

VT ElektroPlast

CODE OF ETHICS

TECHNOLOGY

STABILITY

SUSTAINABILITY

DYNAMISM

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Approved by:

Mónika Budai
HR Manager

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1. PURPOSE OF THE CODE OF ETHICS

The most important elements of the operation of VIDEOTON Elektro-PLAST are commitment to ethical conduct and strong ethical foundations. Our company is dedicated to fair organizational operations based on ethical culture and compliance.

The purpose of this Code of Ethics is to provide guidance and define the fundamental corporate values that determine the day-to-day operation of our company, thereby contributing to the Company's continued success.

This Code of Ethics applies to all organisational units, managers and employees of VIDEOTON Elektro-PLAST, including temporary staff, interns and consultants.

We expect the Code of Ethics to promote conduct that regards the preservation and strengthening of the VIDEOTON image both inside and outside the Company as a core value, and considers its protection to be the natural responsibility of every employee. Our objective is to contribute to maintaining the good reputation of VIDEOTON and to promote consistent, predictable and responsible conduct in our internal and external relationships through the consistent application of our internal values. In doing so, we support the adaptability of the organisation and the operation of our employees in accordance with high ethical standards.

The Code of Ethics serves as a tool for achieving these objectives; however, detailed requirements are set out in additional internal rules and regulations.

Familiarity with this document, compliance with its provisions and monitoring any amendments thereto are fundamental expectations.

2. FUNDAMENTAL PRINCIPLES

It is a fundamental principle of VIDEOTON Elektro-PLAST that all managers and employees of the Company are obliged to familiarise themselves with and comply with all applicable laws, regulations and contractual obligations in force at any given time, and to meet the high standards of corporate ethics. Any form of abuse of rights is prohibited. Employees are fundamentally expected to act impartially and in good faith in all matters related to their work, refraining from any action, statement or omission that could undermine trust in the Company. We are committed to ensuring that our standards and values are applied throughout the entire supply chain.

From the perspective of the Company's reputation, good standing, honest and fair conduct, trust between colleagues, and long-term relationships with our customers and partners are core values of paramount importance. Violation of these principles may have serious consequences for our Company; therefore, unethical conduct is unacceptable at any level of the corporate hierarchy. We expect both our employees and our partners to adhere to this Code in both their professional and personal conduct.

We provide secure channels for reporting misconduct, the details of which are set out in Section 16. Our managers bear particular responsibility for demonstrating the importance of the Code of Ethics through their own conduct and for addressing any ethical concerns as quickly as possible. Employees are required to cooperate fully in the investigation of all ethical violations.

3. COMPETITION LAW AND MARKET CONDUCT

Our organisation is committed to ethical and fair competition; we market our products and services on the basis of their excellent quality, compliance and competitive pricing.

It is a fundamental principle of VIDEOTON Elektro-PLAST that the Company cooperates closely with its customers, suppliers, competitors, employees, trade unions, works council, as well as various authorities and governmental bodies. We fulfil our obligations in all cases in accordance with the applicable legal requirements. All employees of our Company must be familiar with the laws and regulations relevant to their work, and are expected to comply fully with all applicable regulations and legislative changes.

Competition law and other applicable legislation govern business dealings with competitors, customers, resellers and other third parties. Accordingly, it is prohibited to enter into agreements with competitors regarding sales conditions (such as prices, discounts or credit terms), production standards or volumes, market or customer allocation, or the boycott of any customer.

Our Company makes independent pricing and sales decisions and rejects all forms of prohibited cooperation. We refrain from any conduct that distorts or restricts competition or damages the reputation of our partners. In the course of performing their duties, our employees are required to comply fully with consumer protection, advertising and competition law regulations.

4. ANTI-CORRUPTION AND FAIR TRADE

Anti-Corruption and Business Integrity: VIDEOTON Elektro-PLAST firmly condemns and rejects all forms of corruption. Our organisation does not participate in bribery, bid-rigging, cartel activities or any other abuse that undermines fair competition.

