



B+N

WE ARE WORKING FOR
A MORE LIVABLE WORLD

International Code of Ethics of the B+N Group

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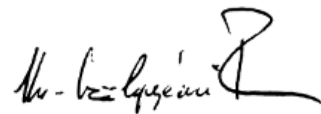


INTERNATIONAL CODE OF ETHICS OF THE B+N GROUP

1 Introduction

One of the most important elements of the professional success and prestige of the B+N Group is the human factor: the work of our highly qualified and committed staff, the right suppliers and subcontractors, the company culture supporting our operations and our ability to adapt to an ever-changing environment. Based on the above, I require the Group's International Code of Ethics (hereinafter referred to as: Code), which, as a basic document, represents the values and commitments of the Group, to be applied.

The Code includes the moral and behavioural rules and ethical requirements relevant for the steering bodies, executives, employees (hereinafter collectively referred to as: employees), suppliers and subcontractors of the Group. The Code provides assistance for the employees, suppliers and subcontractors in identifying and avoiding ethical risks, demands the prohibition of misconduct, protects employees, suppliers and subcontractors from attempts of involvement in misconduct and serves as a guidance for partners contracting the Group, authorities, natural persons, etc. about the ethical requirements to be observed when contacting or keeping in touch with the employees of the Group.



Ferenc Kis-Szölgyémi

CEO

2 Definitions

Employee – a person having an employment relationship with the employer through an employment contract, a contract of service or an agreement to perform a job.

Supplier – Suppliers are companies which provide goods or services to the B+N Group for the proper operation of services.

Subcontractor – A second-tier contractor company which carries out specific tasks for Customer for and on behalf of a first-tier contractor company.

Organisational and Operational Rules – A document which outlines provisions relating to the operations as well as internal and external relations of an enterprise or company.

3 The scope and content of the Code; Compliance

The organisational structure and activities of each member company of the Group are outlined in the specific Organisational and Operational Rules in each country.

The basic values, principles, requirements and rules set forth in this Code (hereinafter collectively referred to as: “Rules”) apply to all the employees of the Group and all its suppliers and subcontractors concerned by the activities relating to the subject matter of the Code. The employees, suppliers and subcontractors must always comply with the Rules and respect them during the working hours and beyond.

- The content of the Code must be understood and interpreted in line with the internal regulations and instructions.
- The executives of the Group are responsible in their own fields for the application of the principles set forth in the Code and ensure they are always observed.

4 The principles of the Group

4.1 Principle of fair conduct

When achieving our goals and targets, everybody must exercise fair conduct and act responsibly, respecting the legal environment and professional ethics.

4.2 Principle of integrity

The Company expects its employees to always act in a fair, honest and responsible manner, observing the provisions of the law and internal regulations, and to exercise integrity under all circumstances.

5 Employee commitment towards the organisation

5.1 Special responsibility of Executives

Executives are especially responsible for ensuring that the rules are always complied with. Executives must do everything that is reasonably possible to ensure that the activities of the employees are in line with these objectives and requirements, that any omission, irregularity or misconduct can be prevented in time and that the risks of corruption are reduced.

While fulfilling their duties, Executives are obliged to observe equal treatment, especially in the field of work organisation, giving instructions, supervision, rewarding and performance assessment.

Executives must pay special attention and respect the human rights of employees belonging to their organisational units. Executives must pay particular attention to the transparency of their leadership activities and the activities of their professional fields, the integrity of their leadership behaviour and the consistency to be exercised in their leadership functions (instructing, directing, decision-making, supervision).

Executives are obliged to provide employees with all the information that they need for performing their duties. In the course of this, they must ensure the timeliness, accuracy and thoroughness of such information.

Executives pay particular attention to the seamless on-boarding experience of new hires.

Executives act as a role model and use motivation to make their subordinates meet their obligations they are subject to within their organisational unit, and strive to create a good and constructive workplace atmosphere based on trust.

Executives are expected to make every effort to improve the professional competencies of the organisational units they are responsible for and avoid any conduct or behaviour that would show other organisational units in bad light. When making comments to their subordinates, Executives must always be fair, definite and clear, displaying good manners, finding the right tone and avoiding offensive and impolite behaviour.

Executives must be tolerant, understanding and helpful when listening to the workplace or personal problems of their staff or colleagues, without giving way to intrigues, ill-will and behaviour based on dubious interests. They must defend their subordinates against unauthorised and groundless attacks and defamation unless the employee really provides grounds for reprimand in a specific case.

