

## CODE OF ETHICS OF THE INTELLIPOINT GROUP

### **1 Application of the Code of Ethics**

- 1.1. The management of the Intelliport Group (Intelliport Solutions Ltd. & Intelliport Systems Ltd.) – in accordance with Section 8 and Section 9 (2) of Act I of 2012 on the Labor Code, as well as with the requirements contained in the Anti-Corruption Policy – declares, by adopting this Code of Ethics, the ethical standards that are considered to be of utmost importance and to be followed in the course of its operation. The Code of Ethics defines the expected ethical conduct and the norms of action in accordance with the values of the Group through the mediation of the value system, and encourages the stakeholders to preserve and strengthen the valuable external image of the Group.
- 1.2. Acceptance of the Code of Ethics for employees of the Intelliport Group is a condition of application.
- 1.3. Compliance with the principles and rules set out in the Code of Ethics is the responsibility of all employees of the Group, however, the promotion of an ethical corporate culture (including the communication and enforcement of the principles and rules) is a priority task for the management of the Intelliport Group.
- 1.4. The Intelliport Group encourages its business partners to accept the Code of Ethics as binding on themselves and to confirm this in a statement.

### **2 Our shared values**

- 2.1. The Intelliport Group supports and respects the protection of internationally proclaimed human rights.
- 2.2. The Intelliport Group strives to maintain a good business relationship with its consumers, competitors and business partners by complying with written and unwritten rules on market competition. The Group strictly prohibits and rejects all forms of restriction of competition in the market, in particular cartels, insider dealing and other agreements affecting the market. Our relationships with our business partners are characterized by trust, fairness and a high degree of independence in making business decisions.
- 2.3. The Intelliport Group strictly prohibits all forms of bribery and corruption in connection with its activities. Employees of the Group may not offer, pay, solicit or accept bribes or gifts in order to acquire or withhold business. If any employee is found to be involved in bribery or corruption, disciplinary action will be taken against him or her, which will include dismissal, fines, liability for justice and payment of damages.
- 2.4. The Intelliport Group creates working conditions that are free from any discrimination of any kind, be it race, gender, color, disability, sexual orientation, denominational, political opinion, membership of an advocacy organization or related activities (with the exception of positive discrimination regulated by law).
- 2.5. The Intelliport Group strictly prohibits all forms of violence, intimidation or harassment, especially harassment of a sexual nature. It is the responsibility of the management to deal with the cases that arise in an appropriate manner.
- 2.6. The Intelliport Group condemns the exploitation of children and minorities: it does not carry out forced, slave or child labour and does not accept such activities from any of its partners. All employees and contractual partners of the Group must be aware of these principles, which they must apply in the course of their work.

- 2.7. The Intelliport Group is committed to sustainability, environmentally conscious operations and the reduction of the negative environmental impacts associated with doing business.
- 2.8. With purposeful, accurate work, all employees of the Intelliport Group perform their work in compliance with the relevant legal requirements, according to a jointly thought-out and structured system, where the work performed can be monitored and is transparent.
- 2.9. With advanced analytical and evaluation methods, we help to ensure the transparency of organizational processes, the efficiency of leadership and decision-making, the identification of problematic areas and their rapid resolution.
- 2.10. In the course of our activities, we only cooperate with subcontractors and suppliers who are familiar with the policies of the Intelliport Group. We pay special attention to our outsourced processes, defining and applying the audit role.
- 2.11. The Intelliport Group considers its employees to be one of its main values, so it makes every effort to continuously improve the working environment and the working atmosphere and to ensure that employees receive appropriate training. Our goal is to maintain the fact that working for the Group is a privilege through continuous developments.

### **3 Conflict of interest and conflicts of interest**

- 3.1. During the operation of the Intelliport Group, any situation that could lead to an apparent or real conflict of interest with the interests of the Group should be avoided.
- 3.2. It is forbidden to take the position held or to use the assets of the organization to obtain personal benefits or if it otherwise leads to a conflict conflicting with the interests of the organization.

### **4 Data protection and data security**

- 4.1. The information obtained in connection with the Group shall be treated confidentially and may only be used lawfully for the performance of the tasks. All data and information learned during the work belongs to the Group.
- 4.2. The protection and security of personal data is of particular importance, and full compliance with data protection requirements is supported by the Group's data protection officer.

### **5 Privacy and social media use**

- 5.1. Employees of the Group shall not engage in any conduct, either at or outside their workplace, that directly and effectively endangers the reputation of the Group, its legitimate economic interest or the purpose of the employment relationship.
- 5.2. The Group supports its employee presence on social media, but at the same time, during communication, special attention must be paid to the separation of individual and employee roles. Employees shall not exercise their right to a declaration of benefits in a manner that seriously harms or endangers the reputation or legitimate economic and organizational interests of the Group.

