001 (Information Security Management System) standards.



We complement our existing integrated system with an Anticorruption System that meets the requirements of ISO 37001.

We are among the first in Hungary to build and certify a management system in accordance with the ISO 37001 standard (currently only one organisation in Hungary has such a certificate).

The structure of the anticorruption system itself will be similar to our existing integrated management system. We therefore believe that its construction and implementation will not create an increased workload for the colleagues involved.

Our anticorruption system focuses on the following areas:

- corruption on the part of the Fornax Company Group as an organisation;
- corruption by the Fornax Company Group's human resources on behalf of or for the benefit of the organisation;
- corruption by business partners acting on behalf of or for the benefit of the Fornax Company Group;
- corrupting the Fornax Company Group;
- corruption of Fornax Company Group personnel in relation to the activities of the organisation;
- corruption of the Fornax Company Group's business partners in relation to the activities of the organisation;
- and any corruption directly or indirectly related to any of these (e.g. unlawful advantage offered or accepted by or through a third party).

During the implementation of the anticorruption management system, we will identify and assess corruption risks and put in place measures to prevent, detect and manage corruption.

**The management of the Fornax Company Group firmly declares
and is committed to the following**

- ensures the development, implementation, maintenance and review of an anticorruption management system to adequately address the organisation's corruption risks;
- ensures that the requirements of the anticorruption management system are embedded in the organisational processes;
- ensures that adequate and appropriate resources are available for the effective operation of the anticorruption management system;
- communicates the anticorruption policy both within and outside the organisation;
- communicates within the organisation the importance of dealing effectively with corruption and complying with the requirements of the anticorruption management system;
- ensures that the design of the anticorruption management system serves its objectives;

- controls and supports the workforce of the company group in contributing to the effectiveness of the anticorruption management system;
- promotes an adequate anticorruption organisational culture;
- promotes continuous improvement;
- supports those in other relevant management roles to demonstrate leadership in their areas of responsibility in preventing and detecting corruption;
- encourages the use of procedures for reporting suspected or actual corruption;
- **ensures that no member of staff is subject to any disadvantage, discrimination or disciplinary action as a result of making a report if they make it in good faith or have reason to assume the breach of the organisation's anticorruption policy.** Nor shall the whistleblower be subject to disadvantage, discrimination or disciplinary action for refusing to participate in the corruption, even if it causes the organisation to lose business opportunities (unless the whistleblowers themselves participated in the corruption)

In the spirit of all the above, we encourage and enable that corruption, attempted or suspected corruption, or any violation or deficiency of the anticorruption management system is reported in good faith or on the basis of reasonable belief (directly or through an appropriate third party) to the person responsible for the anticorruption compliance (Dr. Judit Antalovits).

For the investigation, we ensure the confidential treatment of the reports by the Fornax Company Group in order to protect the identity of the person doing the reporting and the people involved or referred to in the report.

Reports can be made anonymously.

We prohibit adverse measures and protect from adverse measures whistleblowers who, in good faith or on the basis of a reasonable belief, express concern or make a report about a corruption offence, attempt, suspicion or violation of the anticorruption policy or the anticorruption management system.

We give all our staff the opportunity to ask the right person for advice on what to do in the event of a corruption concern or situation. All employees can make a report by emailing antikorrupcio@fornax.hu.

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