Exercising their right to instruct, Executives must always be prudent and considerate and strive to learn about the qualities and competencies of their subordinates as much as they can. When providing employees with monetary or moral recognition, Executives must avoid subjective, emotion-driven recognition or reprimand; objective and factual judgements are to be preferred.

5.2 Compliance with currently valid laws and ethical standards

Compliance with the currently valid law and the instructions and internal regulations of the Group is a basic requirement for each employee.



The Group makes all the internal regulations fully available. Each employee is responsible for making themselves familiar with and observing the relevant instructions and the internal regulations.

The Group rejects any and all forms of misconduct (corruption) and makes every effort to prevent them. Behaviours where misconduct is suspected are investigated as necessary.

The Group respects the employees' right to privacy and basically does not keep an eye on what they do beyond normal working hours. However, conflicts

of interest may occur if the private matters of an employee are in conflict with the loyalty expected in connection with the interests of the Group. Conflicts of interest occur if a personal relationship or participation in external activities or any interest in another business enterprise has an actual or apparent negative impact on objective decision-making.

Employees must avoid all 'conflict of interest' situations, may not behave in a way that would harm or endanger the legitimate economic interests of the Group and must refrain from activities which may in any way prevent them from making objective and unbiased decisions when acting on behalf of the Group or which may endanger the interests of the Group. Good business ethics and compliance with the relevant laws are in the focus of B+N's business practices.

The B+N Group has a zero tolerance policy against employees, suppliers and business partners committing fraud, corruption or other serious infringements. Therefore our suppliers and subcontractors must also comply with all the relevant laws and regulations, including the rules on competition, data protection as well as the anti-corruption laws and regulations. Our suppliers may never be involved in activities with hidden conflicts of interest with B+N. If the supplier has personal relationships (relatives, partners or friends) which may cause conflicts of interest with B+N, the supplier must notify its contact person at B+N of such conflicts of interest and refrain from performing activities at the B+N Group until such conflicts of interest are assessed and approved.

Our suppliers may process personal data on behalf of B+N with permission.

The whistle-blower system of the B+N Group enables employees, business partners and other stakeholders to report serious and sensitive concerns or events in a confidential manner.

All our suppliers and subcontractors must comply with the whistle-blower policy of the B+N Group by reporting serious or sensitive concerns which may adversely influence the operations and business performance of the B+N Group.

5.3 Conflicts of interest

The best result can be achieved if we join forces for reaching our common goals and make independent business decisions.

To avoid conflicts of interest, the following rules are applicable:

- Employees must act in a transparent manner in all their activities;
- Employees must avoid all personal activities, interests or relationships which may have actual or apparent negative impacts on objectivity;

- Employees must refrain from making deals in their own names and from using their position at the Group for gaining benefits which are not available to others;
- If you have doubts about conflicts of interest, ask your immediate supervisor or the Human Resources Department for instructions;
- Employees must report any possible conflict of interest to their immediate supervisor or the Head of the Human Resources Department;
- Employees must know the restrictions on the employment of relatives or people the Employees have a personal relationship with;
- Each Employee must notify the Human Resources Department if the Employee obtains information that the Group is planning to hire one of the Employee's relatives or transfer such relative within the Group or if the Employee becomes a relative of another Employee of the Group.

5.4 Business activities outside the Company

5.4.1 THE FOLLOWING ARE CLASSIFIED AS BUSINESS ACTIVITIES CARRIED OUT BY EMPLOYEES OUTSIDE THE GROUP:

- When the Employee occupies the position of a director or is a member of the Board of Directors at a profit-oriented or non-profit organisation,
- When the Employee performs a public function,
- When the Employee is appointed with the authorities,
- Participation in any business activities other than the core activities of the Group, where actual or assumed conflicts of interest occur or may occur.

5.4.2 IN ORDER TO AVOID CONFLICTS OF INTEREST ARISING FROM EXTERNAL BUSINESS ACTIVITIES, EMPLOYEES ARE OBLIGED TO COMPLY WITH THE FOLLOWING RULES:

- It is the Employee's duty to inform their supervisor of his or her planned activities and obtain all the necessary approvals before participating in them;
- External business activities must be prevented from interfering with the proper performance of workplace duties at the Group.

