

AutoWallis


Insider Dealing and Market Manipulation Policy

Approvers and their signatures:

Document Owner (Director of Investor Relations)  Gábor Székely

Head of Department (Director of Corporate Affairs)  dr. Zoltán Pataki

Chief Compliance Officer  Ferenc Batonai

CEO  Gábor Ormosy

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I. Objective and scope of the document

I.1. Objective of the Policy

The objective of this policy (hereinafter: „**Policy**”) is to define the procedures for compliance with the legal requirements relating to insider dealing and market manipulation, including, in particular, Regulation (EU) No 596/2014 on market abuse („**Market Abuse Regulation**” or **MAR**, see Section IX), for AutoWallis Nyilvánosan Működő Részvénytársaság (company registration number: 1-10-047350; registered office: 1097 Budapest, Könyves Kálmán körút 34.), acting as an issuer of securities (hereinafter: „**Company**”), whose securities are admitted to trading at the trading venues operated by the Budapest Stock Exchange.

Being aware of and applying this Policy does not exempt anyone from being aware of and complying with the law.

I.2. Material scope of the Policy

The material scope of this Policy extends to all information that constitutes Inside Information for the purposes of this Policy.

I.3. Personal scope of the Policy

The personal scope of this Policy extends to AutoWallis Nyrt. (hereinafter: „**Company**”) and its subsidiaries consolidated in accordance with IFRS (International Financial Reporting Standards) (each subsidiary is referred to as a „Hiba! A hivatkozási forrás nem található.”), collectively referred to as „Hiba! A hivatkozási forrás nem található.” or „Hiba! A hivatkozási forrás nem található.” (the Company or any of its Subsidiaries are, in a general sense, referred to as a „Hiba! A hivatkozási forrás nem található.”).

This Policy shall be binding on all persons who are employed by, engaged under a contract for services with, or otherwise in a work-related legal relationship with any of the Group Members (hereinafter collectively: „**Employee**” or „**Employees**”). This Policy shall also be binding on any person who performs activities for any Group Member within the framework of an advisory, expert, or other contractual relationship and, in the course of such activities, has or may potentially have access to inside information.

All Employees of AW Group and other persons having access to inside information are required to become familiar with and comply with the provisions of this Policy.

The Policy enters into force at the date of its publication and remains in force until revoked. The Policy must be reviewed at least once a year and in the event of any change in legislation or the internal environment and must be amended if necessary. The Company ensures that persons entering into an employment contract or other employment relationship with the Company familiarise themselves with the Policy when the relationship is established and in the event of any amendment to the Policy.

The Person Maintaining the Insider List ensures that the relevant persons receive regular training (at least once a year or, in the event of any changes in legislation or to this Policy, within 30 days of such change).



II. Definitions

Term	Definition
Inside Information	<p>a) Precise Information which</p> <ul style="list-style-type: none"> i. has not been made public; ii. relates directly or indirectly to the Financial Instrument or the Company; iii. if it were made public, would be likely to have a significant effect on the price of the Financial Instrument or on the price of related derivative financial instruments; <p>b) Precise Information conveyed by a client or by other persons acting on the client's behalf or information known by virtue of management of a proprietary account or of a managed fund and relating to pending orders in a Financial Instrument, relating, directly or indirectly, to the Company or that Financial Instrument, and which, if it were made public, would be likely to have a significant effect on the prices of that Financial Instrument, the price of related spot commodity contracts, or on the price of related derivative financial instruments.</p>
Insider List	A record of persons having access to Inside Information, which is maintained by the Company for the purpose of facilitating inspections by authorities relating to insider dealing.
BSE	Budapest Stock Exchange
Person Maintaining the Insider List	The person designated by the Company to maintain the Insider List and the list of persons closely associated with persons discharging managerial responsibilities.
Supervisory Authority	Hungarian National Bank
Company or Issuer	AutoWallis Nyilvánosan Működő Részvénytársaság
Financial Instrument	For the purposes of this Policy, a financial instrument issued by the Company and admitted to trading on a trading venue, which is issued in accordance with Section 6 of Act CXXXVIII of 2007 (the Investment Firms Act).
Precise Information	Information that indicates a set of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, where it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the Financial Instruments. In this respect, in the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be Precise Information.
Benchmark	Any rate, index or figure, made available to the public or published that is periodically or regularly determined by the application of a formula to, or on the basis of the value of one or more underlying assets or prices, including estimated prices, actual or estimated interest rates or other values, or surveys, and by reference to which the amount payable under a Financial Instrument or the value



	of a Financial Instrument is determined.
Persons Closely Associated	<ul style="list-style-type: none"> a) a person's spouse or partner considered to be equivalent to a spouse b) a dependent child c) a person's relative who has shared the same household for at least one year on the date of the transaction concerned d) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a Person Discharging Managerial Responsibilities or by a person referred to in point a), b) or c), or which is directly or indirectly controlled by such a person, or which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person
Disclosure Obligation	Fulfilment of the obligations specified in the cases set out in the Capital Market Act and in Decree No. 24/2008 (VIII. 15.) of the Ministry of Finance on the Detailed Rules of Disclosure Obligations Relating to Publicly Offered Securities.
Person Discharging Managerial Responsibilities	Members of the Board of Directors and Supervisory Board of the Issuer and any other executive officers who have regular access to Inside Information relating directly or indirectly to that entity and power to take managerial decisions affecting the future developments and business prospects of that entity.
External Expert	Persons or organisations not employed by the Company (for example, legal advisors, auditors, financial advisors or consulting firms) who, in the course of their work, may have access to non-public, price-sensitive information relating to the Company. Accordingly, they may also be subject to the rules and prohibitions relating to insider dealing and the use of information.

Where terms used both in the MAR and the Capital Market Act differ in definition, the interpretation set out in the MAR must prevail.



III. Description of the regulations

III.1. Prohibition of insider dealing

The fundamental characteristic of insider dealing is the unfair advantage obtained by persons using Inside Information over third parties who do not possess such Inside Information. As a result, such unfair advantage undermines the integrity of financial markets and investor trust.

Accordingly, any conduct is prohibited whereby a person in possession of Inside Information obtains an unfair advantage using such information by entering into market transactions on the basis of that information by directly or indirectly acquiring or disposing of, or attempting to acquire or dispose of, Financial Instruments to which the information relates, or by cancelling or amending, or attempting to cancel or amend, an order concerning the acquisition or disposal of such Financial Instruments, whether for their own account or for the account of a third party.

III.2. General prohibition

It is generally prohibited to:

- a) engage or attempt to engage in insider dealing;
- b) recommend that another person engage in insider dealing or induce another person to engage in insider dealing; or
- c) unlawfully disclose inside information (unlawful disclosure of Inside Information arises where a person possesses Inside Information and discloses that information to any other person, except where the disclosure is made in the normal exercise of an employment, a profession or duties).

III.3. Special prohibitions („closed periods”)

A Person Discharging Managerial Responsibilities may not conduct any transactions on his own account or for the account of a third party, directly or indirectly, relating to a Financial Instrument during a closed period of 30 calendar days before the announcement of an interim or year-end financial report.

The Company may allow a Person Discharging Managerial Responsibilities within it to trade on his own account or for the account of a third party during a closed period:

- a) on a case-by-case basis due to the existence of exceptional circumstances, such as severe financial difficulty, which require the immediate sale of the Financial Instrument; or
- b) due to the characteristics of the trading involved for transactions made under, or related to, an employee share or saving scheme and employees' schemes concerning financial instruments other than shares, qualification or entitlement of shares and qualifications or entitlements of financial instruments other than shares, or transactions where the beneficial interest in the relevant security does not change.

The Company allows a Person Discharging Managerial Responsibilities within it to trade or to make transactions on his own account or for the account of a third party in the case of transactions or trade activities that do not relate to active investment decisions undertaken by the Person Discharging Managerial Responsibilities, or that result exclusively from external factors or actions of third parties, or that are transactions or trade activities, including the exercise of derivatives, based on predetermined terms.

III.4. Cases of insider dealing

Insider dealing arises where:

- a) a person possesses Inside Information and uses such Inside Information by acquiring or disposing of, for his own account or for the account of a third party, directly or indirectly, Financial Instruments



to which that information relates;

- b) Inside Information is used by cancelling or amending an order concerning a Financial Instrument to which the information relates where the order was placed before the person concerned possessed the Inside Information;
- c) a person in possession of Inside Information recommends that another person conduct a transaction concerning Financial Instruments to which that information relates (acquire or dispose of such Financial Instruments, or cancel or amend an order concerning such Financial Instruments), or induces that person to do so;
- d) recommending that another person engage in insider dealing, or inducing another person to engage in insider dealing, arises where the person in possession of Inside Information
 - i. recommends, on the basis of that information, that another person acquire or dispose of Financial Instruments to which that information relates, or induces that person to make such an acquisition or disposal;
 - ii. recommends, on the basis of that information, that another person cancel or amend an order concerning a Financial Instrument to which that information relates, or induces that person to make such a cancellation or amendment.
- e) The use or onward disclosure of the recommendations or inducements referred to above amounts to insider dealing where the person using or disclosing the recommendation or inducement knows or ought to know that it is based upon Inside Information.

