



BUDAPESTI  
KÖZLEKEDÉSI  
KÖZPONT

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

on BKK Zrt.'s

Code of Ethics

### BKK CENTRE FOR BUDAPEST TRANSPORT

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## **EXECUTIVE MESSAGE**

Dear Colleagues,

Our colleagues' knowledge, experience, talents and the enforcement of our company's values all guarantee the successful activities and acknowledgement of BKK Centre for Budapest Transport. Our roles played in Budapest's transport management give particular importance to the ethical requirements expected from BKK's managers and employees.

By compiling this Code of Ethics, BKK gives expression to the fact that it is bound by this Code of Ethics and beyond the compliance of legal regulations and internal guidelines in force, the company wishes to follow each and every moral value and principle as guidelines, which contribute to the performance of professional work to the best of the employees' knowledge, to the accomplishment of common goals and also to the protection and enhancement of the company's traditions and good reputation as well as its corporate and professional integrity.

Through our activities, we all endeavour and work on to promote the establishment and maintenance of trust inside and outside BKK and also the appreciation of the professional activity and operation. Our aim is to achieve that these norms could be present both in our decision making and also in our everyday operation, by permeating the company's entire operation. We are doing our best to make these norms clear and liveable for our customers who are using our services, for our partners, for our owners and also for our colleagues alike.

On one hand, this Code of Ethics collects the values and principles generally expected from BKK's staff, on the other hand, specifies the requirements of colleagues' job position (hereinafter collectively referred to as: ethical norms).

This Code of Ethics is a compilation of directives, not enabling to cover each and every business situation, however some examples are given, describing the essence of our operation. In case you have concerns or doubts in relation to any topic specified in this Code, please feel free to turn to your team lead, superior or to the department being in charge of our company's compliance policies. I expect the entire BKK community, my colleagues to carry out their work, by meeting the spirit of this Code.

We all bear responsibility for BKK's fame and corporate image. I am well aware of the fact that I can count also on you to achieve that the focus could be put on integrity, sustainable business practices as well as on the provision of services of the highest possible level, by and while performing our company's activities. I expect each and every colleague working at our company to behave irreproachably every single day, by taking into consideration and also meeting the ethical norms, regardless of the job position, with no exception. We are proud of the significance of mandate received from the representatives of the Hungarian capital, our operation's level, the demand regarding the continuous development of services provided by our company and also the members of BKK's community. Let us keep up the good work and strive for the operational excellence.

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## **PREAMBLE**

Based on the legal powers in force, the Municipality of Budapest appointed **BKK Centre for Budapest Transport** (seat: 1075 Budapest, Rumbach Sebestyén utca 19–21; company registry no.: 01-10-046840, hereinafter referred to as: **BKK** or **Company** or **Employer**) as Budapest's transport organiser.

The work done at publicly-owned business organisations (BKK is fully-owned by the Municipality of Budapest) has significant moral values in itself, however responsibility in relation to public service provision imposes high-level professional requirements for the staff meeting such duties. This responsibility and expectation mean a stricter general moral standard to meet the general moral requirements by entities working for Budapest and its passengers, based on the authorization given by Budapest's residents.

At BKK, we are well aware of the fact that more and more passengers getting about in the Hungarian capital opt for the city's public transport services, walking, cycling and other alternative options compared to private car use. Therefore, the company not only provides transport options to Budapest's residents as well as to other passengers visiting and getting about in the Hungarian capital. We truly believe that our work is much more than this. Transport builds human relationships, boosts economic opportunities and makes connections.

Responsibility pertaining to and taken in relation to our work requires BKK's each and every employee and employer to carry out their job, meeting the highest level of moral and business-ethical principles in all cases in connection with the company's operation field and to conduct themselves in a manner, which is following the generally expected ethical norms.

## **1. GENERAL PROVISIONS**

### **1.1. Objective and scope of this Code of Ethics:**

- 1) The objectives of this Code of Ethics are the following:
  - a) to specify and lay down the ethical and behavioural rules applicable to the company's employees;
  - b) to provide help in order these rules could be kept;
  - c) to inform the public on the behaviour expected from the staff;
  - d) to save the company's staff, on one hand, from involvement in misconduct-related attempts, on the other hand, from arbitrary and unlawful measures taken by the employer and also from unsubstantiated accountability.
- 2) The personal scope of this current regulation extends to persons having employment relationships or having legal relationships on the basis of a service agreement with the company.

