PARTNER CODE OF CONDUCT

SMP Solutions Zrt.

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1. GENERAL PROVISIONS

1.1 Purpose of the Policy

This document is the Partner Code of Conduct of SMP Solutions Zrt. (hereinafter: the Company or SMP). It sets out the ethical standards, values and commitments applied by the Company towards its business partners and serves as guidance, expressed as expectations, for all business partners in developing business and ethical conduct that SMP considers appropriate and to be followed. The Company is committed to lawful, ethical and transparent business-partner relationships and cooperation.

The Company's favourable reputation and business success are founded on the trust of customers, manufacturers, external service providers and subcontractors. This applies equally to business and personal relationships between the Company and its customers and between the Company and every participant in its supply chain. The Company establishes and continuously strengthens its credibility by complying with legal requirements in all respects, remaining committed to integrity under all circumstances and pursuing its objectives exclusively through ethical means. The Company conducts its business processes impartially, neither requests nor provides undue advantages, acts in good faith and does nothing that could erode trust in the Company. The Company therefore recommends and expects its business partners to support and adopt this commitment, identify with the Company's ethical standards and values, and follow them in their own operations and value chains.

This Policy sets out the expectations that the Company also seeks to enforce in relation to its business partners based on the ethical standards and values contained in its own Code of Conduct. Through this Policy, the Company calls upon its business partners to take measures, proportionate to their headcount and organisational structure, the nature and complexity of their processes, their anti-corruption regulatory environment and their exposure to corruption risks, to continuously ensure and maintain ethical business operations and conduct and compliance with anti-corruption legislation.

The Company asks its business partners to notify the Company without delay through its whistleblowing system if, during business cooperation with the Company, they obtain information concerning any corruption incident, unethical or irregular conduct involving the Company or its Employees, or any suspicion thereof. Further information is available in the Whistleblowing Policy on SMP's official website (https://smpsolutions.hu/#/).

Reports may be submitted through the following channels:

- **By post: 1138 Budapest, Madarász Viktor utca 47-49, Building 2, 3rd floor**
- **By e-mail: visszaeles_bejelentes@smp.hu**
- **By telephone: +36 1 412 2540**
- **In person: Varga Ádám (HR Director**)

Reports are investigated by an ad hoc Ethics Committee of at least three members appointed by the HR Director.

No reporting person shall suffer retaliation, discrimination or any other unfair treatment!

1.2 Scope of the Policy

The personal scope of this Policy extends to the Company's managers, employees, persons engaged under other work-related legal relationships, temporary agency workers, interns and individual subcontractors providing services to business partners on behalf of the Company, insofar as they have any relationship or communication with the Company's business partners.

SMP may engage only Employees and business partners who accept this Policy as binding when entering into the contractual relationship and undertake to comply with its provisions when acting on behalf of or in the interests of SMP. SMP's management shall ensure that SMP's Employees and business partners become familiar with the Policy without delay, accept it as binding and ensure that all Employees and business partners comply with it when acting on behalf of or in the interests of SMP.

This Policy does not apply to matters governed by the Organisational and Operational Rules, the Quality Management Manual or the Deed of Foundation, and it does not establish rules contrary to the Organisational and Operational Rules, the Accounting Policy or the Information Security Manual. In the event of conflict, the provisions of those documents shall prevail.

Compliance with and enforcement of this Policy is a key responsibility of all Company employees. Any breach is regarded as serious misconduct and may result in appropriate disciplinary measures.

1.3 Legal consequences of non-compliance

Applicable laws, requirements and other internal rules must be respected and complied with in the performance of work**.**

Employees and business partners acknowledge that failure to comply with this Policy may endanger or harm SMP's reputation and may result in supervisory measures, including warnings, fines, damages and compensation for non-pecuniary harm**.**

In the event of non-compliance, SMP may apply the consequences provided for in the relevant employment, agency or other work-related agreement and may enforce any applicable criminal-law or civil-law consequences of the infringement**.**

1.4 Copies of and access to the Policy

The Company publishes all documents forming part of its policies electronically so that all affected Employees may access and read them whenever necessary.

SMP reserves the right to amend this Policy unilaterally. In the event of an amendment, SMP shall notify Employees and Sales Partners through the electronic platform available to them or in person.