III.5. Legitimate behaviour

Being in possession of Inside Information alone does not give rise to insider dealing.

- a) The mere fact that a legal person is or has been in possession of Inside Information does not mean that that person has used that information and has thus engaged in insider dealing on the basis of an acquisition or disposal, where that legal person:
 - i. has established, implemented and maintained adequate and effective internal arrangements and procedures that effectively ensure that neither the natural person who made the decision on its behalf to acquire or dispose of Financial Instruments to which the information relates, nor another natural person who may have had an influence on that decision, was in possession of the Inside Information; and
 - ii. has not encouraged, made a recommendation to, induced or otherwise influenced the natural person who, on behalf of the legal person, acquired or disposed of Financial Instruments to which the information relates.
- b) The mere fact that a person is in possession of Inside Information does not mean that that person has used that information and has thus engaged in insider dealing on the basis of an acquisition or disposal where that person:
 - i. for the Financial Instruments to which that information relates, is a person authorised to act as a counterparty, and the acquisition or disposal of the Financial Instruments to which that information relates is made legitimately in the normal course of the exercise of its function as a market maker or as a counterparty for those Financial Instruments;
 - ii. is authorised to execute orders on behalf of third parties, and the acquisition or disposal of the Financial Instruments to which the order relates, is made to carry out such an order legitimately in the normal course of the exercise of that person's employment, profession or duties.



- c) If a person in possession of Inside Information conducts a transaction to acquire or dispose of Financial Instruments and that transaction is carried out in the discharge of an obligation that has become due in good faith and not to circumvent the prohibition against insider dealing, provided that such transaction is carried out on the basis of an agreement or order concluded before the person concerned possessed such Inside Information, or to satisfy a legal or regulatory obligation that arose before the person concerned possessed such Inside Information.
- d) The use of Inside Information obtained by a person in the conduct of a public takeover or merger with a company if such Inside Information is used solely for the purpose of proceeding with that merger or public takeover, provided that at the point of approval of the merger or acceptance of the offer by the shareholders of that company, any Inside Information has been made public or has otherwise ceased to constitute Inside Information.
- e) The disclosure of Inside Information during the course of a market sounding as defined in Article 11 of the MAR, provided that the requirements set out in Section III.4 are met.

III.6. Insiders

In the context of the Company, an Insider means any person who possesses Inside Information as a result of any of the following:

- a) being a member of the Board of Directors or the Supervisory Board;
- b) being a person or organisation with a shareholding in the Company;
- c) having access to such information through the exercise of an employment, profession or duties;
- d) having obtained the Inside Information by committing a criminal offence;
- e) any person who possesses Inside Information under circumstances other than those referred to in points a) to d) where that person knows or ought to know that it constitutes Inside Information;
- f) where the insider is a legal person, the natural persons who participate in the decision to carry out the acquisition, disposal, cancellation or amendment of an order for the account of the legal person concerned also qualify as insiders;
- g) the credit institution managing the Company's bank account, as well as its executive officers, members of its supervisory board and relevant administrators with respect to the transaction concerned and the Company's financial position and account activity.



IV. Procedural rules for preventing insider dealing

IV.1. Insider List

In order to facilitate inspections by authorities relating to insider dealing, the Company maintains an electronic list of all persons who have access to Inside Information and who are working for the Company under an employment contract or otherwise performing tasks on behalf of the Company through which they have access to Inside Information (such as External Experts).

The format of the Insider List is included in Annex 6.¹

The **Person Maintaining the Insider List** must file the Insider List as soon as possible upon the request of the Supervisory Authority. The Insider List must be filed in a manner that guarantees the completeness, confidentiality and integrity of the information in all cases.

The Company or the person acting on its behalf or on its account takes all reasonable steps to ensure that the persons on the Insider List acknowledge, in writing, the legal and regulatory duties entailed and are aware of the sanctions applicable to insider dealing and the unlawful disclosure of Inside Information. For this purpose, insiders must be informed of the legal and regulatory duties related to their inclusion in the list in the form set out in Annex 4.

IV.1.1. Permanent Insider List

Permanent Insiders are persons who, by virtue of their position within the Company, participate in the Company's strategic planning and decision-making and, therefore, are involved in creating Inside Information, and those who, by virtue of their managerial position in the organisational hierarchy, become aware of Inside Information created in other organisational units as part of their job.

The template for the Permanent Insider List is included in Annex 6 of this Policy. The List must be kept up-to-date at all times².

The Person Maintaining the Insider List must maintain the Insider List on a documented basis, which means that the Permanent Insider List must be modified on the basis of notifications made by the Board of Directors, persons designated by the Board of Directors, or persons already on the list.

IV.1.2. Deal-specific (Event-based) Insider List

In case of an event or transaction outside of the Company's ordinary course of business, the Company must draw up a Deal-specific Insider List which records the persons who have access to Inside Information created in connection with the event in question.

The Insider List contains:

- a) Internal Insiders (employees and other persons in possession of Inside Information within the Company's organisation)
- b) External Insiders (negotiating partners, external experts, i.e., advisors, experts and service providers entering into a contractual relationship with the Company in connection with the transaction, such as law firms or tax advisory firms)

In the case of External Experts, it is sufficient for the Insider List to indicate the legal entity acting as the External Expert, while the External Expert is responsible for listing the natural persons performing tasks on behalf of that legal entity.

¹ Using the format set out in Template 1 of Annex I of Commission Implementing Regulation (EU) 2022/1210.

² Using the format set out in Template 2 of Annex II of Commission Implementing Regulation (EU) 2022/1210.



The Person Maintaining the Insider List must maintain the Insider List on a documented basis. This means that the Deal-specific Insider List will be drawn up or amended by the Person Maintaining the Insider List on the basis of a notification made by any person who possesses Inside Information. The Person Maintaining the Insider List may require that entries in the Deal-specific Insider List be made based on a notification submitted using the form included in Annex 4, which the person concerned must provide to the Person Maintaining the Insider List, either on paper or electronically.

IV.1.3. Inclusion in the list, updating the list and removal from the list

Any person performing activities for the Company on the basis of an employment contract or any other legal relationship who obtains access to Inside Information must, immediately after obtaining such information, but no later than within two workdays, inform the Person Maintaining the Insider List of the existence of Inside Information by providing the data required for inclusion in the list, in order to ensure that the Person Maintaining the Insider List fully complies with their obligation to maintain the Insider List.

Inside Information serving as the basis for inclusion in the Insider List includes, but is not limited to:

- a) financial reports and the data included therein;
- b) personal or organisational changes subject to a Disclosure Obligation;
- c) decisions, contracts, cooperation agreements and court or administrative compensation proceedings significantly affecting the Company's operations or market position;
- d) court or administrative proceedings initiated by or against the Company, as well as any interim decisions or measures adopted in this regard that are subject to a Disclosure Obligation;
- e) any information related to the preparation of decisions that gives rise to a Disclosure Obligation.

The Company must promptly update the Insider List, including the date of the update, in the following circumstances:

- a) where there is a change in the reason for including a person already on the Insider List;
- b) where there is a new person who has access to inside information and needs, therefore, to be added to the Insider List; and
- c) where a person ceases to have access to Inside Information.

Any person included in the Insider List must notify the Person Maintaining the Insider List of any change in their data recorded in the Insider List within five workdays. The Person Maintaining the Insider List will not be held liable if the reason why the Insider List does not comply with statutory requirements is that a person subject to the notification obligation fails to submit such notification, fails to do so in a timely manner, or submits incorrect data.

The Company must retain the Insider List for a period of at least five years after it is updated.

Where a person on the list ceases to have access to Inside Information for any reason, that person must be promptly removed from the Insider List. The removal from the Insider List must be carried out in such a manner that the deleted data and the date of removal remain identifiable afterwards.

IV.2. Delay of disclosure of Inside Information

The Company may, on its own responsibility, delay the disclosure of Inside Information to the public if:

- a) its legitimate interests would be harmed,
- b) confidential treatment is ensured, and
- c) the delay is not misleading.



Such delay may occur, for instance, in the case of a protracted process that occurs in stages and that is intended to bring about a particular circumstance or a particular event. The Person Maintaining the Insider List is responsible for this task.

The Company must record the delay and the planned date of disclosure using the template provided in Annex 7.

Where the confidentiality of Inside Information is no longer ensured (for example, if such information has leaked or unauthorised persons are expected to gain access to such information), the Company must disclose that information to the public as soon as possible. According to this provision, Inside Information must also be disclosed to the public as soon as possible in cases where a rumour explicitly relates to Inside Information whose disclosure has been delayed, and that rumour is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured.

