

ECON ENGINEERING KFT.'S CODE OF ETHICS AND BUSINESS CONDUCT

THE PURPOSE OF THE CODE IS TO LAY DOWN THE RULES, PRINCIPLES, VALUES AND EXPECTATIONS TOWARDS EMPLOYEES THAT AN ORGANISATION CONSIDERS AS IMPORTANT AND FUNDAMENTAL FOR THEIR SUCCESSFUL OPERATION.

Version: 4

Latest update: 2023.06.29.

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1. Foreword

Our commitment to ethical conduct and solid moral principles are the key pillars of eCon Engineering's operation. We are committed to conducting business in a fair manner, based on ethical culture and compliance.

In the long term, the only way to meet the challenges of a competitive market is to take moral responsibility both as individuals and as a company, for acting in accordance with our principles. We require our colleagues at all times to act legally, ethically and in accordance with the values of eCon Engineering Kft.

We extend our gratitude for abiding by our values and for supporting us in operating in the right way. This means that we not only settle for offering carefully designed, reasonably priced and high-quality products and services, but we also consider fairness and honesty a priority at all times. We only partner and work with supply sources that have an impeccable record of honouring human rights and compliance rules.

We ensure the integrity of our supply chain, and we monitor that our entire operation complies with our Code of Ethics.

Gábor Kiglics
Managing Director

2. Introduction

This CODE OF ETHICS AND BUSINESS CONDUCT presents our ethical commitment and serves as a guide for all stakeholders in regard to proper business conduct. eCon Engineering Kft. is committed to legal, ethical, and transparent business.

This document applies to the entire staff of eCon Engineering Kft., including senior officials, directors, managers, leaders, employees, as well as temporary workers, trainees, subcontractors, and consultants. eCon Engineering Kft. requires its staff to be impartial and honest in any work-related matters. The entire staff is responsible for acting in good faith and not doing anything that could undermine trust that is much needed for work relationships.

Our business success is based on the trust that our colleagues, customers, and investors place in us. We establish our credibility by clinging to our commitment to honesty and by resorting exclusively to ethical means to achieve our goals. We expect the entire staff to adhere to this Code in both their professional and personal conduct, and to treat everybody with respect, honesty, and integrity.

eCon Engineering Kft. is always open to discussing any questions, and it does not tolerate any punishment or retribution against a person who blows the whistle on improper conduct in good faith.

Senior officials and managers have a special responsibility to demonstrate the importance of this Code through their conduct. Senior officials and managers are also responsible for addressing any ethical issues or concerns that may arise in a timely manner. Employees must cooperate in the investigation of any potential or alleged ethical misconduct.

Any behaviour that violates the Code can be considered as misconduct, which could lead to disciplinary (with a view to impose adverse legal consequences) action and, in justified cases, the termination of employment.

We are committed to applying our values and norms to our suppliers, subcontractors, service providers and partners along the entire supply chain.

3. Our Values

- Honesty
- Integrity
- Trustworthiness
- Respect of others
- Responsibility
- Accountability
- Reliability
- Respect for law

4. Ethical Decision-Making

Ethical conduct means value-driven decision-making. Some key questions may help identify an improper or unethical situation. Ask yourself:

- Is what I am doing legal?
- Are they in accordance with the values and ethics of the company?
- Is it in line with the Code and other rules/regulations?
- Do I respect the rights of others by doing it?
- How would it read if it made the headlines?
- Am I being true to my family, my company and myself if I do it?
- Is this right?
- What would I advise my children to do in the same situation?
- Have I been asked to misrepresent a fact or to deviate from the ordinary procedure?

5. Legal Compliance

Our commitment to integrity starts with obeying laws and other legal acts. We know and comply with legislation and regulations necessary for doing business legally.

We honour all of our valid contractual obligations, and we do not abuse our rights.

Our employees are obliged at all times to adhere to every legal act and regulation, including the Code, and ensure that they operate in accordance with them.

6. Sustainability

We attach particular importance to meeting our present needs not jeopardising the opportunities of future generations. Therefore, we take into account both economic, environmental and social factors in our operations and business decisions.

7. Human Rights

We are committed to respecting the Human Rights of all people through our operations and in our value chain, in alignment with the United Nation's Guiding Principles on Business and Human Rights.

We do not cause or contribute to any violation of human rights in any form. Our staff is required to treat everyone with dignity, respect, care and with consideration for their human rights.

