

# ● Busch-Hungária Ltd.

Compliance management system

A background image of an industrial setting, likely a steel mill, showing molten metal being poured into a ladle. The scene is dimly lit, with the primary light source being the intense orange and yellow glow of the molten metal. The text 'CODE' is overlaid on a black rectangular box on the left side of the image.

# CODE

# OF ETHICS

# AND CONDUCT

The current version  
of the Code is dated  
**1st December 2023.**

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## 1. Leaders' welcome and introduction

We are convinced that one of the fundamental elements of the operation of Busch-Hungária Ltd. is ethical conduct in full compliance with legal regulations and other external and internal requirements. Business operations based on ethical culture and compliance are of utmost importance to us, as this is the only way to be successful over time in a competitive market environment. Ethical behaviour and compliance with the law are essential to gain and maintain the trust of our employees, customers, business partners, local communities and other stakeholders.

We are proud of our achievements to date, the conscientious communication of our values to others, and the full awareness of our responsibilities to our internal and external stakeholders.

Unethical or inappropriate behaviour may affect the trust placed in Busch-Hungária Ltd. It is our firm intention and commitment to ensure that any breach of the standards set out in the Code of Ethics and Conduct will be followed up and any problems that may arise will be remedied. We apply a zero-tolerance approach to corruption, serious human rights abuses and breaches of health, safety and environmental standards.

Strengthening our business based on our ethical principles and values is in our common interest and purpose. We encourage and support ethical and compliant behaviour through leadership by example and expect all stakeholders to join our efforts to achieve positive change at Busch-Hungária Ltd.

**Busch-Hungária Ltd. management**

**"We are committed to conducting business in accordance with our ethical principles and code of conduct, which we believe is the foundation of our mutual success."**



## 2. Busch-Hungária Ltd.'s compliance management system, the purpose and role of the Code of Ethics and Conduct in the system

We at Busch-Hungária Ltd. are aware that we face significant risks in the course of our business. In order to manage these risks properly, we have developed a complex Compliance Management System (CMS). The Code of Ethics and Conduct is foundational document of the Compliance Management System, which sets out the compliance objectives we consider important, the ethical and conduct rules we have to follow and the procedures to be followed in the event of possible violations. The Code also sets out our policies on legal compliance, human rights and ethical issues, as well as our commitment to ethical and socially responsible conduct.

Legal and ethical behaviour is the basis of trust in business and society. In order to ensure trust, we at Busch-Hungária Ltd. behave honestly, fairly, and in accordance with the law. We uphold our ethical principles and values towards internal stakeholders (employees, managers) and external stakeholders (customers, suppliers, competitors, governmental and political actors, local communities, the natural environment, society) and expect the same from them.

We are committed to ethical behaviour in all circumstances, even if this places Busch-Hungária Ltd. at a competitive disadvantage or deprives it of business opportunities.

We believe that this responsibility must extend to all our activities and to all parties affected by our activities. We operate a comprehensive compliance management system to ensure that the values set out in the Code are an integral part of our day-to-day operations.

Management is responsible for implementing, monitoring and controlling the compliance management system.



## 3. Guidelines for the application of the Code of Ethics and Conduct

### 3.1. The Code of Ethics and Conduct is an important core document of the compliance management system

The Code of Ethics and Conduct sets out the principles, behaviours and standards of conduct that we expect from both our employees and our business partners. The guidelines it provides help us to identify situations that may violate our ethical standards and set out what to do if we have questions about the conduct we are engaging in, or if we become aware of ethical or compliance violations.

The Code illustrates and answers questions that arise in practice with examples, but is not exhaustive. A review of the Code is not a substitute for compliance with the law and company standards. If both internal and external regulations and the Code apply in a given situation, the stricter rule should be observed.

If expectations are not clear about specific behaviours, it is worth seeking guidance from managers and compliance management system operators, the Compliance Committee. While the Code mainly regulates conduct in the course of business, Busch-Hungária Ltd. expects all employees to behave ethically and not to manifest themselves in any forum associated with the company in a manner that is ethically objectionable under the guidelines of this Code of Ethics and Conduct.

The Code is reviewed annually, or more frequently if appropriate, to ensure it is up to date and in line with our compliance management system processes.

### 3.2. Decision-making in challenging situations

Every day, we may all face situations where there is no clear-cut solution. In a challenging ethical decision-making situation, answering the following questions can help you find the right way forward:

1. What is the problem? What compliance or ethical problem do I see in the situation?
2. Do I really not know what the right thing to do is, or am I just reluctant to do what I think is right?
3. How is this covered by legislation, regulations and/or the Code?
4. What are the possible consequences of my decisions and actions for the company, my supervisor, colleagues, customers, suppliers and local communities, and external stakeholders?
5. How will I feel once I have made the decision? Would I feel comfortable sharing my decision with my family, friends and colleagues?
6. How would I feel if I saw my decision on the internet or on TV?

In most cases, answering these questions will help you make the right decisions. If you are still in doubt or need help, contact your supervisor or a representative of the compliance organisation (see contact details in the Contact section).

### 3.3. Scope - To whom does the Code of Ethics and Conduct apply?

All managers and employees of Busch-Hungária Ltd. are obliged to act in accordance with the Code. It shall be ensured that all employees are familiar with and apply the provisions of the Code of Ethics and Conduct.

We expect our suppliers, sponsored partners and other stakeholders to act in accordance with the Code.

### 3.4. How do we comply with the Code?

It is everyone's responsibility to speak up if they see something that is wrong, unethical, potentially dangerous or harmful.

#### 3.4.1. Responsibilities of our staff

- They declare in writing that they have read, accept and will comply with the Code.
- In their day-to-day work, they act in accordance with the Code of Ethics and Conduct.
- If they have any doubts or become aware of any breach or potential breach of the rules or the Code, they should report it to the contact point provided.
- In the event of an ethics investigation or compliance check, they will cooperate fully with any investigations.
- They ensure that our partners are also familiar with the ethical and conduct rules of Busch-Hungária Ltd.