When the delayed disclosure is made, the Company must also notify the Supervisory Authority of such delay via the ERA system. The notification must include proper justification demonstrating that the conditions for the delay were met.

The person designated by the Company, i.e., the Director of Investor Relations, maintains a record of such notifications submitted to the Supervisory Authority.

The following information must be attached to the record:

- a) the notification submitted to the Supervisory Authority;
- b) the subject of the notification;
- c) proof of delivery to the addressee (e.g., a return receipt).

The notification is made via the ERA system operated by the Supervisory Authority, which ensures that the information is not accessible to third parties until disclosure. The notification regarding the delay of disclosure of Inside Information includes the data specified in the relevant annex.

If, during the period of delay, the information is no longer price-sensitive and ceases to constitute inside information, no extraordinary disclosure is required; however, the Supervisory Authority must still be informed without delay even after the information no longer constitutes inside information.

Particular care must be taken to maintain the confidentiality of the Inside Information throughout the period of delay as well.

IV.3. Notification obligation for managers' transactions (PDMR/PCA Dealing)

Subject of the obligation	<ul style="list-style-type: none"> a) transactions relating to the Company's Financial Instruments conducted by Persons Discharging Managerial Responsibilities and, where applicable, Persons Closely Associated with them on their own account; b) the pledging or lending of Financial Instruments by or on behalf of Persons Discharging Managerial Responsibilities or Persons Closely Associated with them (unless and until such time that such transactions are designated to secure a specific credit facility); c) transactions made under a life insurance policy, defined in accordance with Directive 2009/138/EC of the European Parliament and of the Council, where the policyholder is a Person Discharging Managerial Responsibilities or a Person Closely Associated with such a person, the investment risk is borne by the policyholder, and the policyholder has the power or discretion to make investment decisions regarding specific
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	instruments in that life insurance policy or to execute transactions regarding specific instruments for that life insurance policy.
Persons subject to the obligation	The notification obligation applies to Persons Discharging Managerial Responsibilities and, where applicable, Person Closely Associated with them.
Threshold	The total amount of all transactions involving the same person has reached EUR 20,000 within a calendar year. ³
Deadline	Without delay, but no later than three workdays after the date of the transaction.
Procedure	<p><u>If the person subject to the obligation is a natural person:</u></p> <p>The notification must be submitted by the person concerned to the Supervisory Authority by using the electronic form in the ÁNYK application, and the template provided in Annex 3 must be attached.⁴</p> <p><u>If the person subject to the obligation is a legal person:</u></p> <p>The notification must be made via the ERA system by filling out the designated electronic template.</p> <p><u>Notifying the Company:</u></p> <p>The person subject to the obligation must notify the Company by sending the template provided in Annex 3 of this Policy to the registered office of the Company.</p> <p>Persons Discharging Managerial Responsibilities must notify the Persons Closely Associated with them of their obligations under Section III.1 in writing and must retain a copy of such notification. The persons concerned may use the sample letter provided in Annex 2 of this Policy to comply with the notification obligation.</p>

IV.3.1. The relevant obligations of the Company

- a) The Company must disclose the notified information without delay, but no later than two workdays after the date of the transaction, in accordance with the procedures set out in the Disclosure Policy.
- b) The Company must inform, in writing, the Persons Discharging Managerial Responsibilities within the Company about their notification obligations using the sample letter provided in Annex 1 of this Policy.
- c) The Company must maintain a list of all Persons Discharging Managerial Responsibilities and Persons Closely Associated with them.⁵

³ The threshold of EUR 20,000 is calculated by adding up, without netting, the amount of all transactions. The amount of each transaction must be calculated using the closing EUR exchange rate for the date of the transaction as published on the website of the European Central Bank (<https://www.ecb.europa.eu/stats/exchange/eurofxref/html/index.en.html>)

⁴ The content of the template provided in Decree No. 36/2017 (XII. 27.) of the Hungarian National Bank is regulated by Commission Implementing Regulation (EU) 2016/523. This regulation lays down the format and template for the notification and public disclosure of managers' transactions in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council (MAR).

⁵ To comply with this obligation, Persons Discharging Managerial Responsibilities must provide the Person Maintaining the Insider List with the data of all Persons Closely Associated with them that are necessary for maintaining such a list. This list is not the same as the Insider List.



IV.4. Market soundings

Market soundings usually involve the creation and/or disclosure of Inside Information.

IV.4.1. What constitutes a market sounding?

Market sounding includes:

- a) the communication of information prior to the announcement of a transaction, if any, in order to gauge the interest of one or more potential investors in a possible transaction and the conditions relating to it, such as its potential size or pricing, to one or more potential investors;
- b) the disclosure of Inside Information by a person (in this case, the Company) intending to make a takeover bid for the securities of a company or a merger with a company to parties entitled to the securities, provided that:
 - i. the information is necessary to enable the parties entitled to the securities to form an opinion on their willingness to offer their securities; and
 - ii. the willingness of parties entitled to the securities to offer their securities is reasonably required for the decision to make the takeover bid or merger.

IV.4.2. Preparations

In order to ensure traceability, each procedural step must be recorded in writing after the decision on conducting a market sounding is made, and such records must be retained for five years. The templates included in the annexes can be used to record each step, and additional steps must be documented by taking electronic notes and retaining official correspondence.

The CEO must decide on the following matters and must make a written record thereof:

- a) Does the market sounding involve the disclosure of Inside Information? (The conclusions and the reasons must be documented in accordance with the note provided in Annex 8, and the note must be updated if new information becomes available or if any information ceases to constitute Inside Information.)
- b) The CEO designates and appoints the employee or agent conducting the market sounding by filling out the authorisation set out in Annex 8. (If the CEO conducts the market sounding personally, then this must be documented in the same Annex.)
- c) The authorisation set out in Annex 8 contains the standard set of information to be provided in the course of the market sounding and the order in which that information must be provided.
- d) The CEO forwards the authorisation to the Person Maintaining the Insider List.

The privacy notice relating to the market sounding is included in Annex 9.

IV.4.3. Conducting discussions

Method of conducting market soundings

Market soundings may be conducted orally, in physical meetings, in audio or video telephone calls, or in writing, by mail, fax or electronic communications. The person conducting the procedure must use the Company's own facilities (telephone lines and other technical equipment) for this purpose.

Data protection

Where the personal data of the person receiving the market sounding (such as voice or image) are recorded, the person receiving the market sounding must be informed in advance about the processing of personal data and their consent must be obtained in accordance with Annex 9.



Disclosures and statements of consent

Prior to the market sounding, the person conducting the procedure will provide the person receiving the market sounding with the information set out in Annex 10. The person receiving the market sounding must give their explicit consent to the recording of data and to receiving inside information, and such consent must be recorded by the person conducting the procedure. In the absence of such consent, inside information may not be disclosed.⁶

Keeping records of communications

Communication channel	Method of keeping records of communications
recorded telephone line	recordings of telephone conversations
in writing	a copy of the correspondence
physical meetings using audio or video recording	recordings of meetings (consent required)
unrecorded physical meetings or telephone conversations	written minutes or notes of the meetings or telephone conversations (the minutes are prepared by the person conducting the procedure in the form set out in Annex 11)

IV.4.4. Information to be provided in the course of a market sounding

Where the CEO considers that the market sounding will involve the disclosure of inside information, the Company or the person designated by the Company to conduct the market sounding may provide only the following information to the potential investor (the person receiving the market sounding). Such information must be provided in the following order and must be limited to the following:

- a) a statement clarifying that the communication takes place for the purposes of a market sounding;
- b) where the market sounding is conducted by recorded telephone lines, or audio or video recording is being used, a statement indicating that the conversation is recorded and the consent of the person receiving the market sounding to be recorded;
- c) a request for a confirmation from the contacted person that the Company is communicating with the person entrusted by the potential investor to receive the market sounding and the reply to that request;
- d) a statement clarifying that, if the contacted person agrees to receive the market sounding, that person will receive information that the disclosing market participant considers to be inside information, and a reference to the obligation laid down in Article 11(7) of the MAR, i.e., the fact that the person receiving the market sounding must assess for themselves whether they possess inside information and the date on which the information they possess ceases to be inside information;
- e) where possible, an estimation of when the information will cease to be inside information, the factors that may alter that estimation and, in any case, information about the manner in which the person

⁶ If communication takes place in person or in writing, the person conducting the procedure will request that the statement of consent set out in Annex 10 be filled out, and if communication takes place by telephone or other recorded means, the person receiving the market sounding must approve the statement of consent set out in Annex 10 after being read out by the person conducting the procedure.



receiving the market sounding will be informed of any change in such an estimation;

- f) a statement informing the person receiving the market sounding that that person will be prohibited from using inside information, or attempting to use inside information, by acquiring or disposing of, for that person's own account or for the account of a third party, directly or indirectly, financial instruments relating to that information;
- g) a statement informing the person receiving the market sounding that that person will be prohibited from using inside information, or attempting to use inside information, by cancelling or amending an order which has already been placed concerning a financial instrument to which the information relates;
- h) a statement informing the person receiving the market sounding that, by agreeing to receive the information, that person is obliged to keep the information confidential;
- i) a request for the consent of the person receiving the market sounding to receive inside information and the reply to that request;
- j) where the consent required under point i) is given, the information being disclosed for the purposes of the market sounding, identifying the information considered by the disclosing market participant to be inside information.