8. Decent Employment and Working Conditions

Our aim is to promote equality in the workplace and implement legal and fair employment and remuneration practices. We strongly oppose slavery and child labour, and the direct or indirect use of any form of forced, compulsory or bonded labour. We condemn all forms of unlawful, unfair, or unethical employment which exploits the workforce, undermines the social security system, or is used for tax evasion, such as undeclared or „grey” work or the withholding of wages.

Our staff must behave fairly and treat colleagues and partners with full respect.

9. Exercising the Right of Association and Collective Rights

eCon Engineering Kft. recognises and respects the freedom of association as a fundamental, constitutional right that cannot be restricted, and guarantees the right of forming and joining to trade unions, as well as the right of collective bargaining.

10. Working Time Policy

eCon Engineering Kft. is committed to respecting its employees, partners and all people’s right to privacy, and ensures work-life balance for its employees.

11. Discrimination and Harassment

We ensure equal opportunities in employment, and we do not tolerate any form of discrimination, harassment, or coarse behaviour. No direct or indirect discrimination based on any professionally irrelevant trait or circumstance, such as sex, marital status, age, national, social, religious, or ethnic identity, colour, political view, disability, sexual orientation, membership in an interest group, financial, birth or any other situation, will be tolerated. Any form of discriminative behaviour, harassment, intimidation, or bullying is forbidden for the members of our organisation.

We expect every staff member to adhere to the highest standards of mutually respectful behaviour both in their verbal and written communication, and to refrain from harassment, slander, or any other behaviour that others may consider as aggressive, intimidating, humiliating or offensive.

12. Health, Safety, and Environmental Protection

We ensure a clean, safe, and healthy working environment and we are committed to maintaining a healthy environment. We want our operations to have the least possible impact on our natural environment. We are making effort to reducing our use of finite resources, such as energy and water, and to decrease harmful emissions.

Our colleagues must always comply with every applicable health, safety and environmental legislation, regulation, and rule.

13. Appearance and Behaviour

We require our staff to be diligent in their work and show decency in their appearance, behaviour, and communication in the context of their work. Since employees represent eCon Engineering Kft. in relation to customers and partners, not only through what they do at the company but also through their personality, we consider it essential that they always dress neatly and properly for the given occasion, and that their behaviour and communication be in harmony with the values cherished by the company.

14. Fair Competition and Business Operations

Our cooperation with our partners is built on trust and mutual benefits in line with the competition law. We are committed to ethical and fair competition; therefore, we sell our products and services on the basis of their quality, suitability and competitive price. We make our own pricing and sales decisions, and we do not cooperate or engage in concerted practices with our competitors in any prohibited way. We refrain from any behaviour that would undermine competition, the reputation of our partners or the credibility of our competitors.

We do not offer, and we do not demand unlawful payments or favours, and we do not take part in illegal agreements which are intended to exclude certain customers. We are committed to complying with every applicable trade regulation, limitation, sanction, and import-export embargo.

We do not allow any behaviour that violates fair competition in competitive bidding and tendering procedures.

We do not withhold due payments from our partners in bad faith, unlawfully or unjustifiably, nor do we allow such practice in our supply chain. This is how we fight against the unethical practice of “debt chains”.

Our staff is responsible for ensuring fair business practices in their work, and for complying with every competition law, consumer protection law and advertising regulations. Customers and business partners must always be treated fairly and equally, and products and services must be presented fairly and accurately with relevant information (fair marketing and advertising).

15. Anti-Corruption

We strongly condemn and refuse all forms of corruption. It is forbidden to directly or indirectly offer, promise, give, solicit or accept any unfair advantage or benefit for any business purpose. Unfair advantage or benefit may be money, a cash substitute (e.g. voucher), a gift, a credit line, a price discount, travel, personal gain, accommodation or service. We do not take bribes from official persons or employees of economic actors in order to ensure or accelerate ordinary procedures. Corruption also includes racketeering, when somebody creates the impression that they are influencing a decision-maker dishonestly.

Corruption is considered a serious abuse, whether it is for gaining business or any other economic advantage. Likewise, accepting a bribe or allowing someone else to accept a bribe is considered a serious offence. Our staff must be able to account for every advantage they have gained in the course of their business activity, and they are prohibited to give or take a bribe or act corruptly in any other way.

16. Gifts and Hospitality

We must avoid any behaviour that could create the impression that we seek, receive, or give preferential treatment in return for personal gain.