It is strictly prohibited to offer, promise, give, request or accept — directly or indirectly — any unfair advantage, whether in the form of money, cash equivalents, gifts or benefits, for the purpose of selling products and services or influencing governmental (central or local) decisions. In conducting our business activities, we act in accordance with the principles of fairness and integrity, and we actively expect the same from our partners.

Gifts and Hospitality: Our employees may neither give nor accept any benefit that could constitute an unfair business incentive or create the appearance of personal gain. We consistently avoid any conduct that could create the impression that anyone may receive preferential treatment in exchange for personal benefits.

Information Gathering and Protection of Trade Secrets: We obtain information about our partners and competitors exclusively through ethical and lawful means. Deception, conduct amounting to espionage, theft of proprietary information, or the unauthorised acquisition or possession of confidential commercial information are strictly prohibited. We do not encourage other companies (whether current or former partners) to disclose such information unlawfully.

5. POLITICAL INVOLVEMENT AND POLITICAL STATEMENTS

We do not restrict the political involvement of our employees. However, during any political activity, employees are prohibited from using the name of the Company, and such activities must not conflict with the interests of the VIDEOTON Group.

We expect our employees, when engaging in political activities, to:

- refrain from creating the impression that our Company supports or is committed to any political party or ideology;
- avoid joining groups whose objectives or activities conflict with the interests of VIDEOTON;
- refrain from using VIDEOTON resources (such as telephones, photocopiers, computers or notice boards) for political purposes;
- refrain from engaging in political activities in the workplace.

We also expect our employees not to express political opinions or positions, either verbally or in writing, while at work, during the performance of their duties, or in any situation where they represent the Company.

6. COMPLIANCE WITH INTERNATIONAL TRADE REGULATIONS

The VIDEOTON Group fully complies with all regulations governing the import, export and re-export of products, components, technologies and services. This includes providing information regarding the origin, export classification and export restrictions applicable to such products, as well as obtaining all necessary licences and permits. Our Company assumes strict responsibility for operating in compliance with cross-border trade legislation, including the prevention of money laundering, the enforcement of economic sanctions and export control regulations.

Our Company is committed to combating crimes against property, offences against the order of business operations and money laundering. VIDEOTON Elektro-PLAST maintains zero tolerance towards all forms of money laundering and expects its employees and partners to comply fully with this principle and all applicable domestic and international laws and regulations. We pay particular attention to establishing business relationships only with partners who demonstrably conduct lawful business activities from legitimate sources. In order to preserve our business integrity, we continuously monitor the compliance and transparency of our processes

6.1 Responsible Sourcing

VIDEOTON Elektro-PLAST expects its suppliers to adhere to the principles set out in this Code of Ethics. In order to verify compliance, our Company reserves the right to conduct joint audits and on-site inspections.

Trade Restrictions and Compliance: We make every effort to comply with binding international trade regulations, import and export bans, and economic sanctions. Particular attention is paid to the enforcement of environmental regulations (especially REACH, the EUDR Regulation and the RoHS Directive) within our procurement processes.

Conflict Minerals and Ethical Resources: In accordance with our customers' expectations, tin, tantalum, tungsten and gold (3TG) are sourced exclusively from responsible, conflict-free sources. Our procurement policy strictly prohibits:

- human rights abuses related to the extraction or trade of minerals;
- any direct or indirect support of armed groups or security forces;
- falsification of the origin of minerals.

We undertake to document and provide supply chain data (e.g. in CRMT and/or EMRT file formats) in accordance with applicable customer requirements.

7. SUSTAINABILITY

In our operations and business decisions we consider economic, environmental and social factors together. The VIDEOTON Group is committed to sustainable development; therefore, as one of the largest exclusively Hungarian-owned industrial manufacturers, we consider it particularly important to contribute to the promotion of a green economy, the reduction of emissions, the increase of waste recycling, proper waste disposal, the installation of energy-efficient energy sources, and the application of environmentally friendly manufacturing processes. We support selective waste collection and reuse. We pay particular attention to meeting our present needs without jeopardising the opportunities of future generations.

