

**BETATRANS[®]***Anywhere, anytime*

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Code of Ethics

Dear Colleagues and Partners!

One of the most essential components of our company's good reputation and successful operation is the human factor. How our colleagues and partners relate to each other and to our clients largely determines how our company appears to the outside world. In today's world, this is of particular importance, as thanks to the ease of sharing information, any good or bad experience or opinion can quickly reach the general public.

Our company is committed to conducting our operations fairly, honestly and transparently, as well as in accordance with all legal and regulatory obligations. We expect all colleagues, partners and persons acting on our behalf to always comply with the standards of ethical (business) conduct.

Our main goal is that our colleagues and partners can promote the implementation of the values that our company considers important through their ethical behavior, so in this Code of Ethics we lay down the basic principles that all our colleagues and partners are expected to comply with in order to achieve the above goals.

We ask all our colleagues and partners, regardless of their position or form of cooperation, to strive at all times, both in and outside their work, to uphold the fundamental values set out in this Code of Ethics, thereby helping our company to earn the trust placed in it and to communicate the values set out in this Code of Ethics to the outside world.

We therefore ask all our colleagues and partners to join our joint efforts and help achieve the goals defined in this Code of Ethics.

Budapest, 1 December 2023

BETA-TRANS Plusz Kft.

Zoltán Rakita

Managing director





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1. Attitude towards clients

1.1. Confidentiality

Confidential information about our company's colleagues, partners and clients must be kept confidential to the greatest extent possible. Telephone calls or correspondence in public places that could provide an opportunity for anyone to gain unauthorized access to the confidential information of colleagues, partners, and clients, especially their personal data, should be avoided.

Confidential information and conversations during the company's internal work must not be made public without authorization, and permission must be requested from the immediate superior or the otherwise authorized person.

1.2. Communication with clients

Colleagues and partners must strive for the following in their communication:

- (i) they must be attentive to the actual and real needs of clients;
- (ii) demonstrate the highest standards of behavior when communicating with clients;
- (iii) to provide clients with transparent, accurate and understandable information about the services provided by the company;
- (iv) they must strive to ensure that communication with clients is carried out both orally and in writing within reasonable deadlines;
- (v) client information must be kept confidential;
- (vi) in the course of work or in connection with it, they may not give financial benefits or gifts to clients, beyond the gifts permitted by the company.





1.3. Independence

Any activity or act that hinders the independent exercise of professional judgment shall be avoided. As part of this, efforts must be made to ensure that no one uses their personal position to assert their personal advantages or the advantages of their relatives, relatives, or friends without authorization.

No form of bribery or corruption is tolerated. The company must also refrain from using business partners with whom there is a legitimate concern that the partners may violate the rules against corruption and bribery. It is necessary to refrain from corruption and bribery even if this results in the failure or termination of a business or other contractual relationship as a result.

2. Organizational integrity

2.1. Property protection

The assets and property of the company, colleagues, partners, and clients, including intellectual property, must be handled appropriately and carefully. In the absence of an express instruction to this effect, the private use of the devices provided by the company is prohibited, and care must be taken to ensure that the devices, documents, and information that are the common property of the company are available to all colleagues.

2.2. Inclusion and diversity

No form of discrimination is tolerated within our company. Our company supports equal opportunities and equal treatment, regardless of the position of the person concerned in the company, as well as regardless of race, age, gender, nationality, marital status, sexual orientation, social background, relationships, disability or religious beliefs. Differences between colleagues, partners and clients can only be made for objective reasons.

2.3. Human dignity

No form of harassment is tolerated within our company. Our company expects everyone to treat their colleagues, partners or clients with dignity and respect at all times. Any behavior that creates or aims to create a hostile work environment is to be condemned.

Excluding or discriminating between colleagues for personal reasons is prohibited.





2.4. Social media use and public speaking

Everyone is individually responsible for what they share, post, like or interact with on social media. In doing so, the privacy, honor, reputation and personal data of others must be respected. For any publication on social media, the colleague or partner must obtain the consent of the person about whom they wish to publish, including statements about the company.

Unless expressly instructed to do so, company information, especially confidential information, may not be published on social media or any other similar public platform.

You must never disclose confidential information or classified data about a client, partner, or the company. Posts and comments must refrain from inciting hatred, defamation, and harming the reputation of others. Always be aware that your behavior on social media may have an impact on our company, so use these platforms responsibly.

2.5. Use of digital devices

All information, documents, software and hardware acquired, recorded and created during work - whether at the workplace, in a vehicle or at home - are the intellectual property of the company.

Colleagues may never use the company's electronic communication for illegal data transmission, to leak or steal business secrets or data, to open images, videos, and content that promote pornography, violence, or hatred, as well as to store or open materials that promote terrorism, intolerance of others, or harassing activities.

