

**Annex 1:**

**Director General's Order no. 28/2021/1**

**On BKK Zrt.'s**

**Business Partner Code of Ethics**

**BKK Centre for Budapest Transport (hereinafter referred to as: BKK or Company)** is deeply committed to fair and ethical business operations, while carrying out its activities and also in relation to the provision of its (public) services and does its best to make its consistent representation also in its business partnership.

BKK's Business Partner Code of Ethics pertaining to BKK's Code of Ethics specifies the norms we consider particularly important in our business relations, and we also expect our business partners to comply with these norms. This, however, is not interchangeable with BKK's entire Code of Ethics that we kindly request and advise our business partners to familiarise themselves also with that document.

Business partners include BKK's suppliers, contractors, service providers, customers, partners, advisors, sponsorship or corporate giving co-operation and BKK's other contracted partners, whom BKK expects to follow the highest standards of business ethics including but not limited to the following.

- 1. Ethical values** – BKK's business partners are expected to adhere to the ethical values of sustainable operation, the public service provider's liability, personal responsibility, professional excellence, transparency, cooperation, leniency, fairness and justice as described in BKK's Code of Ethics.
- 2. Human rights** – BKK's business partners shall respect human rights during their operation, including, but not limited to:
  - right to life and dignity,
  - right to liberty and security of the person,
  - right to the highest attainable standard of health,
  - right to just and favourable working conditions, to fair pay and decent living conditions and adequate standard of living,
  - right to form and join trade unions and to the collective negotiations,
  - right to freedom from all forms of forced or compulsory or child labour,
  - right to freedom of opinion and religious belief and peaceful assembly,
  - right to rest, free time and regular paid leave.

- 3. Fair labour practices** – BKK’s business partners shall not tolerate any form of forced, bonded and child labour, in addition shall commit themselves to implementing a fair policy of employment and remuneration in compliance with applicable law.
- 4. Health, safety and environmental protection** – BKK’s business partners – regardless of their core activities – shall comply with the relevant applicable health, safety and environmental protection-related laws and regulations at all times and also shall meet the requirements regarding the establishment and provision of healthy and safe working conditions along with the content of relevant internal company policies on BKK’s service premises. In the course of their activities they shall be in possession of the specified and required environmental licences and permits and shall also apply precautionary approach in relation to environmental protection challenges.
- 5. Prohibition of discrimination** – Employment-related decisions shall be made on the basis of relevant and objective criteria. BKK’s business partners shall not discriminate against anybody on the grounds of any professionally non-relevant trait or situation like gender, marital status, age, ethnic origin, colour, religion and political conviction, disability or sexual orientation. Employment-related decisions cover – including but not limited to – rules regarding employees’ hiring, promotion, redundancy and relocation, training and professional training, labour protection and working conditions, such as working hours and the wage-system.
- 6. Communication** – BKK’s business partners are expected to follow the highest standards of conduct in all verbal and written communication based on mutual trust. BKK’s business partners shall not engage in such behaviours that could be characterised as offensive, intimidating, humiliating, malicious or insulting.
- 7. Information security** – BKK’s business partners shall keep each and every business data confidential, in line with the applicable confidentiality agreements. Business partners shall take appropriate security-related measures to ensure the confidentiality and completeness of data and also their accessibility to entitled entities. Business partners shall respect that valuable information, confidential ideas, strategies and other operational and business data developed at BKK are considered business property and in certain cases, they are protected by copyright as intellectual creation.
- 8. Protection of personal data** – BKK’s business partners shall respect others’ privacy and also comply with the regulations in relation to protection of personal data; they shall collect and manage solely the required personal data; furthermore, they shall provide due information to affected entities specified by the legal regulations. BKK’s business partners

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shall take appropriate security-related measures to ensure the confidentiality and completeness of personal data and also their accessibility to entitled entities.

- 9. Avoidance of corruption, fair business** – BKK’s business partners are forbidden to use inside information unlawfully for their financial gain and to share inside information with entities not entitling to them. Business partners are forbidden to spread fake market information.

