



CERTA KFT.

CODE OF **E**THICS AND
COMPANY **R**ESPONSIBILITY
POLICY

1. Purpose of the Code of Ethics:

The purpose of the present code of ethics is to describe the ethical and legal conduct to be displayed by the members of the management and the employees.

This code of ethics summarises the most important principles which the company management and all the employees of the company must commit themselves to.

It is compulsory to meet this code of ethics in order that Certa Kft. can foster its image and can ensure that its companies will be successful in the long run.

2. Behaviour in business environment

2.1 Observing the provisions of law, internal rules and policies

All the applicable provisions of law, rules and regulations, minimum norms and all the internal rules and policies and other relative rules (hereinafter referred to as "Rules") must be observed.

2.2 Fair competition

Certa Kft. meets the rules of fair competition and supports endeavours to fulfil free market and open competition both at national and at international level. Each business activity must be based upon responsible and ethical principles and procedures and be in harmony with the Rules. Certa Kft. refuses any orders and other advantages which can be attained only by means of violating the relative Rules.

2.2.1 Anti-competitive agreements

Neither the company management, nor the employees may hold discussions with competitors in order to co-ordinate or otherwise fix the prices and capacities.

Certa Kft. does not conclude any agreement or arrangement with the aim to

(a) fail to compete with a given competitor,

(b) to boycott a certain supplier or buyer,

(c) to submit pretended offers,

(d) to divide the buyers, territories and manufacturing programmes, or

(e) to take any steps which can be regarded or can be interpreted as an attempt to monopolise the sector, or which is otherwise illegal. These prohibitions include without limitation the unofficial meetings, unofficial agreements based on "mutual confidence" and "harmonised measures" which aim at or result in the limitation of competition as said above.

2.2.2 Bribery

Certa Kft. is convinced of the quality of its products, its own innovative power, of the integrity of its relations and of the capabilities of its employees. In view of this it is strictly forbidden to bribe any business partners, employees and representatives of those, civil servants, politicians and other third parties. The management and employees of Certa Kft. are forbidden to offer, promise or give advantages in return for favourable treatment received during the procurement of products or services to business partners, employees and representatives of those, civil servants, politicians and other third parties.

2.2.3 Trade incentives

Trade incentives are typically performance-based commissions, premiums (including the written pooling agreements providing for these), price discounts, products and services provided for free as well as similar elements. Incentives of this kind may be given and accepted exclusively in harmony with the relative Rules. Giving and accepting such trade incentives must always be ethical, legally authorised and socially correct and should be documented in detail. In other cases incentives of this kind must be rejected and/or returned immediately. Remuneration, especially in the form of commission given to third parties, primarily sellers, real estate agents, consultants and other mediators should be comparable to the work carried out and should be documented in writing in full, indicating all the details concerning the purpose of the services rendered, including also the due date.

2.2.4 Offering and providing advantages

The management and the employees of Certa Kft. have to proceed fairly and ethically, strictly in compliance with the applicable rules of law. In harmony with this principle gifts, souvenirs, invitations and similar advantages may be offered only if neither the values thereof, nor the business context, nor any other reason can question the targeted person's independence or can give the targeted person the impression that he should conceal the existence of such advantage or that he is exposed to an unfair pressure. It is prohibited to give invitations, gifts or any other advantages exceeding the generally accepted level or which is unusual in business practice. It is prohibited at all times to give cash as a gift. Any invitation to an event or activity must be acceptable in usual business practice and should be of a level and type usual in such practice or should refer to a clear business objective. Amounts spent on business meals and hospitality must always be adjusted to the given circumstances and must be of a reasonable level.

2.2.5 Requesting and accepting advantages

The management and the employees of Certa Kft. have to proceed legally, ethically and fairly. Certa Kft.'s management members and employees may not use their positions and posts for requesting, accepting and using personal advantages (including also non-material advantages). Occasional gifts of small value and symbolic nature are to be regarded as general and usual. If an invitation is accepted the event in question must clearly be of a business nature and business meals and hospitality must be of proper nature and of reasonable value. No cash as gift may be accepted at any time. If such a gift, advantage or such advantageous conditions are offered either to a management member or employee or any relative thereof which exceed the limits set in the present code of ethics, the respective gift or advantage must be rejected on principle. Offers of this nature must be reported to the compliance manager immediately.