#### 3.4.2. Additional responsibilities of our managers

- Setting a personal example of ethical behaviour and compliance to create and maintain a culture of ethical co-operation.
- Continuous monitoring of compliance with ethical principles.
- Supporting employees to report issues they perceive to be problematic.
- Protecting whistleblowing workers against possible retaliation.

#### 3.4.3. What do we expect from our business partners?

We expect our business partners to acknowledge and comply with the provisions of the Code of Ethics and Conduct of Busch-Hungária Ltd. In addition, we expect all our partners to develop their own code of ethical conduct and compliance, to ensure its enforcement in their own organisation and along their entire value chain.

### 3.5. Whistleblower protection: zero tolerance for retaliation

We will not tolerate any retaliation against a bona fide whistleblower who raises a compliance issue.

If someone feels that they have suffered retaliation, they should report it. All such complaints will be investigated and appropriate action taken. Disciplinary action will also be taken against anyone responsible for retaliation against someone for reporting alleged unethical behaviour, and other compliance problems or business risks.

The zero tolerance principle protects whistleblowers acting in good faith. Abuse of our compliance system, unwarranted reporting, anonymous defamation cannot be considered a proper use of the compliance system. Anyone involved in malicious whistleblowing or accuses others unjustly is not only unnecessarily burdening the organisation with work, but is also in breach of the Code of Ethics and Conduct.



### 3.6. Compliance organisation and complaints handling process

To report, identify and address ethical and compliance issues, we have established a Compliance Committee and the necessary processes. The Compliance Committee is composed of:

- Compliance Officer
- HR Manager
- CEO
- CFO and IT Manager

In case of ethical or compliance problems or suspicions, you can report them by filling in the form <https://bejelentes.Busch-hungaria.hu>

Telephone notifications can be made in Hungarian, and written notifications (email, post) in Hungarian, English, Russian or Ukrainian.

You can report securely, even anonymously, through the above channels. All reports will be treated confidentially, recorded and handled through appropriate processes based on an assessment of the nature of the problem.

## Questions and answers

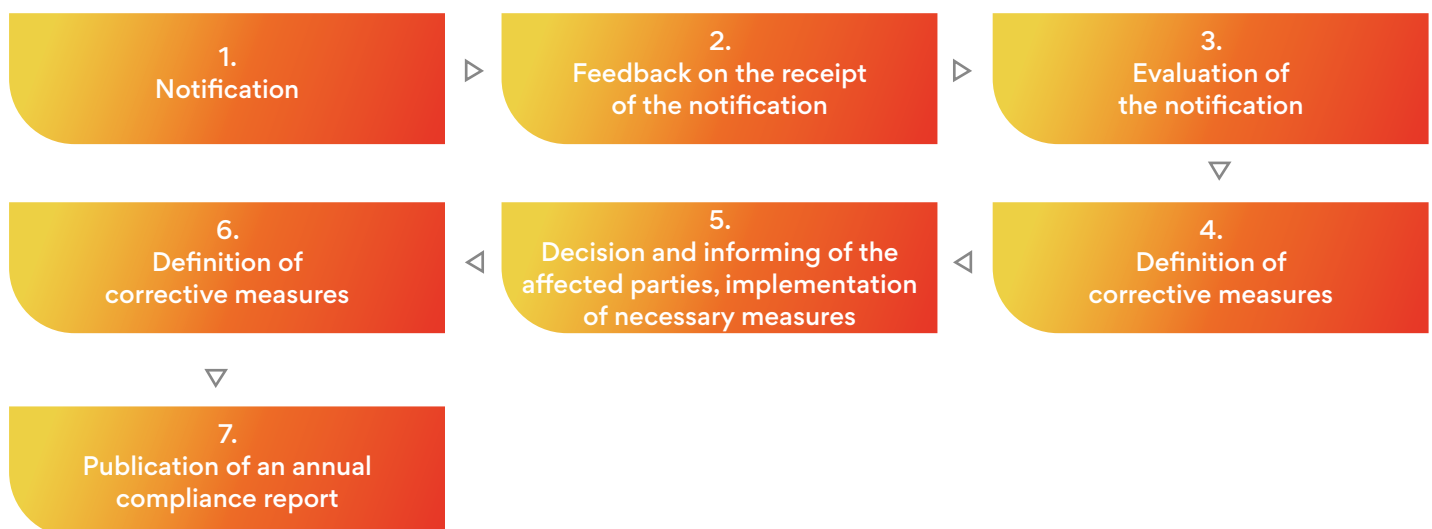
### QUESTION:

*I suspect that my line manager has violated the Code of Ethics and Conduct. I am afraid that if I report the matter, I will be dismissed. What should I do?*

### ANSWER:

*Be sure to report the suspected abuse! All reports will be treated confidentially and no retaliation will be tolerated against a bona fide whistleblower.*

### The process for handling notifications



The consequences of an ethics or compliance violation will be determined in accordance with the applicable legal requirements. The consequences may range from a verbal warning to termination of employment or other contractual relationship. In cases provided for by law, civil or criminal proceedings may also be brought, depending on the seriousness of the misconduct found.

## 4. Compliance objectives, ethical principles and code of conduct of Busch-Hungária Ltd.

### 4.1. Compliance with laws, regulations and generally accepted business standards

Busch-Hungária Ltd. is committed to operating in good faith and in compliance with the law. We consider it a fundamental requirement to comply with all applicable national and European laws and regulations, including legal requirements, industry and organisational standards applicable to our business activities.

In many cases, our principles and internal rules set out in our Code of Ethics and Conduct exceed legal compliance standards, and we ensure compliance with the stricter standards in all other events.

In the development of the Code of Ethics and Conduct, we have taken the Hungarian Act XXV of 2023 on complaints, reports of public interest, and rules related to the reporting of abuses (<https://njt.hu/jogszabaly/2023-25-00-00>) as the key legislation.

