



Dunapack Packaging
PRINZHORN GROUP

We will.



CODE OF BUSINESS
CONDUCT AND ETHICS

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PURPOSE OF THE CODE OF BUSINESS CONDUCT AND ETHICS

The purpose of creating the Code of Business Conduct and Ethics is to inform all those concerned of the ethical norms and standards which the company considers especially important in the course of its operation. By communicating the company's value system, Dunapack Kft.'s Code of Business Conduct and Ethics lays down the expected ethical behaviour and activity norms complying with the company values. Further, it encourages those concerned to safeguard and strengthen the good image formed of the company.

Everybody complies with the basic rules of courtesy in human interactions. Dunapack Kft. employees shall behave neither at their workplace nor outside it in a way that could harm the company's good reputation.

SCOPE

The values and rules incorporated by the Code of Business Conduct and Ethics apply to all Dunapack Kft. employees, contracted partners and business partners. Managers of the company leading others' work assume particular responsibility for establishing and maintaining the culture of ethical operations.

COMPLIANCE WITH THE LAW

All Dunapack Kft. employees, partners, and suppliers are required at all times to act in accordance with:

- laws and regulations, and
- the ethical rules defined in the present Code of Business Conduct and Ethics.

Dunapack Kft. employees must act in accordance with

- the basic interests of the company, and
- the principles set out in the mission statement of the company.

RESPECT FOR HUMAN RIGHTS

Dunapack Kft. supports and respects internationally declared human rights.

ANTI-CORRUPTION, ANTI-BRIBERY

Those concerned (employees, business partners and suppliers) are obliged to refrain from deceptive behaviour and/or blackmailing in their business activities. Consequently, they are not allowed to offer, pay, ask and/or accept a bribe for allocating or withholding business.

CONFLICT OF INTERESTS

Employees can face conflict situations when they must choose between the interests or gain of their own, a family member or a third person and the interests of the company. Employees must avoid all situations when such conflict of interests may occur. They must not acquire direct gain from their business steps and decisions. Such business activities must not be influenced by their personal circumstances.

FAIR EMPLOYMENT

- ***Equal opportunity and treatment***

At the company nobody is allowed to enjoy advantage and/or suffer disadvantage because of his/her gender, age, origin, race, nationality, religious, political or family affiliation, disability, sexual orientation, membership of an interests representation organisation or associated activities. Exceptions are positive discrimination governed by law.

- ***Prohibition of harassment***

The company strictly prohibits any forms of violence, intimidation or harassment. Any form of these including racial or sexual violence, intimidation and harassment is totally unacceptable, and the management is responsible for handling any such issues that arise in the proper way.

It is the duty of employees, if they notice any form of aggressive activity violating the above mentioned principles, to take steps against the occurrence or report the misdemeanour to their direct leader, the responsible manager, or to the Ethical Committee.

- ***Forced labour and child labour***

Dunapack Kft. expresses full condemnation of child labour and other forms by which children and members of minorities are exploited. The company does not have work performed by forced labour, slavery or child labour and does not tolerate such activities from any of its partners. Each employee and every partner must be aware of these principles and apply them in the course of their work.

- ***Occupational health and safety***

The company ensures safe and healthy working conditions for its workers. Healthy and safe working conditions are regularly inspected at its premises by Dunapack, and, if necessary, the company takes measures to rectify any failings. During its operations all of the relevant technological and ecological guidelines are taken into consideration. In addition, the company supports acceptance of more rigorous standards setting higher expectations of the industry. By complying with health, safety and environmental protection rules, technological discipline and other regulations regarding their work, all employees have to strive to prevent health damage and avoid environmental damage and pollution.

- ***Working time and wages***

Dunapack Kft. complies with all the Acts, legislation, regulations and industrial standards concerning working time, including overtime. It pays its workers wages that meet at least the expected minimum requirements and which are enough to cover basic human needs in the given community.

- ***Freedom of association, interests representation***

The company does not limit the freedom of association and right to collective agreement of its employees.

POLITICAL AND RELIGIOUS ACTIVITIES

The company's employees shall respect each others' ideological and political views and shall not influence each others' views using any means during working hours.

Employees engaging in ideological and political activities should avoid making reference to the company and should expressly refrain from presenting their opinion as the position of the company. Employees engaging in such activities must not use equipment and services provided by the company (e.g. mobile phone, laptop, company car), even if they are entitled to use such equipment and services for private purposes otherwise

ENVIRONMENTAL PROTECTION, ENVIRONMENTALLY FRIENDLY TECHNOLOGIES

Environmental protection is an important element of the business philosophy of Dunapack Kft. Its approach and operations are environmentally friendly. When making decisions the company takes coexistence with the natural environment into account. It avoids wasting resources and handles by-products in compliance with the relevant rules and regulations. At the company everybody strives to reduce harm to the environment caused by the production process. The company expects its suppliers to adapt to the above mentioned principles and encourages other partners to do so too, since Dunapack Kft. believes that this can lead to achieving sustainable development and improvement in life quality.

COMPANY PROPERTY

• *Property protection*

Dunapack Kft. employees

- take responsibility for the good condition of company property, equipment and the appropriate and economical use of them;
- do not use company property, equipment and company premises for private purposes, except if the manager exercising employer rights gives express permission to do so in compliance with the relevant rules and regulations. However, even in such situations, those concerned must act with due care;
- do not use working time for private purposes

• *Data protection /data handling/ information policy*

The company ensures efficient internal inspections in order to avoid abuse and misuse of its capital, assets, property and devices. Each document which sets out the obligations of the company towards a third party must be signed by two persons from the company whom the management has authorized. Dunapack Kft. places special importance on respecting the confidential data of customers, partners and employees and complying with data protection regulations.

