



VT ElektroPlast

VT Battery

VT ElektroPlast Váll.

CODE OF ETHICS

TECHNOLOGY

DYNAMISM

PROGRESS

STABILITY

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- VIDEOTON Elektro-PLAST Kft.,
- VIDEOTON Battery Technologies Kft.
- VIDEOTON Holding ZRt. Elektro-PLAST Vállalat

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1. Introduction

The most significant elements of the operation of VIDEOTON Elektro-PLAST Kft., VIDEOTON Battery Technologies Kft., and VIDEOTON Holding ZRt. Elektro-PLAST Vállalat (hereinafter referred to as VIDEOTON Kaposvár - Marcali) are the commitment to ethical conduct and solid ethical foundation. Our companies are committed to fair ethical-culture and compliance-based organizational operations.

Our effectiveness is inconceivable without prepared, committed, and ethically active employees. Basic requirements for all employees of VIDEOTON Kaposvár - Marcali are to perform their work in full compliance with legal, moral, and professional regulations.

We exclusively work with organizations that have an impeccable background in respecting human rights and compliance rules. We continuously monitor whether the full operation of our partners complies with our Code of Ethics.

Code of Ethics summarizes the basics of ethical operation and its directives. To become acquainted with the document, comply with its rules, as well as monitoring the changes are fundamental requirements for all employees.



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The Code of Ethics of VIDEOTON Kaposvár - Marcali provides clear and explicit directives, requirements about the operation of our companies to protect our employees and those who take advantage of our manufacturing services. It records those fundamental company values which determine the daily operation of our company, thereby supporting further success of the company group. It contributes to the further development of the corporate culture, creates synergies between organizational units as well as confirms our internal and external relations. It declares a coherent and predictable form of behaviour to which all employees of VIDEOTON Kaposvár - Marcali can adapt. We expect both our employees and partners to adhere to this Code in both their professional and personal conduct.

Companies of VIDEOTON Kaposvár - Marcali are committed to legal, ethical, and transparent organizational conduct.

We provide the opportunity to report the violations of the Code of Ethics in person, by phone, or via e-mail. We also do our best to protect the employee who reported infringement from discrimination and unfair treatment. We prohibit the application of retaliatory measures or negative consequences against anyone who reports in good faith an actual or suspected violation of the values and directives of the Code of Ethics.

Our managing directors have prior responsibility to express the significance of the Code of Ethics by their behaviour and to deal with any ethical questions arise as soon as possible. Employees are required to cooperate in the investigation of any ethical violence. Inappropriate behaviour that does not comply with the Code may be considered a misdemeanour that may result in disciplinary proceedings, possible downgrading, or dismissal.

2. Personal scope of Code of Ethics

Provisions of the Code of Ethics shall apply to all companies of VIDEOTON Kaposvár - Marcali, to the operation operational units, organizations, corps, managers, and employees (including temporary, trainee, and consulting workforce too).

3. Ethical values

Core values of VIDEOTON Kaposvár - Marcali:

Respect human dignity, family life, and private life, respect for others, fairness, responsibility, reliability, acceptable behaviour according to the law.

3.1 The protection of the reputation of VIDEOTON Kaposvár - Marcali

Compliance with legislation: Our companies comply with the laws and regulations of Hungary in force, maximally adapt to them, and comply with the legal requirements in all respects. Our personal and business affairs always occur in accordance with the legal requirements. Compliance with the law is a fundamental requirement for our employees and partners.

Behavioural expectations: Our employees and partners shall refrain from any manifestation that could adversely affect the reputation of our companies. Their moral duty is to represent the reputation of VIDEOTON Kaposvár - Marcali and to introduce it to the public. As individuals, we are also responsible for creating and maintaining a good impression. The behaviour of the organizational unit leaders and the employees is free from harassment, intimidation, discrimination, inappropriate tone, and offensive wording.

Employees may not exercise their right to express an opinion that shall offend or threaten the reputation of VIDEOTON, legitimate economic and organizational interest (neither orally nor in writing, nor on social media platforms). In case of any ethical problem in connection with our companies, employees may contact people referred to in point 7 in one of the ways indicated there.

3.2 Fair business operation

Cooperation of VIDEOTON Kaposvár – Marcali, with other organizations, is based on trust and mutual benefits in accordance with competition law. Our organization is committed to ethical and fair competition; we sell our services and the products we manufactured based on their quality, conformity, and competitive price. All of our employees are personally responsible for complying with legal, professional and ethical rules regarding their job and level of responsibility.