5.4.3 EMPLOYEES MUST AVOID ALL ACTIVITIES THAT WOULD CREATE DIRECT COMPETITION FOR THE GROUP:

- No external business activities that are similar to the services or products offered by the Group or in competition therewith may be performed;
- No Employees of the Group may be compelled to participate in, contribute to or in any other way support the activities of external business organisations.

5.5 Data protection and obligation of secrecy, protected and confidential information

The Group attaches great significance to the protection of personal data. The Group pays particular attention to the proper processing of data. The specific rules and regulations on such processing are included in the currently valid Privacy Policy of the Group and Employees must always act according to this Policy.

In the event of a data breach, Employees must inform their supervisor in writing without delay and act according to the Privacy Policy of the Group.

The Group treats all the internal information obtained in a legitimate way and owned by the Group (e.g. information related to services, research, technology developments, finances, projects or personnel matters) in a confidential manner.

The Group makes every effort to design and maintain a secure internal information system.

The information in possession of the Group may be under copyright, patent or other legal protection.

The Employees of the Group are required to comply with the confidentiality rules at all times.



5.5.1 DATA PROTECTION

- Protected information: Information owned by the Group and created by the Employees in the course of their employment. It includes every information, datum, intellectual property, analysis, report, process and system which may ensure a competitive advantage for the Group over its competitors.
- Confidential information: Information, whether written, oral or electronic, such as customer data, protected information, non-public information. It is generally assumed that any information obtained from the Group or its customers is confidential and protected against disclosure to others.
- Personal data: Information which can be used to directly or indirectly identify an individual, including the former or current customers, employees or people in close relationship with the staff of the Group, furthermore, those applying for a job at the Group, irrespective of the method of collecting information or the source of information.

- Employees, in the course of employment with the Group or after termination of employment or other legal relationships with the Group, must treat all the personal, protected or confidential information they have obtained or become aware of in the course of their activities as confidential.

5.5.1.1 To ensure that the above provisions are complied with, Employees must:

- observe the principles and procedures on the security and confidential treatment of personal data or confidential information (especially the provisions of the Privacy Policy – GDPR) at the workplace and beyond;
- ensure that they use and share the information for the purpose it was collected for, only to an extent necessary for their activities and only with the authorised people;
- prevent the unauthorised disclosure of personal data and protected or confidential information when they are created, copied, used, forwarded, stored or destroyed;
- comply with the relevant laws;
- prevent protected, personal or confidential information from being disclosed outside the Group, unless the relevant laws or regulations stipulate so or the authorities, courts or other legislative bodies request it, however, even then, only to the extent permitted by law;
- respect confidential information obtained from their former employers;
- respect the protected and confidential nature of the information of the Group, even after the employment or other legal relationship with the Group has ended. Before termination of their employment relationship, Employees must return all the assets of the Group in accordance with the internal principles of the Group;
- report without delay if they become aware of the unauthorised creation, use, storage or destruction of protected, confidential or personal data;
- contact the Legal Department or the person responsible for the protection of personal data in case of doubts in connection with the processing and management of protected, confidential or personal data;
- refrain from discussing sensitive topics or personal, protected or confidential information at public places, including activities on the internet or on social media networks. Always stick to confidentiality at your workplace!
- ensure safe access to work areas and IT equipment;
- exercise extreme care when visiting the Website, opening e-mail attachments and using the IT systems of the Group;
- comply with the information security policy and other related regulations of the Group;
- refrain from making personal, protected or confidential information available on devices or by means that are not owned by the Group (e.g. personal computer, external server, websites other the company website, personal e-mail address);
- protect their passwords and personal identifiers.

5.5.2 PROTECTION OF ASSETS

Definition of asset: classified as property: real estate, equipment, materials and devices used for carrying out work, stocks, cash, valuables, business plans, customer and employee files, supplier information, intellectual property and all other protected, personal or confidential information. Furthermore, assets include the Employees' working hours. Our goal is to use such working hours in a responsible manner.

Property may only be used for legitimate business purposes.

