

Fair and ethical conduct is the foundation of Lightware's operations and is essential to our long-term success and sustainability. Unethical or dishonest actions can have a negative impact not only on the individual and the relationships between the parties involved, but also on the operation of the entire organization. Every individual has the right to work in a safe and fair organisation. Therefore, we emphasise that adherence to the rules and guidelines on ethics and integrity is a shared responsibility and that everyone must play an active role in maintaining ethical operations.

We strive to create an atmosphere where any ethical concerns can be discussed openly without fear of negative consequences. At the same time, we know and understand that unethical behaviour can be uncomfortable to face and difficult to talk about openly. However, we cannot find solutions to what we do not know. We therefore encourage you to report any suspected irregularities, violations, or unethical behaviour.

One of Lightware's core values is cooperation, and as such, we believe that the best way forward is to resolve conflicts in the first instance in person, possibly with a mediator, and only in certain cases to report unethical behaviour.

What is the whistleblowing system?

The whistleblowing system is a reporting channel for reporting information about illegal or suspected illegal acts or omissions or other misconduct relating to an organisation's activities.

Who can make an ethics report?

Anyone who believes they have experienced ethical misconduct in connection with the operation of Lightware.

How to report?

A Whistleblower can make a report in **writing or orally**.

- Electronically by sending an email to whistleblowing@lightware.com;
- On paper, by mailing it to Lightware Zrt., 1071 Budapest Peterdy utca 15. The envelope must be addressed with the word "Ethics";
- In person or by telephone to the HR Manager.

You can also submit anonymously, but we would still encourage you to include your name and contact details. Your information will be treated in strict confidence and our organisation takes seriously that no one should be disadvantaged for making a good faith report.

What should the notification contain?

The notification must include a detailed description of the person(s) concerned by the notification, the conduct complained of, the case and all relevant information about the case.

- Who(s) is / are involved in the case? Please list anyone who may be relevant to your report: anyone who may have been involved in an alleged wrongdoing, who may have been subject to unethical behaviour, who may have witnessed or otherwise known about the incident, who may have tried to cover up an unethical behaviour.
- What happened, what is suspected?
- When did the incident happen?
- Where did it happen?
- Is it a repeat offence?
- What evidence is available? / How did you find out about the incident? e.g. happened to you, witnessed it, read about it in a document
 - If you have any documents that could help us investigate your report, please send them to us.

The whistleblowing system also accepts and handles anonymous reports, but these will only be investigated if the investigation is substantiated and there is sufficient information to proceed.



What are the principles of whistleblowing?

- It is important that you use whistleblowing in good faith and only raise concerns that you believe to be genuine and well-founded.
- It is OK if you do not have evidence or do not know all the details.
- Do not allege that you know is not true.
- If necessary, take an active part in the investigation.

Can I be disadvantaged if I report a case?

The protection of whistleblowers is paramount and we will ensure that whistleblowers are not subject to any form of retaliation, discrimination, or other unfair treatment. Nor can a whistleblower be disadvantaged if a report made in good faith is found to be unfounded during the investigation.

Why do I need to make a complaint?

When we see unethical behaviour, whether involving ourselves or others, it is important to report it because

- Protect ourselves or others (e.g. in cases of harassment, discrimination, unfairness),
- Strengthen our community,
- Prevent more serious crime,
- Avoid serious financial or reputational consequences,
- We can prevent similar unethical behaviour in the future.

What are the criteria for investigation?

- A complaint or case may be investigated if it is made within 1 year of the occurrence of the event or conduct complained of, or within 6 months of the date on which it comes to the attention of the investigator.
- An investigation of the allegations contained in an ethics complaint shall be conducted within the shortest time possible under the circumstances, and in any case within 30 days of receipt of the complaint, except in the case of a complaint from an anonymous or unidentified informant, in which case this time limit may be waived only in duly justified cases and after the informant has been informed.
- The investigation period shall not exceed three months.
- The system shall operate in full transparency and the whistleblower and the parties involved in the procedure shall be informed. The flow of information and the processing of data must be protected and confidential.