Competition and antitrust laws determine the way of business agreements with competitors, customers, suppliers, and other third parties. It is forbidden to enter into agreements with a competitor on sales conditions (prices, discounts, credit terms, etc.) on the definition of production standards, volumes, the allocation of customers or territories, or the boycott of a customer.

VIDEOTON Kaposvár - Marcali is not involved in any bribery, secret agreement in connection with any tender, cartel activities, or abuses of corruption that violate fair competition.

Our companies act in accordance with the principles of fairness and the business integrity in case of customer and supplier relations. We do not provide misleading or false information to our customers and suppliers. We refrain from conduct that violates competition or the reputation of our partners or the truthfulness of our competitors.

Anti-corruption: It is forbidden in all cases to influence or obtain an unjustified or unlawful advantage in return for consideration. We strongly condemn and reject all forms of corruption. It is forbidden to offer, promise, provide, ask, or approve any unfair advantages or benefits, which can be currency or non-cash means of payment (e.g.: voucher) or gift, directly or indirectly, for any business acquisition purpose.

It is also forbidden to steal proprietary information, to possess confidential commercial information without the approval of the person, to reveal them for past or current employees of other companies, or encourage them to do so.

Bestowal and hospitality: We avoid any behaviour which may give the appearance of seeking, receiving, or providing preferential treatment in exchange for personal advantages.

Occasional gifts and hospitality may be offered by our employees in accordance with the standards and reasonable ethical principles of the market; if it is not exaggerated, does not show frequency, and does not give the impression that it used to influence business decisions. They may not give or accept anything that constitutes unfair business incentives or that violates any law, regulation, or principle.

Our employees – outside the public business affairs –, neither directly nor indirectly, may not get or accept refund, discount, benefits, or a gift which value exceeds 10% of the current minimum wage from a person, firm, or company which has a business relationship with our companies. It is the

responsibility of the giver and the gifted person to decide whether the gift is appropriate. Furthermore, our employees may not give or accept gifts or other properties to each other that may arise the may give rise to the possibility of gaining a personal advantage (material or promotion) or may be interpreted as bribery.

Conflict of interests: In our business, honesty and integrity must prevail. Employees of VIDEOTON Kaposvár - Marcali may not engage in any activity incompatible with their job and responsibilities, they may not accept any recommendations which are incompatible with business ethics, or ensure personal advantage. All business steps may be implemented and documented only in a form that may be verified afterward in accordance with the established rules of procedure (in their absence, the generally applicable business standards).

We accept civil and public office activities of our employees; however, these activities must not be incompatible with the position held at the company.

3.3 Employees

Human rights: We are committed to respect the dignity and human rights of all people and communities with whom we come into contact during our activities. We condemn inhuman treatment, human rights abuses, and discrimination. Our managers and employees must treat everyone with dignity and respect. They must show respect and acceptance of religious, national, ethnic, sexual, political, and worldview affiliation of others;

- they must refrain from racist manifestation and communication of contents, which are appropriate for incitement;
- they must respect the constitutional and statutory rights of others;
- they must ignore vulgar, obscene, defamatory, or libellous terms.

Discrimination: We strive to create a work environment where individual differences are accepted. All discrimination is forbidden which basis is the real or received characteristics of a given person (his/her gender, race, skin colour, nationality, national or ethnic minority, mother tongue, disability, health, religious or philosophical beliefs, political or other opinion, marital status, maternity/pregnancy or paternity, sexual orientation, gender identity, age, social origin, wealth, part-time nature of employment or other employment relationship, or fixed duration, affiliation, other status, nature of characteristics).

We do not restrict the political activity of our employees out of the company; however, we do prohibit carrying out political activities at their workplace or influence each other's political views and beliefs by any means. During their individual political action, it is forbidden to use the name "VIDEOTON"; their activity must not contradict with the interest of VIDEOTON; nor may they give the impression that VIDEOTON is committed to any political party or tendency. According to the laws in force, our employees have the right to assembly or join the trade union. VIDEOTON Kaposvár - Marcali provides equal opportunities during employment.

Alcohol and drugs: We prohibit our employees from being under the influence of alcohol or drugs, furthermore, from possessing, selling, buying, or trading with illegal drugs.

Violence at work: VIDEOTON Kaposvár – Marcali does not tolerate violence at work, or the threat of violence, should it be the property or the physical integrity of the employees, nor any behaviour that may cause the fear or make others unsafe in their workplace.