5.5.2.1 To ensure protection of the Company's assets, Employees must:

- prevent wastage and the unauthorised use of assets;
- avoid carelessness;
- prevent fraud and deception in connection with the Group's assets and the unauthorised disclosure of information;
- ensure that the equipment of the Group's partners, customers, suppliers and other third parties is only used for the intended purposes and in accordance with the related permissions and under the specified conditions;
- disclose and make available to the Group any share in any technology, software, invention, development, discovery, know-how, design, copyright or intellectual property created or invented by an employee or any group;
- when communicating for and on behalf of the Group, use only the communication equipment, systems and services provided, used and approved by the Group;
- acknowledge that the Group, to the extent permitted by the relevant laws and regulations, may monitor and record the use of the Group's facilities, systems and services and at any time inspect the information that its Employees sent or received in the course of such use;
- reduce the personal use of the above to the minimum, in line with the policies and procedures of the Group as well as the relevant laws and regulations;
- not install unauthorised software, application, hardware or storage media on the equipment provided by the Group;
- not have access to the Group's network via unauthorised applications or devices;
- not use the Group's resources for the unauthorised downloading or use of copyrighted or unlicensed materials. This rule applies to downloading music, unlicensed software, images, videos and copyrighted materials;
- not use the Group's resources for viewing, downloading, forwarding or publishing illegal, inappropriate, harassing, humiliating or offensive materials.

5.6 Protection of the Group's good reputation

Employees must carry out their activities and make every effort to communicate in a way that does not harm the Group's good reputation. The Group expects its employees to do their best to protect the good reputation and prestige of the

Group at their workplace and beyond and refrain from any behaviour or conduct that has an adverse impact on the Group's interests.

The Group expects its employees to use the internet and social media sites in line with the currently valid regulations of the Group and the values set forth in this Code and respect them also in terms of the information they make public about themselves (comments, images, data).

5.7 Social media

Employees may not be present or create posts on social media sites in the name of the Group, give interviews without a permission of their supervisors, communicate or keep in touch with journalists, share or publish company information in any form, refer to the Group or present the Group in a way that is contradictory to its values.

5.7.1 RULES FOR A RESPONSIBLE USE OF SOCIAL MEDIA:

- Employees, suppliers and subcontractors must pay attention to the fact that social media platforms are public forums;
- All the relevant instructions and policies of the Group as well as all the provisions of the applicable laws and other regulations must be adhered to;
- Content may be published on social media networks only with the express approval of the Group;
- It must be ensured that the use of social media content will not interfere with work – it may happen only out of working hours and it must be in line with the values and policies of the Group;
- The disclosure of protected or confidential information must be avoided;
- Any form of harassment, retaliation or discrimination must be avoided.

The presence of the Group in social media may be coordinated by the company's employees responsible for communication.

5.8 Public and media relations

Press releases and official communiqués in the name of the Company may only be published by the CEO or the appointed staff member of the Sales and PR Department, following the approval of the CEO. This applies to all official and unofficial media releases.

5.8.1 TO SUPPORT A CONSISTENT AND CLEAR BUSINESS COMMUNICATION, THE FOLLOWING RULES MUST BE OBSERVED:

- The representatives of the media contacting any employee must be directed to the Sales and Marketing Department or the CEO.
- Speeches, interviews or public appearances in the name of the Company may only be made with the consent of the CEO.
- Posting or sharing content in connection with the Group is allowed only with the consent of the Group's CEO.

6 Ethical requirements in the internal and external relations of the Group

6.1 Respect for human rights and the requirement of equal treatment

The Group expects its employees, suppliers and subcontractors to act in a fair, honest and responsible manner in all circumstances, exercising integrity and observing the provisions of the law and the internal policies.

The Group protects and respects the dignity of all of its employees, suppliers and subcontractors. The Group requires all its employees, suppliers and subcontractors to respect the human rights of other employees. The Group does not tolerate any form of humiliation, intimidation, threat, defamation, mental or physical harassment or ill-treatment.

The Group expects all its employees, suppliers and subcontractors to refrain from any form of negative discrimination in their relations with one another and ensures equal treatment for all its employees.

The Group pays special attention to equal treatment and protection against discrimination, since they are basic human rights that are to be applied to each employee.

6.2 Cooperation

The cohesive force of workplace communities, trust and respect for each other, which increase the efficiency of workplace activities, are all parts of a quality organisational culture.



To ensure this, our employees, suppliers and subcontractors are obliged to observe the following rules in their relations with one another:

- They must cooperate and help others with their work,
- They must settle their conflicts in a way that will have no impact on their workplace environment,
- They must observe basic social formalities, exercise good manners and refrain from aggressive behaviours or conduct that could be offensive or outrageous for others.