In addition to binding national and European legislation, we have taken into account the guidelines presented in the Annex.

### 4.2. Respect for human rights

We are committed to respecting human rights, which include a range of civil, political, economic, social and cultural rights, including:

- the right to human dignity;
- the right to liberty and security of person;
- the right to the highest attainable standard of health;
- the right to just and favourable working conditions;
- the right to decent wages and decent living conditions;
- the right to an adequate standard of living;
- the right to exemption from all forms of forced or compulsory labour;
- the right to exemption from child labour;
- the right not to be discriminated against;
- the right to freedom of expression.

Our aim is not only to respect human rights – we actively support their implementation and condemn all forms of human rights violations. We pay particular attention to our employees, suppliers and local communities, as well as to vulnerable groups such as women, nationalities, ethnic, religious and linguistic minorities, people with disabilities, migrant workers and their families.

#### 4.2.1. Health and accident prevention

We are committed to providing a safe, healthy and secure working environment and to safeguarding the health of our employees. In all our activities, we comply with the relevant technological, environmental, fire and occupational health and safety regulations.

We provide a safe and secure working environment and protective equipment, free from unnecessary risks, for all persons working for us and operating on our licensed premises, and we require and enforce their proper use.





**”The health and safety of our staff is our top priority. We work hard to continuously improve and maintain safe and healthy working conditions.”**

### ✓ **Do it!**

- Always follow health and safety instructions!
- Always use the required protective equipment!
- Immediately stop any activity that could cause an accident or report it if you see it!
- Only do work for which you have the appropriate qualifications and authorisation, and for which you are medically fit, sufficiently rested and alert.
- In case of an accident, report it immediately to the driver in charge!

### ✗ **Don't do it!**

- Never work under the influence of alcohol or other substances that affect your attention or ability to work.
- Never ignore health and safety regulations!
- Do not harm the health of others and yourself!

## Questions and answers

### QUESTION:

*A colleague of mine suffered a minor injury at work, but returned to work a few days later, so I did not report the incident. Was I doing the right thing?*

### ANSWER:

*No. All accidents at work must be reported immediately to the appropriate manager.*

### QUESTION:

*A subcontractor is in the plant area without a safety helmet. In principle, he is contractually obliged to comply with the health and safety rules, so I think it is his responsibility and I do not need to tell him. Am I right?*

### ANSWER:

*No. It is our responsibility to take care of the physical safety of all people working at Busch-Hungária Ltd. and we must do everything possible to avoid accidents and injuries. Any irregularity must be reported to the person concerned and reported to the responsible manager.*

#### 4.2.2. The principle of equal treatment and harassment at work

We are committed to eliminating all forms of discrimination, both in the workplace and in society.

We understand the value of diversity. Our employees, customers, business partners, suppliers and other external stakeholders represent a wide range of nationalities, religions, cultures and social backgrounds. We condemn all forms of discrimination, including but not limited to discrimination on the basis of race, colour, sex, age, language, religion, political or other opinion, ethnic, national or social origin, property, birth, sexual orientation or other status, such as marital status or number of children.

We will not tolerate harassment or any other degrading, humiliating, offensive, intimidating or hostile, conduct or behaviour. We believe that everyone is entitled to courtesy and respect. Sexual harassment, defamation and slander are considered serious violations of human dignity and will be dealt with severely in all cases.



**”We believe that mutual respect, acceptance and equal opportunities for all are essential to our success.”**



#### **Do it!**

- Treat everyone else equally, politely and fairly, regardless of where they come from or what their social background, colour, gender, nationality, religion or age.
- Help others to have a good time at work, so that no one feels left out or hurt.
- If someone reports harassment, listen and help them, don't leave them to deal with the problem alone.
- Work together to make everyone feel welcome at work and build a good community where everyone counts.
- If someone's behaviour or behaviour upsets you, tell them so, explaining why you find it upsetting and ask them to stop.



#### **Don't do it!**

- Do not treat anyone with disrespect or prejudice because of their gender, age, ethnic origin, nationality or any other characteristic.
- Do not say or do anything that offends, humiliates or harasses others.
- Do not spread gossip, false information or make malicious comments about colleagues.
- Do not distribute offensive, rude, humiliating, mocking images or emails.
- Do not harass anyone with unsolicited sexual advances, make sexual comments or gestures, or engage in any other sexually offensive behaviour.
- Don't ignore someone reporting harassment and don't try to silence or trivialise the problem.

## Questions and answers

### QUESTION:

*A manager feels more effective if he sometimes communicates his expectations loudly and harshly. Is this a good way to do it?*

### ANSWER:

*No. Managers need to use the right tone and encourage their staff in an ethical way.*

### QUESTION:

*I received an email with jokes, which included jokes about Roma people. Can I send them to my colleagues?*

### ANSWER:

*No. These jokes can be offensive and are not allowed in workplace communication.*

### QUESTION:

*A colleague keeps asking me for coffee and to meet him outside work, even though I've turned him down several times. What should I do?*

### ANSWER:

*Tell your colleague that you are not interested in the meeting. If the situation does not improve, tell your manager or use the company's complaints channel.*

### 4.2.3. Privacy and protection of personal data

We respect the privacy and protection of personal data of both our employees and our business partners. In accordance with the legislation in force (GDPR), we ensure that personal data can only be processed by those competent to do so, for a predefined purpose and for a predefined period of time, in accordance with the rules. We have information security measures in place to protect personal data from destruction, leakage or unauthorised access and we expect our data handling colleagues to attend mandatory annual data protection training on an annual basis.



#### Do it!

- Learn about the legislation on personal data processing.
- Respect your employees' privacy and personal data.
- Use personal data only for purposes permitted by law.
- Inform your employees and business partners if you need their data and ask for their consent.
- Protect employee's personal data from unauthorised access and use.
- Report any misuse of personal data to your manager.



