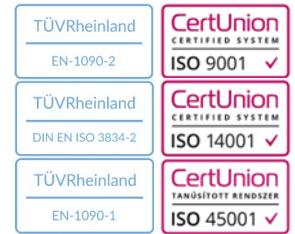




CODE OF BUSINESS CONDUCT

WEINBERG '93 KFT.



“The management of Weinberg, including myself, belongs to a generation whose outlook on life is imbued with straightforwardness, conscientiousness, and the sanctity of one's word. These are the values we represent and pass on to our successors and colleagues. We have learned that when we look each other in the eye and shake hands, it signifies a commitment that will be fulfilled. For a handshake is not merely a gesture; it reflects trust, credibility, and responsibility toward the other party, as well as respect and appreciation. Maintaining good relationships with our partners and personal trust continues to play a central role in the life of the company. This is what strengthens our business relationships and drives our business lines forward.”

István Derczó, owner of Weinberg '93 Kft.

Foreword

Weinberg Építő Kft., founded in 1993, is a 100% privately owned Hungarian construction company, which has won numerous awards in the relevant business sectors it operates, i.e. general construction and steel structure manufacturing. Over the last 30 years we have been able to continuously increase our market share, turnover, volume of construction and building activities. Today, with around 300 employees, we have grown to be one of the leading companies of the Hungarian construction industry.

Ethical and law-abiding behaviour is an important part of our company culture. To ensure that our employees, customers, business partners and suppliers continue to consider us as trusted partner, it is essential that we always demonstrate integrity, respect and honesty towards our employees, customers, subcontractors and competitors.

In our day-to-day decision-making and operations, it is expected to consider and comply with the laws, standards and practices of all business environments in which Weinberg operates. All employees are required to be aware of and comply with applicable regulations within their area of responsibility.

This Code of Business Conduct, in line with the Code of Ethics for Construction Contractors, is a comprehensive set of standards of conduct, operating standards and rules of behaviour that sets out the Company's principles and expectations for ethical and compliant behaviour, as well as good working practices together with the Company's corporate philosophy and internal policies.

Scope of the Code of Conduct

Our Code of Business Conduct applies to all employees of Weinberg '93 Építő Kft., to all decision-making processes and in all areas of the Company.

In addition to our employees, the Company expects all of its workers, representatives, subcontractors, business partners and other stakeholders having a business relationship with us to conduct their work and other activities affecting Weinberg in full compliance with the Code of Business Conduct.

No deviation from the Code of Business Conduct is allowed.

Our corporate philosophy

Our mission is to **make a difference in the world of construction**. We are committed to achieve our vision of becoming a leader in the construction and steel structure industry, both in our home country and on the international market.

In the spirit of our slogan *"BUILD Together!"*, **we build together** with our clients, partner enterprises, business partners and employees. We believe in the power of working and creating together.

In all cases, our actions are guided by four Core Values of the Company.

Sustainability

Being a responsible and environmentally conscious company, we strive to use environmentally friendly solutions, low-emission and green technologies.

We obtain an increasing share of the energy required for our operation from renewable sources, and by reducing our emissions and energy consumption, we are constantly trying to reduce our ecological footprint. We stand for a responsible approach to protect our environment and conserve natural values and resources.

Reliability

Our business conduct is driven by integrity, ethics and full compliance with the laws that apply in the setting where we operate. Our most important message to our customers is honesty, fairness and responsibility. Our goal is to make Weinberg '93 name synonymous with high quality, stability, cooperation and long-term business relationships in our country and throughout Europe.

Expertise

The Weinberg brand is a guarantee of professionalism.

The professional recognition we have gained over the past three decades, as well as numerous national and international references, are testimony to the exceptional quality of our professional work.

We are committed to continuously develop our expertise, to apply unique and innovative technical solutions, to meet the *design and build* needs, and to continuously improve the quality, content and complexity of the services we provide.

People-centered approach

In our business, we pay particular attention to the human aspect, both in the workplace and in our surroundings.

We consider our employees as family. We value commitment and mutual respect, a positive working environment and a modern, healthy and safe workplace.

We work in close cooperation with vocational schools and higher education institutions of the region; in the context of corporate social responsibility, we support local education, churches, cultural organizations and sports; and we actively participate in professional organizations and chambers. We care deeply about the development of Zemplén region and the preservation of local values.

Workplace behaviour

Weinberg '93 Kft. recognises, respects and expects all its employees to respect fundamental human rights, particularly the rights to human dignity, physical

integrity and health, privacy, honour, reputation and the protection of personal data, as well as protection against discrimination.

