

## Summary of rules on gifts and invitations

Legislation to prevent corruption and bribery must be complied with both in Hungary and internationally, and one of the main issues in the prevention of corruption is the regulation of the handling of gifts and invitations. The MBH Group pays particular attention to the transparent regulation of gifts and invitation practices.

In order to ensure impartial customer care, to protect the interests of customers, employees and its own reputation, MBH Bank Nyrt. has Group-wide regulations on gifts and invitations that can be accepted and given by employees, and on the rules for giving and receiving gifts and invitations, where it pays particular attention to ensuring that employees act fairly and impartially, free of any influence, in their work towards the Company's customers, prospective customers and other persons with whom the Company has business or official relations.

### Key principles and rules

#### **Prohibitions**

Gifts and invitations may only be sent to a business address and never to the address/place of residence of the person receiving the gift/invitation.

- Giving or accepting **cash** or **cash equivalent gifts** (e.g. cash substitutes, gift vouchers, gambling tokens, precious metals, crypto instruments and tokens, etc.) is prohibited;
- It is prohibited to solicit or offer gifts or hospitality **in exchange for** a deal, service or information.
- It is prohibited to accept gifts, invitations or hospitality that **create a conflict of interest**, in particular if the employee's commitment to the Company is diminishing or if their decisions and behaviour are or appear to be contrary to the interests of the Company.
- Offering or accepting favours of any kind that violate the **moral, religious or ethical standards** of the customer or business partner, are socially undesirable, potentially **damaging to reputation, discriminatory** or otherwise violate the MBH Group's commitment to mutual respect is prohibited.
- Inviting, accepting or selecting of a business meal, catering, entertainment or function at a disreputable/scandalous catering establishment or participating in one is prohibited.
- Accepting favours or gifts that do not meet the requirements of courtesy or common courtesy and favours is prohibited.

#### **Acceptance of gifts**

Value limits:

- An employee may accept gifts up to a maximum of **HUF 80,000** per calendar year per person/partner making a gift.
- For the same person/partner, the value may not exceed **HUF 40,000/per occasion**, and gifts may be accepted on a maximum of **3 occasions** per person/partner per year.

If the value of a single gift exceeds HUF 40,000 or, in the case of several gifts, the next gift would exceed the annual limit, the gift may not be accepted according to the main rule applied.

The gift that cannot be accepted must be returned to the gift provider.

The rules are intended to ensure fair business practices and to strengthen relations with customers and partners. In justified exceptional cases, deviations from the specified limits are only possible at MBH Bank with the permission of Compliance and Anti-Money Laundering area or with the permission of the area/person responsible for compliance at the Group member concerned!

## Acceptance of invitations

Opportunities and invitations to participate in professional or non-professional events offered by an external partner or customer are grouped as follows:

- **Business meals:** as a general rule, the value per person may not exceed HUF 20,000 and a maximum of 3 business meal invitations per year may be accepted from the same partner/person.
- **Non-professional invitations and partially professional invitations, professional invitations:** if the invitation is addressed specifically to the person invited, it is subject to prior authorisation in all cases, as defined in the internal rules, which must be arranged by the employee concerned.