#### Don't do it!

- Do not leave personal data unattended.
- Never attempt to access personal data to which you are not entitled or for which you have no reason to have access.
- Never give out personal data before you are sure you are doing the right thing.
- Do not collect personal information from your colleagues.

## Questions and answers

### QUESTION:

*My colleague left her laptop on, went out for lunch and didn't lock the screen. I have to leave too, what should I do?*

### ANSWER:

*Lock the machine by pressing CTRL+ALT+DEL and selecting "Lock" to prevent unauthorised access. Tell your colleague to remember this basic step next time!*

### QUESTION:

*I accidentally received an email that was obviously not addressed to me. What can I do, read it to see if it's important?*

### ANSWER:

*No. Emails not addressed to you should be deleted immediately. After deletion, inform the sender that a mistake has been made.*

#### 4.2.4. Fair, family-friendly employment practices, rejection of forced and child labour

Our people are our most important value. We are committed to employee development, decent work-life balance and fair employment, and we expect the same from our business partners and other stakeholders. We will not tolerate forced, compulsory, bonded, slave or child labour, nor unethical, illegal employment or undeclared work.

We will take the necessary steps to ensure that slavery, servitude and human trafficking do not occur in any part of the supply chain.

Protecting children and minors, and balancing family and work are important to us. The minimum working age is 15 for non-dangerous work and 18 for dangerous work. We endeavour to support our workers with special needs.

If an issue should arise, senior management will act in accordance with internal rules and regulations, the Labour Code and other relevant legislation. Disciplinary procedures Investigations into possible disciplinary or ethical misconduct will be conducted in a fair and transparent manner and employees will be treated humanely in taking the necessary action.



#### Do it!

- Respect workers' rights and provide them with decent working conditions.
- Where possible, offer flexible working opportunities for your staff, in positions that allow them to work flexibly.



#### Don't do it!

- Don't abuse your staff's free time. Don't expect anyone to attend meetings or complete tasks outside working hours or during holidays.
- Do not discriminate in the hiring and promotion of employees.
- Never accept or request work that would be performed by children or persons under duress!

## Questions and answers

### QUESTION:

*We have a young 16 year old worker applying for the casting area who assures us that his parents will support him to work for us. Can we employ you?*

### ANSWER:

*No. We cannot employ minors in dangerous jobs (such as casting), as this would be a serious breach of our commitments against child labour.*

### 4.3. Fair business conduct, anti-corruption and anti-fraud

#### 4.3.1. Fair competition

We value fair market conduct and always comply with relevant laws and standards. Competition is good – it encourages innovation and gives customers the best choice and prices. Respecting strong competition is very important, so we avoid unfair behaviour, only collect data on our competitors in a legal way, and do not spread rumours or defamatory information about them.

Full compliance with competition law is not only a legal issue, but also a cultural one, which can have a positive impact on business. We are not part of any cartel and we do not coordinate directly or indirectly with our competitors on prices, market sharing, production or sales quotas.

In our procurement, we pay particular attention to ensuring that there is always the possibility of fair competition, and do not impose conditions that unduly limit the number of participants in the competition.



#### Do it!

- Know and respect the rules of competition law and only contact your competitors when necessary.
- Use only publicly or legally available sources to understand business, customer, supplier and technology trends.
- Avoid inappropriate market behaviour and respect conditions that promote fair competition.
- Make sure that everyone can compete freely and fairly in the tenders we put out.



#### Don't do it!

- Never collude with competitors on prices or enter into anti-competitive, secret agreements or practices.
- Don't spread rumours, bad news, or negative information about your competitors, and avoid bad publicity.
- Do not impose conditions on purchases that unduly restrict competition.

## Questions and answers

### QUESTION:

*I meet the competitor's expert, who is a long-time friend of mine at a professional conference. He suggests that we share the price and technical parameters of our product, so we can learn from each other. Can I share this information with him?*

### ANSWER:

*No. The sharing of any such information is strictly prohibited, against the law and does not meet the requirements of fair competition.*



**” We are committed to fair market conduct, ethical business behaviour and condemn corruption in all its forms.”**

#### **4.3.2. Export and import bans, international sanctions**

We are committed to complying with current export and import regulations, restrictions and bans. Such restrictions and prohibitions include sanctions aimed at preserving or restoring international peace and security and protecting human rights, democracy and the rule of law. Such sanctions are legal provisions that prohibit or restrict the sale, purchase, transfer or making available of goods, funds, services, software or information.

Sanctions are highly complex, volatile and dynamic measures. It is important be aware that domestic and international legislation may change at any time. It is therefore essential to monitor such restrictions and to seek expert advice if any proposed transaction or conduct raises questions or doubts in this regard.



#### **Do it!**

- Keep up to date with international events and check if your business partners are affected by any international trade restrictions!
- Know and apply the relevant international trade rules and requirements.
- Pay duties, taxes and fees and meet import-export requirements.
- If sanctions are imposed on a country, natural or legal person, a group with which you do business, or any planned transaction that may be affected, contact your supervisor immediately.



#### **Don't do it!**

- Do not import or export prohibited goods!
- Do not enter into any business relationship with a sanctioned country, person, group or entity without due diligence.

## **Questions and answers**

### **QUESTION:**

*We are currently receiving some raw materials for production at a very favourable price from a country that has recently been sanctioned by the EU. Am I right in thinking that I have no choice because the contract was signed long before the sanctions?*

### **ANSWER:**

*No. Be sure to raise your concerns with your supervisor and have them assess the situation with you, as it is likely that the contract will need to be amended or terminated.*



### 4.3.3. Bribery, corruption, gift-giving

We strictly reject and do not tolerate corruption in any form (including bribery, kickbacks, extortion, abuse of power for personal gain, granting undue advantages and gifts). We reject any and all form(s) of corruption, even if it leads to a competitive disadvantage or loss of business opportunities. We have a zero-tolerance policy against corruption and bribery throughout our value chain, including suppliers, customers, charities and sponsorship.

