



Synergicon Information Systems Plc.
and its subsidiaries

Publication policy and procedures

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Synergicon Information Systems Plc.
Chief Executive Officer



Synergicon
System Integrator Ltd.
Managing Director



Synergicon Retail
Systems Ltd
Managing Director



FIBEX Ltd.
Managing Director



Publication principles

- Synergon Information Systems plc. is a public limited economic company (hereinafter called: the Company), the shares of which are listed on the Budapest Stock Exchange so the public requires efficient and discrimination free information provision in relation to the operation, strategy and result of the Company free of charge.
- The term of public is interpreted by the Company as the actual circle of potential investors, interest representation and regulatory bodies, and the media, among which there may occur national and foreign institute investors and private persons as well.
- The Company's Board of Directors is committed to informing the public in a manner which ensures the Company's transparency and publicity. In the course of publication the Company provides the investors with all the information which may affect the value or return of the Company's equities or the judgement of the issuer either directly or indirectly. The Company shall regularly, precisely and in due time publish the information required for the investors to make decisions, such as the events in relation to the Company, the effects thereof and the Company's results. The Company aims at achieving all these commitments as a player participating on the capital market of the European Union observing the spirit of the transparency guidelines.
- A publication principle is that which the investors and parties concerned shall be informed with the content and form stipulated in the legislative provisions (Act CXX of 2001 on the Capital Market), and the Introduction and Keeping in Circulation regulations of the Budapest Stock Exchange as well as the directives of the Ministry of Finance published in 2008.
- The Company has determined its publication policy and the practical solutions applying the same to be within the regulation environment that changed as of 1 December 2007, until the publication of the final regulation, in the lack of the partial rules (MF directives) in line with the spirit and in conformity with the objectives of the recommendations made to the preparation of the same.

Publication procedures

- Synergon Information Systems Plc. and its subsidiaries regulate the responsibility of the owner of information within their own system. The
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regulation of the activities and responsibilities are available to, known, and interpreted by the participants of the publication procedures.

- The establishment of regulated information forms and contents (see the stipulations in the legislative provisions) has a constant process owner in the event of the continuous information provision, while regarding other information it is realized through a topic owner designated by the Board of Directors. Publication is achieved through closed stages in each event, which ensures the control over the content and form related requirements of the publications and the content and scheduling related approval of the Board of Directors.
 - The Company assigned and authorized the Chairman of the Board and the Chief Executive Officer with a permanent assignment and authorization for making public verbal communications and statements on behalf of the Company. In individual cases, a person appointed by them shall perform these tasks. In each event the person making the publication is responsible for observing the content of the external legislative provisions and the internal regulations in their publications.
 - In addition to the legislative obligations, the efficiency of the publication processes are also measured by means of direct or indirect methods, after which the information gained is used for evaluation and feed back purposes.
 - The insider trading related guidelines and publication stages are stipulated in a separate document within Synergón's Corporate Governance System.
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Information qualification procedure

- All information in relation to significant business, strategic or organisational changes, or personal changes in strategic positions, or the organised events affecting a considerable or wide circle as well as the events realized upon the approval of the Board of Directors shall be qualified by the Company from the aspect of publication. The Chief Executive Officer as the decision maker and the Board of Directors as the party approving, also consider the basic publication principles.
- Regarding events happening outside the scope of competence of the Company's supreme management, the Chief Executive Officer determines whether or not these affect the Company and the Board of Directors initiates the related publications.
- The publication with the content approved by the Company's Board of Directors shall be published in due time in accordance with the regular publication obligations as worded in an explicit manner (see principles) in the regulation environment of the Company.
- The Company shall consider the circle of parties affected significantly by the information and regarding certain items of news the Company is entitled to use a more direct information channel in addition to the basic publication locations in conformity with the nature of the content of the information. In this event the Board of Directors shall inform the parties performing the publication of the tasks.

Information publication procedure

The content related editing of the qualified information intended to be published shall be performed by the persons in the position assigned to do so with a permanent or occasional assignment in conformity with the internal regulation used at the Company. The Company's publication procedure is fixed, the training of the participants of the process and the provision of the technical requirements have been delegated into the competence of the Chief Executive Officer by the Board of Directors. The form, content and time of publication shall be approved of by the Board of Directors as the final approving party in the position of process controller.

Providing access to and dissemination of information

- The Company uses three publication sites simultaneously for the continuous data provisions (annual, mid-year, interim statements, end-of-month reports) and the extraordinary announcements (gaining influence,
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voting rights, other, in an itemized form in conformity with the FM directive), as well as the other publications:

- Budapest Stock Exchange homepage (www.bet.hu)
 - PSZAF /HFSA/ electronic publication site (www.kozzetetelek.hu)
 - Synergon Information Systems Plc.'s homepage (www.synergon.hu).
- In addition to the above, the Company shall simultaneously send an electronic mail about the publication of the news to a dedicated, up-to-date address list, which also includes press agencies.
 - The Company shall publish the continuous data provision and the extraordinary announcement as well as the other publications in Hungarian and English at all three publication sites.
 - The Company provides access to the annual, mid-year and interim reports on the homepage of Synergon Information Systems Plc.
 - The electronic website operated by the Company supports information provision by means of an investor relation menu item, a structured event calendar, a publication list and a browser. As of 1 April 2008, the Company shall provide access to and the storage of information on its homepage for 5 years as of publication.

Liability assumption

The Company shall be liable for the validity of the information published and the observance of the publications basic principles.