By showing good behaviour, each of our employees has an individual responsibility to help ensuring that our workplace is free from any form of misconduct, harassment and discrimination. All of us are expected to follow the rules of courtesy and prudence towards our colleagues, and all others associated with the Company.

Our employees must not engage in any conduct, either at work or outside of work, that could harm Weinberg's good reputation or legitimate interests.

General respect

We expect our employees to do their jobs with integrity and respect, to be courteous and considerate of others, and to respect the personalities and individual values of their colleagues.

We shall be considerate of others' work-life balance, and show understanding of our colleagues' family or personal situations.

We shall acknowledge our own mistakes, encourage feedback and share ideas.

Human dignity

We are committed to ensure that our employees can work in a safe, inclusive and undisturbed environment, free from any form of abusive or undignified behaviour. The Code of Business Conduct categorically prohibits all forms of workplace harassment, including any unwelcome verbal, written, physical or psychological conduct that may violate human dignity and may intimidate or humiliate others.

Equal treatment

We strive to provide a working environment free from discrimination and disadvantage, while supporting diversity and seeking to take advantage of individual differences. The Company will not tolerate any unjustified differentiation which undermines equal opportunities, whether in recruitment and selection, employment, compensation and benefits, promotion, training, transfer or dismissal.

Particular care is taken to respect the requirement of equal treatment, namely non-discrimination on the grounds of age, sex, marital status, national or ethnic origin, religion, political opinion, sexual orientation or any other grounds.

Human rights

We employ our workers within the framework of legal employment. This includes, particularly but not limited to, employment in full compliance with the labor law, fair remuneration, increased respect for the principle of equal treatment, compliance with the rules on statutory working hours, overtime and vacation days, and the provisions on the employment of young workers.

We reject child labour, forced labour and all forms of modern slavery, and we will not accept such practices from any of our suppliers, subcontractors or business partners.

Within the legal framework, we are committed to the freedom of association and collective bargaining rights of our workers.

Sustainable development

Weinberg '93 Kft. is committed to minimize the environmental impact of its activities. In meeting our operational needs, we strive to take all reasonable steps to reduce our impact on the environment, reduce emissions and energy consumption, with a preference for alternative energy sources and waste heat recovery.

In our design and construction activities, we pay special attention to efficient insulation, energy-saving lighting and cooling/heating systems, the use of recycled materials, innovative design and construction methods, digital devices and intelligent building automation.

We make significant efforts to reduce and prevent waste and pollution during our manufacturing processes.

We also expect our employees to carry out their daily work in a sustainable and environmentally responsible way, to use our resources in a conscious, economical and responsible way, and to take the utmost care in the management and recycling of waste.

Health protection

We expect our employees to cooperate in maintaining safe working environment and healthy workplace conditions. The Company applies good health and safety practices to protect the health and ability to work of all its employees and to reduce potential work-related accidents, safety and occupational hazards.

Our employees are required to attend aptitude tests and regular occupational health examinations, to comply with general and personal hygiene rules at

work, and to make every reasonable effort to protect the health, safety and physical integrity of themselves and their colleagues – with particular regard to the proper wearing of work clothes, occupational safety and protective equipment.

Protection of corporate assets

In addition to their own personal safety and that of others, our employees are also responsible for safeguarding the Company's tangible and intangible assets, intellectual property and information.

Protection of tangible assets

Tangible assets include raw materials and products, machinery and equipment, electronic devices, facilities and buildings, commercial vehicles and cars, bank cards, printed and digital documents and records of the Company.

Employees of Weinberg '93 Kft. are obliged to use company assets handed over to them for use or safekeeping, with an obligation to return the assets or account for them, as intended, and with the help of appropriate security measures to prevent damage resulting from their loss, theft, destruction or excessive use.

Financial responsibility

Our employees are required to comply with internal rules on responsibility, approval and documentation for the usage of financial resources, and to ensure that resources are used solely for the intended business purposes, authorized in advance, in accordance with the relevant policies and procedures.

The obligation to use and conserve resources properly applies particularly to employees who decide or authorize the use of company resources on behalf of Weinberg.

Protection of intellectual property

All materials produced by Weinberg's employees, in whole or in part, in connection with their work, using company equipment, are considered company product and regarded as the Company's intellectual property. Our intellectual property is of inestimable value that must be protected, and may only be used by third parties with the Company's prior permission and under the appropriate contractual conditions.

The Company treats third-party intellectual property and intellectual creations, patents and discoveries, copyrighted or industrial law protected works, designs, logos and trademarks as confidential.