Procurement procedures are carried out in a fair and transparent manner and suppliers, contractors and subcontractors are evaluated according to their anti-corruption policies and rules. Violations of anti-corruption laws are considered serious offences and we watch out for signs of corruption and take strong action against perpetrators.

Gift-giving can be a thoughtful gesture, but it can also very easily be a corrupt transaction if we don't exercise due diligence. Gifts are only considered to be business courtesies, items and invitations (e.g. meals, accommodation) that do not have a significant material value and are not very frequent, and which can never be intended to influence decision-making in an unfair way. Gifts are never expected to be reciprocated and should never be perceived to be intended to influence unbiased decision-making. They should not be offered or accepted in the hope of receiving more favourable treatment in any transaction.

Gifts of small value are acceptable, but gifts with a value of EUR 100 or more must be registered in the „Gift Register” and can only be accepted or given with the written permission of the head of the workplace. Unregistered gifts, business meals and event invitations in excess of EUR 100 may be considered bribes. Gifts or hospitality given with undue influence are always considered bribes. If the gift can no longer be refused, the manager may decide to keep it or donate it to charity.

Special care should be taken with gifts and hospitality for and from public officials and political figures. Under no circumstances should attempts be made to influence decision-making through personal benefits offered to public officials or anyone else.

Instead of giving a gift, our preference is to use the gift to support a charitable corporate initiative. All charitable donations must be transparent and legal, they should not be used to cover up corruption.



#### Do it!

- Know and respect the anti-corruption rules!
- Minimise the number of exclusive suppliers, as they may be based on a conflict of interest or an unfair, anti-competitive agreement!
- Ensure objective, transparent evaluation criteria and management of procurement.
- If you receive a gift worth more than EUR 100, register it in the Gift Register and report it to your supervisor, who will decide whether you can keep it, donate it to charity or return it!
- Make sure your business partners are aware of and comply with anti-corruption rules!



#### Don't do it!

- Never offer, accept, promise or request an unauthorised payment, gift or expense account.
- Do not keep hidden, parallel records and accounts!
- Don't do any favours that involve breaking any obligations or rules!
- Never force, compel or order others to commit similar acts of corruption!

## Questions and answers

### QUESTION:

*One of my business partners invites me to lunch at a local restaurant to discuss professional issues. Can I accept the invitation?*

### ANSWER:

*Yes. If it is an average consumption of less than €100 in what can be considered average circumstances, then of course you can accept the invitation. The meeting should not, of course, discuss trade secrets, agreements to restrict competition or anything else that would be contrary to the Code of Ethics.*

### QUESTION:

*One of my business partners indicates that he can „grease the wheels” of a very important bureaucracy for me and I don’t have to do anything. Can I accept his offer?*

### ANSWER:

*No. We have a responsibility to ensure that our entire value chain is free from all forms of corruption. If you experience such an incident, please report it to your manager or the compliance officer.*

#### 4.3.4. Fraud and money laundering

Fraud is any intentional and malicious deception, such as the intentional misrepresentation or concealment of facts or circumstances for financial or other gain.

We are committed to fighting fraud. In order to protect our core values, assets and reputation, we all have a personal responsibility to act in good faith and in accordance with the relevant rules and regulations, and to always being alert to signs of fraud and reporting them promptly to the appropriate managers and responsible parties.

In addition to fraud, we are consistently fighting money laundering, which is the illegal process of legalising illegally obtained assets concealed behind business practices that appear to be legal, in accordance with the law.

We never condone, enable or support money laundering. To this end, we comply with all anti-money laundering laws and regulations and never engage in criminal or terrorist financing activities. We take reasonable and appropriate measures to identify and assess the integrity of our business partners.



### Do it!

- Find out the rules and regulations against fraud.
- Always act in accordance with fraud prevention measures and procedures!
- Watch out for any signs, events or transactions that could indicate fraud!
- Document all events and transactions factually!
- Ensure that business processes, including procurement, delivery confirmation and invoice receipt processes, are transparent.
- Immediately report any money laundering concerns, suspicious transactions or events to your line manager.



## Don't do it!

- Never forge or alter data, certificates or supporting documents, and never accept suspicious documents!
- Avoid engaging in transactions that are or could lead to fraud.
- Don't try to circumvent regulations, procedures and controls just to get your job done easier and faster!
- Never deal with persons suspected of being involved in a crime, or with funds derived from a crime, until the suspicion has been investigated and found to be unfounded.

## Questions and answers

### QUESTION:

*What should we do if our business partners are being offered too good a deal and are suspicious?*

### ANSWER:

*If business partners offer too good a deal and it looks suspicious, report it to management immediately. It is important that all such offers are documented and that the background and business activities of the company making the offer are investigated in detail to prevent fraud and money laundering. If the offer is too good to be true and the business partners refuse to answer questions, stop negotiating immediately and report suspicious activity to the authorities.*

### QUESTION:

*What should we do if the client asks us not to use the usual financial procedures for business transactions, e.g. to transfer to an account number other than the one officially provided by the client?*

### ANSWER:

*If a customer requests that we do not use standard financial procedures for business transactions, we should report this to management immediately. Such a request is risky and can lead to numerous irregularities and fraud. The importance of standard financial procedures should be explained to the client and the process and procedures for transactions should be agreed. If the customer refuses to accept the standard procedures, the transaction should be rejected and the suspicious activity reported to management and authorities.*

### 4.3.5. Credibility, honesty, transparency

At Busch-Hungária Ltd., we do what we say and say what we do. We communicate credibly, consistently, transparently and honestly, both verbally and in writing.

Records and reports are key to running a business, so it is important that they are accurate and comprehensive. At our company, we place a high priority on honesty, accuracy and objectivity when preparing company records and reports, or when communicating with our owners, customers, business partners and employees.

