

Ongropack kft

CODE OF ETHICS

2024. MAY



Approved by: Eszter Kovács Executive Director



1. Introduction

Ongropack Kft, as a major plastics company of the European market, is committed to and expects its coworkers and its related partners to conduct their daily work accordance with the basic rules specified and set out in the Code of Ethics.

All Ongropack managers and employees must comply with the requirements of this Code. The managers are responsible for set a positive example of compliance with the rules and encourage their employees and partners to do the same.



2. DEFINITION, PURPOSE AND SCOPE OF THE CODE OF ETHICS

2.1. *Definition of the Code of Ethics*

The Company's Code of Ethics is an ethical requirements system for employees, which sets out the conduct norms that are considered to be appropriate and in the interests of the company.

2.2. *Purpose of the Code of Ethics*

The purpose of the Code of Ethics is to define the minimum principles for a corporate community to establish and maintain working relationships based on mutual respect, partnership and interaction.

Our goal is to develop and build a workplace culture that supports fair, honest and collaborative working that goes beyond the social norms of our environment.

2.3. *Scope of the Code of Ethics*

Territorial scope:

- The entire premises of the company in Szirmabesenyő

Personal scope:

The regulations of the Code of Ethics are binding for all the

- employees, interns, students of the Company
- temporary workers
- advisers
- contractors (suppliers) and their agents performing any services

Temporal scope:

The date of the coming into force of the Code of Ethics is: 2024 1 May

The Code of Ethics applies for the duration of the employment or other legal relationship.

3. Principles of our company

- respect for each other
- commitment and loyalty to the company and our partners
- recognising and following the rules
- efficient working and striving for improvement
- teamwork, partnership building
- openness and honesty
- cooperation, transparency

4. KEY AREAS AND RULES OF CONDUCT APPLIED

4.1. Communication

In our daily work, proper communication is essential for progress and advancement. The management pays particular attention to ensuring that employees and partners can express their opinions and concerns openly and without fear, through the information channels set up for this purpose.

It is very important to be understanding and open in our communication with our colleagues and business partners.

4.2. Data protection, intellectual property protection

The protection of internal data and company secrets (e.g. recipes, production data, production technology processes, other know how) is mandatory for all employees

(as well as for employed service providers and contractors) and is also regulated in other management instructions.

Any violation or failure to comply with these rules, or causing damage, whether knowingly or unknowingly, may result in sanctions.

Particular care must be taken with regard to the company data and information that is posted on the Internet, in letters and e-mails.

We value and respect the privacy rights of all our partners and customers, and their right to have their personal data processed in accordance with the law and for legitimate business purposes only. We are committed to complying with data protection legislation. We only collect and process personal data that is necessary for our business and corporate life. We ensure the security and protection of personal data through appropriate information security measures.



We respect the intellectual property of others, do not improperly obtain trade secrets or other confidential information, and do not engage in the unauthorized use or dissemination of other people's intellectual property. We will not engage in unfair business practices or unethical acts with our competitors.

4.3 Preserving the reputation of the company

Employees of Ongropack Ltd. are obligated to always protect and enhance the company's good reputation. Neither at the workplace nor outside of it should they say or engage in actions that could adversely effect the company's reputation.

To safe ground our company's data and business secrets, and to ensure that only essential and publishable documents and information are made available and the executive website, limited access rights have been granted.

4.4. Protection of corporate property, assets

Employees of Ongropack Ltd. may only use company-owned assets with permission for work purposes. Damaging, selling or abandoning any corporate property is strictly prohibited. Any damage caused to the company must be reimbursed in all cases. Additionally, our employees should pay special attention to preserving the condition of production lines, components, technical equipment, and other facilities used for production and work processes, beyond their personal use. Specific instructions regarding potential damages are provided separately by the executive management.

4.5. Expected behavior during working hours

Employees of the company are expected to start their work every day in clean and orderly work attire and prescribed in the instructions and regulations. Neither conspicuous nor offensive clothing is permitted.