Employees, taking the primary interests of the Group into consideration, must strive to cooperate with other organisational units to find a common solution to problems with one another's interests in view.

To achieve the goals of the Group, it is essential to create an accord of cooperation within the organisation, in particular an atmosphere built on the cooperation of supervisors and subordinates and efficient team work among employees.

The Group expects its employees to respect one another's professional opinion and make every effort to avoid conflicts when discussing opinions, find a compromise-based solution without an upheave of emotions and settle the possible differences of opinions in a civilised manner.

The Group considers it important that its employees should take up a helpful and pro-active attitude when coming across tasks and difficulties in their activities. Employees must do their best to complete their tasks in the most efficient and successful way possible.

Attitudes ruining team work and collaboration, criticism of the work of others without proper grounds, built on rivalry or misleading others is forbidden.

6.3 Sharing information, communication ethics

Each employee must take part in communication within the Group to a reasonable extent.

Cooperation within the Group is based on sharing information as a common resource. It is important that employees provide one another with the information necessary for their work in their daily cooperation and facilitate the efficiency of common decisions by sharing their individual knowledge, experience and information to achieve organisational goals. It is forbidden to hold back or conceal information, in part or as a whole, necessary for work, since this behaviour may prevent employees, especially those appointed for substitution, from performing their activities in an efficient manner or the Group from achieving its goals.

Employees are obliged to inform one another in a factual, objective and timely manner and as fully as possible of the information necessary for their work, for which various communication means, methods and procedures are provided by the Group (mobile phone, laptop, intranet, e-mail, etc.).

The Group or supervisors are obliged to inform the employees concerned of the changes in due time and form and provide employees with information necessary for their work on a constant basis.

6.4 Basic rules for behaviour, conduct and dressing

When working in the offices of the Group, our employees may wear a proper, comfortable office casual outfit. The Group expects each of its employees to use the offices and other rooms used by the Group for their intended purpose. Employees must comply with the requirements on the safe operation and preservation of premises as well as all basic rules for behaviour and conduct.

The Group provides workwear for its employees carrying out activities at the sites where the Group offers its services. The Group expects each of its employees to wear a clean and neat outfit at the place of work. Employees responsible for carrying out the services offered by the Group must be present at their place of work in the workwear specified by the Workwear Policy.

Employees must refrain from wearing an extreme, provocative or improper outfit at the place of work and must keep their surroundings clean and tidy.

6.5 Compensation and working time

The B+N Group is committed to ensuring that the compensation for the work of and the working time of its employees, suppliers and the employees of its subcontractors are in line with the applicable labour laws, regulations and practices as well as the international labour standards.

The B+N Group ensures the following and expects its suppliers and subcontractors to do the same:

- To ensure that the work done is based on recognised employment relationships that are in conformity with the applicable laws, regulations and practices as well as the international labour standards.
- To provide compensation for employees through wages, overtime pay, benefits and paid holidays which conform to the requirements specified by the applicable laws, regulations and collective agreements as fully as possible.
- To comply with all the applicable laws, requirements and mandatory industrial standards on working time.
- It must be guaranteed that overtime is based on voluntary work and occurs only rarely.
- To ensure that nobody is allowed to work for more than six consecutive days without having at least one day off work.

6.6 Freedom of association and collective bargaining

Employees, suppliers and subcontracts may freely join social organisations and take part in the activities thereof, with the condition that during their membership and in the course of their activities carried out in the organisation, they may not exhibit behaviours which, based on the position or role of the employee within the Group's organisation, are directly and effectively capable of endangering the good reputation, legitimate business interests or the purposes of employment.

If they make a statement in connection with their social activities, they are obliged to do so in a way that makes it clear that they are not making a statement as an employee of the Group and that their activities or the statement are in no way related to the Group.

6.6.1. B+N Group expects its suppliers:

- Not to restrict the employees' right to establish or join trade unions or other associations of their choice.
- Not to discourage anyone from joining trade unions.
- To ensure that employee representatives are not exposed to discrimination and have access to employees at the workplace.
- To recognise employee representatives.

6.7 Prohibition of discrimination and harassment

Discrimination, harassment and misconduct are not tolerated and the B+N Group is committed to treating its employees with respect and dignity and refraining from using discrimination during its hiring and the employment practices.