Harassment: We expect all employees to refrain from any forms of harassment. All kind of behaviour is forbidden, whether verbal, non-verbal, or physical, which is realized with a purpose or effect that

violates the dignity of a person, creates an intimidating, hostile, humiliating, offensive, humiliating or offensive environment.

All gender and sexuality-related actions, verbal remarks, or written communication (physical contact, provocative, implicit conduct) are considered as sexual harassment, which hurts the person's gender integrity or intimate sphere, and he/she could reasonably feel that way.

Offensive contact: employees shall strive to make the addressing collegial and equal. Condescending, arrogant, hurtful, disrespectful addressing violates ethical norms in all cases.

4. Commitments of the organization

4.1 Accounting, real reporting and financial integrity

VIDEOTON Kaposvár - Marcali prepares financial reports according to the generally accepted accounting principles and relevant laws, represent and publish them appropriately. All financial and other records of our companies shall accurately and in detail, reflect their revenues, expenses, assets and resources. We condemn all forms of money laundering; we are committed to entering into economic relationships only with such partners who perform legitimate business from legal sources. We are committed to fair taxation, and we refrain from any tax avoidance practices.

It is forbidden to write any false, misleading, or deceptive entries into any book or report or register of the company. Furthermore, it is forbidden to provide false information to government bodies, public officials.

4.2 Competition law

Companies of VIDEOTON Kaposvár - Marcali refrain from any behaviour that may result in the restriction of market competition or abuse of dominant economic position. Employees shall be aware of their competition responsibilities during their daily activities, both with competitors and business partners. We consider compliance with ethical norms as a priority, so we regularly review and monitor our partner organizations (customers and suppliers).

4.3 Responsible sourcing

VIDEOTON Kaposvár and Marcali, in cooperation with its suppliers, strives to comply with the regulations of the Code of Ethics, which may include joint audits and on-site inspections to assess performance. Our companies encourage all suppliers to apply the provisions of the VIDEOTON Code of Ethics for their own company and supply chain.

Companies of VIDEOTON Kaposvár and Marcali undertake that they shall make every effort to comply with all relevant rules, binding trade regulations, and restrictions. Penalties, prohibitions of imports and export are trading regulations imposed on such countries, territories, natural people, groups, or legal people aimed to maintain or restore international peace and security and to maintain human rights, democracy, and the rule of law. These kinds of penalties are such legal provisions that prohibit or restrict the sale, purchase, transfer, or access of goods, funds, services, software, or information. We pay special attention to the compliance with the REACH regulation and ROHS directive valid in the European Union. Furthermore, in case of special customer requirements, we take into account procurement and adequacy of components by paying attention to the expectations out of the European Union.

Our companies adhere to the directive of customer expectation of sourcing tin, tantalum, tungsten, and gold (3TG) from an exclusively responsibly selected source. We ensure that members of our supply chain do not contribute to the financing of armed conflicts. Besides, procurement policy of VIDEOTON Kaposvár – Marcali prohibit the following ones:

- serious abuses related to the extraction, or transportation or trade of minerals;
- direct or indirect protection of non-governmental armed groups;
- direct or indirect support of public or private security forces;
- bribery, fraudulent misrepresentation of the origin of minerals;
- money laundering operations;
- payment of taxes, fees, and royalties to governments.

VIDEOTON Kaposvár – Marcali undertakes to supply collected supplier data in the relevant supplier chain to the buyer in a valid CRT file format.

4.4 Information security, trade secret, intellectual property, organizational data protection of personal data

Corporate confidential information means such information to which access is limited or has particular importance to the business of the company. Such may be confidential information concerning customers, suppliers, competitors, trade secrets. All employees are required to keep these information confidential. They may not disclose business or trade secrets, or confidential information; they may not publish them without the permission of the managing directors, may not submit false information about the company, products, and services. Employees must continue to observe confidentiality even after their employment has ended.

Employees should refrain from formal or informal share of information related to the operation and activities of VIDEOTON Kaposvár - Marcali in situations where it is not necessary for the general business course or with people who are not the employees or business partners of the organization. Taking photos or recording videos at all sites of VIDEOTON Kaposvár – Marcali is exclusively allowed if it is necessary for work.

To ensure completeness, confidentiality, and availability of business information, we apply appropriate IT security solutions, which maintenance is the responsibility of all employees to protect computer networks from threats. At the end of the daily work, employees must ensure that materials produced and stored on paper or in electronic form do not remain in a place and condition accessible to unauthorized people. All rules for information security and the provisions of the company's data protection and data management regulations must always be observed.