Protection of information assets

All employees are required to take the necessary precautions to ensure the proper usage and handling of the Company's data, as well as data entrusted to them by others and to prevent data from unauthorized access. In order to protect data, our employees can only disclose entrusted business information to persons who need to know and use the information to perform their duties. In some cases, this may require a confidentiality agreement, especially for confidential business information.

Protection of confidential business information

Confidential means any and all non-public business information created by or on behalf of the Company that the Company wishes to keep undisclosed for the purpose of gaining or maintaining a competitive advantage or any other value. Potentially all internal information shall be considered confidential until it has been disclosed by the Company through conventional channels.

Confidential business information includes but not limited to financial data, legal documents, detailed organizational charts, internal processes, production methods and know-how, sales, branding and business development studies, bidding and tender documents, business plans, as well as wages and personal data.

No confidential information obtained while working for Weinberg '93 Kft. may be used for personal interests or made available to unauthorized persons.

The confidentiality obligation applies during and after the legal relationship.

Weinberg '93 Kft. will investigate all suspected or actual violations of the policy on the protection of confidential business information and will take disciplinary action against any violators.

Information owned by others

We respect the intellectual property rights and confidential business information of others, including our competitors and our business partners.

All partner and customer information must be kept secure and prevented from being seen or accessed by unauthorized persons.

Our Company does not seek to obtain confidential information of our competitors, nor can our employees use unethical, unfair or otherwise unacceptable means to improperly obtain confidential information of competitors or other third parties.

Data protection and documentation

We will protect our data and documents against unauthorized access, misuse, loss, damage and premature destruction by all available, appropriate and adequate physical, electronic and organizational means.

Personal data

Considering the principle of purpose limitation, we collect, use, store, process and destroy personal data of our employees only to the extent and for the duration that is lawfully permitted by applicable law.

Our company fully complies with European and local data protection legislation applicable to personal data. Our employees are also obliged to comply with all relevant regulations and to do their utmost to protect information of this nature.

Records

We are committed to manage our business records, including but not limited to invoices, documents related to taxation, contributions and charges, other financial records and expense reports, quality reports, personnel records, payroll, working time and leave records, documents submitted to customers or regulators in accordance with applicable law.

We pay particular attention to the continuous availability of permits, employee declarations and documents required for the conduct of our activities in compliance with the law, as well as to the transmission of appropriate data to public and local authorities and organizations.

All employees are individually responsible for the proper management of company records under their supervision, including their maintenance, safekeeping, protection and archiving, regardless of the format of the records.

As required, it is equally important to carefully destroy the documents that have expired beyond their retention period and become obsolete.

It is prohibited to destroy documents that are subject to ongoing legal proceedings, administrative investigations or tax audits.

Electronic devices

The main purpose of the policies and regulations on the use of computing tools is to protect the Company's information assets, employees' personal data and information about external parties. Electronic devices

and systems, including computers, portable electronic devices and data carriers, smartphones, computer networks and electronic mail must be used responsibly and in accordance with Weinberg '93 Kft.'s Core Values and Information Technology Policy. Our employees must ensure the physical protection and safe use of the electronic devices entrusted to them.

To protect information, personal passwords to electronic company devices and systems must not be shared, as well as modifications to computing devices, such as installing private software or disabling virus protection are not allowed.

Relationship with business partners

We will always treat our business partners, customers, subcontractors, suppliers, competitors and third parties fairly, respectfully and ethically.

We are committed to ensure that all comparisons with our competitors are correct, complete, accurate and clear. To this end, it is prohibited to make misleading, discrediting, deceptive, untrue, false or defamatory statements about our competitors or their products.

Collusive bidding, price-fixing and any agreement to engage in unlawful business practices that aim at or result in restriction or distortion of free competition or in an unfair market division are especially prohibited.

We also expect the highest standards of fair business conduct from our subcontractors and suppliers.

Relationship with public partners

In all of our activities, we always strive to maintain constructive relations with public and local authorities and bodies in accordance with the law and regulations. We comply with the required reporting and administrative obligations, and pay our taxes, duties and other public charges on time.

When working with representatives of public and local authorities, our employees are required to make truthful and accurate statements and to behave in a cooperative and respectful manner.

Unless their job entitles them to do so, Weinberg '93 Kft. employees should generally avoid direct contact with civil servants, and that kind of communication should preferably be made through the Company's management or designated representatives.

Prohibition of corruption and money laundering

The Company has a zero-tolerance policy towards bribery, corruption and money laundering, and firmly rejects all forms of these.

Our employees must act in an ethical manner in both the public and private sectors. They must not offer, promise or approve payments, gifts, services or other benefits to influence the official proceedings or decisions of a public or civil servant for the purpose of obtaining or maintaining a business advantage. The same prohibitions apply when dealing with individuals or employees of other companies with whom the Company has or plans to have a business relationship.