Similarly, we expect our suppliers to treat all their employees with respect and dignity:

- They should not take part in and tolerate any discrimination or harassment, including sexual harassment.
- To respect equal opportunities with respect to hiring, compensations, access to trainings, promotions, termination of employment or retirement,
- They should not take part in, support or tolerate discrimination based on criteria such as sex, age, religion, marital status, race, social class, social background, illnesses, disabilities, pregnancy, ethnic origin, nationality, political opinion or sexual orientation.

6.8 Prohibition of forced or compulsory labour

The B+N Group does not tolerate the use of forced or compulsory labour as set forth in the fourth principle of the United Nations Global Compact.

Accordingly, our suppliers must always:

- ensure that all work is carried out on a voluntary basis and their employees are not threatened by punishment or sanctions.
- refrain from using any form of forced or compulsory labour, including prison labour, if it is not in line with ILO Convention no. 29.
- refrain from requiring their employees to make a deposit or provide financial guarantee and from keeping personal identity documents (for example, passports, ID cards, etc.).
- refrain from any form of slavery and must not allow or encourage their employees to take on debts through recruitment fees, fines or other ways.
- respect the right of their employees to terminate their employment relationship with a reasonable notice period.
- respect the right of their employee to leave their workplace after the end of their shift.

6.9 Prohibition of child labour

The B+N Group expressly disapproves the use of child labour or the benefits resulting therefrom. Child labour is work that is harmful to or hinders the health or the physical, mental, spiritual, moral or social development of children.

In line with this, we require our suppliers:

- not to recruit children or use child labour and exploit children in any way;
- to comply with minimum age requirements specified for employment.

6.10 Supplier relations

The aim of the Group is to optimise the Group's resources and supplier relations:

- All goods and services must be purchased on the basis of price, quality, availability and business conditions;
- Equal and fair treatment must be ensured in the course of purchasing and the selection of and cooperation with suppliers;

- Competition among a wide range of suppliers is desirable;
- Actual or potential conflicts of interest in public procurement processes must be avoided;
- Information on suppliers, prices or public procurement contracts may only be shared with properly authorised people;
- Personal interests must be set aside when granting public procurement contracts or announcing tender winners;
- Insider trading, sharing confidential information or giving tips must be avoided.

6.11 Procurement of ethical and sustainable goods and materials

We cooperate with suppliers who strive to ensure that the goods and materials they use in their products are of agricultural, forestry, fishery or aquaculture origin and that they do so in an ethical and sustainable manner. We do our best to reduce the harmful impacts of our activities, products and services on the environment to the minimum and choose suppliers who do the same.

The procurement efforts of the B+N Group:

- Taking advantage of our global purchasing power for the procurement of sustainable and cost-efficient products and services.
- Consulting our suppliers on the innovation or development of products and services.
- Close cooperation with suppliers having sustainable and responsible business practices. As a minimum requirement, our suppliers must always ensure compliance with all the relevant environmental protection laws and regulations.

7 Safe working environment

The primary intention of the Group is to establish a safe working environment for its employees. Proper working conditions which protect our employees' health and provide safety for them are a top priority for the B+N Group.

The Group provides the necessary protective equipment, protective clothes and safety shoes for its employees. The Group provides plant physician services. Our employees regularly take part in industrial safety trainings to prevent accidents. Access to clean drinking water and sanitary units is provided to our workers. During a pandemic, the Group provides consumables necessary for hygienic procedures ensuring a safety distance (e.g. disposable gloves, face masks, hand sanitizers, surface disinfectants) for its employees, suppliers and subcontractors.

8 Environmental protection

The B+N Group is committed to continuously improving its impact on the environment and acts as a partner in cooperating with others in facilitating environmental protection and adopting best practices. It makes every effort to use environmental-friendly technologies in the course of carrying out its activities.

Regarding climate change, the B+N Group is committed to reducing the emission of greenhouse gases during its operations.



The B+N Group strives to:

- reduce the impact its operations have on the environment and the climate by promoting sustainable processes and products, including energy and sustainability consciousness.
- protect natural resources by the careful management of our operations.
- collect the waste generated via our service activities in a selective manner.
- reuse and recycle waste.
- improve energy efficiency in connection with our operations by reducing the emission of greenhouse gases.

