

Code of Ethics and Business Conduct

1. Introduction

DPDgroup IT Solutions Hungary Kft. (hereinafter referred to as **DGITSHU** or the **Employer**) is a responsible company that wishes to set out its ethical business operations and values in this Code of Ethics and Business Conduct (hereinafter referred to as the **Code of Ethics**). The purpose of the Code of Ethics is to set out clear standards of conduct and guidelines for the implementation of the provisions of the Labour Code of 2012. I of 2012 (hereinafter referred to as: "**Employees**") under the Employment Act I of 2012 (hereinafter referred to as: "Act I of 2012"), to help them understand potentially critical or dangerous situations in which inappropriate behaviour may put them and/or DGITSHU at risk.

The Code of Ethics is in line with the fundamental principles of DGITSHU, such as:

- **Integrity:** we are straightforward, honest, respectful and transparent in our business conduct;
- **Ambition:** we take an entrepreneurial approach to our short-, medium- and long-term plans, and our resilience means we are not afraid to fail in order to grow.
- **Empowerment:** we encourage our Employees to use the opportunities and resources we provide to be the best they can be and to build themselves, their team and DGITSHU as a whole by strengthening each other.

Our leaders are expected to set an example and encourage all stakeholders to follow these principles in all circumstances.

As an Employee, if you have any questions or concerns about what constitutes good behaviour, please inform your supervisor immediately or use our complaint handling platforms.

2. Purpose and scope of the Code of Ethics

- 2.1. Ethical practice is a set of behaviours that promote trust, good partnership and success in economic activity. The Code of Ethics also fully complies with the relevant legal requirements. In order to achieve this, all DGITSHU Employees are obliged to comply with all legal and employer requirements, bearing in mind the core values set out in this Code of Ethics.

The principles and behaviours that underpin ethical practice ensure that external and internal stakeholders who come into contact with the Employer are treated with equal importance and respect.

The Code of Ethics helps DGITSHU employees to align with and embrace our values and to act responsibly and ethically, taking into account the views of our stakeholders. This responsibility is reflected at the level of the individual, a specific group and DGITSHU as a whole.

2.2. The Code of Ethics applies to all Employees, representatives, agents and business partners of DGITSHU for the entire duration of their employment or contractual relationship.

3. DGITSHU's Core Values as an Ethical Employer

a. Responsible employment

DGITSHU, as an Employer, whether Employees are engaged in an employment relationship or as a contracted partner in another employment relationship, is committed to applying the same principles set out in this Code of Ethics in the same way, promoting the efficiency of all Employees' work for DGITSHU, and the satisfaction of all Employees by providing stability and security.

b. Vision and strategy

We are striving to develop a clear, unambiguous and long-term strategy, which requires a clear definition and communication of the future image, structure and goals of DGITSHU.

c. Employee opinions

DGITSHU is not only open to hearing from Employees, but we also encourage Employees to share their views, ideas and suggestions for change with us. DGITSHU takes into account the opinions of its Employees, because it is a fundamental principle of our employer that they are the ones who have a clear view of the smallest details of the operation, so it is essential for the development of DGITSHU that we listen to them regularly and incorporate their ideas into the operation.

d. Equal treatment requirement, Equal opportunities

DGITSHU supports, promotes and respects fundamental human rights and freedoms and human dignity and expects all Employees to do the same.

Not only in our day-to-day operations, but also from time to time through various voluntary giving campaigns, we work to promote equal opportunities and reduce the possibility of discrimination. We do not discriminate in either recruitment selection or employment, and we do not tolerate discrimination by those involved. DGITSHU takes action against all forms of discrimination, whether based on sex, origin, age, religion, marital status, sexual orientation, disability, wealth, nationality, political opinion, etc. and expects Employees to conduct themselves in a manner consistent with the requirement of equal treatment at all times. We have created a corporate culture that values human values and our shared principles, while being open to learning, change and getting to know each other. The benefits of diversity are clear both in our projects and at the level of the company as a whole: complexity, efficiency and speed are our rewards.

e. The prohibition of harassment

DGITSHU's values are based on mutual respect and appreciation, and unconditional respect for each other's human dignity. The DGITSHU prohibits and opposes any conduct of a degrading, sexual or other nature, which has the purpose or effect of creating an intimidating, hostile, humiliating, degrading or offensive environment towards any person.

DGITSHU therefore has a zero-tolerance policy towards such conduct and expects its Employees to report any form of harassment through the communication channels set out in Section 5 of the Code of Ethics.

f. Health and safety

DGITSHU makes every effort to provide a safe and healthy working environment. In addition, Employees have the opportunity to receive free screening tests.

g. Performance and rewards

DGITSHU communicates expectations and the compensation received for meeting them in a transparent and clear manner.

h. Political, religious and philosophical neutrality

DGITSHU creates a party-neutral and non-political environment for Employees, eliminating the possibility of influence and avoiding discrimination. The DGITSHU does not subscribe to any political, religious or other ideological persuasion and requires Employees to respect each other's political, religious and ideological beliefs.

i. DGITSHU's company

Our accounting and other records comply with all relevant legislation, and we adhere to all regulations accurately and fully. Our accounts are audited year after year.

