

# AutoWallis

## Code of Ethics and Business Conduct

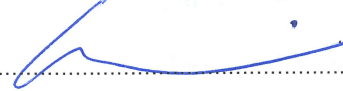
*("Code of Ethics")*

**Approvers and their signatures:**

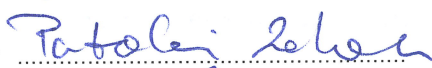
Group Compliance Officer



Group HR Director



Group Legal Director



Group Chief Financial Officer



Group Chief Executive Officer



Effective date: 1 September 2025

## A message from the CEO

**Dear Colleagues and Business Partners,**

When we created the Code of Ethics and Business Conduct of AutoWallis Group, our goal was to establish a compass that offers genuine support to our employees in their day-to-day decisions, while also providing our partners with clear guidance on the values we stand by and the standards of conduct we expect. The Code outlines the core values of AutoWallis Group and expectations regarding ethical conduct and defines responsibilities and the ways of protecting interests.

We strongly believe that legal compliance is only the foundation on which to build, but we hold ourselves to a higher standard. We are convinced that a decision can only be truly right if it is not only legally sound but also aligned with our organisational values and our social and environmental goals. This is why it is essential that we keep working together to safeguard and develop the responsible, ethical and value-based corporate culture that our company has.

Our Code describes core principles such as respect for human dignity, honesty, integrity, commitment, trust, empathy and accountability. In addition, transparency, sustainability, fair market conduct, professional excellence and a results-oriented approach are of particular importance to us.

We believe that if we consistently let the principles of the Code of Ethics guide our day-to-day business practices and behaviour both on and off the job, we can foster a corporate culture that is not only successful, but also sustainable, transparent and responsible over the long term.

A blue ink signature of Zsolt Müllner, written in a cursive style.

**Zsolt Müllner**

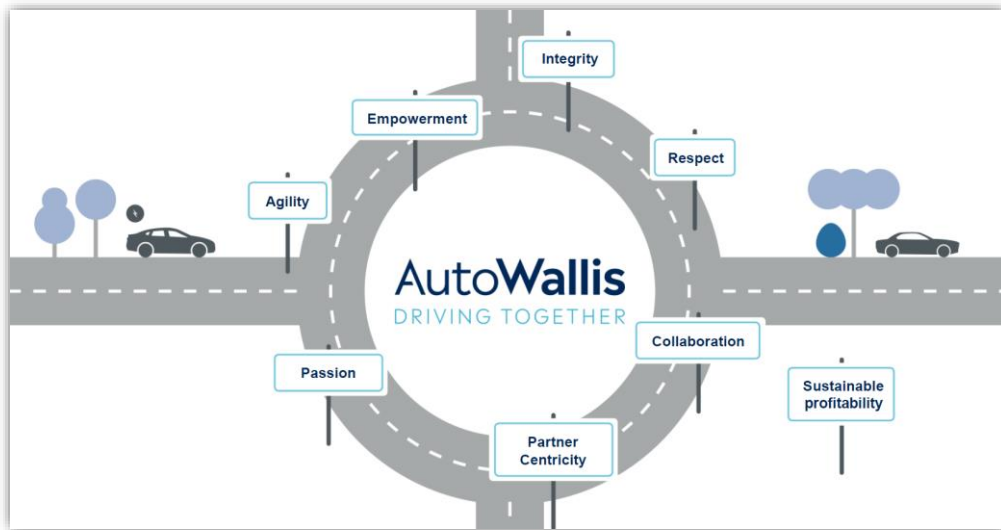
*Chairman of the Board of Directors*

A blue ink signature of Gábor Ormosy, written in a cursive style.

**Gábor Ormosy**

*Chief Executive Officer*

## Core values of AutoWallis Group



### **Agility**

We adapt swiftly to internal and external changes, focus on opportunities, and encourage our colleagues to effectively implement new approaches.

### **Empowerment**

We delegate clearly, transparently and trust our colleagues, while we encourage them to share their opinions and suggestions.

### **Integrity**

We act and communicate in a transparent and fair manner while following ethical and compliant practices.

### **Respect**

We consider the point of view and feelings of others, while we encourage involving people irrespective of their backgrounds.

### **Collaboration**

We are willing to unite our skills and efforts and enhance a culture of teamwork while encouraging our colleagues to rely on each other's expertise.

### **Partner centricity**

We put our partners and clients first, while we encourage our colleagues to think outside the box to create the best experience for them.

### **Passion**

We focus on making a difference and approach our work with enthusiasm even when facing complex challenges.

### **Sustainable profitability**

We strive for cost efficiency and business excellence, while focusing on profitability and increasing shareholder value.