• *Confidential information*

Employees shall safeguard confidential information possessed by the company and refrain from obtaining confidential information from other companies by illegal means.

Information qualified as confidential by Dunapack shall not be shared with outside persons or used for personal purposes. This obligation applies not only during employment, but also after termination of employment and is valid until the end of the time period set in the working contract. Dunapack Kft. also expects its partners to treat confidentially information qualifying as confidential that is obtained in the course of the business relationship.

- ***Confidential information regarding employees***

Information regarding employees is confidential, including details of career path, income and personal circumstances.

- ***Handling of electronic data***

Employees of the company are expected to:

- be aware of the company's rules regarding use of the Internet. They must solely use properly licensed programs. They should not use the electronic communication system of the company for transferring data which they are not authorised to forward.
- be informed that the employees of the company and partners of the company will not tolerate any violent, abuse or offensive electronic messages.

- ***Social media***

It is prohibited to publish any offensive text content which harms the interests of the company.

- ***Speaking on behalf of the company***

Only authorised persons are entitled to make official statements of any nature regarding the company.

- ***Protection of intellectual property***

Success of the company depends on compliance with rights concerning the protection of confidential business information and intellectual property. This applies in particular to inventions, research results, technical data, formulae, designs, ideas, production guidelines, computer programs, trademarks, patents, copyright, non-public financial or pricing information, as well as any other documents which refer to the above mentioned matters.

Every Dunapack Kft. employee is obliged to take action against or - if it is beyond his/her scope, possibilities - to notify his/her superior of the illegal producers of products which are the intellectual property of Dunapack Kft. or under the utility model protection of Dunapack Kft.

In order to achieve the above aims, employees are expected NOT to

- disclose or use any types of confidential information owned by their previous employers or any other third party, and not to violate knowingly the intellectual property rights of others.

RELATIONSHIPS WITH AUTHORITIES AND BUSINESS PARTNERS

Successful and long-lasting business connections with customers, suppliers, authorities and organisations are based on honest and fair behaviour, mutual trust and respect. All information which is connected to the relationship between the company and its suppliers qualifies as confidential. Dunapack Kft. does not misuse its market position and is committed to providing equal business opportunities to all of its business partners and respecting the conditions set out in its contracts and agreements.

The company establishes and maintains business relations only with those partners who act and operate according to the rules of business fairness and honesty. In its business operations Dunapack acts in the spirit of good faith and honesty, follows the rules and regulations of the given country, and only uses means permitted by law.

- ***Acceptance of gifts and benefits***

Dunapack Kft. employees must not accept payments, fees or any other benefits from organisations or persons whose interests are connected to the company or from economic organisations that qualify as competitors. The value system of the company does not allow our employees to receive personal gifts. In case of doubt the value of business gifts must not exceed HUF 5,000. All gifts received will later be drawn or shared among all employees at company events. No gift or favours whose value exceeds HUF 5,000 may be accepted.

It is strictly forbidden to accept travel, holiday and accommodation offers from business partners, outside suppliers or private persons who work for the company (consultants, agents etc.).

In certain cases (e.g. professional training courses, conferences, business events, invitations to make a presentation), travel and accommodation offers may be accepted provided that the person exercising employer rights has given approval in written form.

- ***Selecting suppliers***

Dunapack Kft. expects its suppliers to follow the rules and guidelines that Dunapack Kft. has provided. Suppliers who breach these principles must not be involved in tender processes and may not be employed in any form, either directly or indirectly. Upon Dunapack Kft.'s request, suppliers should provide evidence that they comply with the obligations set out in the present Code of Business Conduct and Ethics.

- ***Competitors, fair competition***

Dunapack Kft. wishes to operate as a firm competitor and acts in accordance with the norms of fair competition and applicable competition rules. We gather information about our competitors exclusively by legal means and we use only publicly available sources to understand business, consumer, suppliers and technological trends as well as legal submissions and activities of suppliers and competitors. The company acquires this information solely in a legal and honest way.

- ***Insider information***

Information at the competency level is open and available. Free flow of information must be ensured both vertically and horizontally among departments and units. The company is committed to involving colleagues to the highest degree in company activities and promoting open communication.

- ***Civil society, local communities***

Dunapack Kft. contributes to economic development and improving living standards in the regions where it operates. It serves the common good is by creating new jobs, as well as through activities that develop a healthy lifestyle, culture and sports. We are committed to supporting social donation and sponsorship in a way that is free from corruption and bribery. Our company communicates in a responsible way: our activities and endeavours are communicated to the public through understandable and accurate information in all media.

QUESTIONS, REPORTING UNETHICAL CONDUCT

If any employee, contracted worker or business partner becomes aware of any conduct that is in violation of the provisions of the Code of Business Conduct and Ethics of Dunapack Kft. or finds themselves in a decision-making situation where they are uncertain of the ethical course of conduct, they should write to dunapack@dunapack.hu, or alternatively to the general managers of Dunapack Kft. at management.bp@dunapack.hu or management.nyh@dunapack.hu. The company will only investigate anonymous reports in the event of suspicion of severe ethical misconduct.



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