### **6 Receiving and managing reports**

- 6.1. Reporting organizational operational concerns provides important and valuable feedback on the operations of the organization, so The Intelliport Group encourages and supports reporting and investigating concerns about conduct contrary to its principles and rules.
- 6.2. The concerns under point 6.1 include, but are not limited to, reporting in good faith and based on reasonable conviction of corruption, attempted or suspected corruption, or any

violation or deficiency of the anti-corruption governance system.

- 6.3. In order to facilitate the lawful and prudent operation of the Intelliport Group, the Intelliport Group operates a shared internal whistleblowing system for reporting concerns that indicate violations of its values and conduct rules.
- 6.4. In the reporting system - beyond the current legislation -, employees of the Group, as well as business partners with a contractual relationship with the Group, as well as persons who have a legitimate interest in making a report or in remedying or eliminating the conduct that is the subject of the notification (the applicant) may report.
- 6.5. A report can be made in writing to the e-mail address created for this purpose, as well as orally to the compliance officer. Minutes shall be drawn up of the oral report.
- 6.6. The compliance officer ensures that reports are received and investigated, as well as that whistleblowers are informed and protected.
- 6.7. In order to protect the identity of the whistleblowers, the persons involved in the report or mentioned in the report, the Group shall treat the reports confidentially to the extent necessary for the investigation. A report made anonymously or by an unidentifiable reporter should be assessed and investigated on the basis of its content.
- 6.8. The Intelliport Group prohibits adverse actions and protects whistleblowers who have expressed or reported concerns in good faith or based on reasonable belief from adverse actions.
- 6.9. The Intelliport Group ensures that potential whistleblowers can contact the Compliance Officer for advice and information regarding their concerns or before making a report.

## **7 Ethical procedure**

- 7.1. Violations of the principles and rules of the Code of Ethics should be investigated in the context of an ethical procedure.
- 7.2. The purpose of the ethics procedure is to establish whether the employee has violated the principles and rules set out in the Code of Ethics and to recommend to the holder of the employer's authority the imposition of a necessary and proportionate sanction appropriate to the gravity of the conduct.
- 7.3. Ethical proceedings cannot be initiated after 6 months from the date of the conduct. There is no place for conducting an ethical procedure against business partners, and their conduct of possible concern can be examined and addressed on the basis of the existing contractual framework.
- 7.4. The purpose of the sanction imposed is not to deter, but to promote good employee behavior. When imposing a penalty, it is necessary to act fairly and take into account the proposal of the employee.
- 7.5. Ethics proceedings are initiated on the basis of a report or on the initiative of the compliance officer. The compliance officer is responsible for the conduct of procedural actions (fact-finding investigation, collection of documentation and other evidence, taking witness statements, requesting written and signed reports, documenting procedural acts).
- 7.6. If the compliance officer is not allowed to participate in the proceedings due to a conflict of interest, the head of the Intelliport Group shall appoint another competent and non-incompatible person to conduct the procedure. If the procedure is not carried out by the compliance officer, he/she must be informed of its outcome.
- 7.7. The ethical process should be impartial and objective, and the data subjects should be

able to become aware of and respond to the concerns raised about them, after the necessary preparation time.

- 7.8. During the ethics process, employees are obliged to cooperate with the investigator and provide him with the necessary data, information and clarifications.
- 7.9. 30 days are available for conducting the ethical procedure from the filing of the report or, if the compliance officer himself/herself initiates the procedure, which can be extended by another thirty days if necessary by the head of the Intelliport Group.
- 7.10. At the conclusion of the investigation, the investigator-in-charge shall prepare a report to the Head of the Intelliport Group recommending that the sanction be waived or that a necessary and proportionate sanction or other measure be taken in accordance with the seriousness of the conduct. If it was presented to the head of investigation, the report should also contain a proposal from the employee.
- 7.11. The sanction may be an employer's measure related to an employment relationship (written warning, transfer, dismissal from work, termination of employment) or a criminal complaint for a criminal offence.
- 7.12. The investigator may also recommend that action be taken that contributes to the prevention of the behaviour, deficiency or risk identified, to making the Intelliport Group's integrated management system, anti-corruption management system and operations more efficient and effective.

## **8 Monitoring, feedback and improvement**

- 8.1. It is the responsibility of the compliance officer to monitor the provisions of the Code of Ethics.
- 8.2. As necessary, but at least once a year, the compliance officer shall report on the implementation of the principles and rules contained in the Code of Ethics in the framework of the management review, including proposing amendments to the Code of Ethics and further development of its provisions and application.

## **9 Publicity assurance and training**

- 9.1. The Intelliport Group provides all employees and business partners with direct access to the Code of Ethics.
- 9.2. Efforts should be made to ensure that the Code of Ethics is a mandatory annex to all contracts of the Group.
- 9.3. Intelliport Group provides all employees of the Intelliport Group with practical training to ensure familiarization with the principles and rules of the Code of Ethics upon entry into employment and thereafter on a regular basis, but at least once a year.

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