### **1.2. Principles, BKK's Organizational Values**

- 3) The principle-based ethical requirements, the generally- and universally-expected behavioural patterns and norms concerning the company's staff are the following:

#### **1.2.1. Liabilities and duties of the public service provider**

- 4) To provide public services to the community of Budapest's residents as well other persons getting about in the Hungarian capital:
  - a) we identify the community interest with the totality of the interests of Budapest's residents and with those of persons getting about in the Hungarian capital,
  - b) contrary to the individual and group interests, we give preference to the interests of the company, hence to those of the traveling community, we provide public services to the community of Budapest's residents and other persons visiting and getting about in the Hungarian capital,
  - c) we make the most of the available human, social, economic and environmental resources duly consciously, serving the interests of the community of Budapest's residents and other persons getting about in the Hungarian capital the best possible ways.

d) we refrain from such activities, which could raise doubts over partial and ethical work and all other situations, which could lead to undue influence.

### **1.2.2. Professional excellence**

5) Priority of professionalism-related aspects, while carrying out activities:

- we carry out our activities, in compliance with legal, moral-ethical and professional requirements,
- we do our best to fulfil our tasks and duties on the highest possible level, with the intention to eliminate probable deficiencies and errors as soon as possible,
- in every single case, we act regardless of private and political interests,
- we clearly separate our work-related activities from other activities done in an advocacy group or social organization and from those done in a trade union and/or works council,
- we apply the trade-related expertise properly and carry out every single element of our work, in compliance with the rules of the profession and we also update and develop the professional knowledge on a continuous basis,
- by transferring experience, we support our staff's professional development, we preserve, expand and share the knowledge accumulated in the organization.

### **1.2.3. Personal liability**

6) Tasks are fulfilled with the importance of decisions, declarations and actions in mind, in a responsible manner and being committed to our values, in full compliance with the rules:

- we carry out our tasks and obligations duly consciously and responsibly, in good faith, meeting the legal frameworks and the ethical norms and we also respect and protect the rights of any kind of stakeholders,
- we enforce the equal opportunities-related factors and apply equal treatment for our staff, customers and business partners alike,
- both inside and outside the workplace, we comply with the relating legal, moral and ethical requirements in an exemplary manner and we are also committed to making them kept,

- during the decision-making process and the fulfilment of tasks, we take into consideration the conceivable social, economic and environmental consequences,
- we do our best to improve the work standard on a continuous basis.

#### **1.2.4. Transparency**

##### **7) During the transparent performance of tasks:**

- we provide access to data of public interest and also to public data of public interest to the persons concerned the simplest possible way, free-of-charge and under equal conditions,
- every single process of our work can be reviewed and monitored and also information on our work manner can be obtained,
- for the sake of the transparent organizational operation, we document the processes of work properly,
- our operation and decision-making processes are conducted by generally-known and generally-represented principles and values: we truly believe in open, straight, direct communication, our activities can be monitored, our relationships are characterized by openness and we consider information a common resource.

#### **1.2.5. Cooperation**

##### **8) Cooperation with different stakeholder groups during the fulfilment of tasks:**

- within the constraints imposed by legal regulations, we establish and maintain the tightest possible cooperation with state-owned and municipal entities and also with publicly-owned economic companies,
- our partners' satisfaction makes us satisfied too, therefore we cooperate with stakeholders, in order we could enforce and serve more efficiently and successfully the interests of Budapest's residents as well as those of other passengers wishing to get about in the Hungarian capital,
- we take into consideration progressive solutions that are acceptable for the greatest possible number of stakeholders and search the common ground and point of reference to break down barriers to common goals, therefore we conduct substantial dialogues with the representatives of the relevant social groups, by ensuring public consultations in the community's interest.