This Policy is also available on the official website of SMP Solutions (https://smpsolutions.hu/#/).

1.5 Related policies

SMP's other internal policies affecting Compliance, in particular:

- Compliance Policy (SMP_01_014),

- Code of Conduct (SMP_01_017),
- Data Management and Information Security Policy (SMP_01_004),
- Anti-Corruption Policy (SMP_01_015),
- Whistleblowing Policy (SMP_01_008),
- Partner Vetting Policy (SMP_01_012),
- Equal Opportunities Policy (SMP_01_013),

shall be interpreted consistently with this Policy and with due regard to its requirements.

If there is any discrepancy between this Policy and another SMP policy, the Compliance Policy shall apply to compliance-related matters concerning the prevention of misconduct by Employees and Partners and the maintenance of prudent operations.

2. POLICY PROVISIONS

2.1 Respect for human rights and ethical employment

The Company expects all partners to respect the human rights of all persons concerned. Accordingly, all business partners must refrain from business practices that violate human rights and must exercise due care in business decisions, particularly regarding their potential impact on the enjoyment of human rights.

Business partners are expected to apply fair employment practices and to exercise rights in employment relationships in accordance with their intended purpose. The Company rejects all forms of forced labour and child labour and other unethical employment practices, including withholding wages or statutory benefits, denying sick leave or rest periods, and abusing alternative forms of employment.

2.2 Health and environmental protection

SMP expects its business partners to prevent personal injury, environmental damage and hazards and to reduce health, safety and environmental risks.

They must therefore always conduct their activities in compliance with applicable occupational-safety and environmental rules and in a manner involving the lowest possible environmental impact and the lowest possible health and workplace-safety risk.

The Company applies zero tolerance to drug use and excessive alcohol consumption. Accordingly, employees and other contributors of business partners may not use drugs at SMP workplaces or work under the influence of alcohol, narcotics or other psychotropic substances.

2.3 Equal opportunities, equal treatment and the prohibition of discrimination

SMP is committed to providing equal opportunities to everyone and expects all business partners to provide equal treatment to everyone in accordance with applicable law and the principle of equal opportunities. The Company expects every partner to refrain from

any conduct, measure, condition, omission, instruction or practice that constitutes direct or indirect discrimination or unlawful segregation.

2.4 Human dignity and mutual respect

Business partners are expected to create a working environment based on mutual trust, in which everyone is valued and human dignity is respected. SMP expects business partners to ensure respectful communication in both oral and written interactions. SMP regards harassment, defamation and insult as particularly serious violations of human dignity. The Company's business partners and their representatives must refrain from all forms of harassment, including intimidating, hostile, degrading or humiliating conduct or conduct capable of creating such an environment.

2.5 Fair trade and competition

The Company is committed to fair market conduct and expects business partners to perform their activities in accordance with the standards of fair competition and the letter and spirit of applicable law. In particular, business partners must not unfairly obtain or use information concerning another party's business operations, disclose or publish it without authorisation, or enter into agreements or engage in concerted practices with members of the Company or any other person where the purpose is to restrict, prevent or distort competition.

2.6 Prevention of insider trading

Certain employees of SMP's business partners may acquire inside information in the course of their daily work. They must not use it for financial gain or disclose it to unauthorised persons. Business partners are expected to take all necessary measures to prevent and prohibit insider trading.

2.7 Protection of reputation

SMP expects its business partners to protect the Company's reputation during and after the business relationship. Business partners must not, whether in connection with their economic activities or otherwise, publicly or privately, engage in conduct directly or indirectly capable of harming or endangering SMP's reputation. In particular, they must exercise their freedom of expression in a manner that does not harm SMP's reputation. The Company also expects each business partner to ensure compliance with these requirements by all its employees and other third parties under contract with it, including subcontractors, business partners and suppliers.

2.8 Prohibition of corruption and bribery

SMP does not tolerate any form of corruption, including bribery, facilitation payments, kickbacks, extortion, trading in influence, abuse of power for personal gain, and undue advantages or gifts provided with intent to influence, whether in the private sector or among persons operating in the state or municipal sector, and expects the same from its business partners.