BKK’s business partners shall never ever endanger the completeness and authenticity of financial declarations and reports and shall engage in lawful and ethical practices at all times.

BKK’s business partners shall be committed to business activities free from all forms of corruption and bribery, including the provision of bribes, abuse of influence and other fraudulent practices. This commitment shall include staying away from offering or giving and the rejection of propositions of any kind of benefit, or any such attempts made to, by or on behalf of their employees, organisations or intermediaries aiming at unlawfully influencing or deceiving anyone.

- 10. Prohibition of money laundering and fair competition** – BKK along with its business partners do not support, rather prevent the laundering of money or things of a monetary value originating from criminal offenses via activities exposed to the threat of money laundering and the supporting of terrorism with money or things of a monetary value.

BKK’s business partners shall carry out their activities, in compliance with the rules of fair competition and also with the rules of transparent, lawful and fair public procurement. BKK does not support the unethical practice of withholding payments or ‘chain of debts’ in its value chain and BKK’s business partners shall apply measures to avoid such circumstances.

- 11. Compliance with domestic and international trade restrictions** – BKK’s business partners shall comply with and make all efforts to follow all applicable trade rules, controls, restrictions, sanctions and import-export embargos. BKK’s business partners are expected to disclose every related information if they or any of their affiliates are affected by such measures.

- 12. Avoiding conflict of interests** – BKK’s business partners shall not engage in relations with BKK company employees in a way that could cause conflict of interest, including but not limited to:

- Employing persons who are employees of any BKK Group company (except in case of dual employment agreed by the relevant BKK Group company);

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- allowing employee of any BKK Group company to personally invest, acquire property or shares in their companies, except of acquiring shares of publicly listed companies.

BKK's business partners are expected to avoid and disclose any further situation that could cause – or apparently cause – conflict of interests with BKK. (This phase strictly and expressly relates to the conflict of interest with business partners based on financial interest, as the prohibition of the conflict of interest with relatives is specified in point 2.3. of BKK's Code of Ethics.)

**13. Assets** – BKK's business partners shall make responsibility for the integrity, proper and economical use of assets operated and utilised by BKK as a public service provider along with assets covered by public good, to which they have access in the framework of the business partnership or to which the scope of their business activities common with BKK extends.

**14. Products and services** – BKK's business partners shall strive for quality, safe and secure product or service. BKK's business partners shall provide the highest attainable quality and safest delivery that can be expected according to product and service specifications; supply timely; disclose true, reliable, precise and clear information to every customer and do not worsen deliberately or negligently expected quality excellence.

This Business Partner Code of Ethics is applicable to BKK's partners. We introduce its content to both the possible future and the already-existing partners and expect our partners to entirely meet and enforce its stipulations.

To our partners, BKK provides guidelines on how to meet the business-ethical expectations and on how these are evaluated by BKK. BKK's business partners shall ensure that all of the affected entities could familiarise themselves with the above-described expectations and their application.

While performing BKK's activities and also its tasks in relation to public services provided by BKK, a universal expectation that we set for each and every employer and employee is that they familiarize also our partners with our company's commitment to the compliance of high level legal and business-ethical requirements.

Our internal guidelines lay down and specify the norms of conduct to be met during our operation and work, among others, in relation to favours, conflict of interest, corruption, competition law and confidential information. We encourage both BKK's staff and BKK's business partners to consider the requirements of ethical conduct on a continuous basis.

**BKK Compliance Department’s whistle-blower line to which integrity violation, corruption and ethics-related issues can be reported is, as follows:**

- Postal address: BKK Compliance, 1075 Budapest, Rumbach Sebestyén utca 19-21.
- E-mail: [compliance@bkk.hu](mailto:compliance@bkk.hu)

For further information, please visit: [www.bkk.hu](http://www.bkk.hu)

In case you have any ethics-related question or complaint or you wish to report an unethical conduct, please feel free to turn to BKK’s Compliance Department through one of the above-described contacts. BKK will not tolerate any retaliation against people reporting compliance issues or raising concerns in good faith.

**BKK has a “zero tolerance” policy on corruption, cartels, major human rights violations and breaches of health, safety and environmental protection rules.**