- we facilitate open communication even with our external work-related contacts and customers in connection with the decisions made and activities taken about our operations,
- we engage in conduct with our customers and partners alike, meeting the business and ethical principles and fulfil our tasks, not discriminating persons or any of their groups,
- within the constraints imposed by legal regulations, we make decisions fairly, on the basis of considerations of real circumstances,
- we strive to enhance and maintain trust in our company and apply rules also in a morally right manner,
- we avoid engaging in extreme conducts; behaving in such a manner, which strengthens trust in publicly-owned economic companies and their staff,
- during working hours, we are dressed and behave in a manner, which strengthens our workplace's appreciation.

#### **1.2.6. Sustainable operation**

**9)** During the fulfilment of our tasks, we apply the sustainability-related approach in connection with our company's activities:

- in favour of climate protection and the healthy lifestyle of Budapest's residents, we are striving for the development and long-term operation of a state-of-the-art, customer-oriented, sustainable public transport.
- we are doing our best on a continuous basis to enhance trust in our company, therefore to apply aspects of sustainable development and operation that are even morally right,
- we would like to emphasize that making public transport sustainable and accessible has a favourable impact also on several other fields (air pollution, climate protection, use and liability of public spaces, sizes and quality of green areas and even equal opportunities through accessibility).



## **2. DETAILED RULES**

### **2.1. Additional requirements applicable to the company's directors:**

#### **2.1.1. Directors as exemplary role models**

**10)** In case of senior-level positions, fulfilment of tasks in an exemplary manner:

- enhanced compliance with legal and moral requirements expected by employees,
- facilitation of employees' behaviour, which meets legal and moral requirements, by leading by example,
- fulfilment of obligations covered by the senior-level job in an exemplary and responsible manner.

#### **2.1.2. Support**

**11)** In case of senior-level positions, support of employees in the fulfilment of tasks:

- conveyance of information required for effective work by setting clear and realizable objectives,
- acknowledgement and evaluation of employees' performance, by promoting the development of their skills and professional knowledge,
- if required, protection of employees from every single illegitimate or unethical attack, which is caused as a reason of their work.

#### **2.1.3. Monitoring, evaluation**

**12)** In case of senior-level positions, consistent monitoring and evaluation of employees' legal and ethical obligations:

- consistent monitoring of work by legitimate and ethical means on a regular basis,
- leaders shall evaluate employees' performance regularly, based on objective professional aspects, also by taking equity into consideration and act fairly, duly and impartially, in case errors, neglect or probable misconduct is observed.

#### **2.1.4. Enforcement of professional aspects**

**13)** Holders of a senior position shall enforce primarily professional aspects in the decision-making process:

- in order to ensure the realization and execution of the goals set,
- holders of a senior position shall take actions, ignoring personal, political and private interests and avoiding any form of power abuse.

### **2.2. The company's activities undertaken in relation to ethical expectations**

#### **2.2.1. Equal opportunities and treatment**

**14)** The company strives to maintain safe, professional and diverse corporate culture, which is based on respect and tolerance and is free from abuse and discrimination.

**15)** The company strives to create and maintain such a working environment, where individual differences are accepted and appreciated.

**16)** Such discriminatory acts and bullying are forbidden that are based on a given person's real or perceived characteristic traits (e.g. gender, race, age, disability, ethnicity, religion, etc.)

**17)** As an ethically operable business partner and liable employer, the company generally enforces the aspects of equal treatment and opportunities.

**18)** The company enables accessibility to its public services for every single person, by taking into consideration special demands on an equal basis.

**19)** The employer is committed to ensuring equal chance to everyone in various areas of life, or at least mitigating disadvantages of individuals belonging to disadvantageous groups. In the framework of which:

- the employer acknowledges equal opportunities independent from gender and strives to enforce the principle of gender-based proportional representation;
- acknowledges the right of employees with disabilities to employment and ensures that these people do not suffer from any disadvantage and discrimination compared to their peers;
- supports employees with family/small children and also persons who are out work due to their childcare-related leave;

- supports employment of persons aged 50+ or persons just starting their career (below the age of 25), as groups disadvantageous in the labour market;
- strives to contribute to the mitigation of disadvantages of persons belonging to groups disadvantageous in terms of any other aspects (e.g. ethnicity, religion).

### **2.2.2. Liability**

**20)** It must be ensured that new colleagues could get acquainted with the principles and regulations specified in this Code of Ethics.

**21)** Employees shall bear responsibility for acquiring this Code of Ethics and do their best to comply with its stipulations. In case doubts are raised over an issue, employees have the chance to turn to the representatives of the Compliance department.

