

CODE OF ETHICS

I. Purpose and scope of the Code of Ethics

The purpose of this Code is to systematise and present to all stakeholders the behavioral and moral norms, legality and Corporate Responsibility adopted and expected by VIRE SOL Kft. (hereinafter referred to as „the Company”), which are of the utmost importance in the Company’s operations considered. Employees should not only comply with the Code of Ethics but also the general ethical requirements of their workplace, ethical business conduct rules and fair behavioral norms.

The personal scope of Code applies to all employees of the Company, contracted employee.

I./1. Responsible person

The Corporate lawyer is responsible for the compliance and enforcement of these regulations. If the Corporate lawyer notices any events, behaviors related to the Codex, reports to the HR Director and the Managing Director directly.

II. Principles determining the operation of the Company

II/1. Compliance with legislation

The company pays special attention to comply with legal, ethical and other regulations. The Company operates in accordance with the relevant legislation in force.

II/1 Insurance of Equal Opportunity

The Company is committed to maintaining a place where the principles, values and expectations reflect that Employees treat each other with dignity and respect.

Employees are mindful during their daily work and cooperation, to contribute to the company’s success through their work, to encourage themselves and each other for regular learning and development.

The Employee is obligated to be fair with the external partners, in accordance with the Company’s operating principles to maintain a successful and long-lasting business relationship.

The Company does not tolerate or discourage behaviour that is directly or indirectly digest a person’s respect, dignity, or creates an intimidating, hostile, or offensive atmosphere.

Employees can make their decisions solely on the basis of merit, performance, qualifications and other work-related factors. Employees’ workplace relationships are based on cooperation, openness, trust, mutual recognition and support.

Prohibition of discrimination

The Company is committed to preventing any act, conduct and behaviour that is contrary to the principle of non-discrimination, and is severely affected by any action that has been incurred in this context.

The Company ensures that Employees’ protected properties, in particular but not exclusively, cannot be the fact of discrimination based on gender, age, nationality, religion, gender identity, political belief, association of workers’ interests or any related activity.

The leadership of the Company is expected to act accordingly at every stage of the application including the recruitment, promotion, dismissal of employees, providing their development opportunities, determining their salaries and benefits.

Creating workplace safety

The Company is committed to maintaining a work environment that is safe and free from any hazardous effect to health. To this end, it organizes its working order and procedures to meet the existing labour safety and health legislation. It continuously monitors the fulfilment of its obligations under these regulations.

In addition to creating safe and non-hazardous conditions, the Company prohibits violence and harassment against employees, contractual partners, suppliers and other stakeholders in the workplace under the jurisdiction and supervision. The Company is committed to maintain a work environment, which is fair, equitable and free from unjustified harassment and discrimination.

Besides the enforcement and validation of occupational safety and health, the Company seeks to enforce the ban on forced and child labour. The enforcement of these two prohibitions is essential in the world of contemporary work and it is a prerequisite for one of the pivots of human rights.

II/ 2. Incompatibility

The Company expects loyalty from all its partners and employees during its operation, which requires that the parties act in the interest of each other in the course of their work and that the other’s good repute be preserved.

Any person within the scope of this Code shall be prohibited from carrying out any activity, which causes conflicts of interest between them and between the Company or gives its impression.

Incompatible, in particular, but not limited to, any personal interest actually, or even seemingly, conflicts with the interests of the Company. Such a situation may arise, when the subject of the personal scope behaves or has an interest, which makes it difficult for him/her to work for the Company objectively and efficiently.

To avoid any activity, financial interest or relationship that is outside the scope of the Company’s activities and may result in potential conflicts of interest appearance.

The obligation of the person and companies subject to this Code to the Company to promote their legitimate interests to the best of their knowledge.

In the course of co-operation, it is forbidden, from the personal interest, to grasp the opportunities, which are clearly within the scope of the Company’s activities.

It is forbidden to use the Company’s property, information and position for its own use and act as a competitor against the Company.

Avoid Corruption - Business Gifts

The Company’s decisive business policy objective is to avoid any form of corruption, establish and maintain a fair business relationship.

In order to avoid corruption, it is not allowed to accept or offer on behalf of the Company any gift or service beyond the representative gifts of business. Only those (lunch / dinner invitations, business hospitality, sports and recreational programs) can be accepted and provided, which are of little value and lawfully serve business goals, individual job responsibilities, and do not have influence on any business decisions and do not impose any actual or apparent obligations to the person who gives or receives the gift, and are approved by the Area Manager.