2.2.6 Donation and supporting (sponsorship)

Any donation and supporting made by the company should always be transparent, which means that both the person receiving such donation or support and the purpose of the use by him must be known and traceable. Any support must be of a level adjusted to the counter-value agreed upon.

2.3 Sustainability and environmental impact

Our company is aware of the bottleneck of resources and of its responsibility towards future generations. It is a self-evident obligation of the management and each employee of the company to observe the applicable environment protection laws, rules and regulations.

2.4 Tolerance and equal opportunities

It is prohibited and is subject to disciplinary proceedings if any employee or business partner is discriminated, harassed or humiliated on grounds of sex, ethnic origin, nationality, disability, race, religion, political beliefs, sexual orientation, age or any other feature protected by the law. At the workplace sexual and any other form of harassment is forbidden even if the targeted person was able to avoid it or if the harassing person regards that his/her behaviour is acceptable. Members of the company management must give leading example and ensure a working environment free of any discrimination and harassment.

2.5 Reporting and documentation

Each protocol and report, especially those intended to third parties should be exact, precise and trustworthy. The data indicated and the records made must always be complete, correct, timely and compatible with all the needed systems and should indicate the initiator or the author and the creation date.

2.6 Selection of business partners

Certa Kft. examines each offer presented by the suppliers in a fair and impartial manner. Either giving priority to or hindering any supplier for subjective and especially personal reasons is prohibited on principle. In the course of tenders invited for any project the contract must be concluded with the applicant who submitted the most cost-efficient bid, except if there are other reasons for the decision made on the contrary (including without limitation quality, service, long-term business connections, creditworthiness, etc.). Certa Kft. expects each of its suppliers, customers and other business partners to respect and meet the values defined in the present code of ethics at their own companies.

2.7. Secrecy and data protection

Each information pertaining to Certa Kft. and its business partners is of confidential nature, which may not be made available to any third parties, save if the given information is already public or has become public in a legal way. This secrecy obligation will remain valid even after the termination of employment. Use of any confidential information for personal purposes either directly or indirectly is strictly forbidden. Each member of the company management and each employee will be obliged to actively prevent any unauthorised access to the confidential data in harmony with the internal guiding principles of the company. Secrecy of personal data and security of business data must be protected during every business activity in accordance with the relative provisions of law. Each confidential information, official document and data medium must be protected from any unauthorised access by third parties on principle.

3. Conduct towards colleagues

3.1. Management culture

Each member of the company management is to be held liable for his subordinated employees. The members of the company management must acquire respect from the employees by means of their exemplary personal behaviour, performance, openness and social competence. Certa Kft. regards its employees as its primary capital. Accordingly it invests in training and development of their employees and it incites and awards devotion to work and performance.

3.2 Fair and safe working conditions

Protecting the employees' health and safety is a significantly important principle of Certa Kft. The processes, systems, operating resources must meet all the relevant provisions of law, internal health and safety rules, fire and environment protection legislation, rules and regulations.

3.3 Avoidance of incompatibility

Certa Kft. does its utmost so that the members of the company management and the employees should not face the dilemma of incompatibility and loyalty during their professional working activity.

4. Enforcement of this code of conduct

Each manager is obliged to inform his employees on the contents and importance of the present code of conduct. Furthermore they must ensure that their employees understand the contents of this code of conduct, they must supervise the observance of the provisions hereof and should support their employees in the endeavours made for the sake of meeting the stipulations of the present code of conduct. Should any employee, contracted worker or business partner become aware of any act which conflicts the provisions of the Code of Ethics Certa Kft. has in place, or if the same faces a decision to be made where it is uncertain what is the ethical procedure to be followed, he may give a relative notice to the e-mail address of info@certa.hu. Anonymous reports are investigated by the company on the suspicion of serious violation of ethics exclusively.

Sátoraljaújhely, June 1, 2018

Lajos Rudnay
Managing Director

János Farkas
Managing Director