**22)** In senior positions, it is required to expect employees to act, in compliance with the principles and regulations specified in this Code of Ethics and also to call them to account in this matter and in case specific regulations are violated, an ethical procedure is required to be initiated.

### **2.2.3. Ethics-related support**

**23)** In order that operation, in compliance with the provisions specified in this Code of Ethics could be ensured in practice and doubtful cases could be filtered out more efficiently, the company operates a contact form (e-mail: [compliance@bkk.hu](mailto:compliance@bkk.hu)), supporting compliance, through which inquiries can be made and pieces of advice can be requested in relation to this Code of Conduct.

**24)** In case any employee of the company receives a request by an authority (e.g. police, court, etc.) in relation to the company's activities, s/he can turn to the company's contact form supporting compliance even in that matter to request support or help required for the reply intended for the authority (e-mail address: [compliance@bkk.hu](mailto:compliance@bkk.hu)).

**25)** Employees at the Compliance department being in charge of this task give a reply to the given request and also provide advice, in compliance with the legal regulations and internal rules in effect and if requested make consultations with the relating departments.

**26)** To make inquiries and request advice, inquirers do not need to identify themselves; anonymity and data protection management shall be maintained even in this process, in case there is explicit request to do so. To ensure the possibility of anonymity, employees have the chance to turn to the Compliance department to make their inquiries and contact through

different modes and forms, such as in person, via phone and also via paper-based mails and e-mails. Mails are to be delivered either by post addressed to the Compliance department or through the dedicated on-the-spot "Message box".

### **2.3. Expected behaviours**

#### **2.3.1. Reconciliation of other activities with work, conflict of interest**

**27)** During their entire employment-related period at the company, employees shall take the utmost care to fully meet their notification obligation specified in the employment-related rules regarding conflict of interest.

**28)** Employees are forbidden to pursue any other paid or unpaid activity and to fill a post that based on legal regulations or the company's internal rules (primarily BKK's actual Labour code in effect, other rules and regulations specifying the conflict of interest) is in conflict with the company's work or endangers the legal and ethical fulfilment of BKK's work.

**29)** Superiors along with employers exercising employment rights shall be notified in advance about other paid activities, not relating to BKK's work.

**30)** Intellectual properties made by co-workers are forbidden to be indicated as the properties of an employee during the activities done in relation to the company's work and other permitted and paid activities. Products made under the scope of BKK's activities, hence pertaining to the company's intellectual property are forbidden to be used publicly without prior permissions.

**31)** It shall be borne in mind also in terms of other copyright or intellectual activities (e.g. holding presentations, compilation of a study) that the employee shall not accept such requests, by which he or she could be obliged to the requestor.

#### **2.3.2. How to maintain impartiality**

**32)** Partiality is considered each and every situation, in the framework of which, personal interests or loyalty to organisations other than BKK impede or can impede impartial, legal, ethical and professional work.

**33)** Advantages and disadvantages concerning employees, their relatives or other persons and organisations shall be considered personal interests that can result in partiality.

**34)** Employees shall refrain from any kind of influence or its impression of conduct aiming at promoting employment of employees' relatives at BKK or its business partners, with the exclusion of the internal employee referral program.

**35)** In case an employee considers that she or he has or could be affected by partiality in a case, then she or he is obliged to:

**a)** take into consideration each and every actual or possible partiality-related reason with the greatest care,

**b)** inform his/her superior and the department unit to which the given task has been assigned without delay on the relating partiality circumstances,

**c)** accept every legitimate managerial decision that is aimed at the elimination of partiality.

**36)** At the request of the employer, employees shall make an unambiguous declaration about whether or not they are subject to partiality-related circumstances.

**37)** In case a task is assigned to an employee in the framework of which, it could be assumed that his/her personal interests could influence the fulfilment of the task, the given employee is obliged to notify his/her direct boss without delay of this fact.

### **2.3.3. Acceptance of gifts**

**38)** Except for give-aways, courtesy gifts given by partners and regular hospitality provided on a work-related event, employees shall not request and accept such gifts, services or any advantage promised to them or to their relative(s) or any other stakeholder that can be associated with their work.