Business courtesies or treats can be gifts, favours, meals, drinks, entertainment or other benefits from a person or company with whom we have or may have a business relationship. We do not give or accept anything that is, or reasonably appears to be, an unfair business incentive, or that violates any law, regulation, or principle, or otherwise creates an embarrassing or inconvenient situation. Our staff may never use personal resources to do something that they would not be allowed to do from corporate resources.

Occasional gifts or hospitality that are customary and in line with reasonable market ethics may be offered and accepted, provided that they are not excessive, frequent or give the impression that they are intended to influence business decisions. Only low-value and insignificant gifts may be accepted.

All other gifts must be politely declined or, if sent by post, returned. If returning it is not possible, it must be donated for a charitable or community cause.

It is the responsibility of the giver or the person receiving the gift to determine whether a gift is appropriate.

17. Protection of Property and the Proper use of Company Assets

We are responsible for the safety, protection, and economical use of the company's resources. Our resources, including time, materials, equipment, and information, may only be used for legitimate business purposes. Occasional use for private purpose is permitted if it is not unlawful and if it does not impact performance or undermine work ethic.

Our colleagues must comply with the safety measures and treat both tangible and intangible company assets with respect, and they must not misuse them or handle them negligently.

18. Confidentiality, Information Security, the Protection of Business Secrets and Intellectual Property

We are committed to ensuring the completeness, confidentiality, and accessibility of our business information, and to this end, we use appropriate technical and safety solutions, which our staff must maintain. Trade secrets include any information that has not yet been made public and would be harmful for the company or its customers and business partners if it were to be disclosed to unauthorised persons. All of our colleagues are required to treat such information as confidential. We comply with every rule regarding information security, and we compel our colleagues to do likewise. We respect the intellectual property of others. We do not acquire or attempt to acquire trade secrets or any other protected or confidential information with improper means. We do not engage in the unauthorised use, copying, distribution or altering of protected intellectual property.

19. Accounting, Factual Reporting and Financial Integrity

Our accounting books, records, accounts and financial reports are reasonably detailed, and we keep a record of and put together our transactions with factual accuracy. We condemn all forms of money laundering, and we are committed to entering into an economic relationship only with partners who earn their revenue from legal sources and conduct a legitimate business activity.

We are committed to paying our taxes fairly and refrain from any tax avoidance practices, such as failure to provide receipts or invoices, or submitting false expense claims. The members of our organisation are required to follow all accounting procedures, ensure that economic events are properly recorded and documented, and financial statements are complete, honest, accurate, timely and comprehensible. We reject any attempt to influence, manipulate or mislead an audit or any accounting control.

20. Preventing Fraud

Fraud or fraudulent conduct, i.e. with the intent to deceive, steal, mislead or lie, is unethical and punishable in most of the cases. All forms of fraud (including, for example, false expense claims, falsification or alteration of certificates or financial documents, misuse or misappropriation of company assets, false entries in financial or non-financial records or reports) are prohibited.

21. Conflict of Interest

Our decisions must be based on objective and fair assessment, and any possibility of dishonest influence must be avoided. A conflict of interest may arise if an employee's personal interest (which can be related to, for example, a relationship with a friend or family, customer, competitor, supplier, or subcontractor) conflicts or may potentially conflict with the interests of eCon Engineering Kft. Determining whether a conflict of interest exists is often not easy; therefore, anyone who has a question related to conflict of interest should consult with the management.

A conflict of interest may arise, for example, from the following situations:

- Employment relationship (own second job or the employment of a family member) or economic relationship with an existing or potential customer, competitor, supplier, or subcontractor.
- Employment or supervision of family members of close relatives.
- Membership on the board of directors or other body of another company or other organisation.
- Significant investment or stake in the business of a customer, competitor, supplier, or subcontractor.
- Personal interest, benefit or potential personal benefit related to a company transaction.

When employees have a private relationship with each other, it is the responsibility of the more senior employee to bring this to the attention of their manager and to ensure that there is no conflict of interest.

22. Data Protection, Protection of Personal Data

We respect everybody's rights to privacy and recognise the need of our customers, employees, and any other natural persons to be confident that their personal data are processed with due diligence and exclusively for legitimate business purposes. We are committed to compliance with data protection regulations. We only collect and process personal data that are necessary and provide appropriate information to data subjects about these activities. We take appropriate information security measures to ensure the confidentiality, integrity, and accessibility of personal data.

Our staff is required to adhere to the applicable legal requirements, implement appropriate practices, and follow procedures that ensure lawful data management and processing.