4. Expectations of an ethical employee

a. Use of resources

All Employees are expected to manage the resources entrusted to them and available to them in a reasonable and efficient manner.

b. Intellectual property

Each Employee is contractually bound to maintain the confidentiality of trade secrets and to protect sensitive data. In parallel, third party intellectual property and confidential information received from them is expected to be handled in an ethical manner. All ideas, inventions and solutions created and developed in cooperation with DGITSHU are the intellectual property of DGITSHU. This requirement does not only apply to active employees and contracted partners, as compliance with these provisions is expected after the termination of employment or other employment or other contractual relationship.

c. Conflict of interest, reputation protection

Employees shall not engage in any activity or have any financial interest or relationship outside their scope of duties that is incompatible with their position and role with DGITSHU. It is accepted that our Employees may engage in legitimate financial and business activities in their own time, but they must not be in conflict with or detrimental to the image of DGITSHU.



The following are illustrative examples of incompatibility:

- preferential recruitment or promotion of a partner, relative or close personal friend without prior approval of the senior manager, following an open and non-discriminatory selection procedure;
- using the DGITSHU brand or Employer resources for personal gain;
- award a contract to a friend or family member without tendering, without taking into account the requirements of the procurement rules;
- provide competitors with market information and advice.

In order to protect the reputation of DGITSHU, only its authorised Employees are entitled to make external communications and statements on its behalf. Employees must refrain from posting or sharing any information on social media that could be in any way harmful to DGITSHU, its business partners or any Employee, or that could damage the reputation or constitute criminal conduct. Sharing confidential business information about DGITSHU on social media platforms is not permitted.

d. Business activity

In doing business with customers, suppliers and other third parties, all Employees must behave and conduct themselves in a fair and professional manner, in accordance with our principles and values.

e. Customers

Our clients and their needs are at the heart of everything we do, so it is of paramount importance to us that we build and manage our relationships with them with integrity, respect and transparency. We also expect our employees, in the conduct of our business, to bear in mind that DGITSHU is at the heart of everything they do and say, and it is particularly important to us that our principles are understood and accepted by them, so that they feel fully in control of them. This is the key to acting professionally and coherently in front of external and internal stakeholders, thus increasing the satisfaction of all stakeholders.

f. Suppliers

We strive to build mutually beneficial, fruitful relationships with each of our suppliers, increasing economic efficiency and personal satisfaction. DGITSHU committed to the accurate execution and full compliance of all contracts concluded.

g. Gifts and irregular payments

Accepting money, gifts or favours from any of our Employees is strictly prohibited. Gifts for corporate, entertainment or business hospitality are permitted, provided that no obligation is imposed on the parties.

h. Bribery, corruption, fraud

Strictly prohibited:

- offer financial or other benefits to anyone in exchange for a favour or advantage,
- deceive others for financial gain,



- commit corruption by extortion, abuse of office or any other means.

DGITSHU will not tolerate any form of such activities, whether directed towards or initiated by our Employees.

i. Compliance with legislation

Everyone involved is expected to know and comply with all the legislation that affects our activities, whether it is the core business or the day-to-day running of DGITSHU.

j. Prevention of money laundering

DGITSHU only deals with customers who are legally conducting their business and whose funds come from a legitimate source. If any Employee suspects that a partner has obtained funds through dishonest means, he or she should immediately report the suspicion to his or her supervisor. Typical indications of money laundering: large cash flows, triangular transactions without a contract, refusal to enter into a contract, etc.

k. Competition law

Any activity that hinders or distorts free market trade is prohibited. DGITSHU attaches the utmost importance to conducting its business in accordance with the rules of fair competition and we expect the same from our Employees.

l. Data protection

The DGITSHU is committed to data security and will do its utmost to ensure that the relevant data controller's policies and applicable laws are complied with. Particular attention is paid to the protection of customer data and the personal data of data subjects.

5. How to use the Code of Conduct

The DGITSHU Code of Ethics provides guidance for the conduct of day-to-day business. If you have any questions about its contents, or if you become aware of any breach of the principles set out in the Code of Ethics by any staff member or partner, please do not hesitate to contact us:

- To your line manager,
- to the HR team,
- to the administrator,
- by e-mail to dgitshu.panaszbejelentes@dpdgroup.com .

If you wish to report an anomaly anonymously, you can do so on the following platforms:

<https://www.safecall.co.uk/clients/dgitshun/>

As an employee, you should not suffer any disadvantages as a result of your notification.

6. Temporal scope of the Code of Ethics

This Code of Conduct shall enter into force on 01 May 2025.

The DGITSHU also reserves the right to amend, issue or repeal the provisions of this Code of Ethics at any time at its unilateral discretion.

DGITSHU, as the Employer, shall ensure compliance with the requirements set out in this Code of Ethics by employees employed under the terms of the Labour Code. as an essential employee obligation pursuant to § 78 (1).

DGITSHU has published this Code of Ethics both on its website and on its internal intranet, thus ensuring that the provisions contained therein are made known to the public, and thus conduct in accordance with the guiding values and guidelines is expected at all times.

Budapest, 01 May 2025

DPDgroup IT Solutions Hungary
represents
Sebastian GRYS
CEO