

# Code of ethics

The success of Profigram Transilvania S.R.L. depends on the trust we earn from our employees, customers and partners. We will be credible if we keep our commitments, demonstrate honesty and integrity, and achieve the company's goals with honest business conduct. We all deserve to work in an environment where we are treated with dignity and respect. Profigram Transilvania S.R.L is committed to creating such an environment because it benefits us all and directly contributes to our business success.

Profigram Transilvania S.R.L is committed to the principle of equal opportunity in employment and is committed to providing a workplace that is free from all forms of discrimination and abusive or harassing behavior. Any employee who experiences harassment or discrimination should report the incident to their manager.

It is the responsibility of leaders to create an open and supportive environment where employees feel safe and comfortable.

Profigram Transilvania S.R.L investigates all reported questionable or unethical behavior. In all cases where improper behavior has occurred, the company takes appropriate action. We do not tolerate retaliation against employees who raise and/or report genuine ethical concerns in good faith.

Profigram Transilvania S.R.L.'s whistleblower policy is to encourage employees to discuss such issues with their managers or the relevant HR representative first, as most issues can be resolved quickly. It is the responsibility of management to demonstrate the importance of the code through their actions and to lead by example. For our code to work, managers must take responsibility for promptly addressing ethical issues or concerns raised by employees and for taking appropriate steps to address such issues.

## **Competition**

We are committed to ethical, fair competition. Our cooperation with our partners is based on trust and mutual benefits in accordance with competition law. We are committed to ethical and fair competition, as we market our products and services based on their quality, suitability and competitive prices. We make independent pricing and sales decisions and do not cooperate or coordinate with competitors in any prohibited way. We refrain from any conduct that harms competition or the reputation of our partners or the credibility of our competitors.

We do not tolerate conduct that violates fair competition in tenders and negotiations.

Our employees are responsible for ensuring fair business practices in their work and for complying with all competition, consumer protection and advertising rules. Customers and business partners must be treated fairly and equally in all cases, products and services must be presented with fair and accurate information (fair marketing and advertising), and all relevant information must be shared.

#### Trade secret and intellectual property protection

It is important that we respect the property rights of others. We do not improperly obtain or seek to obtain a competitor's trade secrets or other proprietary or confidential information. We do not engage in the unauthorized use, copying, distribution, or modification of software or other intellectual property.

#### **Conflict of interest**

We must avoid any relationship or activity that impairs or may impair our judgment or in any way create the appearance that it impairs our objective and fair decision-making in the course of our work. From time to time, we may encounter situations where our business activities carried out on behalf of Profigram Zrt. may conflict with our own personal or family interests. We have a duty to promote the legitimate interests of Profigram Zrt. whenever possible. We must never use Profigram Zrt. property or information for personal gain.

It is not always easy to determine whether a conflict of interest exists. If a conflict of interest issue arises, employees should seek advice from management before engaging in an activity, transaction or relationship that may constitute a conflict of interest.

#### **Gifts**

We must avoid any behavior that could create the appearance that we are seeking, receiving, or giving preferential treatment in exchange for personal advantage.

Business courtesies or courtesies can include gifts, favors, meals, beverages, entertainment, or other benefits from a person or company with whom we do or may do business. We will not give or accept anything that constitutes or could reasonably be perceived as an unfair business inducement, violates any law, regulation, or policy, or otherwise creates an embarrassing/uncomfortable situation.

We may offer and accept occasional gifts or hospitality that are customary and in accordance with reasonable ethical principles in the marketplace, provided that they are not excessive, infrequent, or give the impression that they are intended to

influence business decisions. Only gifts of low value and inconsequential may be accepted. All other gifts should be politely declined or, if sent by mail, returned. If return is not possible, they should be offered for a charitable or community purpose. It is the responsibility of the giver and/or recipient to consider whether a gift is appropriate. Employees who have questions about accepting a business favor should speak to their managers.

### **Accurate public disclosure**

We ensure that all disclosures in financial reports and public documents are complete, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial managers, who are responsible for preparing such reports, including editing, reviewing and signing or certifying the information contained therein. No business purpose can be used as an excuse for misrepresenting facts or falsifying records.

### **Data protection**

Protecting confidential company information and non-public information entrusted to us by employees, customers and other business partners is an integral part of Profigram Zrt.'s business success. Confidential and proprietary information includes, for example, pricing and financial data, customer names/addresses or non-public information about other companies, including current or potential suppliers and vendors. We do not disclose confidential and non-public information without a valid business purpose and appropriate authorization.

All employees of our company are required to follow the relevant legal requirements, apply appropriate practices, and adhere to procedures ensuring the lawfulness of data management and processing.