CODE OF ETHICS AND COMPLIANCE

Extract from the Internal Policies of 3D MAP Ltd.

Publication Notice

This document is a public information extract.

Detailed internal procedures, employee declaration templates, internal record-keeping requirements, and technical system references do not form part of this public version.



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Important Notice

This English-language version is provided solely for information purposes.

In the event of any discrepancy, inconsistency, omission, or difference in interpretation between this English-language version and the original Hungarian document, the Hungarian-language version shall prevail.

The governing and binding version of this Code of Ethics and Compliance is the original Hungarian-language document maintained by 3D MAP Ltd.

1. Management Commitment

We believe that long-term business relationships are built upon professional integrity, transparency, and mutual trust.

The management of 3D MAP Ltd. is committed to ethical business conduct, compliance with applicable laws and regulations, and the prevention of all forms of corruption.

The foundations of the Company's operations are professional independence, transparency, accountability, and fair business cooperation.

We expect all employees, business partners, subcontractors, and other contributors to act in accordance with these principles.

2. General Provisions

The purpose of this public extract is to present the key ethical and compliance principles governing the operation of 3D MAP Ltd.

The Code supports transparent, fair, and consistent business conduct and provides guidance in situations where risks related to corruption, conflicts of interest, or business integrity may arise.

AREA	PUBLIC EXPECTATION
Prevention of Corruption	All forms of bribery, improper advantage, and improper influence over decision-making are prohibited.
Engagement of Third Parties	Third parties may only be engaged where there is a genuine professional need, a clearly defined role, and a documented decision.
Conflicts of Interest	All actual or potential conflicts of interest must be disclosed and appropriately managed.
Documentation	Decisions relevant from a compliance perspective must be documented in a traceable manner.

3. Principles and Regulatory Framework

3.1. Integrity and Anti-Corruption Principles

Corruption is understood as any conduct whereby a person offers, promises, requests, gives, or accepts an improper advantage for the purpose of unfairly influencing a decision or business process.

The Company applies a zero-tolerance approach to bribery, trading in influence, facilitation payments, and any form of improper advantage.

The following activities are strictly prohibited:

1. giving, offering, requesting, or accepting bribes;
2. providing or accepting improper advantages;
3. unfairly influencing another person's decision-making;
4. engaging in conduct intended to secure an unauthorised business benefit.

In situations where uncertainty exists, the following questions may assist ethical and lawful decision-making:

1. What is the purpose of the proposed action?
2. Could it influence another person's decision?
3. Would it be transparent and defensible if reviewed by an external party?
4. Does it reflect ordinary and accepted business practice?
5. Is its value or nature proportionate and reasonable?

3.2. Conflicts of Interest

The Company manages actual or potential conflicts of interest through proportional and documented procedures following appropriate disclosure.

This public extract does not contain the detailed internal employee procedures and declaration forms applied by the Company.

Compliance and reporting contact: compliance@3dmap.hu

External Communication

The Company's anti-corruption and business conduct principles are publicly communicated through its website.

External communication concerning compliance matters may only take place following a considered and responsible corporate decision.

4. Employee and Business Partner Conduct

All employees, contractors, and business partners are expected to:

1. comply with applicable laws and regulations;
2. act professionally, fairly, and responsibly;
3. avoid situations that may give rise to corruption or conflicts of interest;
4. cooperate with compliance-related reviews and investigations;
5. maintain the confidentiality of information entrusted to them;
6. support transparent and accountable business practices.

5. Gifts, Hospitality, and Other Benefits

Reasonable hospitality serving a legitimate business purpose is permissible, provided that it is transparent, justifiable, proportionate in value, and unrelated to any decision-making process.

The following are prohibited in all circumstances:

1. the giving or acceptance of cash;
2. the giving or acceptance of cash equivalents;
3. any benefit intended to influence a business decision;
4. any benefit intended to secure an unauthorised advantage.

Value (HUF / person / occasion)	Procedure
0 – 10.000 HUF	Permitted without documentation
10.001 – 30.000 HUF	Disclosure required

Value (HUF / person / occasion)	Procedure
30.001 HUF and above	Prior approval from the Managing Director
Any value	Prohibited where connected to a decision making

The documentation requirement extends to recurring gifts or hospitality where gifts or hospitality are provided by, accepted from, or exchanged with the same individual or organisation on multiple occasions and their cumulative value reaches or exceeds HUF 15,000.