**39)** Give-aways supplied with a logo or other corporate sign signifying the gift-giving company are considered to be gifts received with regard to the company's participation in an event. Give-aways received on work-related events shall be used primarily at the workplace during work, unless their nature precludes them from their workplace use.

**40)** Standard catering is primarily provided to all participants in the framework of a professional event, in accordance with the position level of the invited guests. In addition, standard catering is deemed such catering that is provided by an employee of a foreign organisation or by any

other foreigner during an official work-related foreign trip, is similar to the domestic hospitality practice and is not subject under any obligation.

**41)** In such cases, it is particularly important that the invitee shall keep the appropriate distance with the gift-giver or the inviter. Excessive or fancy gifts, meals or entertainment that could create the impression of influence shall be avoided. It shall be thought over in each case whether or not the gift, meal or entertainment intended to be offered or accepted could be considered excessive or inappropriate or could entail or imply some obligation.

**42)** The company's employees shall strive to register in writing gifts, advantages, invitations and services received by clients and business partners, regardless of their estimated market value.

**43)** In case the estimated market value of the gift, meal or entertainment intended to be offered or accepted is over HUF 50,000 (fifty thousand Hungarian Forints), the given employee, besides registering it in writing, shall notify the Compliance Department in writing without delay, particularly if the employee filling a managerial position gives or receives the gift.

**44)** Employees obliged to make an Assets Declaration based on their position title shall indicate a gift over the estimated market value of HUF 100,000 (one hundred thousand Hungarian Forints) received in connection with BKK's activities also in their Assets Declaration of that year.

#### **2.3.4. Refusal of offered, undue advantage**

**45)** In case undue advantage of any kind is offered to an employee by anyone, the following behavioural principles shall be followed to avoid each and every type of corruption:

- The offered, undue advantage shall be refused and nothing that could be undue shall be accepted - not even to obtain evidence.
- If anyone provides an undue advantage to the employee without the employee's knowledge, the direct superior shall be notified without delay following its detection.
- The company's every single employee shall notify in writing and without delay their direct superior and also the representatives of the Compliance Department (e-mail address: [compliance@bkk.hu](mailto:compliance@bkk.hu)) of every suspected corruption case and experiment. Investigations initiated based on the notification shall be conducted, in compliance with the legal regulations and the relating provisions of internal rules.
- It shall be initiated to appoint another employee, if possible, to conduct the case, in connection with which, undue advantage has been offered, in a manner that the

employee, who is innocent with respect to corruption, from whom the given case is withdrawn shall not be subject to any discrimination and disadvantage.

- Work shall be continued, in accordance with the regular workflow procedure and also special attention shall be paid to the fact that the process related to the given case shall not be challengeable in either aspect and shall be appropriate even in terms of moral-ethical aspects.

### **2.3.5. Avoidance of influence on others**

**46)** Every single situation shall be avoided, which could be or could become appropriate to make an employee provide some undue advantage, due to someone's threat or offset or the promise or provision of an advantage. Neither in their private life, nor in their other relations shall employees engage in conducts, which could be appropriate for others to exert undue influence on them.

**47)** Neither advantages, nor special treatments shall be provided in any form to current or former employees of state-owned organisations, majority state-owned and municipal organisations or any other economic company.

**48)** No advantages that could be related to profession or workplace shall be provided to anyone, unless authorisation is granted by legal regulations (e.g. cases of positive discrimination).

### **2.3.6. How to report misconducts**

**49)** In case an employee learns that a co-worker has breached the requirements stipulated by legal regulations, this Code of Ethics or other internal norm, s/he shall notify the Compliance department (e-mail address: [compliance@bkk.hu](mailto:compliance@bkk.hu)). In case the given employee expressly requests anonymity and also confidential processing of his/her data in his/her report – if it does not hinder the investigation of the given case – the employee(s) being in charge of the case will pay particular attention to ensure anonymity and confidentiality.

**50)** Employees shall fulfil their reporting obligations in a thoughtful and responsible manner, by respecting and considering human dignity and managerial power.

**51)** The company's community along with its management ensure that persons reporting abuse and misconduct in good faith shall not suffer any prejudicial effects on the part of the company, due to the report.