SMP strictly prohibits all persons acting in its name, on its behalf or in any way in its interests from offering, giving, requesting, accepting or receiving an undue advantage. Business partners may not use payments or assets originating from the Company for improper influence in any form. The Company acts in this manner, and expects the same from its business partners, even if this places SMP at a competitive disadvantage or causes it to lose a business opportunity. SMP selects its partners transparently and free from improper influence. Business partners are therefore expected to act in accordance with these principles in their relationships with the Company, particularly regarding business gifts and hospitality, and to refrain from any conduct that could create even the appearance of improper influence.

2.9 Combating fraud and money laundering

Business partners are expected to act in good faith and in accordance with applicable rules and requirements, support the fight against fraud and not tolerate fraudulent business practices.

Business partners must never participate in transactions intended to support criminal offences, use or conceal the origin of criminal proceeds, or finance terrorism, and must comply with and apply the anti-money laundering rules applicable to them.

The Company further expects every business partner to take reasonable and appropriate measures, proportionate to its organisation's size, available resources and risk exposure, to identify its business partners and assess their integrity.

2.10 Accurate records, reporting and the integrity of business processes

SMP's business partners must maintain financial, accounting and non-financial records honestly, accurately and objectively, prepare their reports and statements accordingly, and apply lawful and ethical accounting practices presenting a true and fair view of the Company's operations. Falsification of records or misrepresentation of facts is neither justifiable nor acceptable.

2.11 Avoidance of conflicts of interest

Employees and Partners must ensure that their own interests do not conflict with their obligations towards SMP and Customers. A conflict of interest arises where parties seek to achieve different objectives because they have different economic or personal interests. Conflicts may arise in particular in relation to gifts, hospitality, the award of engagements, transactions in financial instruments, corruption, fraud and market abuse.

A conflict of interest exists where the interests of SMP, its Employees or Partners and its Customers are opposed. Conflicts of interest may primarily arise between SMP's managers, Employees or Partners and Customers, as well as between Customers themselves.

SMP aims to identify situations indicating a conflict of interest and, as far as possible, avoid such conflicts. In individual cases avoidance may not be possible. In such cases, the priority is to resolve the situation with due regard to the Customer's interests. If this

is not possible, the Customer must be informed and may decide whether to continue the business activity despite the conflict.

2.12 Protection of corporate assets

The Company's business partners must assume responsibility for the integrity and proper, economical and efficient use of SMP assets and resources entrusted to them or to which they have access, and must use them solely for lawful and approved business purposes.

2.13 Protection of trade secrets and intellectual property

SMP's business partners must treat and preserve as trade secrets all data and information acquired in the course of their activities concerning the Company, its group companies and third parties, their commercial relationships, transactions, operations, financial position, investments, negotiations, economic performance and plans, business activities, counterparties, customers and suppliers, related documentation and data media, and solutions, facts, data, knowledge, ideas, concepts and other information created or collected during their activities. They may not use, transfer, publish or otherwise make such information available outside the group of persons designated by the authorised party, whether for their own benefit or that of a third party.

Business partners must not disclose to unauthorised persons any information obtained in connection with their relationship with SMP and the performance of their activities where disclosure could adversely affect the Company or third parties, where SMP has designated the information as confidential, or where the partner should have recognised its confidential nature. As information, data and knowledge are critical assets, every business partner is responsible for protecting the confidentiality and integrity of data created, modified, transferred, shared, stored or used during the business relationship with SMP, regardless of its physical location or format, including electronic, paper-based or other formats.

SMP respects the work and intellectual-property rights of others and expects the same from its partners.

2.14 Data protection and data security

Particular care must be taken when receiving and retaining data, including Customer data, records and documents containing trade secrets. Applicable rules on data protection, insurance secrecy, banking secrecy and trade secrets must be strictly observed, and it must be ensured that others cannot access, use or destroy such information. Personal data may be requested, processed and used only within SMP's professional activities and in compliance with data-protection and confidentiality requirements. Personal access credentials must be treated confidentially and must not be disclosed to third parties. Detailed rules are set out in SMP's Data Protection and Data Security Policy (SMP_01_004).

3. FINAL PROVISIONS

The Company’s Partner Code of Conduct shall be published in the customary manner at the Company so that all Employees and Partners may become familiar with it.

This Policy is also available on the official website of SMP Solutions (https://smpsolutions.hu/#/).