If the CEO considers that the market sounding will not involve the disclosure of inside information, the standard set of information must include and be limited to the following, in the stated order:

- a) the information that would have to be provided if the market sounding were to involve the disclosure of inside information, i.e., the information specified in points a), b), c) and d) above;
- b) a request for the consent of the person receiving the market sounding to proceed with the market sounding and the reply to that request;
- c) where the consent required under point e) is given, the information being disclosed for the purposes of the market sounding.

IV.4.5. Notification following the market sounding

Where the Company assesses that the inside information disclosed in the course of a market sounding has ceased to be inside information, the Company must promptly notify, in writing, the person or organisation that had received the information from the Company (the person having received the market sounding). The notification must be made in the form set out in Annex 13.

IV.4.6. Record-keeping requirement

The Company draws up and maintains a record of all information given to the person receiving the market sounding using the template set out in Annex 14, as well as the identity of the potential investors to whom the information has been disclosed and the date and time of each disclosure. Such record must be kept up-to-date at all times so that the Company can promptly provide the record to the Supervisory Authority upon request.

The Company maintains a list of the potential investors that have informed the Company that they do not wish to receive market soundings, in relation to either all potential transactions or particular types of potential transactions. These persons must not be contacted for the purposes of market sounding.



V. Prohibition of market manipulation

V.1. Market manipulation

Market manipulation, or attempted market manipulation, is harmful to investors as it forces them to make their investment decisions based on false or misleading information, harmful to the Company as it erodes trust in the information available about the Company, and harmful to the capital markets as a whole as it undermines public trust in the proper functioning and transparency of the markets.

Market manipulation is prohibited and may result in severe sanctions under civil law and criminal law. The Company is committed to complying with the applicable rules and expects a high standard of compliance from all of its shareholders and employees.

V.1.1. What constitutes market manipulation?

Actions that qualify as market manipulation are defined in Article 12(1) of the MAR. Accordingly, market manipulation may include:

- a) entering into a transaction, placing an order to trade or any other behaviour which:
 - i. may give false or misleading signals as to the supply of, demand for, or price of, a Financial Instrument;
 - ii. secures, or is likely to secure, the price of a Financial Instrument at an abnormal or artificial level;

unless the person entering into the transaction or placing an order to trade establishes that such transaction or behaviour has been carried out for legitimate reasons, and conforms with an accepted market practice.
- b) entering into a transaction, placing an order to trade or any other behaviour which affects, or is likely to affect, the price of a Financial Instrument and employs a fictitious device or any other form of deception or contrivance;
- c) disseminating information, including through the internet, the media or by any other means of communication, which gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of, a Financial Instrument, or may secure the price at an artificial level, including the dissemination of rumours, if the person who made the dissemination knew, or ought to have known, that the information was false or misleading;
- d) transmitting false or misleading information or providing false or misleading inputs in relation to a Benchmark where the person who made the transmission or provided the input knew or ought to have known that it was false or misleading, or any other behaviour which manipulates the calculation of a Benchmark.

Market manipulation also includes, in particular, any behaviour listed in Article 12(2) of the MAR, such as:

- a) conduct aimed at securing or maintaining a dominant position over the supply of, or demand for, a Financial Instrument;
- b) buying or selling Financial Instruments at the opening or closing of the market in a way that could mislead investors acting on the basis of the prices displayed, including, in particular, the opening or closing prices;
- c) placing orders to a trading venue or employing trading strategies in a way that could have one of the effects referred to in point a) or b), including, in particular:
 - i. disrupting or delaying the functioning of the trading system;



- ii. entering orders that make it more difficult to identify genuine market orders, including by overloading the order book;
 - iii. entering orders that create a false or misleading signal about the supply of, or demand for, or price of, a Financial Instrument, for example to initiate or exacerbate an artificial market trend;
- d) taking advantage of access to the traditional or electronic media by voicing an opinion about a Financial Instrument (or indirectly about the Company) while having previously taken positions on that Financial Instrument, and profiting subsequently from the impact of the opinions voiced on the price of that instrument without having simultaneously disclosed that conflict of interest to the public in a proper and effective way.



VI. Roles and responsibilities (summary)

The purpose of this chapter is to provide a clear summary of the tasks and responsibilities of the key participants involved in managing the Internal Governance Documents of AutoWallis Group.

Responsibility is always attached to the position, not the individual.

The contents of the table below are based on the processes described in detail in the previous chapters (creation, review, amendment, approval and revocation).

Participant	Responsibility
Document Owner (Director of Investor Relations)	<ul style="list-style-type: none"> a) Acts as the Person Maintaining the Insider List. b) Defines the purpose, content elements and control points of the regulation, consults with the affected persons and requests comments. c) Verifies alignment with higher-level regulations with the involvement of the Compliance Function. d) Ensures that the annual review, updates and corrective actions are carried out. e) Participates in the publication of the policy, the provision of training and, where required by the functional area, the implementation of the policy.
Administrative staff	<ul style="list-style-type: none"> a) Assists the Director of Investor Relations by performing administrative tasks (e.g., maintaining the Permanent Insider List and communicating its content to those affected, as instructed by the Director of Investor Relations).
Reviewer	<ul style="list-style-type: none"> a) Comments on the MAR Policy from a governance and compliance perspective. b) Supports the development and review of the regulation by offering professional recommendations. c) Signs off on the policy to confirm that the commenting process has been completed.
End-user/Executor	<ul style="list-style-type: none"> a) Applies the provisions of this policy during day-to-day work and in everyday life (to comply with their confidentiality and notification obligations).
CEO	<ul style="list-style-type: none"> a) Issues this policy b) Decides whether a market sounding involves the disclosure of Inside Information, designates the person conducting the market sounding, and notifies the Deputy Person Maintaining the Insider List

VII. Review history („audit trail” or „version control”)

Version	Effective date of the change	Summary of changes
v1.0	15/09/2022	<ul style="list-style-type: none"> • New document
v2.0	13/03/2026	<ul style="list-style-type: none"> • Update to reflect changes in legislation

VIII. Legal acts used



No.	Name of legislation
1	Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC (Text with EEA relevance) and implementing regulations for the MAR
2	Commission Implementing Regulation (EU) 2016/347 of 10 March 2016 laying down implementing technical standards with regard to the precise format of insider lists and for updating insider lists in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council (Text with EEA relevance)
3	Decree No. 36/2017 (XII. 27.) of the Hungarian National Bank on the Rules of Electronic Communication in Certain Official Matters Before the Hungarian National Bank
4	Act CXX of 2001 on the Capital Market
5	Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities
6	Act C of 2012 on the Criminal Code



IX. Annexes

Annex 1: Notification to Persons Discharging Managerial Responsibilities regarding their obligations related to their transactions (sample)

Annex 2: The obligation of Persons Discharging Managerial Responsibilities to notify the Persons Closely Associated with them of their obligations related to their transactions (sample)

Annex 3: Template for notification and public disclosure of transactions by Persons Discharging Managerial Responsibilities and Persons Closely Associated with them

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Annex 6: Permanent Insider List and Deal-specific Insider List (template)

Annex 7: Documentation of a delay of disclosure of Inside Information (sample)

Annex 8: Note on whether the information disclosed during a market sounding constitutes inside information and the procedure to be followed

Annex 9: The Company's privacy notice related to market soundings

Annex 10: Prior consent to receive inside information in the context of a market sounding

Annex 11: Minutes

Annex 12: Notice on the fact that information disclosed in the course of a market sounding has ceased to be inside information

Annex 13: List of information disclosed in the course of a market sounding

Annex 14: List of persons receiving market sounding



Annex 1

Notification to Persons Discharging Managerial Responsibilities regarding their obligations related to their transactions (sample)

Dear [Name],

AutoWallis Nyilvánosan Működő Részvénytársaság (hereinafter: Company), a public limited company listed on the Budapest Stock Exchange, is required to comply with various legal obligations and requirements. This means that, among other things, the Company is required to maintain a list of persons performing work on its behalf who have access to inside information, in order to facilitate inspections by authorities relating to insider dealing.