Our Company avoids and prohibits the manufacture or use during production of products containing substances prohibited under national or international law (e.g. mercury, asbestos, arsenic, carrageenan, etc.).

As a responsible company, we also participate actively in social responsibility initiatives. To this end, the Group established the VIDEOTON Employees Foundation (VDA), which, among other activities, provides donations and sponsorships, supports children's education and holiday programmes, assists public benefit organisations, and offers support in the areas of sport, healthcare services, health screenings and cultural activities.

8. EMPLOYEES

VIDEOTON Elektro-PLAST is committed to respecting the dignity and human rights of every individual and community with whom it comes into contact during its operations. Our Company prohibits and rejects all conduct and omissions that violate human rights, both within its own operations and in relation to suppliers and contracted service providers (e.g. payroll providers, temporary employment agencies and security services). In particular, but not exclusively, the following are prohibited: violations of human dignity, cruel, inhuman or degrading treatment, child labour, all forms of forced labour, restriction of freedom of movement, and restrictions on or prohibition of freedom of thought, conscience, religion, expression and assembly. Our managers and employees are required to treat one another and our partners with respect and to refrain from hateful, racist, vulgar or defamatory behaviour.

We are committed to workplace equality and to lawful and fair employment and remuneration practices, while complying with regulations concerning minimum wage, overtime and legally mandated benefits. Our Company strives to maintain an appropriate remuneration and benefits system, continuously improve wages and benefits, and ensure equal treatment in remuneration practices.

Our employees work within cooperative organisations where relationships with colleagues and other organisational units are characterised by mutual respect and the reconciliation of interests. Quality and professional excellence are regarded as core ethical values.

We pay great attention to creating healthy and safe workplaces, guaranteed through regular occupational safety inspections and continuous improvements. We operate an effective health

protection programme, including local occupational healthcare services and free medical screening programmes.

It is the duty of every employee to protect both their own health and the health of their colleagues, maintain cleanliness in their immediate working environment, preserve the condition of provided work equipment and working conditions, and comply with occupational health and safety regulations. These obligations are governed by safety, occupational safety and fire protection rules, as well as internal, national and international legal requirements concerning the establishment and maintenance of a safe and healthy working environment.

We support work-life balance, paying particular attention to flexible working arrangements, the integration of employees with reduced working capacity, part-time employees, and colleagues returning from parental leave.

Our Company expects all of its employees to adhere the following principles:

8.1 Non-Discrimination

Our employees are selected in all cases on the basis of their qualifications and relevant professional experience. We do not discriminate on the grounds of gender, age, ethnic origin, nationality, skin colour, marital status, religious or political beliefs, worldview, disability, health condition, financial status, sexual orientation, or any other criterion protected under equal treatment regulations.

8.2 Alcohol and Drugs

Within the working areas of the Company, alcohol consumption, being under the influence of alcohol, the use of illegal substances, as well as the possession, sale or purchase of such substances by employees are strictly prohibited. For occupational safety reasons, the employer may verify the presence of alcohol or narcotic substances in the body in compliance with the applicable regulations. During such inspections, employees are obliged to cooperate and provide the necessary information.

8.3 Workplace Violence

Our Company does not tolerate workplace violence or threats of violence, whether directed against Company property or the physical integrity of employees. We do not permit any conduct that may create fear or cause others to feel unsafe in the workplace. The Employer expects its employees to communicate with one another and with partners respectfully and appropriately at all times.

8.4 Harassment

We expect all of our employees to refrain from all forms of harassment (verbal, physical or sexual) intended to create, or having the effect of creating, a hostile or intimidating work environment, including behaviour that is offensive or abusive.