6. Third Parties and Due Diligence

The Company engages third parties only where there is a genuine professional need, a transparent allocation of responsibilities, and a documented business decision.

The Company does not engage a partner whose remuneration structure lacks transparency, could be used to conceal an improper advantage, or may serve to influence decision-makers improperly.

6.1. Third-Party Compliance Expectations

3D MAP Ltd. expects its business partners, subcontractors, suppliers, and consultants to conduct their activities lawfully, transparently, and in accordance with recognised standards of ethical business conduct.

The Company will not cooperate with a partner whose activities present corruption, conflict-of-interest, or other compliance-related risks, or who is unwilling to cooperate with reasonable due diligence procedures.

The Company applies a risk-based and proportionate approach when managing business partner relationships.

6.2. Due Diligence Considerations

When assessing a partner relationship, the following factors may be considered:

1. What is the partner's specific role and responsibility?
2. Does the partner perform a business development or intermediary function?
3. Is the remuneration proportionate to the services provided?
4. Is any success fee or commission paid?
5. Is the partner connected to the public sector or a decision-making body?
6. Is there any known conflict-of-interest or sanctions-related risk?

The Company may use publicly available databases and information provided by the partner, including company registers, tax-related registers, VAT validation services, and sanctions-related information sources.

6.3. Sanctions Screening

The Company may perform sanctions screening in relation to any partner, subcontractor, supplier, consultant, or other third party whose engagement involves financial payments or may give rise to reputational, export-control, or compliance risks.

Source	Purpose
EU Sanctions Map	Verification of EU restrictive measures
European Commission Consolidated Financial Sanctions List	Verification of persons, groups, and entities subject to EU financial sanctions
OFAC SDN List	Standard international source for assessing business risk
UK Sanctions List and United Nations Sanctions List	Supplemental international sanctions screening sources

7. Reporting, Investigations, and Non-Retaliation

Reporting Channel: compliance@3dmap.hu

Anonymous reporting is permitted.

The identity of the reporter and the personal data of all individuals involved in a report are handled confidentially and in accordance with applicable legal requirements.

The Company does not tolerate retaliation against any person who submits a report in good faith.

Investigations are conducted in a fair, proportionate, documented, and lawful manner.

Investigations concerning suspected corruption or matters falling under whistleblower protection legislation are carried out by the designated Compliance Officer or an external expert appointed by the Company.

Where necessary, the Managing Director or the Company's legal counsel will act in communications with public authorities.

Reports are investigated within the shortest practicable timeframe permitted by the circumstances and applicable legal requirements.

The reporter is informed of the outcome of the investigation and any completed or planned measures in accordance with legal requirements.

7.1. Possible Consequences

Corruption-related misconduct or serious compliance violations may result in:

1. employment-related consequences;
2. contractual consequences;
3. liability for damages;
4. civil or criminal proceedings.

In the case of a business partner, the Company may be entitled to terminate the commercial relationship, seek contractual penalties or damages, or initiate action before competent authorities where justified.

8.Environmental and Sustainability Principles

3D MAP Ltd. is committed to reducing environmental impact, using resources responsibly, and taking into account the effects of climate change in its operations.

Principle	Practical Focus
Paperless Operations	Preference for electronic document management and digital collaboration
Energy Efficiency	Use of energy-efficient IT and office equipment
Responsible Resource Use	Avoidance of unnecessary travel and printing, support for selective waste collection
GIS and Digital Solutions	Supporting sustainable infrastructure management, resource stewardship, and environmental monitoring

The Company supports the use of GIS, geospatial, and asset management solutions that contribute to more efficient infrastructure operation and the achievement of sustainability objectives.

Final Provisions

This public extract summarises the ethical and compliance principles of 3D MAP Ltd.

Detailed internal rules, procedures, and record-keeping processes remain available within the Company's internal documentation for authorised persons.

The current version of this document is published through the Company's official communication channels.