

KAYS Kft.

BUSINESS ETHICS CODE



KAYS Ltd. is committed to sustainability and high ethical standards. We are aware of our responsibility for making business in a way to have a positive impact both on the environment and society.

Our company is founded on the following core values:

- reliability
- commitment
- development
- team work
- principle of sustainability

These values guide our daily operations. The KAYS Ltd. Business Ethics Code (hereinafter referred to as the Code) fosters implementation of the company's values by setting mandatory behavioural requirements in key areas.

Everyone is responsible for acting properly. Should an employee be unsure about proper conduct in a given situation, guidance should be sought from the supervisors. Employees should always keep in the following in mind: behave ethically, fairly, and lawfully.

This Code applies to the activities of all KAYS Ltd. employees, as well as their interactions with each other and with partners. Any situation or behaviour that violates the Code will be investigated. Disciplinary action will be the consequence of the violation of the Code by an Employee.

Introduction

Our Business Ethics Code sets out high expectations for fair business conduct, as required by the owners of our company, and forms the basis for all of KAYS Ltd.'s business activities and decisions. National and other relevant laws and regulations, as well as the principles set forth in this Code, must always be observed in the country where the business is conducted.

Our company's Business Ethics Code stipulates the moral expectations, outlining the behaviour that is deemed appropriate, in the best interests of the company.

It shall include the rules of conduct that employees must follow in their work: in interactions with each other and the Company, with customers and business partners, with suppliers and competitors, and with government agencies and authorities.

Compliance with Laws, Regulations, and Principles

KAYS Ltd. and all its employees are law-abiding. In all business activities and decisions, all relevant laws and corporate regulations must be strictly followed. We expect every employee to become informed about the laws, regulations, guidelines, and rules relevant to their scope of responsibility.

In addition, the obligation applying to our employees to act in business in an impeccable manner goes far beyond strict laws, which shall imply: responsible behaviour, conducting business honestly, sincerely, and reliably, and choosing to act in a manner we are convinced is the most correct.

Human Rights

Human rights are fundamental values that all employees must respect. KAYS Ltd. strictly prohibits all forms of human trafficking, modern slavery, and child labour. National regulations and international standards for the protection of minors must be adhered to.

Fair Treatment, Non-Discrimination

KAYS Ltd.'s declared principle is fair and equitable treatment. KAYS Ltd. does not discriminate against employees based on their origin, nationality, religion, ethnicity, gender, age, or sexual orientation.

The workplace environment at KAYS Ltd. must also be free from all forms of discrimination and harassment. The prohibition of discrimination is a fundamental legal principle that must always be upheld in human interaction. No one shall suffer disadvantage because of their skin colour, religion, gender, age, marital status, disability, national/ethnic origin, political beliefs, or membership in a union. Any conduct that leads to a hostile work environment—such as racial or religious mocking or slander—is unlawful and therefore prohibited. Any discriminatory remarks or actions at the workplace that frustrate, offend, or cause discomfort to others are forbidden and constitute harassment.

Privacy must be respected. Every employee has the right to separate their private lives from their professional activities.

Prevention of Bribery and Corruption

KAYS Ltd. applies zero tolerance to bribery and considers any form of bribery or corruption unacceptable. Accordingly, it is prohibited to offer or accept any value or advantage with the aim to influence decisions or activities. Similar activities involving third parties are also unacceptable.

KAYS Ltd. is committed to conducting business in a fair and ethical manner. The Company acting honestly and in a fair manner in all business activities and relationships is a fundamental goal and requirement. The Company is also expected to develop and implement effective processes to prevent bribery.

Data Protection Guidelines

KAYS Ltd. fully respects the privacy rights of its employees, customers, suppliers, and other partners. The processing of personal data (e.g. collection, use, disclosure, storage) is carried out in accordance with the applicable legal provisions.

Fair Competition

KAYS Ltd. conducts its business at all times in an ethical manner, in compliance with the applicable competition laws. Refrain from unfair collaboration with competitors or any act that might affect fair trade adversely.

In market competition, information about competitors can only be collected in a legal manner, observing the restrictions of the Competition Law. The information is not obtainable in a way violating law or otherwise improperly.

Conflicts of Interest

KAYS Ltd. always makes unbiased decisions, not regarding any undue personal interest. Every employee of KAYS Ltd. is committed to representing the company's interests over undue personal interests.

Environment, Health, and Safety

KAYS Ltd. adheres to all applicable environmental laws and regulations. Our Company emphasises the significance of protecting its employees, the workplace, the broader environment while fostering the adoption of an environmentally conscious mindset. KAYS Ltd. endeavours to establish and maintain a safe and healthy working environment.

Final provisions

When approved, the Business Ethics Code shall be signed by the employees to confirm the acknowledgement of its content and acceptance of it as one binding on them at work.

July 1, 2024

The Business Ethics Code approved by:



Krisztián Norbert Kaisz
Managing Director
KAYS Trade and Service Providing Limited Liability Company