Compliance Programme

I. Introduction

Eximbank Plc. (hereinafter referred to as the "Bank") ensures the Bank's legal and internal regulatory compliance and the management of compliance risks in accordance with the provisions of the law, the guidelines of international and European financial supervisory authorities, including in particular the recommendation of the Magyar Nemzeti Bank on the establishment and operation of internal lines of defence, the management and control functions of financial institutions No. 12/2022 (VIII.11.) (hereinafter referred to as the "MNB Recommendation").

The purpose of assessing and managing compliance risks is to prevent the risks of non-compliance with laws, regulations, internal rules and regulations (related to the provision of services) applicable to the financial institution, or other norms and internal rules that do not constitute law, violations of the law, or any damage (significant financial loss, supervisory or other regulatory sanctions), or damage to its reputation.

At the Bank, the compliance function is fulfilled by the Compliance Directorate, which has independent tasks and powers and whose tasks are defined in the Organisational and Operational Rules in force at the time.

The Bank is committed to comply with all applicable international and domestic laws and regulations in all its business relationships and in the provision of its products and services, and to maintain a reputation for prudent, ethical, reliable and efficient operations, as well as integrity and honesty. To achieve this, the Bank has developed a Compliance Programme aimed at maintaining confidence in our company and ensuring smooth and efficient operations.

The Compliance Programme includes the fight against and prevention of money laundering and terrorist financing, financial sanctions violations and corruption, as well as the identification, detection and resolution of situations of conflict of interest. The Sanctions Compliance Programme is set out in a separate document. In drawing up these programmes, we have taken into account the nature of the Bank as a specialised credit institution, i.e. an institution specialised in international trade, foreign market expansion and investment, and foreign investment, wholly owned by the Hungarian State, with the Minister responsible for the supervision of state assets, i.e. the Minister of National Economy, exercising the ownership rights.

It should be emphasised that our Compliance Programme has been drafted and developed in the context of an intensively changing legal, regulatory and business environment, which is subject to change due to the impact of today's geopolitical and international events.

II. General provisions

The compliance function covers the activities and operations of all the Bank's departments. However, it is of particular importance that legal and natural persons carrying out consultancy or outsourcing activities are subject to the same legal requirements and internal compliance standards and requirements as the organisation itself.

The compliance area is both a part of an organisation's internal control system that addresses compliance risks at an organisational level, and a complex system that needs to be both practical and applied throughout the organisation.

The proper establishment and operation of internal lines of defence, as defined in the MNB Recommendation, is of particular importance to ensure sound and prudent operations. The Bank's internal lines of defence comprise internal governance and internal control functions, which complement the controls built into the business processes (primary line of defence) and form part of the second and third lines of defence. One of the internal control functions in the second line of defence is the compliance function.

III. Detailed provisions, priority focus areas of compliance

1. Compliance with regulations relating to money laundering and terrorist financing

The Bank is committed to comply with national[1] and international[2] regulations on the prevention of money laundering and terrorist financing and takes into account relevant recommendations and guidelines. To comply with these requirements, the Bank develops internal policies, and establishes and maintains effective processes, procedures and controls built into its processes. It shall apply a risk-based approach to its activities, prioritising higher money laundering or terrorist financing risks.

In evaluating country risks, the Bank devotes particular attention to the AML/CFT index published by the Basel Institute of Governance for various jurisdictions, the Transparency International CPI indicator, and the practices and lists developed by the United States Government (INCSR) to combat transnational drug trafficking. It also monitors the international standards and reports of the Financial Action Task Force (FATF).

In the customer due diligence process used, the Bank applies the "Know Your Customer" principle to create a customer risk profile for the customer and the "Know Your Business Partner" principle for its other business relationships.

All Bank employees receive regular, differentiated levels and depth of training to combat money laundering and terrorist financing.

2. Duties carried out to address corruption risks and ensure compliance

Ensuring legal compliance in line with national values is of high priority for the Bank, which has a zero tolerance policy towards all forms of corruption and obtaining illicit benefit. In order to comply with the law, the Bank sets out in its internal policies principles for the prevention of corruption, identifies activities with a higher risk of corruption and provides guidance and information to its partners in the course of its day-to-day activities.

In addition, the Bank conducts its anti-corruption activities in compliance with the OECD Recommendation of the Council on Bribery and Officially Supported Export Credits (OECD/LEGAL/0447, hereinafter "the Recommendation") and actively monitors international undertakings and national (Hungarian) strategies. It also monitors the Multilateral Financial Institutions' anti-corruption blacklists.

In order to facilitate the prudent operation of the Bank, anti-corruption frameworks, templates and documents are regularly reviewed to ensure proper risk evaluation, legal compliance and effective prevention.
The fight against corruption is also a priority for our employees, and regular training and information materials are provided.

[1] Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: Pmt.) and relevant MNB Recommendations
[2] Fight against money laundering and terrorist financing - Consilium

3. Responsibilities related to the Code of Conduct, the whistleblowing system and complaint handling

The values that are of key importance to the Bank and the ethical business conduct requirements for the protection of its customers are set out in the Code of Ethics, which is available in full on the Bank's website (in Hungarian). The Code of Ethics sets out the basis of the Bank's values, the general principles to be followed and the guidance to be followed in the event of breaches of norms.

We are committed to ensure that our reputation is protected and the trust placed in us is preserved, alongside good corporate governance. In doing so, we respect and comply with the rules for the protection of life and limb, health and the environment, and provide a safe and healthy environment for our employees, business partners and those who do business with us. The Code of Ethics sets out the values and principles we hold important, our commitment to fair and ethical conduct, and the rules of business behaviour.