9 Social responsibility

In line with its social responsibility commitment, the B+N Group intends to create a sustainable working environment where it is good to work at and belong to and everybody can give the best of their knowledge. The Group focuses on the conservation of our natural environment and thus it expects its employees to be environmentally conscious and pay attention to environmental protection considerations in their daily work (e.g. selective waste collection, double-sided printing, etc.), to which the Group provides the necessary resources and means. The Group is committed to establishing, maintaining and improving a family friendly workplace and considers it essential that its employees have an up-to-date knowledge, as a result, holds trainings to improve professional competencies and support leadership skills.

10 Ethical requirements in the external relations of the Group

10.1 Unbiased conduct of business

In their workplace activities, employees are obliged to refrain from behaviours which may give the veneer of bias. It is forbidden to ask for, offer, ensure or accept benefits for influencing decisions, making or not making decisions, taking or not taking actions or encouraging behaviours that are in conflict with the internal policies of the Group. Employees are obliged to refuse such benefits and report them to their immediate supervisor.

10.2 Relations with external partners, owners, authorities and administrative bodies

The Group and the employees acting for and on behalf of the Group as well as its representatives are obliged to act in accordance with the general ethical principles in their external relations as well, having the interests of the company in mind, and must preserve and strengthen the Group's and their own good reputation and integrity.

To assert the legitimate business interests of the Group, each employee of the Group, irrespective of their position, is obliged to strive to establish an all-embracing relationship based on trust with external partners.

When performing their duties, they must do their best to choose contractual partners in a careful manner, comply with the relevant provisions of the law and internal regulations, ensure reasonable and economical management and keep costs within reasonable and necessary limits.

10.3 Receiving guests

When receiving guests, the quality and value of services provided must be determined according to the position of the guest, his or her role within the organisation as well as the purpose and nature of the visit. Refrain from ostentatious services costing more than what is reasonable and necessary and those which create the image of or provide an opportunity for misuse.

10.4 Gifts

Employees must avoid offering or accepting gifts under circumstances which compromise or seemingly compromise business decisions.

Receiving and entertaining guests as well as providing gifts may be a part of keeping up business relations. Offering or accepting reasonable and justifiable gifts or entertainment is allowed as long as it is done in an open and transparent manner with the aim of strengthening the Group's image, propagating its services or establishing cordial relationships. The prior approval of the Human Resources Department must be obtained for offering or accepting gifts of a higher value.

The Group's employees, their close relatives and any person acting for and on behalf of the Group **must not offer**, provide, require or accept the following:

- cash or cash equivalent instruments,
- unreasonable advantage or benefits, encouragement or abandonment of actions;
- anything that leads to a negative perception of the Group or has a negative impact on its reputation or goodwill.

11 Compliance with regulations against money laundering

We are committed to full compliance with the regulations against money laundering and ensuring that they are complied with. We make every effort to prevent our services from being used for financing terrorism, money laundering, tax avoidance or evading the applicable laws.

In our fight against money laundering, employees are obliged to:

- exercise due care in their relationship with partners and customers,
- report any unusual or suspicious activity to their superior without delay,
- fully comply with the statutory provisions against money laundering.

12 Fight against bribery

The following rules must be observed by each employee to prevent bribery:

- They must refrain from promising, offering or providing things of value to officials or other people or their family members with the aim of motivating the person receiving such things to take or not to take official measures or involving this person in any business activities with the Group,
- They must refrain from providing bribe money,
- External contractors must be chosen carefully.

13 Investigation of unethical behaviour

If the suspicion of unethical behaviour is raised, the Group ensures a thorough, discreet, fair and timely investigation.

13.1 In the course of such investigation, Employees are obliged to:

- cooperate with the investigation board as much as possible;
- share all important information;
- avoid concealing and manipulating information and make false statements,
- retain the confidential nature of investigations to the maximum possible extent.

The Group makes every effort to ensure that no form of retaliation is permitted against those raising an issue.

Reported issues must in each case be investigated and documented. The competent representative of the Human Resources Department is responsible for the report. The investigation must be started within 3 working days following the date when the issue was reported.

14 Disciplinary proceedings

Violation of the relevant laws, regulations, policies, procedures or this Code of Ethics may result in disciplinary proceedings, including termination of employment with the Group.

Such cases may also be reported to the supervisory authorities and may result in civil or criminal consequences.

15 Authorities

All the employees of the B+N Group must fully cooperate with the authorities and their representatives.