Pursuant to Article 19 of Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (hereinafter: MAR), the Company is also required to draw up a list of all Persons Discharging Managerial Responsibilities within the Company and the Persons Closely Associated with them.

Persons Discharging Managerial Responsibilities include anyone within the Company who:

- a) is a member of the Company's Board of Directors or Supervisory Board, or*
- b) is an executive officer who is not a member of the bodies referred to in point a) and has regular access to inside information relating directly or indirectly to the Company and power to take managerial decisions affecting the future developments and business prospects of the Company.*

Based on the above, you qualify as a Person Discharging Managerial Responsibilities within the Company, which means that you are subject to the following obligations set out in Article 19 of the MAR.

1. Notification obligation for transactions

You are required to notify both the Company and the Hungarian National Bank, acting as the competent supervisory authority (hereinafter: Supervisory Authority), of every transaction conducted on your own account involving the Company's shares no later than three workdays after the date of the transaction, once the total amount of transactions carried out by you within a given calendar year has reached EUR 20,000, and of the reaching of this threshold as well. The threshold of EUR 20,000 is calculated by adding up, without netting, the amount of all transactions referred to above.

This obligation also applies to Persons Closely Associated with you.

The notification must include the following information:

- a) the name of the person subject to the notification obligation;



- b) the reason for the notification;
- c) the name of the Company;
- d) a description and the identifier of the financial instrument involved in the transaction;
- e) the nature of the transaction (e.g., acquisition or disposal), indicating whether the transaction is linked to the exercise of share option programmes or to the specific examples set out in Article 19(7) of the MAR;
- f) the date and place of the transaction;
- g) the price and volume (quantity) of the financial instrument involved in the transaction. In the case of a pledge whose terms provide for its value to change, this should be disclosed together with its value at the date of the pledge.

The Company must disclose the notified information via the ERA system promptly, but no later than two workdays after the date of the transaction.

2. Notification to Persons Closely Associated

As the notification obligation for transactions under Section I also applies to Persons Closely Associated with Persons Discharging Managerial Responsibilities pursuant to Article 19(1) of the MAR, the Persons Closely Associated with you must be notified of this obligation by you in writing and you must retain a copy of such notification.

Persons Closely Associated include:

- a) *a person's spouse or partner considered to be equivalent to a spouse*
- b) *a dependent child*
- c) *a person's relative who has shared the same household for at least one year on the date of the transaction concerned*
- d) *a legal person, trust or partnership, the managerial responsibilities of which are discharged by a Person Discharging Managerial Responsibilities or by a person referred to in point a), b) or c), or which is directly or indirectly controlled by such a person, or which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person*

3. Notification obligation

In order to comply with its obligation under Article 19(5) of the MAR, the Company is required to forward the following data relating to **you** and the **persons closely associated with you** under point 2 to the person maintaining the list:

Name:

Surname of the insider at birth (if different from the current surname):

Reason for being insider (nature of the relationship):

Date of birth:

ID number:



Home address:

Professional telephone number (landline and mobile telephone numbers):

Personal telephone number (home and personal mobile telephone numbers):

Please inform me of any changes in the above data within five workdays.

Yours sincerely,

[Person Maintaining the Insider List]

Annex 2

The obligation of Persons Discharging Managerial Responsibilities to notify the Persons Closely Associated with them of their obligations related to their transactions (sample)

Dear [Name],

AutoWallis Nyilvánosan Működő Részvénytársaság (hereinafter: Company), a public limited company listed on the Budapest Stock Exchange, is required to comply with various legal obligations and requirements. This means that, among other things, the Company is required to maintain a list of persons performing work on its behalf who have access to inside information, in order to facilitate inspections by authorities relating to insider dealing.

Pursuant to Article 19 of Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (hereinafter: MAR), the Company is also required to draw up a list of all Persons Discharging Managerial Responsibilities within the Company and the Persons Closely Associated with them.

Persons Closely Associated include:

- (a) a person's spouse or partner considered to be equivalent to a spouse*
- (b) a dependent child*
- (c) a person's relative who has shared the same household for at least one year on the date of the transaction concerned*
- (d) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a Person Discharging Managerial Responsibilities or by a person referred to in point a), b) or c), or which is directly or indirectly controlled by such a person, or which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person*

Based on the above, you qualify as a Person Closely Associated with a Person Discharging Managerial Responsibilities within the Company, which means that you are subject to the following obligations set out in Article 19 of the MAR.

You are required to notify both the Company and the Hungarian National Bank, acting as the competent supervisory authority (hereinafter: Supervisory Authority), of every transaction conducted on your own account involving the Company's shares no later than three workdays after the date of the transaction, once the total amount of transactions carried out by you within a given calendar year has reached EUR 20,000, and of the reaching of this threshold as well. The threshold of EUR 20,000 is calculated by adding up, without netting, the amount of all transactions referred to above.

The notification must include the following information:

- a) the name of the person subject to the notification obligation;
- b) the reason for the notification;



- c) the name of the Company;
- d) a description and the identifier of the financial instrument involved in the transaction;
- e) the nature of the transaction (e.g., acquisition or disposal), indicating whether the transaction is linked to the exercise of share option programmes or to the specific examples set out in Article 19(7) of the MAR;
- f) the date and place of the transaction;
- g) the price and volume (quantity) of the financial instrument involved in the transaction. In the case of a pledge whose terms provide for its value to change, this should be disclosed together with its value at the date of the pledge.

The Company must disclose the notified information promptly, but no later than two workdays after the date of the transaction.

I, the undersigned _____ *[name]*, acknowledge that I qualify as a person closely associated with a person discharging managerial responsibilities within AutoWallis Nyilvánosan Működő Részvénytársaság (hereinafter: Company) pursuant to Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (hereinafter: MAR), and I acknowledge my obligations under Article 19 of the MAR.

I acknowledge that, in accordance with Article 19(5) of the MAR, the Company is required to draw up a list of persons closely associated with persons discharging managerial responsibilities within the Company. In order for the Company to comply with its obligation, I am forwarding my data below to the person maintaining the list, and I consent to the processing of such data for record-keeping purposes:

Name:

Surname of the insider at birth (if different from the current surname):

Reason for being insider (nature of the relationship):

Date of birth:

ID number:

Home address:

Professional telephone number (landline and mobile telephone numbers):

Personal telephone number (home and personal mobile telephone numbers):

Date:

.....

signature

CLAUSE:

The Person Discharging Managerial Responsibilities is required to retain a copy of this notification.



Annex 3

Template for notification and public disclosure of transactions by persons discharging managerial responsibilities and persons closely associated with them

1.	Details of the person discharging managerial responsibilities/person closely associated	
a)	Name	<i>[For natural persons: the first name and the last name(s).] [For legal persons: full name including legal form as provided for in the register where it is incorporated, if applicable.]</i>
2.	Reason for the notification	
a)	Position/status	<i>[For persons discharging managerial responsibilities: the position occupied within the issuer emission allowances market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO, CFO.] [For persons closely associated: — An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities; — Name and position of the relevant person discharging managerial responsibilities.]</i>
b)	Initial notification/Amendment	<i>[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]</i>
3.	Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor	
a)	Name	<i>[Full name of the entity.]</i>
b)	LEI	<i>[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]</i>
4	Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted	
a)	Description of the financial instrument, type of instrument Identification code	<i>[— Indication as to the nature of the instrument: — a share, a debt instrument, a derivative or a financial instrument linked to a share or a debt instrument; — an emission allowance, an auction product based on an emission allowance or a derivative relating to an emission allowance. — Instrument identification code as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i>
b)	Nature of the transaction	<i>[Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 adopted under Article 19(14) of Regulation</i>



		<p><i>(EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.</i></p> <p><i>Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linked to the exercise of a share option programme.]</i></p>					
c)	Price(s) and volume(s)	<table border="1"> <thead> <tr> <th>Price(s)</th> <th>Volume(s)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Price(s)	Volume(s)			<p><i>[Where more than one transaction of the same nature (purchases, sales, lendings, borrows, ...) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed.</i></p> <p><i>Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p>
Price(s)	Volume(s)						
d)	Aggregated information — Aggregated volume — Price	<p><i>[The volumes of multiple transactions are aggregated when these transactions:</i></p> <ul style="list-style-type: none"> <i>— relate to the same financial instrument or emission allowance;</i> <i>— are of the same nature;</i> <i>— are executed on the same day; and</i> <i>— are executed on the same place of transaction.</i> <p><i>Using the data standard for quantity, including where applicable the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p> <p><i>[Price information:</i></p> <ul style="list-style-type: none"> <i>— In case of a single transaction, the price of the single transaction;</i> <i>— In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions.</i> <p><i>Using the data standard for price, including where applicable the price currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p>					
e)	Date of the transaction	<p><i>[Date of the particular day of execution of the notified transaction.</i></p> <p><i>Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]</i></p>					
f)	Place of the transaction	<p><i>[Name and code to identify the MiFID trading venue, the systematic</i></p>					



		<p><i>internaliser or the organised trading platform outside of the Union where the transaction was executed as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014, or if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading venue'.]</i></p>
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Annex 4

Notification to insiders regarding their obligations related to their inclusion in the Insider List and data processing (sample)

Dear [Name],

Pursuant to Regulation (EU) No 596/2014 on market abuse, AutoWallis Nyilvánosan Működő Részvénytársaság (Company), a public limited company listed on the Budapest Stock Exchange, is required to draw up a list of persons who have access to inside information, and to ensure that such information remains confidential and is disclosed or made available to third parties only in the cases specified in the above regulation.