**52)** Based on the employment contract, the employee shall carry out work, in compliance with his/her boss direction and instructions. The employee shall refuse to obey the fulfilment of instructions, in case it would endanger some other person's health or environment directly and severely. The employee may refuse to obey the fulfilment of instructions, in case its fulfilment would be in conflict with the employment-related rule or it would endanger the person's health, life or safety directly and severely. The employee shall be available even when s/he refuses to obey. In case any employee of the company would wish to request information, expertise or advice in relation to the received instructions or the legality of their probable refusal, s/he can turn to the company's contact form supporting compliance even in that matter to request support or help (e-mail address: [compliance@bkk.hu](mailto:compliance@bkk.hu)).

**53)** Employees at the Compliance department being in charge of this task give a reply to the given request and also provide advice, in compliance with the legal regulations and internal rules in effect and if requested make consultations with the relating departments.

**54)** To make inquiries and request advice, inquirers do not need to identify themselves; anonymity and data protection management shall be maintained even in this process, in case there is explicit request to do so. To ensure the possibility of anonymity, employees have the chance to turn to the Compliance department to make their inquiries and contact through different modes and forms, such as in person, via phone and also via paper-based mails and e-mails. Mails are to be delivered either by post addressed to the Compliance department or through the dedicated on-the-spot "Message box".

### **2.3.7. Avoidance of misuse of public, company and personal data**

**55)** Employees shall do their best to guarantee the safety of and – except for the data of public interest and the public data of public interest – also the confidentiality of company and personal data (hereinafter referred to as: data), which has come to their notice. Data may be transferred to others, only in compliance with the relating legal regulations and company rules.

**56)** No insight into the data qualified as business secret and confidential information shall be provided, unless an employee is authorised to do so and it is required to carry out a task based on a legal regulation, internal rule, or relating work instruction, approval or contractual provisions and also misuse of data in conflict with the objective of data management shall be refrained from.

**57)** Neither inside, nor outside the workplace shall be transferred such pieces of information, about which there are reasonable grounds for assuming that they are misinformation,



inaccurate information and/or information that could result in the damage of BKK's good reputation.

**58)** Public data or public data of public interest shall not be withheld.

**59)** Confidential information and data gained during work or information and data inaccessible to others shall not be used for employees' own financial benefit or for their other gain.

#### **2.3.8. Responsible use of public funds and resources**

**60)** Efficient and economic management and use of employees' workforce, publicly-owned devices, publicly-funded and ordered services and state and municipal funds shall be particularly taken care of.

**61)** It is forbidden to carry out other work-related activities for the benefit of any other legal relationship within the company's working hours.

**62)** In relation to official company travels inland and abroad, particular attention shall be paid to ensuring that neither employees, nor others participate in publicly-funded travels whose necessity and efficiency could not be verified in advance.

#### **2.3.9. Directors' responsibility**

**63)** Directors being in charge of the management, supervision and control of employees shall carry out their duties, in line with the company's objectives, relating legal regulations and professional requirements.

**64)** Directors shall do their best in order their staff's work could comply with the objectives and requirements. Every single action shall be taken to prevent employees' work-related irregularities and also to mitigate arising organisational integration and corruption risks.

**65)** Accordingly, the means in relation to information exchange, awareness-raising, leading by example, acknowledgement, provision of continuous trainings required for the fulfilment of

work, the establishment and operation of control systems and the compliance of relating rules shall be applied consistently.

#### **2.4. Forbidden behaviours that have no place in the workplace**

**66)** The company shall forbid and not accept such behaviours that are based on the employees' intimidation, specifically if an employee persuades others by intimidating them to behave in conflict with legal regulations.

**67)** Employees are forbidden to engage in verbal, non-verbal and other physical types of conduct with the intention and effect that insult a person's dignity, creating an intimidating, hostile, humiliating, offensive, shameful or insulting work environment.

**68)** Both in their professional and private life, BKK's staff shall strive to engage in proper conduct, respecting their own and each other's dignity, in compliance with the generally-expected ethical norms in terms of moral-ethical aspects, to remain worthy of trust put through the company by the citizens of the Hungarian capital and also by other passengers getting about in Budapest. The company shall not restrict employees' public activities practiced by right of citizenship.