We respect the intellectual property of others. We are not engaged in any unauthorized use, copy, distribution, or alteration of protected intellectual property. We respect the rights of individuals. We acknowledge the claims of employees and partners, as well as other individuals, to manage their data properly, solely for legitimate business purposes. We are committed to complying with data protection laws. We solely manage such personal data that are necessary by the law, authorized by our employees, and used for targeted data processing. We ensure the safety of personal data with appropriate information security measures.

4.5 Safe and healthy working environment

VIDEOTON Kaposvár - Marcali puts great emphasis on establishing safe workplaces, and creating the conditions of flexible work. We provide clean, safe, physiologically, and ergonomically suitable working conditions that meet worker safety regulations. We are committed to maintain and improve a healthy environment. We provide occupational health and safety- and fire training; we also organize health-preserving programs and screenings for our employees. All employees have to protect their own and their colleagues' health, keep their working environment clean, preserve working conditions and the consistency of working equipment provided, comply with health and safety regulations, which are governed by safety, work- and fire safety regulations, and by internal-, national- and international legal regulations for the establishment and maintenance of a safety and healthy working environment.

4.6 Environmental protection, corporate social responsibility

We take economic, environmental, and social factors together during our operation and business decisions. Batteries for renewable energy storage, healthcare- and medical applications are a significant part of our entrance into new markets.

We are committed to promoting sustainable development. We, as a member of the largest Hungarian industrial manufacturing company group, consider extremely significant to contribute to the green economy, reduce harmful emissions, specific energy, water consumption, and waste generated during our operation; for the recycling of waste generated, and for the use of environmentally friendly production processes. We protect selective waste collection and recycling. We pay special attention to meet our current needs without compromising the opportunities of future generations.

As a responsible company, VIDEOTON Kaposvár - Marcali participates in social responsibility for sustainable development. Our range of support is expanding year by year mainly with respect to our sites in Kaposvár and Marcali. Our company group VIDEOTON Holding ZRt. founded VIDEOTON Foundation for Workers (VFW) in 1998, which primarily provides assistance to VIDEOTON employees and pensioners. Among other things, VFW primarily helps educate the children of the employees, children's camps, holidays, and provide social support. Besides, it supports family and sport events, screenings, and provide cultural opportunities.

4.7 Fair employment and working conditions

We are committed to achieving equality at work, legal and fair employment and remuneration practices, in compliance with the regulations on minimum wages, overtime, statutory benefits. We strongly oppose either direct and indirect use of child, slave, forced, or compulsory labour in any form. We condemn all forms of illegal, unfair, and unethical employment that exploit the workforce, destroy the social security system, or serve tax evasion.

Our employees accept that their work is compensated in accordance with wage laws. They work in collaborative organizations, where their relationship with other organizational units is determined by mutual respect and reconciliation of interests. We also consider quality and professional excellence to be fundamental ethical values.

5 Company's assets

All managing directors, leaders, group leaders, employees must protect the company's assets. They may not use the asset, capital, facilities, equipment, employees, or other sources of the company for private purposes, unless if required by law or authorized by the company policy.

Company assets include material or intellectual products created during work, as well as the equipment park of the company (computer, software, office, vehicles, machinery, and devices).

In case of emergency, not property, but human life is determinative. In such cases, unlike before, internal regulations are governing.

6 Communication and press release

Primarily, colleagues of PR organization keep contact with the press. If any organizational unit receives information demand from the press, direct it towards the PR organization with the proposal concerning the person of statement. With the approval of any managing directors, the PR organization shall appoint the employee authorized to make a statement and respond following the rules of representation. A statement may only be made by those authorized.

Concerning the company group, CEOs may make a statement, while in connection with the subsidiaries managing directors may make. The topic of the interview, statement, and the emerging questions shall be reconciled with the press representatives. No one can make a statement about our partnerships without the permission of the partner concerned. In case of an unscheduled, event-related interview, managing directors may make a statement according to their own decision and responsibility or appoint a colleague to make a statement complying with the above principles.

In other cases, the PR department organizes press conference, prepare a press release and material of VIDEOTON Kaposvár - Marcali – involving the relevant disciplines.

7 Reporting ethical issues

If any of our employees become aware of a potential violation of the determined values in the Code of Ethics, submit comments in the following way:

- by phone, Monday – Friday from 7:30 to 16:00, +36 82 502 132 (Mónika Budai HR manager)
- via e-mail: budai.monika@vtep.videoton.hu, etika@vtep.videoton.hu
- in person at the representatives of the Works Council

All notifications are going to be managed confidentially, in compliance with applicable laws and regulations, while protecting the whistle blower.