As we are of the opinion that you have obtained or will obtain access to inside information by virtue of your relationship with the Company, we hereby wish to inform you of your key obligations and the possible consequences of non-compliance.

1. Definition of Inside Information

Please carefully review the definition below and, on this basis, please treat any information that meets these criteria as inside information in the future:

Inside Information:

- a) *Precise Information which*
 - *has not been made public;*
 - *relates directly or indirectly to the Financial Instrument or the Company;*
 - *if it were made public, would be likely to have a significant effect on the price of the Financial Instrument or on the price of related derivative financial instruments;*
- b) *Precise Information conveyed by a client or by other persons acting on the client's behalf or information known by virtue of management of a proprietary account or of a managed fund and relating to pending orders in a Financial Instrument, relating, directly or indirectly, to the Company or that Financial Instrument, and which, if it were made public, would be likely to have a significant effect on the prices of that Financial Instrument, the price of related spot commodity contracts, or on the price of related derivative financial instruments*

2. Key obligations relating to Inside Information

Please carefully review the rules relating to Inside Information set out in our policy, which is attached to this letter. The most important rules are summarised below.

The disclosure of Inside Information or its communication to third parties is lawful only where expressly permitted by Regulation (EU) No 596/2014 or by a policy that complies therewith. In all other cases, please retain, and maintain the confidentiality of, Inside Information.

In cases where you use Inside Information to acquire or dispose of the Company's ordinary shares, directly or indirectly, for your own account or for the account of a third party, you are engaging in insider dealing. The use of Inside Information to cancel or amend an order relating to the Company's ordinary shares also constitutes insider dealing where the person obtained the Inside Information after placing the order.



Furthermore, insider dealing also includes cases where a person in possession of Inside Information recommends that another person engage in any of the above, or induces that person to do so, where he or she knows or ought to know that such actions are based upon Inside Information.

The Company is required to maintain a list of persons who have permanent or temporary access to Inside Information, including employees, agents and service providers.

Information request form for maintaining the Insider List

First name(s) of the insider	[Text]				
Surname(s) of the insider	[Text]				
Surname(s) of the insider at birth (if different)	[Text]				
Professional telephone number(s) (work direct telephone line and work mobile numbers)	[Numbers (no space)]				
Function and reason for being insider	[Text describing role, function and reason for being on this list]				
Obtained (the date and time at which the insider obtained access to the inside information)	[yyyy-mm-dd, hh:mm UTC]				
Date of birth	[yyyy-mm-dd]				
National Identification Number (tax ID)	[Number and/or text]				
Personal telephone numbers (home and personal mobile telephone numbers)	[Numbers (no space)]				
Personal full home address (street name; street number; city; post/zip code; country)	[Text: detailed home address of the insider				
	street name and street number	city	post/zip code	country]	

I, the undersigned, as the person identified in the table above, hereby declare that the data provided above are true and accurate, and I agree to report any changes in the above information within five workdays.

[date] _____

[signature] _____

Ceased (the date and time at which I ceased to have access to the inside information)	[yyyy-mm-dd, hh:mm UTC]
---	-------------------------

[date] _____

[signature] _____

Please inform me of any changes in the above data within five workdays.



3. Sanctions for breach of the rules for handling Inside Information

The unlawful disclosure of Inside Information and insider dealing are prohibited and sanctioned under both administrative and criminal law.

Administrative sanctions are set out in Chapter 5 of Regulation (EU) No 596/2014 and, in addition to granting the power to impose a maximum administrative pecuniary sanction of up to three times the profit gained as a result of an infringement of the Regulation, may include fines of up to EUR 5 million for natural persons and up to EUR 15 million for legal persons in relation to the breach of certain obligations (such as the unlawful disclosure of Inside Information), or up to 15% of the total annual turnover of legal persons for the preceding financial year where this amount exceeds the above threshold.

Criminal sanctions are set out in Sections 410 and 410/A of Act C of 2012 on the Criminal Code, and may include imprisonment for up to five years for committing the relevant offences.

Please immediately inform the Company if you become aware of any unlawful disclosure or use of Inside Information.

4. General privacy information

The Company, acting as controller, continuously ensures the lawfulness and appropriateness of the processing of personal data in connection with Inside Information obtained in the course of the business relationship.

The Company's data processing activities comply with the applicable laws, including, in particular:

- Regulation (EU) 2016/697 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: „GDPR”)
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Information Act)

The Company, as controller, carries out data processing activities in connection with records maintained in relation to the disclosure of Inside Information.

The Company does not engage any processors with respect to such processing, does not transfer personal data outside the European Union, and does not carry out automated decision-making, including profiling, in relation to such data.

5. Data processing activities

5.1. Processing required for handling Inside Information

Where the Company discloses Inside Information, the Company will, in accordance with the applicable legal requirements, record the fact that such disclosure took place, retain the records for the period required by law and, where necessary, forward them to the Hungarian National Bank acting as the competent supervisory authority. The data subject acknowledges that, in such cases, the processing is based on a legal obligation and, therefore, the data subject does not have the right to withdraw consent, and may request the



erasure of the data only in duly justified cases as set out below. However, before receiving Inside Information, the data subject may object to receiving such Inside Information using the declaration attached to this notice.

Any person included in the Insider List must notify the Company of any change in their data recorded in the Insider List within five workdays.

Where a person included in the list no longer has access to Inside Information for any reason, the Company will promptly remove that person from the Insider List.

Purpose of the processing: maintaining records relating to the disclosure of inside information in terms of processing relating to such records.

Legal basis for the processing: compliance with a legal obligation to which the Company is subject as controller in terms of keeping records relating to inside information, pursuant to Article 6(1)(c) of the GDPR. The legal obligation is set out in Article 11 of Regulation (EU) No 596/2014, while the scope of the data to be processed is specified in Article 6 of Regulation (EU) 2016/960.

Categories of data subjects: those participants of market soundings to whom the Company discloses inside information.

Scope of the personal data processed: the data subject's name, name at birth, date of birth, ID number, home address, professional telephone number (landline and mobile telephone numbers), personal telephone number (home and personal mobile telephone numbers), date and time of each disclosure, correspondence with the data subject, and notes of discussions with the data subject.

Duration of the processing: five years from the date of recording the data, in accordance with Article 11(8) of Regulation (EU) No 596/2014.

6. Rights of data subjects

The data subject may submit a request to exercise his or her rights in writing to the Company's email address or mailing address. The controller will inform the data subject on action taken in response to the request without undue delay and, in any event, within one month of receipt of the request.

If the controller does not take action on the request of the data subject, the controller will inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The rights of data subjects are set out in detail in Articles 15 to 22 of the GDPR. The rights of data subjects relevant to the above processing activities are summarised below:

6.1. Right of access

The data subject has the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed, as well as access to information on the processing.

6.2. Right to rectification:

According to the law, anyone has the right to obtain the rectification of inaccurate personal data concerning him or her and have incomplete personal data completed.

6.3. Right to erasure

The data subject has the right to have us erase the personal data concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected



- or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data are found to have been processed unlawfully;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The right to the erasure of data does not apply to the extent that processing is necessary, amongst others, for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or for the establishment, exercise or defence of legal claims.

6.4. Right to restriction of processing

The data subject has the right to request the restriction of processing where one of the circumstances listed in Article 18 of the GDPR applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data may, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. The data subject must be informed before the restriction of processing is lifted.

6.5. Right to data portability

Where the data subject is contacted and data are provided by electronic means, the data subject has the right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller.

6.6. Right to object

In cases where the data subject objects to the processing, the Company may no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

6.7. Right to withdraw consent



The data subject has the right to withdraw his or her consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

7. Options for legal remedy

Please also be informed that, if you believe that your rights to informational self-determination have been violated by AutoWallis Nyrt., you may contact the Company or lodge a complaint with the National Authority for Data Protection and Freedom of Information and before the competent court.

National Authority for Data Protection and Freedom of Information

Mailing address: 1363 Budapest, Pf. 9.

Address: 1055 Budapest, Falk Miksa utca 9-11.

Phone: +36 (1) 391-1400

Email: ugyfelszolgalat@naih.hu

Website: <http://naih.hu>

Should you have any questions, please do not hesitate to contact me.