The records and reports include financial (accounting) and non-financial information such as project descriptions and project results, technology data, performance evaluations, HR records, human rights information and any other information that supports business operations. These should be prepared in accordance with the requirements of the legislation, with a view to decision making and building the corporate knowledge base.

Falsifying records or misrepresenting facts is unacceptable. We are strongly opposed to false or misleading information, records, reports, concealment of data or their use for “spur-of-the-moment” purposes in bad faith.

The integrity of financial and non-financial records and reports is essential for good decision making, for protecting credibility and reputation, for meeting legal and regulatory obligations and for fulfilling our responsibilities to our stakeholders.



### Do it!

- Find out what information needs to be recorded and how to manage it properly.
- All reports, evaluations and proposals must be prepared honestly and in their entirety!
- Ensure that decisions are sound and that all transactions are properly authorised, accurate and fully recorded!
- Ensure that all stakeholders have the right permissions and settings in company systems to ensure reliable and accurate decision-making.
- Ensure that no unrecognised or unrecorded amounts, values or assets are created or remain in the records.



### Don't do it!

- Do not keep hidden accounts and records!
- Never mislead decision-makers by concealing, falsifying information or misleading reports!
- Do not intentionally record false or misleading information in documents, reports or cost statements.
- Do not manipulate company information or assets regarding an audit, legal proceeding, government or regulatory investigation.
- Do not enter into contractual obligations without proper authorisation!

## Questions and answers

### QUESTION:

*Towards the end of the year, it is becoming clear that we will not be able to reach our sales targets. My big dilemma is whether we should show this in the forecasts, or is it enough for the owner to be confronted with it at the close of the year?*

### ANSWER:

*All reports should include reliable information to the best of our knowledge. As soon as the deviation from the forecast becomes sufficiently certain, it must be incorporated into the forecasts, so that management can take the appropriate corrective measures in time.*

#### 4.4. Commitment to the company

##### 4.4.1. Avoiding conflicts of interest

All company employees must avoid conflicts of interest, avoid situations that conflict with the company's interests or legal obligations and take all necessary precautions in this regard. Employees must at all times avoid situations which could affect the interests of the company.

A conflict of interest exists when an employee or a person close to him or her finds himself or herself in a situation where his or her interests or relationships influence or may influence the activities of the company. An example of a conflict of interest is when an employee engages in activities outside the company that compete with the company's activities.

All employees of the company have a duty to report any conflict of interest they become aware of and to act promptly to avoid any adverse effects arising from the conflict of interest, protecting the company and its interests.

The company is committed to creating an open and transparent working culture that avoids conflicts of interest.

**Examples of conflicts of interest include, but are not limited to:**

- The relationships between business partners or suppliers that can influence the company's decisions and services.
- Personal relationships, such as family or friends, which may influence the decisions or actions of the employee concerned in favour of the company.



#### Do it!

- Inform your supervisor of all external work and services and of your relationships with competitors, customers, suppliers or contracted partners. Get written approval for these.
- If you wish to accept any external board position, please ask for written approval first!
- Please notify the company if you intend to invest in the company of a competitor, customer, supplier or contracted partner and ask for written approval, unless you are buying publicly traded shares.
- Please notify the company if any of your relationships may give rise to an actual or apparent conflict of interest.



#### Don't do it!

- Do not influence or control the employment or other contractual relationships of your own relative or close relative.
- Do not work for or provide services to a company that you are required to deal with as an employee of Busch-Hungária Ltd.
- Do not acquire a shareholding in a supplier, contractor, customer or client if you are in any way involved in the selection, evaluation, negotiation or dealings of that company. This also applies to persons under your control!

## Questions and answers

### QUESTION:

*Besides my job at Busch-Hungária, I would also like to help my brother's business. I should negotiate as a representative of the company. Is this incompatible with my job?*

### ANSWER:

*This may depend on the company's activity and clientele. Be sure to notify your supervisor, who will check whether there is a conflict of interest and, if not, give his or her written authorisation. The same applies to similar situations involving not only family but also friends.*

**QUESTION:**

*I got romantically involved with a colleague. Is this an ethical problem, is there a conflict of interest?*

**ANSWER:**

*A romantic relationship in the workplace is not itself unethical, as long as it is developed and maintained with the consent of both parties and in accordance with workplace etiquette. Incompatibility may exist if the relationship in any way affects professional work or decisions made at work.*

**4.4.2. Protecting corporate assets**

Protecting and safeguarding company assets is a priority. We consider corporate assets to include, for example, buildings, equipment, machinery, computers and other work tools, as well as the technology we use. These assets must be carefully safeguarded so that they are not damaged or lost. All assets must be protected from damage from misuse, theft and unauthorised users. Employees must be responsible in their use of company property and must ensure its security and maintenance. Use of company property should only be in the interests of the company and with the appropriate authorisations.

All company employees are responsible for the management of company assets, and have a duty of care to manage, protect and use them. They must not use company property for their own benefit and must prevent its misuse or misappropriation. Assets are managed and maintained according to strict rules and may only be used by authorised persons.

When managing company finances, employees must exercise great care. Financial transactions must be prepared, executed and documented in accordance with company rules and regulations. Special attention should be paid to transparency and control in such transactions to avoid fraud.

**Do it!**

- Immediately notify your supervisor if you learn of any misuse, theft or waste of company assets or funds.
- When planning and implementing all your activities, always strive to choose economical and cost-saving solutions that will protect your company's resources in the long term!

**Don't do it!**

- Never use company property or facilities for private purposes unless your superior has given you express permission to do so.
- No personal activities during working hours!

**Questions and answers****QUESTION:**

*My child needs to copy a book because it is not available anywhere, but I managed to borrow it for a few days. It's only 80 pages, can I copy it at the office?*

**ANSWER:**

*Private use of company equipment is only possible with the express permission of the manager, so basically the answer is no. It is possible, however, that the manager, considering the circumstances, may still consider it acceptable and allow it.*



### 4.4.3. Trade secrets, protection of intellectual property

A company's trade secrets and intellectual property are valuable assets that, like its physical assets, must be protected to protect the company's interests.