8.5 Conflict of Interest and Miscellaneous Provisions

All employees must avoid interests and relationships that conflict with the interests of our Company. No employee may use the Company's assets, property, information or position to grant unauthorised advantages to others or for personal gain. All employees are required to participate in all training and educational programmes mandated or provided by the employer, to acquire and apply the knowledge gained there, continuously develop their professional skills, and familiarise themselves with and comply with internal rules and regulations. During the performance of their work, employees are required to comply with laws, regulations and instructions, and to use the Company's equipment and premises in an environmentally conscious, energy-efficient and resource-conscious manner. They are also required to fulfil all related administrative obligations.

9. AFFECTED COMMUNITIES

Respect for the human rights of affected communities forms an integral part of our operations, including rights relating to freedom, social and cultural rights, property rights, and the right to representation of interests. We expect compliance with these rights throughout our entire supply chain. Any water, air, soil, noise or other pollution exceeding statutory limits, as well as any damage to biodiversity affecting communities within our value chain, is unacceptable. Furthermore, we do not tolerate, at any level of our value chain, the direct or indirect use of child labour, slave labour, forced labour, compulsory labour or bonded labour in any form. We condemn all forms of unlawful, unfair or unethical employment practices that exploit labour, undermine the social security system or serve tax evasion purposes.

10. CORPORATE ASSETS

It is the duty of every director, senior executive, manager and employee to protect the Company's assets. The Company's assets, capital, facilities, equipment, personnel or other resources may not be used for private purposes unless required by law or expressly authorised by an internal Company regulation. Company assets include both tangible and intellectual property created during working hours, as well as the Company's equipment and infrastructure (including computers, software, office equipment and furnishings, vehicles and passenger cars). **In emergency situations, the protection of human life takes precedence over the protection of property.** In such cases, the direct manager may act at their own discretion in order to protect human life as the highest priority.

11. FINANCIAL REPORTS, AUDITING

VIDEOTON Elektro-PLAST always prepares its financial reports in accordance with generally accepted accounting principles and applicable legislation, and presents and discloses them accordingly. All records and reports of the Company constitute the property of VIDEOTON Elektro-PLAST. All financial and other records of the Company must accurately and comprehensively reflect the Company's revenues, expenditures, assets and liabilities. Our employees must pay particular attention to documents that may become subject to litigation or governmental investigation. It is prohibited to make any false, misleading or deceptive entry in any book, report or record of the Company. It is also prohibited to provide false information to governmental authorities or officials.

12. CONFIDENTIALITY, DATA SECURITY

12.1 Business Confidentiality and Intellectual Property

All data, drawings, specifications, financial information and intellectual property with restricted access and of significant importance to the Company's business activities shall be considered confidential corporate information.

All employees are obliged to protect and handle such information confidentially against unauthorised persons. This obligation remains in force during the employment relationship and after its termination, without limitation in time or territory. Confidential information may only be used during work activities for a specific purpose and strictly to the extent necessary for the performance of duties.

12.2 Personal Data Protection (GDPR)

Our Company pays particular attention to the protection of privacy and full compliance with data protection legislation. We recognise the right of our employees, partners and all natural persons to the lawful processing of their personal data.

- We only process personal data that are strictly necessary under applicable legislation or for which the person concerned has contributed.

- Data processing shall always be purpose-specific and serve legitimate business purposes. Our employees are required to carefully protect all personal data obtained during the performance of their duties in accordance with applicable data protection and data security laws and Company policies. This includes personal data relating to our employees, customers, suppliers, partners and any other third parties.

12.3 IT security

In order to ensure the integrity and availability of business information, we apply modern IT security solutions. Compliance with IT security rules is a fundamental obligation of all employees in order to protect the computer network and prevent security threats.

At all sites of VIDEOTON Elektro-PLAST, photographs or video recordings may only be taken where justified for work purposes and duly authorised, in order to protect business secrets.

13. COMMUNICATION AND MEDIA RELATIONS

In order to ensure that information published about our Company is accurate and consistent, all media relations are centrally managed.