Yours sincerely,

[Person Maintaining the Insider List]



Annex 5

Designation of the persons responsible for fulfilling the obligations set out in the Policy

Person Maintaining the Insider List

Gábor Székely

phone: +36 1 551 5773, email: gabor.szekely@autowallis.com

Person responsible for decisions to delay the disclosure of Inside Information

Gábor Székely

phone: +36 1 551 5773, email: gabor.szekely@autowallis.com

Designated deputies in the event of the prolonged absence of the above persons:

Deputy Person Maintaining the Insider List

Ferenc Batonai

phone: +36 1 551 5773, email: ferenc.batonai@autowallis.com

Deputy person responsible for decisions to delay the disclosure of Inside Information

Ferenc Batonai

phone: +36 1 551 5773, email: ferenc.batonai@autowallis.com

The Person Maintaining the Insider List and their deputy may delegate certain administrative tasks, but they remain responsible for ensuring that such tasks are carried out in accordance with the Company's internal policies.

Annex 6

TEMPLATE - Deal-specific or Event-based Inside Information

Description of the source of the specific inside information:

Date and time of creation of this section (i.e. when the specific inside information was identified): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider	Surname(s) of the insider	Surname(s) of the insider at birth (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Obtained (the date and time at which the insider obtained access to the inside information)	Ceased (the date and time at which the insider ceased to have access to the inside information)	Date of birth	National Identification Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address (street name; street number; city; post/zip code; country)
[Text]	[Text]	[Text]	[Numbers (no space)]	[Address of issuer]	[Text describing role, function and reason for being on this list]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd]	[Number and/or text]	[Numbers (no space)]	[Text]



TEMPLATE – PERMANENT INSIDER LIST

Date and time of creation of this section: [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider	Surname(s) of the insider	Surname(s) of the insider at birth (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Included (the date and time at which the insider was included in the permanent insider section)	Date of birth	National Identification Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address (street name; street number; city; post/zip code; country)
[Text]	[Text]	[Text]	[Numbers (no space)]	[Address of issuer]	[Text describing role, function and reason for being on this list]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd]	[Number and/or text]	[Numbers (no space)]	[Text]



Annex 7

Documentation of a delay of disclosure of Inside Information

DECISION AND NOTE - on the delay of disclosure of inside information -

I, [■], as a member of the Board of Directors of AutoWallis Nyilvánosan Működő Részvénytársaság, acting as an issuer of securities (hereinafter: „Company”), hereby adopt the following decision in accordance with Article 17 of Regulation (EU) No 596/2014 on market abuse („MAR”).

I hereby record that inside information has been created in the course of the Company’s operations.

[■]

(The above information is hereinafter referred to as: „Inside Information”).

1. I hereby record that the Inside Information qualifies as inside information within the meaning of Article 7 of the MAR as of the following date:

YYYY/MM/DD/HH:MM

2. I record that the Inside Information will cease to qualify as inside information on the earlier of the following dates:

- [■]
- The date on which the Inside Information is made public.

3. I hereby record that the Inside Information must be disclosed at the earlier of the following dates:

- [■]
- When the confidentiality of the Inside Information can no longer be ensured.

4. I hereby record that the date of creation of the Inside Information and the date of its disclosure are different (delay). The start date of the delay is the date specified in Section 2 above, and the expected end date is the date specified in Section 3 above.

5. I hereby record that, during the period of delay, access to the Inside Information is restricted to the following persons:

- Within the issuer:
 - o [■]
- External experts:
 - o [■]

6. I hereby record that the persons listed in Section 5 above have been included in the insider list maintained by the Issuer and have received the relevant notification and have acknowledged the restrictions relating to the unlawful use of inside information.



7. I hereby record that the conditions for delaying disclosure pursuant to Article 17(4) of the MAR are met, in particular with regard to the note referred to in Section 1, due to the fact that:

- a) immediate disclosure is likely to prejudice the legitimate interests of the issuer, because [■];
- b) delay of disclosure is not likely to mislead the public, because [■];
- c) the issuer is able to ensure the confidentiality of the information.

YYYY/MM/DD/HH:MM

signature

Annex 8

Note on whether the information disclosed during a market sounding constitutes inside information and the procedure to be followed

	Date of preparation/amendment	Name of the person preparing/amending the document	Reason for the amendment
1.			-
2.			
3.			

Person(s) authorised to conduct market soundings:

Description of the transaction:

Will inside information be disclosed during the market sounding? Yes / No

Scope of inside information:

- ---
- ---
- ---
- ---
- ---
- ---
- ---
- ---

Reason why the information to be disclosed qualifies as inside information or not:

Information to be disclosed in connection with the market sounding (to be determined in accordance with Section III.3.4 of the Policy):



- _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____

Amendments and their dates:

Date

Signature

Annex 9

AutoWallis Nyilvánosan Működő Részvénytársaság Privacy notice related to market soundings

1. General information

AutoWallis Nyilvánosan Működő Részvénytársaság (hereinafter: Company), acting as controller, continuously ensures the lawfulness and appropriateness of the processing of personal data by the Company in connection with market soundings under Article 11 of Regulation (EU) No 596/2014 and the keeping of records relating thereto.

The Company's data processing activities comply with the applicable laws, including, in particular:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: „GDPR”)
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Information Act)

The Company, as controller, carries out two interrelated processing activities in relation to the above:

- processing necessary for conducting market soundings; and
- processing related to records kept in connection with the disclosure of inside information.

The Company does not engage any data processors in relation to either of the above processing activities, does not transfer personal data outside the European Union, and does not carry out any processing activities that involve automated decision-making, including profiling, in relation to such data.

2. Data processing activities

2.1. Processing necessary for conducting market soundings

The Company contacts market participants and, based on their consent, processes their personal data as well as the data communicated during the market sounding. The Company and the data subject prepare minutes of the contact in accordance with Article 6(3) of Regulation (EU) 2016/960, and the Company must also draw up, for each market sounding, a list of such data in accordance with Article 4 of Regulation (EU) 2016/960.

Purpose of the processing: conducting market soundings.

Legal basis for the processing: for market soundings, the data subject's consent pursuant to Article 6(1)(a) of the GDPR.

Categories of data subjects: the persons voluntarily participating in the market sounding.

Scope of the personal data processed: the name of the natural persons participating in the market sounding (data subjects), or if they are acting on behalf of an organisation during the market sounding, the name of the represented organisation, as well as the subject matter of the market sounding (the market participants' interest in a potential transaction, knowing the price and size of the transaction; the content of relevant correspondence or email exchanges; the content of the minutes of discussions), the date and time of the disclosure of information, and the contact details of the data subject (telephone number, mailing



address and email address).

Duration of the processing: a storage period of five years in accordance with Article 11(8) of Regulation (EU) No 596/2014.

Rights of data subjects in relation to the processing:

- right of access,
- right to rectification,
- right to withdraw consent,
- right to erasure,
- right to restriction of processing,
- right to data portability,
- right to object (in connection with future contacts).

(The rights of data subjects are described in Section 3.)

2.2. Processing necessary for complying with the obligation to maintain records of market participants who refuse consent under Section 2.1

Where a data subject does not consent to the processing under Section 2.1 and does not consent to being contacted by the Company in relation to a potential transaction or particular types of transactions, the Company will, on the basis of a legal obligation, add the data subject to a list and will refrain from contacting them in the future in relation to any potential transaction or the types of transactions specified by the data subject. The data subject is entitled to request at any time that the Company remove them from that list or change the scope of the restriction on being contacted.

Purpose of the processing: maintaining the list under Article 4 of Regulation (EU) 2016/960.

Legal basis for the processing: Article 6(1)(c) of the GDPR. The legal obligation is set out in Article 4 of Regulation (EU) 2016/960.

Categories of data subjects: those participants of market soundings who have not given their consent under Section 2.1.

Scope of the personal data processed: the name of the data subject and whether the data subject has prohibited the Company from contacting them in the future in relation to any potential transaction or particular types of transactions.

Duration of the processing: five years from the date of recording the data, in accordance with Article 11(8) of Regulation (EU) No 596/2014.

Rights of data subjects in relation to the processing:

- right of access,
- right to rectification,
- right to erasure,
- right to restriction of processing,
- right to data portability.

(The rights of data subjects are described in Section 3.)

2.3. Processing necessary for complying with the obligation to maintain records relating to the disclosure of inside information



Where the Company discloses inside information during the course of a market sounding based on the prior consent of a given market participant, the Company will, in accordance with the applicable legal requirements, record the fact that such disclosure took place, retain the records for the period required by law and, where necessary, forward them to the Hungarian National Bank acting as the competent supervisory authority. The data subject acknowledges that, in such cases, the processing is based on a legal obligation and, therefore, the data subject does not have the right to withdraw consent, and may request the erasure of the data only in duly justified cases as set out below.

