



## Code of Conduct

### Ethical business activities at the PEX Automotive Systems Kft.

#### Introduction

The regulations of the present code of conduct have a binding effect on all the employees, managers and associates of the PEX Automotive Systems Kft. It contains the values and principles that determine the activities of the PEX Automotive Systems Kft. The objective of the company management is to observe the ethical norms and to establish an operation that supports honesty, reputation and fair behaviour.

#### §1. Observing legislation and other provisions in Hungary and abroad

By means of its business decisions and activities the PEX Automotive Systems Kft. seeks to observe the legislation in force and other relevant measures in Hungary and abroad as well. Honesty and sincerity support fair competition and strengthen the relationships between us and our customers as well as our suppliers. We expect our suppliers to have and promote corporate social responsibility (CSR).

#### §2. The obligations of the corporate management

The PEX Automotive Systems Kft. consider it its duty to conduct economical, social and environmentally conscious activities so it seeks to carry out the business activities of the Kft (Ltd.) in a professional and ethical manner and to protect fair competition on every market where the company is present by observing the legislation in force prohibiting cartels as well as governing and restricting competition.

#### §3. Conflicts of interest

The PEX Automotive Systems Kft. expects its employees to be loyal. All the employees have to avoid situations where their economic interest may conflict with the interests of the PEX Automotive Systems Kft. It is especially forbidden to acquire a business share in the competitors, suppliers or customers or to build a business relationship with them in their private environment, which may result in conflicts of interest. The interests of the PEX Automotive Systems Kft shall not be adversely affected due to conflicts. Conflicts of interest may emerge in a lot of cases but no employee shall get any advantages that may influence the business decisions or transactions of the PEX Automotive Systems Kft. The invitations must take place within the framework of hospitality applied in business life. On the basis of their position at the PEX Automotive Systems Kft. the employees cannot gain any direct or indirect advantages by means of their confidential information. All the employees are obliged to support the legitimate interests of the PEX Automotive Systems Kft. and to avoid each competitive situation against the company.

All the existing or potential conflicts of interest shall be reported and discussed with the manager concerned.

#### §4. Ban on corruption

The PEX Automotive Systems Kft. condemns corruption and bribery. It does not tolerate any activities where the business transaction is carried out through dishonest means. The employees of the PEX Automotive Systems Kft. cannot offer such commercial advantages to business partners or accept those from them, which may influence the objective and fair business decisions or only appear to do so.



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#### **§5. Insider trading rules**

All the employees of the PEX Automotive Systems Kft. are obliged to observe the rules of insider trading aimed at securities, with special attention to the ban on insider trading. It especially applies to those employees who can get access to the undisclosed information on the PEX Automotive Systems Kft., its subsidiaries, affiliates and companies that have a business relationship with the PEX Automotive Systems Kft. This inside information includes the plans of the management, the introduction of new products or production methods, corporate transactions, the turnover or profitability of the PEX Automotive Systems Kft., economic information and significant legal disputes.

If an employee of the PEX Automotive Systems Kft. acquires information that an investor would consider significant during a decision regarding an investment, he/she is not allowed to buy or sell the shares of the PEX Automotive Systems Kft. or cannot transmit this inside information until it becomes public. The use of significant, undisclosed information is considered transgression.

#### **§6. Human rights**

The PEX Automotive Systems Kft. respects the internationally standard human rights and considers it its obligation to protect those.

The PEX Automotive Systems Kft. undertakes to respect the principle of equal opportunities during the application and is far from being discriminative. The employees shall not be discriminated against based on race, sex, disability, origin, religion, age or sexual orientation.

The contractual partners give priority to the principles of equal opportunities and take action against discrimination and exclusion. The relationship between the employees and the corporate management can be characterised by mutual respect, understanding and trust so that the joint corporate objectives should be achieved.

The PEX Automotive Systems Kft. rejects any forced labour. Child labour is expressly prohibited. The minimum age of the employees is always in accordance with the legislation in force as well as the provisions of the collective agreement.

#### **§7. Working conditions**

All the employees are entitled to fair compensation. The remuneration/compensation of the other benefits (social benefits, holidays and others) follow the principles of correctness and at least the legal provisions as well as the standard of the economic areas/industries of the country. The working time is determined based on the relevant legal provisions as well as the contents of the employment contracts.