**69)** Every single activity and form of conduct, which could result in the damage of trust shall make employees unworthy to carry out work at the company, particularly in instances, such as:

- an employee uses expressions, words or acts in a way at the workplace or in public suitable for undermining the prestige of the company, any of its employees or its owner, states or spreads or gives direct reference to fake news,
- in public an employee engages in scandalous conduct under the influence of alcohol or other drugs imputed to him/her in a manner, by which his/her legal relationship with BKK could be unambiguously identified (e.g. the employee wears the company's uniform) or becomes unconscious due to consumption of alcohol or drugs,
- at the workplace or in public s/he carries out an activity, which is directly aiming at satisfying or triggering sexual desire, sexually abuses others or put others in an uncomfortable situation by making gender-based personal references or gestures on a regular basis,
- the employee behaves in a manner that makes others feel terrified and engages in aggressive conducts that could cause fear in others directed toward physical attacks,

- at the workplace or in public an employee uses expressions or commits an act to undermine others' honour on any ground, such as their gender, race, origin, ethnicity, colour, mother tongue, disability, health condition, religion or belief, political opinion or political affiliation, family status, motherhood, pregnancy or fatherhood, sexual orientation, gender identity, age, social status, financial situation, part-time employment legal relationship or other part-time work-related legal relationship or employment for a definite period of time or the membership in an organisation-related interest group,
- an employee carries out trade activities for his/her own benefit,
- an employee applies physical abuse to others – not including the case of legitimate protection,
- an employee severely violates rules regulated in relation to conflict of interest or assets declaration,
- as a member of a social or political organisation engaging in activities that are in conflict with legal regulations or constitutionality, an employee acts and behaves in manners that are suitable for the unambiguous identification of his/her employment at BKK,
- for individual gain, an employee deliberately and severely violates copyright law or commits scientific ethics-related infringement (e.g. plagiarizes from literal works),
- an employee pays or accepts bribes or gratuities in exchange of some employment-related advantage or promises or grants and requests, receives or accepts undue advantage of any kind,
- an employee takes advantage of a business secret, confidential information made aware in connection with his/her work or the processing of a personal data, makes them available to an unauthorised person or makes it inaccessible to a person entitled to these data.

## **2.5. Ethics institutions; the Code of Ethics in operation**

### **2.5.1. Ethics Committee**

**70)** An Ethics Committee is set up and operable at the company to investigate probable ethical abuse.

**71)** The Ethics Committee shall be appointed for the first time within 30 days following the entry into force of this Code of Conduct. BKK's CEO shall appoint one deputy member to each member.

**72)** Rules specifying the Ethics Committee's operation, such as its President, membership, sessions, decisions are laid down in a separate document, in the Director General's Order issued about the Ethics Committee's rules of procedure.

### **2.5.2. Ethics Commissioner**

**73)** The Ethics Commissioner is the Compliance advisor working at the Compliance Department.

**74)** The Ethics Commissioner is in charge of the following duties:

- shall carry out the preliminary examination of ethical complaints and request and make specific proposals in connection with them;
- shall play a consultative role in the sessions held by the Ethics Committee;
- shall operate the company's ethical institutional system, if required, make proposals to modify the Code of Conduct or other internal regulations and formulate recommendations on the company's ethical practice;
- shall carry out advisory and intermediary activities in relation to employees' requests
- shall carry out active information activities within the company in relation to his/her own activities.

**75)** Based on the recommendation made by the Director of the Compliance Department, the CEO shall assign the Ethics Commissioner for an unlimited period of time or at least for the period of the Ethics Commissioner's employment at the company.

### **3. FINAL PROVISIONS**

**76)** This Code of Conduct enters into force on the day following its publication and is applicable until further notice; until its repeal.

**77)** In case the company's internal regulations lay down provisions different from those laid down in the Code of Conduct, then rules specified in the internal rules shall be interpreted in the spirit of this Code.

**78)** This Code of Conduct shall be revised first on an annual basis, then every three years and when necessary.

**79)** The Director of BKK's Compliance Department is in charge of and is responsible for the compilation and review of this Code of Conduct.

Budapest, 28 June 2021

Dr. Katalin Walter sgd.

CEO

BKK Centre for Budapest Transport

## **4. ANNEXES**

1. Annex no. 1: Business Partner Code of Ethics