It is strictly forbidden to accept and deliver money gifts.

Authority, public and political relations

During the operation, the Company expects that those who have contractual or business relationship with it do not endanger the positive judgment of the Company in their public affairs, make their bad news and make it clear in their statements that they are acting as a private person.

People, within the scope of this Code during their public affairs outside the Company, cannot use the material or other assets of the Company, furthermore their activities shall always be in accordance with the principles of the Company. If the Employee conducts political activity, it is only at his own discretion, not on behalf of the Company.

Among its business policy principles, the Company considers it important to maintain good professional relations with public authorities, public bodies, professional chambers, with competent bodies smooth and collaborative communication.

Selection of suppliers, ethical investment

The Company’s business policy is focused on fair competition. Accordingly, the Company is committed to complying with fundamental ethical rules with its competitors. Therefore, the company and all its employees stand beside the legitimate and fair information obtaining and keep confidentiality obligations. The Company considers itself and all its employees to be bound by the principle that it obtains business information about competitors only in a fair and legitimate way.

The Company will act with all suppliers and business partners fairly. Acting on behalf of the Company suppliers should be chosen on the basis of merit, avoiding conflicts of interest.

It is strictly forbidden to offer a contract to suppliers who are in any conflict of interest with the Employee engaged in the procurement activity. The Company’s relationship is based on mutual trust and respect with suppliers and other business partners. All information regarding the relationship between the Company and its suppliers shall be considered confidential.

When an Employee is acting on behalf of the Company, it is the duty of the Employee to support the suppliers in knowing and understanding the Company’s ethical principles and expectations.

The Company respects the right of individuals, under present Code, to make personal investment decisions, but such decisions may not be based on unlisted business or contractual relationships with the Company or any other unlisted information obtained through the Company-related relationship.

II/ 3. Protection of the Company’s Property and Values

The primary responsibility of any person or company subject to this Code is the preservation of the Company’s property and values. The Company is owned by all its material and intellectual property, which is recognized by any business partner, employee during the relationship with the Company.

The Company’s ownership, the Company’s disclosure of information about its operation and technology to third parties is only possible with the approval of the Company.

It is expected that any person subject to this Code takes responsibility for the purposeful and economical use of the properties of the Company.

It is strictly forbidden for any person and organization, connected to the Company in business or any other way, to share an opinion or make a statement on the Company on social media.

Everyone is also obliged to act with caution when talking about the Company’s business in public places, airplanes, restaurants, or by using a mobile phone or internet.

The Company is committed to the confidentiality of the personal data of employees, both during their legal relationship and after their termination. For Employees, it only acquires and stores data that is essential to the Company’s effective operation or required by law in connection with the employment relationship.

Personal Data may only be accessed and managed by authorized Employees and may only be used for reasons specified by Business Purposes or subject to the obligation of confidentiality.

Those who have business or other relationship with the Company undertake to retain confidential information, facts and data in connection with the operation and technology of the Company, furthermore, protect these in any circumstances.

II/ 4. Quality and safety of our products

Environmental consciousness and sustainable management are priorities by choosing the technology of the Company, planning and implementing its building complexes. Two important principles of the production are also the environmental consciousness and sustainable farming.

Our products are made of high quality, Hungarian raw materials, hence our customers can buy products of high quality with sustainability and food safety certificates.

III. Compliance program

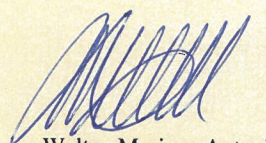
Any person or organisation subject to this Code is obliged to report to the person, responsible for the compliance of the Code, with the information that he / she has encountered or is aware of, which is highly disturbing to the basic working conditions and is contrary to the Code of Ethics or the actions conflicting the Law.

The person who is responsible for the Code shall ensure that the complaint is handled in accordance with the procedures of the Notification system, and provide a summary of the complaint to the Managing Director.

Breach of this Code may result in a punishment or cause reason for termination. If the breach of the Code is accompanied by law breaking or any offense, it may also be a subject to criminal proceeding or statutory investigation according to relevant law.

If the Code does not provide guidance for a specific situation and ethical behaviour is unclear, the person concerned must contact the person responsible for compliance with this Code.

Visonta, 12 June 2024.



Welten Marinus Antonie
Frans Joseph
Managing Director