The principles, expectations and requirements set out in the Code of Ethics are a shared responsibility of all of us and are binding on all persons employed or engaged in an employment relationship with us and our partners in business with us.

We also prioritise the operation of the whistleblowing system, where we encourage the reporting of information about illegal or suspected illegal acts or omissions or other forms of abuse through the various channels available. The objective of the whistleblowing system operated by the Bank is to provide an opportunity to report abuse that is against the law and against the public interest and the interests of the Bank. The system also aims to ensure that the reported whistleblowing is treated fairly and investigated properly, and that the whistleblower is protected. Information on the channels available for reporting, the functioning of the whistleblowing system and the investigation of whistleblowing can be found on the Bank's website under the menu item “Whistleblowing”.

The Bank's main objective and commitment is to ensure that its customers are satisfied with all aspects of its services and administration. To this end, the Bank operates a complaint handling system that can effectively help to ensure that any complaints that may arise are simply and efficiently directed to the forums that can contribute to their prompt resolution. Complaints can be made verbally or in writing, and detailed information on how to make a complaint, the channels available, the contact details, the information document on investigation and complaint handling, the legal remedies, and the forms for filing complaints are available on the Bank's website under the menu item "Complaint Handling".

4. Responsibilities for managing ESG compliance-relevant risks

The Bank aims to create long-term value through green and sustainable solutions in all areas of its operations, using a complex approach to ESG. In line with our mission, we promote the development of Hungarian exports and the realisation of the economic strategy by supporting Hungarian companies that contribute to sustainable development goals through financing operations and investments with positive environmental, social and human rights impacts.

We prioritise ESG-awareness, i.e. the alignment of the Bank's activities with environmental and sustainability objectives, which is also important for meeting international, EU and domestic regulatory requirements. In order to ensure a sustainable future, the Bank has its own ESG Strategy, a document that is built around ensuring sustainable growth in the areas of Environmental (E), Social (S) and Governance (G). The ESG Strategy is available on the Bank's dedicated website.

We work together closely with the Bank's specialised departments, including the ESG Centre, on the sustainability requirements related to the ESG strategic objectives, whereby we provide our professional opinions and delegated employee support to ensure compliance with their tasks, and to integrate climate change and environmental risks into the Bank's processes. Indeed, one of the

ESG Centre's key tasks is to integrate environmental, social and governance (ESG aspects) and general environmental and climate awareness into EXIM's operations, and to actively promote them.

The ESG sub-objectives of the ESG Strategy with compliance relevance include:

- A key sub-objective under the environmental pillar is to operate in an environmentally sustainable way, including reducing the amount of copy paper used. To this end, we are continuously reviewing our compliance workflows and have already achieved a number of progressive results to promote digital and sustainable operations. In the near future, we will continue our efforts to promote sustainable operations while improving and optimising internal processes to facilitate paperless workflows.
- We strive to apply high ethical standards and provide regular training to employees on ethical business and professional conduct and practices to ensure compliance. Strengthening organisational awareness based on expected and legally based market conduct contributes to our joint efforts to achieve a responsible and transparent organisation and responsible corporate governance.
- In addition, it is extremely important to comply with international and domestic requirements and standards of corporate governance, so transparency and disclosure of operational information is a priority. Indeed, ESG-related issues, so-called non-financial reporting, are becoming increasingly important for investment, responsible decision-making and customer relations.

ESG-positive operations can ensure sustainable development by contributing to sustainability and the universal benchmark related to national legislation and strategies, the Paris Agreement and the UN Sustainable Development Goals framework.

5. Managing conflict of interest rules as a priority

The Bank has a conflict of interest policy, the breach of which requires strong action by all directors and relevant departments. It is in our fundamental business interest, and a legal obligation, to ensure that the personal interests of members of management bodies and employees do not conflict with the business interests and commitments of the Bank and its customers. In addition, it is important that the Bank identifies and prevents conflicts of interest in its various business activities. The rules are also designed to address circumstances that may give rise to, or risk giving rise to, conflicts of interest in the Bank's operations that could result in harm to business interests, or possible resulting loss or other material damage.

The Bank strives to identify and manage potential conflicts of interest appropriately and effectively. To this end, detailed conflict of interest rules and documents have been developed, and we ensure that all our employees comply with the requirements of the internal rules and regulations, respect their obligations and do not indirectly engage in any conduct contrary to these rules.

6. Privacy policy

The Bank is committed to ensure an appropriate level of protection in relation to the collection, storage and processing of personal data, and will conduct all these activities in accordance with the General Data Protection Regulation and applicable national (Hungarian) legislation. In order to ensure the adequacy of data protection and data security activities, the Bank employs an independent Data Protection Officer, also independent of the Compliance Directorate, who is responsible for, inter alia, monitoring compliance with the provisions of the legislation on data processing and other internal regulations on data protection and data security and data security requirements, data protection legislation. The Bank's current data protection information is available on the Bank's website.

7. Consumer protection

The Bank, as a specialised credit institution and for the provision of services within the scope of its professional activities, does not manage payment accounts or provide cash services, nor does it serve customers who are consumers. The provisions, information and documents on complaints handling are available as explained in section III. 3.

Budapest, 24 March 2025.

Board of Directors of Eximbank Plc.

Approved: March 27, 2025.