Corporate information - including intellectual property (know-how), trade secrets, the company's intellectual and intangible resources, and personal data - is a valuable corporate asset. It must be carefully protected and safeguarded by all employees. Access to information is restricted to those who need it, and confidential information must not be unlawfully disclosed or used.

All employees of our company are required to protect the above-listed company information that they have acquired in the course of their employment with our company. Such information includes information about the organizational structure, product and service designs, business plans, sales strategies, market research results, and financial information. Such information is the exclusive property of our company and may not be disclosed to third parties.

All our employees are required to respect intellectual property rights, including copyright, patent, trademark and contract law. We will not tolerate any conduct that infringes the intellectual property rights of others. Employees are required to keep all documents containing intellectual property rights secure and to use only those documents that are necessary to perform the task at hand.



#### Do it!

- Always keep company information confidential and do not disclose it to third parties.
- Confidential copyrighted documents must always be treated confidentially and carefully locked away.



#### Don't do it!

- Do not remove confidential documents from the company's premises and do not give them to third parties, either on paper or electronically.
- Do not share confidential documents with people who do not have access to them.

## Questions and answers

### QUESTION:

*A friend of mine who works for a competitor asked me to send him product specifications for internal use. Can I do that?*

### ANSWER:

*No, the product specifications are the intellectual property of the company and can only be disclosed to third parties with management permission.*

### QUESTION:

*One of my colleagues asked me to provide information/documents that he is not authorised to receive. Can I give it to him?*

### ANSWER:

*You can only give out information to anyone (including within the company) to those that are authorised to receive it.*

#### 4.4.4. Information security

Protecting information is not only in our interest, but also preserves the trust of our customers and partners. We are committed to protecting information security along our entire value chain. We keep electronic data (be it customer data, personal data or other sensitive business information) confidential, restricting its accessibility and ensuring its integrity.

All our staff regularly attend information security training. Access to data is restricted to authenticated users with appropriate authorisation to the extent necessary and justified.

Personal data can only be processed in accordance with the applicable legislation (GDPR) and our internal policies. Data should only be transferred if the law allows this or if the owners have given their prior consent.

In order to protect our company's computer systems and the data stored on them, everyone must use their own password and comply with the company's information security policy.

Data storage media, such as hard drives and flash drives, can contain very important information. All information stored on Busch-Hungária Ltd. devices and digital systems is the property of the company. Data media must always be stored in a safe place and may only be copied or deleted in accordance with the relevant policies.

Everyone has a responsibility to use secure communication tools to protect information security. Information sent by email or messaging applications should be encrypted if it is confidential or sensitive.

When using company resources (e.g. software, data, hardware), all employees have a responsibility to ensure that they are properly protected. Under no circumstances will our company accept conduct that compromises the security of or causes damage to company resources.

All employees of our company are obliged to protect the confidentiality of customers' personal data. Customers' personal data must be used only for the purpose of the task in hand and must not be disclosed to third parties.

Non-work-related Internet use is only allowed if it does not compromise the security, performance or stability of the network or company systems, does not interfere with work, and does not involve illegal content.



**„As employees, we can do the most for information security by using information systems in a prudent and careful way, by not opening suspicious emails, not clicking on suspicious links, always following the information security policies in force and notifying IT immediately of any unusual or strange incidents. ”**



## Do it!

- Study and fully comply with the rules on information security.
- Don't see the instructions and rules on information security as a burden, but be aware that they are in the interest of all of us and apply equally to everyone!
- Report immediately if you notice or suspect an information security incident!



## Don't do it!

- Never share your password with anyone, not even IT. Our staff will never ask anyone for a password!
- Never click on links in suspicious emails or SMS messages!
- Never use an unauthorised device to store company data!
- Do not use company equipment for unauthorised purposes!

## Questions and answers

### QUESTION:

*May I send the work left over for the weekend to my private email so that I can finish the requested document at home?*

### ANSWER:

*We appreciate that you would work for the company even on weekends, but do not choose this option. Business documents should only be managed in business, corporate systems. For the same reason, copying to a private pen drive device is not allowed.*

### 4.5. Social responsibility

At Busch-Hungária Ltd., we believe that our business can make a positive impact on people's lives and the overall well-being of the community.

Our company is committed to providing our employees with an environment where they can enjoy good pay, working conditions and opportunities for development. We also promote diversity and equal opportunities in the workplace. As part of our social responsibility, we strive to ensure that our business activities minimise our impact on the environment. We work to reduce carbon emissions from our production processes and take the environmental impact into account when designing products and services.

We also have a strong sense of responsibility to society and support initiatives that help those in need and contribute to community development. We support local community projects and organisations, and strive to support education and culture.

We strive to comply with laws and regulations in the way we do business. In all our business dealings and transactions, we uphold guidelines for ethical conduct, fair market practices and respect for our competitors.

In our supply chain, we also strive to behave responsibly and choose suppliers who share similar values.

#### 4.5.1. Commitment to the local community, sponsorship, patronage

We contribute to the economic, environmental and social development of local communities. In addition to creating jobs, we also seek to return value to local communities through direct support and volunteering programmes, where we serve the common good through health, culture and education development programmes.

We strive to

- engage in open and transparent dialogue and consultation with local communities and other representatives of civil society who are affected by our operations;
- make efforts to develop local communities;
- encourage employee involvement in local community development and social initiatives.



#### Do it!

- Always respect the interests, rules, basic human values and standards of behaviour of local communities.
- Find business solutions to serve local communities!
- Get actively involved in volunteer programmes supporting local communities as much as you can!



#### Don't do it!

- Never give misleading information to local communities about how your company works!
- Always comply with work, fire and health and safety regulations so as not to endanger local communities.