Civil servants, business partners and other third parties may receive small gifts of nominal value or customary hospitality only, unless prohibited by law or the other party's business practices.

Employees of the Company can only pay transparent, documented and proportionate amounts for legitimate services and in no circumstances shall any payment be made that is excessive or may seem unfair.

Our employees are only allowed to accept small gifts of nominal value, business invitations, promotional services or hospitality of customary value.

Weinberg '93 Kft. will investigate all suspected or actual violations of its anti-corruption and anti-bribery policy and will take disciplinary action against any violators.

Conflict of interest

In all of our business decisions, we consider Weinberg's business interests alone. Our employees must carefully avoid any situation in which their personal interests, outside activities, their relationships with relatives or friends may conflict with the interests of the Company, or even appear to do so.

In case a questionable situation should arise, the Company's management will decide whether or not to approve or reject it, following a formal conflict-of-interest procedure.

Whistleblowing obligation

If any Weinberg '93 Kft. employee, other worker, representative, subcontractor, business partner or other stakeholder doing business with us becomes aware of any violation of the Code of Business Conduct, Company's internal policies published in the Employee Handbook, the law or any public authority

provisions regulating the Company's activities, they are encouraged to raise their concerns in a timely manner to resolve the issues as soon as possible and to avoid, prevent or mitigate any serious consequences.

In the case of employees, failure to comply with the whistleblowing obligation will in all cases lead to a disciplinary action.

Complaints or reports about unacceptable business conduct can be made in person through the whistleblower delegate in the first place, or:

- by phone at [+36209293911](tel:+36209293911),
- by e-mail to bejelentes@weinberg.hu.

Complaints or reports regarding the Company's personal data management activities may be made in person through the internal data management contact person in the first place, or:

- by e-mail to gdpr@weinberg.hu.

Following the verbal or written report, the Company will investigate the facts and circumstances alleged in the report. The identity of the whistleblower will be kept confidential by the Company, and special care will be taken in all cases to protect bona fide whistleblowers.

The Company will not tolerate any form of retaliation against any employee who makes a report in good faith.

The whistleblowing procedure is not intended for reporting individual complaints and grievances. Personal issues are handled by the Human Resources Manager and the immediate superior of the person concerned.



István Derczó, owner

Definitions and terms

Bribery: offering a payment, gift, service, preferential treatment or favour to obtain an undue advantage over others

Business Partner: any natural or legal person with whom the Company establishes a business relationship

Civil servant: any person vested with legislative, administrative, political, judicial or other official power, whether appointed or elected, in a state or local government

Code of Business Conduct: a comprehensive provision containing behavioural norms, operational standards and rules of workplace conduct, which sets out the Company's expectations of its employees

Company: Weinberg '93 Építő Kft. (abbreviated Weinberg or Weinberg '93) and its subsidiaries, members and affiliated companies together

Competitor: any company that serves the same target group with products or services similar to those of the Company, either directly or indirectly

Conflict of interest: a situation where there may be a conflict between the interest of an individual and the interest of the company or the public

Corruption: abuse of the power entrusted to a person holding public or private office in order to obtain an undue advantage for another natural or legal person

Employee: a natural person who works for the Company under an employment contract

Employee Handbook: a collection of internal policies and other documents of public interest that describe the Company's human resources practices

Information: any interpreted data, fact, method, experience, knowledge, news, intelligence and content that is of theoretical, practical, financial, economic value or benefit to the Company

Management: a decision-making body of Weinberg '93 Építő Kft., consisting of the executives and other managers, determined by the owner

Nominal: of negligible value, having no real or actual economic worth

Personal data: any specified data related to an identified or identifiable natural person, and any inference related to that person that can be drawn from that data

Policy: a document of principles and guidelines describing a specific subject, the purpose of which is to facilitate sound and consistent management and business decisions

Representative: any legal, organizational or business representative of the Company, any advisor, delegate, agent, lobbyist or other similar mediator acting on behalf of or representing the Company towards civil servants or business partners

Subcontractor: a business partner who performs subcontracted work on behalf of the Company, that is prime contractor or general contractor

Stakeholder: any natural person, legal entity, community or authority that has an ownership share, an interest, or is in any form involved in the business of the Company

Third Party: a natural or legal person who is currently not contractually linked to the Company, not acting on behalf of the Company, or not providing services on behalf of or for the Company

Worker: the Company's employees, including management and temporary employees, as well as any other natural person who has other legal relationship aimed at employment with the Company

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