Health and safety as well as safety at work have the highest priority. The PEX Automotive Systems Kft. guarantees health and safety protection at the workplace in line with the regulations of the country and supports the constant development in the world of work.

#### **§8. Handling knowledge within the company**

All the employees of the PEX Automotive Systems Kft. are obliged to provide the fast and smooth flow of information within the company. Information shall be transmitted in a correct and complete form towards the departments concerned, except for the cases – especially regarding confidential information – if there are no other interests. A part or the whole confidential information cannot be withheld unduly and cannot be falsified and it is not allowed to transmit even only a part of it.



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### §9. Wealth management

All the employees of the PEX Automotive Systems Kft. are obliged to manage the property of the company in a proper and careful manner. All the employees are obliged to protect the property of the PEX Automotive Systems Kft. against being lost, damage, abuse, theft, embezzlement and destruction. All the employees are obliged to immediately inform their superiors if the tangible property is not used properly.

### §10. Confidentiality and data protection

The majority of the PEX Automotive Systems Kft.'s business information is to be handled confidentially or is legally protected, that is, subject to confidentiality obligations. It is an exception if the PEX Automotive Systems Kft. gives permission for the disclosure of the information, or if there is an obligation to disclose it on the basis of statutory or provisional obligation.

The obligation of confidentiality is especially relevant in the case of intellectual property rights. These include trade secrets, patents, brands and copyrights as well as business and marketing plans, designs, business documents, payroll data and any undisclosed economic data and reports.

The personal data of the employees, customers, business partners, suppliers and third parties are handled by the PEX Automotive Systems Kft. confidentially and with due care while fully complying with the data protection law (GDPR).

### §11. Introduction and supervision

The rules of the present code of conduct form an integral part of the PEX Automotive Systems Kft.'s corporate culture. It is mandatory to observe these principles, for which each employee is responsible on their own.

If an employee has a complaint or a question in connection with some points of the code of conduct or learns about the violation of the points determined here, he/she immediately has to clarify this with his/her supervisor. It is possible to report the case or make a remark on it anonymously or in a confidential manner for the **equal treatment officer (Email: [eselyegyenloseg@pex.hu](mailto:eselyegyenloseg@pex.hu))**. If the employee is not satisfied with clarification, he/she may submit his/her complaint not only to his/her supervisor but also to the HR department. We organise trainings for our employees on company level in connection with the contents of the code of conduct every year, or - in the case of changes – when it proves to be necessary. The code of conduct is available for every employee in the following file: **M:\Departments\Management Systems\1\_Quality\_Management\_System\14\_Szabályzatok**.

If our employees have any complaints, they can also turn to the **environmental sustainability contact person (Email: [kornyezet@pex.hu](mailto:kornyezet@pex.hu))**; or the **person responsible for complying with the provision (Email: [codeofconduct@pex.hu](mailto:codeofconduct@pex.hu))**.

### §12. Complying with the code of conduct

The PEX Automotive Systems Kft. guarantees compliance with the present code of conduct. It guarantees that no employees should be at a disadvantage who acts in accordance with these rules. Our leaders must set an example on the basis of their behaviour. It is their task to make the employees know, understand and comply with the code of conduct.

The PEX Automotive Systems Kft. shares the contents of the present code of conduct with its clients with which it has a contractual relationship so that they can cooperate by taking it into consideration and complying with it.

We may check compliance with the present code of conduct when we have an audit at the premises of our suppliers.



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If any employees, agents of the PEX Automotive Systems Kft. or any employees or agents of its clients notice the violation of the contents of the present code of conduct, they can turn to the following persons and organisations with legal remedy or report:

- In case the contents of **§1-2.** are violated: to the manager of the PEX Automotive Systems Kft.
- In case the contents of **§3-5.** are violated: to the manager of the PEX Automotive Systems Kft. or to the 'Gazdasági Versenyhivatal' (Competitive Authority) (1054 Budapest, V., Alkotmány u. 5.).
- In case the contents of **§6-7** are violated: to the manager of the PEX Automotive Systems Kft., to its HR manager, to the Labour and Health and Safety Division of the competent Administrative Authority of the District and the Equal Treatment Authority (1013 Budapest, Krisztina krt. 39/B).
- In the case of a data processing (GDPR) problem to the Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information) (NAIH: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c).

17, May 2019. Érd

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Jáger Tibor

manager

PEX Automotive Systems Kft.