

EXPOL GROUP CODE OF CONDUCT

In force and effect as of 1 August 2024

The EXPOL Group (EXPOL SYSTEM Kft., EXPOL SERVICE Kft., MONEX INVEST Kft., Fortex Property Kft., hereinafter referred to as: EXPOL Group) is committed to compliance with the most fundamental social standards both within the Group as well as in its business relations. The EXPOL Group requires its employees to engage in responsible and ethical business conduct based on the core values of possessing appropriate and competitive skills and extensive experience, along with a basic requirement to demonstrate fair conduct under all circumstances. All employees are responsible for compliance with and enforcing the provisions of law and ethical behaviour standards.

The EXPOL Group established a Code of Conduct designed to encourage compliance with basic social standards throughout its internal operations and among its business partners. These standards constitute an essential part of the internal and business relations of the EXPOL Group. The scope of the Code of Conduct also includes any and all people acting on behalf of, or as a proxy of any members of, but not employed by the EXPOL Group.

The EXPOL Group believes that the following ethical standards are of utmost importance:

Human dignity: Human dignity shall be respected as it is a fundamental and intrinsic prerequisite for human coexistence.

Non-discrimination: It is prohibited to discriminate employees, business partners and consumers of the EXPOL Group on the basis of their ethnic origin; mothertongue; disability; state of health; religion or belief; political or any other opinion; marital status; motherhood (pregnancy) or fatherhood; sexual orientation; gender identity; age; social origin; financial situation; part-time or fixed-term nature or duration of employment or other employment relationship; affiliation to a representative body; or any other status, characteristics or nature. The EXPOL Group recruits and hires employees on a non-discrimination basis solely depending on the skills and experience requirements for the specific position.

Requirement to comply with the provisions of law: The Group shall comply with all prevailing requirements of law in Hungary, as well as the binding regulations, most basic standards and directives of the European Union.

Prohibition of child labour, forced labour and discipline: The EXPOL Group is committed to the prohibition and abolition of the employment of children while manufacturing its products or providing its services. The EXPOL Group is committed to the prohibition and abolition of the employment of children while having products manufactured or using services, and terminates any and all business relationship with its business partners engaged in such conduct along with notifying the authorities thereof without undue delay.

Any form of forced labour is prohibited, as well as corporal punishment and mental or physical abuse.

Environmental protection and waste management: The EXPOL Group pays close attention to compliance with environmental protection and waste management requirements laid down in law, as well as to the management of chemicals and other hazardous substances. The EXPOL Group requires its employees to undergo training on the management of hazardous substances, if their place of work necessitates it.

Freedom of assembly and association: Employees of the EXPOL Group shall be entitled under the terms and conditions laid down in law to establish, join or refrain from joining a representative body or any organisation they choose without any form of discrimination in order to promote and protect their financial and social interests. Employees cannot be discriminated for taking such actions.

Health and safety at work: The EXPOL Group provides its employees with a safe and healthy working environment. The workplace shall provide a work environment that does not violate fundamental human rights and does not expose any employees, in particular young workers within the meaning of the Labour Code to circumstances that are dangerous or detrimental to their health or physical integrity.

Employment and remuneration: Salaries and other benefits shall be clearly defined and paid out or provided each month. Furthermore, the employer shall inform the employees about the method used to calculate their salary, the payment intervals and the day of payment.

Privacy: Privacy is a core requirement within the EXPOL Group, and the Group pays close attention to the protection of personal data related to its employees and clients. The EXPOL Group undertakes to protect any and all personal data in a responsible and adequate manner pursuant to the provisions of laws that govern the collection, use and storage of personal data related to the clients of the EXPOL Group. The EXPOL Group issued a detailed privacy notice in this regard.

Non-harassment policy: The EXPOL Group is committed to the prohibition and abolition of any and all forms of harassment. All employees of the EXPOL Group shall respect the religious, political and other beliefs of EXPOL Group employees and clients, and shall refrain from influencing such beliefs in any manner whatsoever, in particular by power. The EXPOL Group obliges all of its business partners to prohibit any and all forms of harassment.

