



Ethical and Business Conduct Rules of the Magyar Vagon Group

Ethical and Business Conduct Rules of the Magyar Vagon Group

The Magyar Vagon Group's rules of ethics and business conduct define the standards of behavior expected within the group of companies and ensure that all employees and colleagues work within the same framework, avoiding the legal and business risks of violating the rules, developing a common corporate culture, and thereby increasing cohesion and trust.

The Magyar Vagon Group's rules of ethical and business conduct provide guidance on how to apply the group's values and standards in practice. The Magyar Vagon Group's rules of ethics and business conduct are binding on all employees and associates. They also apply to the Magyar Vagon Group's contractual partners on the basis of a separate contract or declaration, which must be ensured during the preparation and creation of contracts and legal relationships.

1. Prohibition of discrimination

The Magyar Vagon Group does not tolerate discrimination, harassment of any kind, or any other personal attacks against individuals or groups. We believe that diversity enriches the work environment and that we all work together regardless of our worldview, gender, ethnic background, culture, religion, age, disability, or sexual identity. According to our values, no job applicant, employee, or other external partner shall be treated unfavorably because of their identity.

2. Respect for political and religious affiliation

Employees of the Magyar Vagon Group are free to exercise their political rights and religion outside the workplace according to their own convictions, and as a result, they shall not be disadvantaged or advantaged in the workplace.

Employees of the Magyar Vagon Group are required to avoid any reference to the Magyar Vagon Group in their political, social, and religious activities, and must expressly refrain from presenting their opinions as the position of the Magyar Vagon Group.

Political, religious, and related activities must not give the impression that any company within the Magyar Vagon Group is committed to a particular party, church, or ideology. Employees of the Magyar Vagon Group are free to exercise their civil rights unrelated to their employment, and we respect their social involvement and commitment.

3. Expected behavior on social media platforms

The Magyar Vagon Group respects the privacy and social media presence of its employees, but has strict expectations in this area. If, as an employee, we share content on social media and identify ourselves as an employee of the Magyar Vagon Group, we are prohibited from publishing false or misleading information that damages the reputation of the group, those in a contractual relationship with the group, or our colleagues and managers. Furthermore, it must be made absolutely clear that the opinion shared by the employee is solely their personal opinion and in no way reflects the opinion or position of the Magyar Vagon Group.

4. Compliance with fair competition rules

The Magyar Vagon Group is committed to the principle of fair competition. We comply with competition law regulations. We do not enter into any illegal agreements with competitors that restrict competition. We comply with and enforce all applicable regulations in transactions involving countries, companies, and individuals sanctioned by Euro-Atlantic countries, the European Union, and Hungary.

5. Prohibition of corruption

We condemn all forms of corruption and apply a zero-tolerance policy in our business activities. If we encounter corrupt behavior in the course of our work, or if there is reasonable suspicion of such behavior, we report it to our supervisor and/or the Magyar Vagon Group's Internal Audit and Compliance Manager.

6. Acceptance of gifts

Business gifts and hospitality may only be accepted if they remain within the framework of general industry business protocol. We do not offer or accept business gifts and hospitality in exchange for obtaining an advantage. In case of doubt, we consult with our line manager and/or the Magyar Vagon Group Internal Audit and Compliance Manager.

7. Protection of company assets

Magyar Vagon Group employees are required to handle, protect, and use all Magyar Vagon Group assets, information, and knowledge with the expertise and care that can generally be expected, and in accordance with their intended purpose.

8. Protection of trade secrets

Magyar Vagon Group employees and contractual partners are required to maintain the confidentiality of any trade secrets or protected knowledge that come to their knowledge in the course of their work or activities.

9. Action against money laundering and terrorist financing

We only maintain business relationships with partners whose business activities comply with legal requirements, whose reputation is impeccable, and whose financial resources are of legal origin, thereby ruling out the possibility of money laundering and terrorist financing.

10. Conflict of interest

In accordance with the provisions of the law and the relevant regulations and instructions of the Magyar Vagon Group, our employees must avoid any conflict of interest arising in connection with their work or position, and must also strive to avoid the appearance of such a conflict. During their employment, employees may not initiate or enter into any employment contract with companies outside the Magyar Vagon Group that are engaged in the same or similar economic activities without the Employer's permission, nor may they engage in any identical or similar economic activities. Employees are required to report any actual or potential conflicts of interest or conflicts of interest between themselves, their relatives, their own or their relatives' business interests and the interests of the Magyar Vagon Group. Employees who engage in the same economic activity alongside their work are required to report this to their manager for approval.

11. Information protection

The Magyar Vagon Group shall take all necessary measures to ensure the careful handling and use of protected and confidential information that comes into its possession or is generated in the course of its operations. It shall ensure the confidential and secure handling of information obtained from others in the course of its business operations.

12. Respect for personal data, data protection

We collect and handle the personal data of Magyar Vagon Group employees and other personal data that comes to our knowledge in a confidential manner, exclusively for legitimate and predetermined purposes, in a transparent manner. The Magyar Vagon Group is committed to complying with the relevant rules and the General Data Protection Regulation (GDPR) when processing personal data.

13. Application of ethical and business conduct guidelines to contractual partners

Contractual partners are expected to take into account and undertake to comply with the provisions of this policy. The Magyar Vagon Group informs its business partners in writing about the contents of the ethical and business conduct policy in its contractual relationships.