The use of offensive or vulgar language, behavior that harms the community, or behavior that endangers others is also prohibited.

Work can only be started in a composed and clean state; the use of any mind-altering substances is forbidden.

Violation of the above constitutes a serious disciplinary offense and any result in termination of employment following executive decision.

4.6. Communication with partners, customers and suppliers

To create and maintain long-lasting and successful relationship it is important that we treat our partners and customers with fairness, full attention, and respect, addressing their emerging needs and problems. Let's establish trust and mutual respect. Additionally, our company expects the names parties to adhere to the obligations and rules formulated in the executive instructions, regulations, and management systems they use and are in effect.

4.7 Fair trading and competition

Ongropack Ltd. is committed to fair market behavior, conducting its activities in accordance with relevant regulations and the norms of fair competition. It is not permissible for our employees to acquire and use the business secrets of other companies or partners in an unfair manner.

Our company respects its competitors and refrains from taking any steps that would harm their reputation or good standing.

4.8. Corruption, bribery

We reject all forms of corruption (bribery, kickbacks, extortion). Regarding our employees, we prohibit them from seeking or accepting unjust advantages from competitors, other organizations, or individuals that could harm Ongropack Ltd.

4.9 Managing real records and reports

Our records, reports – business reports, financial statements, performance indicators, and technological descriptions – can only be prepared and communicated based on real data, reflecting reality and relying on facts. Falsifying these documents is prohibited and not allowed.

4.10. Discrimination, discriminatory treatment

We ensure equal opportunities in employment and do not tolerate discrimination, harassment or any form of mistreatment. In their interactions, leaders and employees must not differentiate based on gender, age, skin, color, ethnic group, religious beliefs, or political affiliation.

Our company strictly prohibits any form of violence, intimidation or harassment.

4.11 Compliance with regulations

The company's commitment to integrity begins with laws and other regulations. We are familiar with and adhere to the legal requirements necessary for ethical business conduct. We fulfill all contract obligations as specified and avoid abusing our rights.



4.12 Safety, environment, health

Onropack Ltd. takes environmental protection seriously and has implemented an environmental management system in line with ISO 14001:2008 standards. The company also participates in initiatives like Vinyl 2010, which focuses on sustainable development and environmental protection within the PVC industry. For instance, Ongropack phased out the use of lead stabilizers during the production of rigid PVC sheets replacing them with safer alternatives.

To achieve and ensure these goals, our company has been successfully operating its environmental management system for several years. This system focuses on minimizing environmental impact, complying with regulations, and continuously improving our environmental performance.

To maintain this and improve its results, our company expects employees to carry out their daily activities with a focus on health, safety, and environmental protection.

The company provides an ergonomic, clean, and livable environment for its employees and expects them to protect and not damage it through their behavior and actions (e.g. preserving vegetation, proper waste collection, maintaining the condition of buildings and equipment, avoiding damage).



5. Execution, sanctions

The adherence to what is described in the Code of Ethics is mandatory for every employee and equally applies to those specified in section 2.3. It is the responsibility of each employee and interested party to report to the management if they observe behavior contrary to what is prescribed in the Code of Ethics or if principles and norms are violated.

The deliberate violation and action result in the breach of the principles and values outlined in the Code of Ethics, which constitutes unacceptable behavior. In this case, one should expect accountability.

The disciplinary action is carried out according to the provisions of other Labor Code, the Civil Code, and the internal executive instructions of Ongropack Kft.

6. Publication of the Code of Ethics

The Code of Ethics publishes its current version on the company's website and electronically in the corporate email system after executive approval.

In order for every employee to become familiar with the content of this document and adhere to what is described therein, it is necessary to display a printed, signed sample copy in the facilities for those who do not have access to the electronic mail system.

The Code of Ethics must be reviewed annually.

Készítette: Dobos Edina
minőségügyi szakértő