Purpose of the processing: maintaining records relating to the disclosure of inside information in terms of processing relating to such records.

Legal basis for the processing: compliance with a legal obligation to which the Company is subject as controller in terms of keeping records relating to inside information, pursuant to Article 6(1)(c) of the GDPR. The legal obligation is set out in Article 11 of Regulation (EU) No 596/2014, while the scope of the data to be processed is specified in Article 6 of Regulation (EU) 2016/960.

Categories of data subjects: those participants of market soundings to whom the Company discloses inside information.

Scope of the personal data processed: the name of the data subject and the names of potential investors to whom the information has been disclosed, including, but not limited to, the legal and natural persons acting on behalf of such potential investors, as well as the date and time of each disclosure, correspondence with the data subject in relation to the market sounding, and notes of discussions with the data subject.

Duration of the processing: five years from the date of recording the data, in accordance with Article 11(8) of Regulation (EU) No 596/2014.

Rights of data subjects in relation to the processing:

- right of access,
- right to rectification,
- right to restriction of processing,
- right to data portability.

(The rights of data subjects are described in Section 3.)

3. Rights of data subjects

The data subject may submit a request to exercise his or her rights in writing to the Company's email address or mailing address. The controller will inform the data subject on action taken in response to the request without undue delay and, in any event, within one month of receipt of the request. If necessary, this deadline may be extended by two months if justified by the complexity of the request and the number of requests. The controller will inform the data subject about the extension of the deadline within one month from receiving the request, stating the reasons for the delay.

Where the data subject has submitted the request by electronic means, the information will be provided by electronic means, unless otherwise requested by the data subject.

If the controller does not take action on the request of the data subject, the controller will inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The rights of data subjects are set out in detail in Articles 15 to 22 of the GDPR. The rights relevant to the above processing activities are summarised below:



3.1. Right of access

The data subject has the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed. Where personal data are being processed, the data subject has the right to access the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, including, in particular, recipients in third countries (outside the European Union) or international organisations;
- the envisaged period for which the personal data will be stored;
- the existence of the right to rectification, erasure or restriction of processing, and the right to object;
- the right to lodge a complaint with a supervisory authority;
- information as to the source of data; the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3.2. Right to rectification

According to the law, anyone has the right to obtain the rectification of inaccurate personal data concerning him or her and have incomplete personal data completed.

3.3. Right to erasure

The data subject has the right to have us erase the personal data concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data are found to have been processed unlawfully;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The right to the erasure of data does not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise or defence of legal claims.

3.4. Right to restriction of processing

The data subject has the right to request the restriction of processing where one of the circumstances listed in Article 18 of the GDPR applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;



- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data may, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. The data subject must be informed before the restriction of processing is lifted.

3.5. Right to data portability

Where the data subject is contacted and data are provided by electronic means in connection with a market sounding, the data subject has the right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller. The Company is able to supply such data at the data subject's request in MS Word or Excel format.

3.6. Right to object

In cases where the data subject objects to the processing, the Company may no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

In addition to the circumstances described above, the data subject also has a right to object in cases where the processing is based on the legitimate interests of the controller; however, in such cases, the request must be assessed on the basis of a balancing test, depending on whether the rights of the data subject or those of the controller prevail in accordance with Article 21(1) of the GDPR.

3.7. Right to withdraw consent

The data subject has the right to withdraw his or her consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

4. Options for legal remedy

Please also be informed that, if you believe that your rights to informational self-determination have been violated by AutoWallis Nyrt., you may contact the Company or lodge a complaint with the National Authority for Data Protection and Freedom of Information and before the competent court.

National Authority for Data Protection and Freedom of Information

Mailing address: 1363 Budapest, Pf. 9.

Address: 1055 Budapest, Falk Miksa utca 9-11.

Phone: +36 (1) 391-1400

Email: ugyfelszolgalat@naih.hu

Website: <http://naih.hu>



Annex 10

Prior consent to receive inside information in the context of a market sounding

I, the undersigned _____, acting on behalf of _____ / as an investor, hereby declare that I give my prior consent to receive inside information from AutoWallis Nyrt. in the context of a market sounding. This consent expressly applies only to the market sounding relating to the transaction of _____.

I hereby confirm that I have received the relevant privacy notice and inside information notice, and that this declaration also constitutes my consent to the processing of personal data in connection with the market sounding.

I am aware that I, as well as any employee or agent of the organisation I represent who receives inside information, will be prohibited from using that information, or attempting to use that information, in order to acquire or dispose of, for my own account or for the account of a third party, directly or indirectly, financial instruments relating to that information.

Furthermore, I am aware that I, as well as any employee or agent of the organisation I represent who receives inside information, will be prohibited from using that information, or attempting to use that information, by cancelling or amending an order which has already been placed concerning financial instruments relating to that information.

I am aware that such information must be treated as confidential.

Date

Signature



Annex 11

Minutes of a market sounding conducted in a physical meeting / by telephone / in a video call

MINUTES

We, the undersigned, as representatives of AutoWallis Nyrt. („Issuer”) and _____ („Investor”), hereby declare that a market sounding was conducted between _____, representing the Issuer, and _____, representing the Investor, on _____ (date) at _____ (time) (time zone: _____) by way of _____.

Accordingly, at the beginning of the meeting, the Issuer informed the Investor that audio and video recording would be used / minutes would be taken in writing / the telephone conversation would be recorded during the meeting, and the Investor consented to the method of recording.

By signing these minutes, the person representing the Investor declares that they are acting on behalf of the Investor and have received authorisation and instructions from the Investor to communicate with the representative of the Issuer in the context of a market sounding.

Contact details of the Parties used for communication:

Contact details of the person representing the Issuer used for the relevant communication:

Contact details of the person representing the Investor used for the relevant communication:

The Issuer has provided the Investor with its notice on market soundings and the handling of inside information. After reviewing the notice, the Investor gave written consent to the market sounding and to receiving inside information in that context.

By signing these minutes, the person representing the Investor confirms that they have been informed of the following:

- they will be prohibited from using that information, or attempting to use that information, in order to acquire or dispose of, for their own account or for the account of a third party, directly or indirectly, financial instruments relating to that information;
- they will be prohibited from using that information, or attempting to use that information, by cancelling or amending an order which has already been placed concerning financial instruments to which the information relates; and
- by agreeing to receive the information, they are obliged to keep the information confidential.

(The above information is included in the prior consent form.)

By signing these minutes, the Parties confirm that the person representing the Issuer has provided information as to whether inside information will be disclosed in the course of the market sounding, and that the person representing the Investor may, on that basis, decline to participate in the market sounding. However, if the person representing the Investor consents to receive the information, the Investor will be responsible for assessing whether the information constitutes inside information and for how long such classification remains applicable.



The following information was disclosed to the Investor during the meeting:

- _____
- _____
- _____
- _____

During the telephone conversation, the Investor requested the following information:

- _____
- _____
- _____
- _____

The Issuer provided the following documents to the Investor in connection with the market sounding:

- _____
- _____
- _____
- _____

Estimated timing of the public disclosure of any inside information that may have been disclosed, an explanation of why such timing may change, and the method by which the Investor will be informed of any such change:

- _____
- _____
- _____
- _____

By signing these minutes, the Parties declare that:

If inside information was disclosed:

The Issuer requested the consent of the person representing the Investor to disclose inside information.

The person representing the Investor consented to participate in the market sounding and to receive inside information.

If no inside information was disclosed:

The Issuer requested the consent of the person representing the Investor to participate in the market sounding.

The person representing the Investor consented to participate in the market sounding.

OR

Issuer

Investor



Annex 12

Notice on the fact that information disclosed in the course of a market sounding has ceased to be inside information

ADDRESS

Dear _____, *(Please always use the full name.)*

AutoWallis Nyrt. hereby informs you that, in connection with the _____ transaction, the following information disclosed to you on _____ (date) at _____ (time zone: _____) ceased to constitute inside information as of _____ (date), having regard to the fact that such information was made public on _____ (date) at _____ (time zone: _____). Accordingly, the information no longer qualifies as inside information as of _____ (date) at _____ (time zone: _____).

Please take note of the above.

Yours sincerely,

Signature



Annex 13

List of information disclosed in the course of a market sounding

	Persons who may have received information during the market sounding (investors, potential investors and persons and organisations acting on their behalf)	Description of the information (or references thereto)	Indication of whether the information referred to in Section II.7.2 a), b), c) and d) was provided	Date and time of disclosure
1.				
2.				
3.				
4.				
5.				

Annex 14

List of persons receiving market sounding

	Person receiving the market sounding	Date and time of the market sounding	Contact details of the person receiving the market sounding	Decision to participate in the market sounding	In case of refusal: whether the refusal applies to all potential transactions or only particular types of transactions
1.					
2.					
3.					
4.					
5.					
6.					
7.					