The EXPOL Group classifies the following conducts as harassment:

- any and all forms of violence (sexual, personal, cultural or gender identity-based harassment);
- subordination of workplace relationships to person-to-person relations;
- promoting a fear-based, hostile work environment, excluding individuals or entire groups of employees;
- engaging in sexual abuse through the use of authority inherent in the position; offering a private relationship to a coworker or any other person in the context of racketeering;
- reference to physical or psychological disability, handicap, cultural, religious or sexual orientation, any resulting exclusion or discrimination.

Alcohol and drugs policy: Employees of the EXPOL Group are prohibited from working under the influence of alcohol or other substances suitable for altering their consciousness. The EXPOL Group expects its employees to be responsible in their consumption of alcoholic beverages beyond business hours and not to harm the reputation of the Group. The EXPOL Group considers the use of all illegal substances suitable for altering a person's consciousness unacceptable. The EXPOL Group demands strict compliance with the laws that prohibit the possession and use of drugs by all its employees. The EXPOL Group reserves the right to check the alcohol and drug consumption of employees at the workplace on a regular or ad hoc basis in compliance with the provisions of applicable laws. If an employee fails to cooperate with the management of the Group during the aforementioned check, it will be considered the violation of ethics and the EXPOL Group will investigate the case and institute proceedings against the employee. Employees who fail to comply with the prohibition on work under the influence of alcohol or possession as well as distribution of substances suitable for altering a person's consciousness shall face immediate consequences under labour law.

Confidentiality obligation and social media use: Employees shall only be entitled to share their own opinion in their private communication on social media platforms (correspondence, chat, posts), and shall ensure that the EXPOL Group cannot be associated with their comments. If it is impossible to avoid that the EXPOL Group becomes associated with the employee when he expresses his opinion, the employee shall clearly state that the opinion expressed is his own and does not represent the point of view of the EXPOL Group. All employees of the EXPOL Group shall preserve the good reputation of the EXPOL Group and its business partners during and after their employment. Companies and private persons share a well-understood interest in maintaining the confidentiality of certain information. It is prohibited to share non-public corporate information of the EXPOL Group and its business partners (including personal information of clients and non-public information of the EXPOL Group) on social media or to disclose it to third parties. The same applies to the disclosure of confidential and sensitive information to third parties or in social media. For the avoidance of doubt, this Code of Conduct stipulates that confidential information may not be shared by the employees of the EXPOL Group even among their family members or friends!

Anti-corruption rules: The EXPOL Group has a fundamental interest in and aims to prevent attempted bribery as well as moral and material damage arising out of corruption. All employees of the EXPOL Group, including managers are prohibited from accepting or offering benefits in any form and in any business relationship that may be interpreted as bribes.

All employees of the EXPOL Group shall report any attempted or actual bribery as soon as they become aware of it, in order to enable the management of the EXPOL Group to take the necessary measures to prevent or remedy the damage as soon as possible.

Employees of the EXPOL Group are not allowed to accept or offer benefits in any form and in any business relationship that may be interpreted as bribes. Bribes may include, but are not limited to the following type of benefits:

- unofficial payment, gift or provision of services that could be interpreted as attempted bribery:
 - o if provided to a public official, civil servant or public employee in order to obtain a benefit, authorisation, consent or business, to expedite pending procedures or to circumvent applicable laws/regulations;
 - o if provided to a business partner or a representative of a prospective business partner in order to obtain or retain business, to obtain information about a competitor or its proposal, or to reject a competitor's offer or terminate its contract;
 - o to a press staff member for the purpose of withholding or falsifying facts in order to present the Group in a more favourable manner or a competitor in a less favourable manner;
 - o to a public person to obtain or retain a business opportunity, to obtain insider information, to achieve a positive assessment result for funding applications or bids.
- Gifts may be given with the approval of the management of the EXPOL Group, otherwise employees are prohibited from giving individual gifts to business partners or clients. Approval of the management fundamentally depends on ensuring that the limits of good morals cannot be crossed, equality and proportionality as well as transparency shall be ensured in the entire process.
- Employees of the EXPOL Group are not allowed to accept gifts from any business partner or client. If the gift cannot be rejected, and if it is not of a personal nature but an official gift, the employee shall inform the management thereof.