## Questions and answers

### QUESTION:

*I am aware of organisations (e.g. foundations) that are making a big contribution to improving the life of the local community. Can I mention to my supervisor that it might be worth supporting this organisation?*

### ANSWER:

*Yes, Busch-Hungária is committed to the local communities and the organisation that helps them, and tries to support them in their work as much as possible.*

#### 4.5.2. Political engagement, government relations, lobbying

Busch-Hungária Ltd. does not participate in any political activities, we do not communicate or pursue political goals, we strictly comply with the legal regulations on political involvement and support.

We do not support, financially or otherwise, political parties or any organisations or individuals associated with them. We recognise that all our employees have the right to engage in politics or to express their opinions, but they must not do so in a way that is not in conflict with the interests or on behalf of Busch-Hungária Ltd.



## Do it!

- Inform your supervisor if you are planning to take an active political role that may give rise to any suspicion of a conflict of interest.
- If you express a political opinion, please make it clear that it is your private opinion and has nothing in connection with Busch-Hungária Ltd. as a company!



## Don't do it!

- Never use the company's name, brand, logo or corporate identity in your political activities or manifestations, and never use the company's resources.
- Do not bring politics into the workplace, do not agitate your colleagues and do not collect donations!

## Questions and answers

### QUESTION:

*I want to run for local government. Can I do that?*

### ANSWER:

*Of course, there is no obstacle to this. You should inform your supervisor of your intention to run, and remember that you cannot use the workplace's resources for political purposes (e.g. printing leaflets) or campaigning at work. And make it clear that any statements you make during the campaign are made as a private person, as a citizen and not as an employee of Busch-Hungária Ltd.*

### 4.6. Responsible communication, social media, media relations

At Busch-Hungária Ltd. we are committed to responsible communication and strive to communicate with external stakeholders in accordance with legal and social requirements.

We listen to the needs of our customers, suppliers and business partners. We continuously evaluate and improve our products, services, technologies and processes to provide quality, safety and innovative solutions to our partners in all areas. Our relationships with our customers, suppliers and other business partners are based on mutual trust and respect.

Busch-Hungária Ltd. attaches great importance to responsible communication. We regularly and reliably inform the public about our activities. We aim to establish positive and high-quality relations with the media. All public communication, including posting on social media platforms on behalf of the company, requires approval and misleading information has serious consequences. Employees may also be active on social media platforms in their private capacity, but they may not represent the company or share company information or contradictory content about Busch-Hungária Ltd.



## Do it!

- Inform your supervisor if you give any information to the media, even if it was done so informally!
- If you are giving a presentation or attending a professional event, you must have the necessary management approval.
- Any information you disclose must be true, correct and complete!
- Behave responsibly on social media and be aware that even if you post something as a private person, it could affect your company as an employer.



## Don't do it!

- Do not publish company information without proper authorisation!
- Never post any misleading, exclusionary, offensive, aggressive, distasteful, harmful or in any way unethical postings, comments, remarks or statements.

## Questions and answers

### QUESTION:

*On Facebook, I post what I like, that's my private opinion, right?*

### ANSWER:

*If the post is of a private nature and cannot be associated with Busch-Hungária in any way (e.g. it was not made on the factory premises, it does not show the company logo, another employee, etc.), then yes. Please consider what and how you share on social media.*

## 4.7. Sustainability

Busch-Hungária Ltd. is committed to sustainability and environmental protection. Our environmental management system is based on the following principles:

- environmentally friendly processes from product manufacturing to corporate governance and administrative processes;
- strict environmental standards to prevent and reduce environmental pressures;
- continuous improvement of environmental objectives and continuous improvement of the environmental impact of production;
- to provide environmentally responsible education and training for our employees and our communities.

Busch-Hungária Ltd. is constantly striving to

- optimise the use of hazardous substances
- increase the recycling rate of waste
- optimise production processes and resource use



## Do it!

- Have consideration for the environment!
- Avoid waste!
- Use resources sparingly!



## Don't do it!

- Never ignore sustainability goals!
- Don't let future generations down!
- Don't think that sustainability is just a passing fad!

## Questions and answers

### QUESTION:

*I thought of a good idea to reduce the amount of waste generated during production. What should I do?*

### ANSWER:

*Share your idea with your supervisor and work it out.*



## 5. Annexes

### 5.1. Relevant legislation

- Act C of 2012 on the Criminal Code
- Act V of 2013 on the Civil Code
- Act I of 2012 on the Labour Code
- Act C of 2000 on the Accounting Act
- Act CL of 2017 on the Rules of Taxation
- Act XXV of 2023 on complaints, reports of public interest, and rules related to the reporting of abuses
- Act LIII of 2017 on the Prevention and Suppression of Money Laundering and Terrorist Financing
- Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information
- Regulation (EU) 2016/679 of the European Parliament and of the Council

### 5.2. Relevant external directives

- International Human Rights Code  
<http://www.ohchr.org/Documents/Publications/FactSheet2Rev.1en.pdf>
- European Convention on Human Rights  
[http://www.echr.coe.int/Documents/Convention\\_ENG.pdf](http://www.echr.coe.int/Documents/Convention_ENG.pdf)
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work  
<https://www.ilo.org/declaration/lang--en/index.htm>
- UN Guiding Principles on Business and Human Rights  
[http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)
- The UN Global Compact  
<https://www.unglobalcompact.org/about>
- Modern Day Anti-Slavery Act 2015  
[http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga\\_20150030\\_en.pdf](http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf)
- Global Principles of the Partnership Against Corruption to End Bribery  
[http://www3.weforum.org/docs/WEF\\_PACI\\_Global\\_Principles\\_for\\_Counteracting\\_Corruption.pdf](http://www3.weforum.org/docs/WEF_PACI_Global_Principles_for_Counteracting_Corruption.pdf)

## 6. Contact

In the event of an ethical or compliance problem or suspicion, please report it using the following contact details:  
<https://bejelentes.Busch-hungaria.hu>