If colleagues and partners receive this type of data, they must immediately delete it from the company's devices while notifying their immediate superior.

2.6. Healthy & safety

Our company strives to create a safe and protected working environment for all its colleagues, where no one is exposed to unreasonable risk.

However, safe and healthy operation does not only depend on technically impeccable operation and also requires active participation from colleagues working at the company.

Among these, the colleagues:

- (i) must comply with the internal measures taken to preserve health and relevant legislation;





- (ii) must immediately stop any activity that becomes dangerous and report the fact to their superior;
- (iii) can only perform work for which they have been specifically trained;
- (iv) can only work if they are medically fit for it and are sufficiently rested and alert for work;
- (v) any accident, infection, injury or illness must be reported immediately to the immediate supervisor in compliance with the relevant data protection regulations;
- (vi) are prohibited from working under the influence of alcohol, drugs, or any other mind-altering substance;
- (vii) must comply with the regulations governing smoking in the workplace.

3. Social responsibility

3.1. Political Statements and Activities

Our company is politically neutral, so we must ensure that our private political statements and participation in any political activity do not violate this neutrality. No colleague or partner should give the impression that his or her personal political views or actions reflect the opinion of the company as a whole.

3.2. Environmental Protection

Our company recognizes the importance of environmental protection and sustainability. In all cases where it is possible, it is necessary to strive to cause the least possible load on the living environment during work and various work-related activities and to use only the resources absolutely necessary for operation.

3.3. Forced and child labour

The company does not tolerate any form of forced or child labour. All colleagues working at the company and the company's partners must respect the protection of human rights and the prohibition of any form of discrimination.

3.4. Report abuse

We encourage all our colleagues and partners to report suspected violations of the Code of Ethics or any related norm to their supervisor or as specified in the whistleblowing policy. It is also





possible to report concerns anonymously, which reports will be immediately investigated by the staff member(s) specified in the regulations for reporting abuse.

Never hesitate to report your concerns and complaints in good faith regarding violations of the Code of Ethics or any other norm. Within this framework, the use of any kind of retaliatory measures against any member of our company who raises real concerns in good faith is prohibited.

4. Company vehicles and work clothes

4.1. Use of company vehicles and trucks

In the course of your work, you may use vehicles provided by the company. Given that the use of vehicles displaying the BETA-TRANS logo or inscription affects the image associated with the company, colleagues must at all times endeavour to ensure that when using such vehicles they fully comply with the rules of the road and that their behaviour does not jeopardise the company's good image and reputation. In this context, they must refrain from any kind of offensive, threatening or aggressive behaviour directed against other road users.

In the event of an accident, if a company vehicle is involved, the police must be called immediately after the injuries and other situations threatening damage have been eliminated and the immediate superior must be notified of the fact of the accident.

4.2. Wearing work clothes

In those positions where wearing work clothes is mandatory, colleagues must wear the work clothes and ensure that the work clothes are always clean and tidy during work.

Clothing with the BETA-TRANS logo or inscription can be worn in a way that does not endanger the company's values, perception and reputation, regardless of whether it is classified as work clothing or whether it is worn by a colleague or partner during or outside of working hours. As part of this, the world view neutrality described in this code should not be jeopardized by the circumstances of wearing work clothes or clothes with company logos or inscriptions (e.g. wearing them at party events).

5. Partners

5.1. Cooperation with partners (other partners).





The business relationship with partners is based on mutual trust and respect. Both colleagues and partners are obliged to treat confidentially the information they come to know during cooperation with each other. The company strives to create equal conditions for all its partners and strives to comply with the contractual obligations it undertakes.

When you act on behalf of the company, you must take care of the following among the above:

- (i) when choosing partners, choose only persons with a good reputation and appropriate qualifications;
- (ii) endeavor to work only with suppliers who comply with all applicable legislation;
- (iii) except for gifts of small value, do not ask for or accept any favors from any business partner;
- (iv) avoid all conflicts of interest when selecting suppliers;
- (v) do not accept any gift, advantage or invitation that you may receive with the purpose of favoring a partner or supplier. If you become aware of this, notify your immediate superior immediately;
- (vi) always strive to comply with the relevant money laundering regulations and, if this is your obligation as our partner, perform the money laundering due diligence procedures in order to identify the ultimate beneficial owner acting on behalf of the supplier.

5.2. Financial records

All financial and accounting activities of the company must be recorded and recorded accurately and in accordance with reality. It is forbidden to record fake or non-existent transactions in the accounting documentation.

During a possible inspection, colleagues must ensure that the data provided during the inspection is not misleading, false, or does not mislead others or attempt to cover up real information.

This Code of Ethics enters into force on the date indicated above and may be unilaterally amended or revoked by BETA-TRANS PLUSZ Kft. at any time.

BETA-TRANS PLUSZ Kft.