This excludes promotional items received maximum once a year from the EXPOL Group or a business partner (i.e. pens, calendars, hats, etc.) up to a maximum value of HUF 5,000.

Employees of the EXPOL Group shall avoid acceptance of any catering offered by a business partner or client, except for a rare acceptance of low-value catering (i.e. mineral water, coffee) provided at the offices or other places of business of the business partner. If rejection of catering would jeopardise the business relationship, or is impossible for other reasons, good morals shall be observed, consumption shall be modest and average, exotic and expensive products and services shall be avoided.

Employees of the EXPOL Group may only stay overnight at an event if accommodation is paid by the EXPOL Group. However, in certain cases when accommodation is included in the event, the accommodation provided may be accepted with the authorisation of the management of the EXPOL Group.

The use of services or acceptance of entertainment services offered by a business partner for the entertainment of business partners is prohibited for all employees of the EXPOL Group. It is strictly prohibited to offer or accept services that violate good morals.

The EXPOL Group and its employees do not engage in political activities and accept any political or financial support from political parties or churches. However, the EXPOL Group does not expect its employees to refrain from making political or charity type donations or engaging in charity work as private persons.

If an employee of the EXPOL Group, including a manager becomes aware of an attempt or risk of bribery or any of the above, especially if he had to accept bribery, or any products or services that may be deemed to be bribery, he shall notify the management of the EXPOL Group or his line manager without undue delay, the latter shall notify the management of the EXPOL Group immediately upon becoming aware of such situation.

If a business partner of the EXPOL Group becomes aware of an attempt or risk of bribery or any of the above, he shall notify its contact person at the EXPOL Group without undue delay, who shall notify the management of the EXPOL Group immediately upon becoming aware of such situation.

The management of EXPOL Group shall take the following measures without undue delay upon becoming aware of the risk of any attempted or actual bribery:

- prevent the re-occurrence of such bribery and attempted bribery;
- identify and eliminate a suspected/identified risk of any attempted or actual bribery;
- identify and remedy the consequences of any actual bribery.

Money laundering rules: The EXPOL Group only enters into business transactions with clients and business partners who are engaged in honest and lawful economic activities and have obtained their financial resources from lawful sources. Employees of the EXPOL Group shall comply with all money laundering laws and regulations in force and effect in Hungary, as well as with those that require the notification of suspicious transactions and cash flows.

Rules on the whistleblowing system: The EXPOL Group operates an internal whistleblowing system. The whistleblowing system shall be used to report information on any and all actual or suspected illegal acts or omissions or other misdemeanour observed during the operation of the EXPOL Group. The Group issued a detailed announcement on the operation of the whistleblowing system.

Applicability of the Code of Conduct

All employees of the EXPOL Group are obliged to get to know and adhere to the guidelines and rules of the Code of Conduct. This obligation arises upon the employment of all EXPOL Group employees, providing that acceptance of the Code of Conduct shall constitute a prerequisite of employment. All

employees of the EXPOL Group who notice an actual or suspected act or behaviour inconsistent with the rules of the Code of Conduct shall report it immediately to the management of the EXPOL Group or to the internal whistleblower protection officer without undue delay.

Employees who report an incident shall not be subject to any retaliation.

The report shall be investigated in accordance with the detailed announcement issued on the operation of the whistleblowing system.

Violation of ethics is considered to be a key offence at the EXPOL Group. Violation of ethics means a breach of a contractual obligation undertaken by an employee towards the EXPOL Group. The EXPOL Group will take legal action or disciplinary measures against the employee in such cases, taking into consideration the options provided by the Labour Code and other related laws, which may eventually result in the termination of the employment or contractual relationship.