- **Rules on Public Statements:** All media enquiries must be directed to the PR department. Statements may only be made by authorised persons: with regard to the entire Group, the CEOs are authorised to speak; in the case of member companies, the Managing Directors or employees designated by them are entitled to provide statements.
- **Approval Process:** Any public appearance or response may only take place with the approval of the Managing Directors and in accordance with the applicable representation procedures. Whenever possible, the questions and topics should be coordinated in advance with media representatives.
- **Protection of Partners:** Trust is a cornerstone of our business ethics; therefore, no one may make statements regarding our partnerships without the prior consent of the partner concerned.
- **Press Materials:** The preparation of official press releases, information materials and media content is the responsibility of the PR department, involving the relevant professional departments where necessary.

It is the responsibility of every employee to preserve the good reputation and business secrets of VIDEOTON Elektro-PLAST in all external communications.

14. CONFLICTS OF INTERESTS

Honesty and integrity must prevail in our business conduct. Employees of the Company may not engage in activities incompatible with their position or duties, nor may they accept any offer that is incompatible with business ethics or provides personal advantage. All business actions may only be carried out and documented in a verifiable manner in compliance with established procedural rules (or, in the absence thereof, generally accepted business standards). We support the public and civic activities of our employees; however, such activities must not be incompatible with the position held at VIDEOTON Elektro-PLAST.

15. REVIEW SYSTEM AND ACCOUNTABILITY

The Code of Ethics is a dynamic document that we continuously keep up to date in order to reflect compliance with changes in the legal, business and social environment. The following review system ensures that the Code of Ethics remains relevant, effective and enforceable for all employees. The

Code of Ethics shall be reviewed every three years; however, reviews may take place more frequently if necessary. The review process is initiated and supervised by the HR Manager, who acts as the Corporate Ethics Officer. Representatives of the departments concerned by the relevant topics must be involved in the process. The purpose of the review is to identify any outdated sections and implement the necessary amendments. Training on the first version of the Code of Ethics was completed with full coverage. Going forward, training on the Code of Ethics shall be mandatory for all new employees. The organisation and documentation of such training are the responsibility of the HR Department. All amendments must be communicated clearly and effectively to all employees. Employees must be informed of changes through internal corporate communication channels, highlighting the most important points. The current version of the Code of Ethics shall always be available on the internal corporate portal. In case of breaching this Code of Ethics, Company Policies or applicable legislation, we shall take appropriate and proportionate disciplinary measures in compliance with the relevant Collective Agreement and labour law regulations. In serious cases, this may result in termination of employment and may also lead to other legal proceedings or criminal liability.

16. FINAL PROVISIONS AND REPORTING ETHICAL CONCERNS

All managers and employees are responsible for complying with and enforcing the provisions of this Code of Ethics and other internal Company policies. Our Company requests and expects employees to report any activity they believe violates the laws or provisions of these policies. If bribery, corruption or any other ethical misconduct is suspected in connection with the operation of the Company or the conduct of any employee, it must be reported through the internal Whistleblowing System via the following e-mail address: bejelentes@vtep.videoton.hu.

Our internal Whistleblowing Policy is available:

- via the internal intranet network: http://intranet.vtep.videoton.hu/?page_id=15007
- on the external website: <https://www.vtep.videoton.hu/belso-visszaeles-bejelentesi-szabalyzat/>

All reports shall be handled confidentially, in compliance with the applicable laws and regulations and with protection afforded to the reporting person.

Compliance with the provisions of this Code of Ethics is in our common interest. Awareness and observance of these rules help ensure that our workplace remains safe and that our operations remain predictable and lawful.

Thank you for paying attention to the principles described herein during your work and thereby contributing to the successful and ethical operation of VIDEOTON Elektro-PLAST.

Document Revision History

Version	Date	Nature of Amendment
1.1	12/2008	First issue
1.2	3/2011	Professional review
1.3	9/2020	Consolidation into a unified structure
1.4	4/2024	Professional review, supplementation
1.5	5/2026	Update in-line with Group-level guidelines