## DRIVING TOGETHER



## Table of Contents

1	Purpose, scope and review of the document .....	4
2	AutoWallis Group – Our ethical values .....	8
2.1	Respect, safety and responsibility – The foundations of working together .....	8
2.1.1	Protection of human rights, prohibition of child and forced labour and discrimination based on gender and other factors.....	8
2.1.2	Workplace behaviour – The principles of a respectful and safe work environment .....	9
2.1.3	Rules of political and religious engagement.....	11
2.1.4	Environment, Health and Safety (EHS).....	12
2.1.5	Responsibility based on environmental, social and governance (ESG) principles .....	12
2.1.6	Rules on side jobs and external activities .....	13
2.2	Integrity in business – Establishing lawful and transparent relationships.....	14
2.2.1	Anti-corruption, fraud and bribery.....	14
2.2.2	Anti-money laundering and countering the financing of terrorism .....	15
2.2.3	Avoiding and managing conflicts of interest .....	16
2.2.4	Media and press relations .....	17
2.2.5	Consumer protection.....	18
2.2.6	Supplier relations .....	19
2.2.7	Competition law compliance and fair market conduct.....	19
2.2.8	Compliance with international trade and sanctions policies .....	20
2.3	Protecting our values – Safeguarding the assets, data and reputation of AutoWallis .....	21
2.3.1	Protection of shareholder interests and disclosure of transparent and reliable financial data (financial integrity) .....	21
2.3.2	Protection of corporate assets.....	22
2.3.3	Protection of trade secrets .....	22
2.3.4	Prohibition and prevention of insider trading .....	23
2.3.5	Protection of intellectual property.....	24
2.3.6	Protection of personal data .....	25
2.3.7	Our IT security.....	25
3	Implementing and enforcing the provisions of the Code of Ethics .....	27
4	Violations of the provisions of the Code of Ethics .....	28



## 1 Purpose, scope and review of the document

AutoWallis Nyrt., its affiliated companies that are under its majority ownership or control and its joint ventures (hereinafter collectively referred to as "**AutoWallis Group**" or "**Group**", while individual subsidiaries are, in a general sense, referred to as a "**Subsidiary**") are committed to creating and maintaining an ethical work environment. To this end, our goal is to implement and enforce a framework for corporate conduct that all employees and persons working in other forms of employment (hereinafter collectively referred to as "**Employees**") must follow, one that reflects and supports the values and vision of AutoWallis Group. AutoWallis Group's commitment is reflected in the development, implementation and consistent enforcement of the principles set out in the Code of Ethics and Business Conduct (hereinafter: "**Code**" or "**Code of Ethics**").

---

*Our Code of Ethics defines the core principles and values that guide our operations. In our day-to-day work, we may encounter complex or ambiguous situations whose assessment requires further guidance. In such cases, it is the duty of every staff member to gather the necessary information and seek advice before making a decision or taking action.*

---

All Employees are required to familiarise themselves with and adhere to the provisions of the Code of Ethics and Business Conduct, to act lawfully and with the highest level of integrity, to ask questions when in doubt, and to promptly report any unethical conduct.

Leaders play a crucial role in establishing and maintaining a culture of ethical conduct. They must lead by example, support their subordinates, and ensure that staff members who report any misconduct in good faith do not suffer any retaliation. The same ethical standards apply to the suppliers, business partners and all other stakeholders of AutoWallis Group.

This document is effective from 1 September 2025 for an indefinite period. However, it is subject to review annually or whenever required by relevant changes in the business or legal environment or the organisation.





The **Code of Ethics and Business Conduct of AutoWallis Group** is intended to provide guidance on the following topics:

*Topic (with links) – the relevant area of ethics, including a reference to the section containing the details;*

*Key stakeholder "pairs" – the parties involved, between whom the relevant ethical risk may arise;*

*Primary risk – the category of risk to which the relevant topic is assigned;*

*Nature of controls – the type of internal tools used for regulation, prevention or control;*

*Combined category – a value-based summary of the topic and a brief description of the expected ethical behaviour.*

Topic (with links)	Key stakeholder "pairs"	Primary risk	Nature of controls <sup>1</sup>	Combined category
<b>2.1 Respect, safety and responsibility – The foundations of working together</b>				
2.1.1 <a href="#">Protection of human rights, prohibition of child and forced labour and discrimination based on gender and other factors</a>	Employer – Employee	Legal / compliance	Preventive, compliance	Respect for human dignity and protection of fundamental rights
2.1.2 <a href="#">Workplace behaviour – The principles of a respectful and safe work environment</a>	Employee – Employee	Reputational	Preventive, corrective, detective	A workplace culture based on respect and safety
2.1.3 <a href="#">Rules of political and religious engagement</a>	Employee – Authorities / Government agencies	Reputational	Preventive, accountability	Maintaining political neutrality and protecting corporate integrity
2.1.4 <a href="#">Environment, health and safety (EHS)</a>	Employer – Employee	Operational	Compliance, detective, corrective	Active protection of employee health and safety
2.1.5 <a href="#">Responsibility based on environmental, social and governance (ESG) principles</a>	Employer – Local communities	Strategic	Compliance, reporting, accountability	Sustainable operations and responsibility towards communities
2.1.6 <a href="#">Side jobs and external activities</a>	Employer – Employee / Authorities	Conflict of interest / operational	Preventive, accountability	Fostering employee loyalty and preventing conflicts of interest
<b>2.2 Fairness in business – Building lawful and transparent relationships</b>				
2.2.1 <a href="#">Anti-corruption, fraud and bribery</a>	Employer – Employee;	Legal / compliance	Preventive, detective, compliance	Transparent and corruption-free business relationships

<sup>1</sup> **Preventive controls** are designed to proactively avoid violations, errors, misconduct or undesirable events. These controls come into play before any risk or harmful impact occurs.

**Detective controls** aim to ensure that errors, violations or risk events that have already taken place are identified in a timely manner. While they do not prevent incidents, they allow for a quick response.

**Corrective controls** focus on resolving or addressing previously identified issues or mitigating their consequences. These controls are designed to restore proper operations.

**Compliance controls** are aimed at ensuring adherence to applicable laws and regulatory requirements. They are typically mandatory and are documented in an auditable manner.

**Reporting controls** aim to document and communicate data and events related to risks, violations or performance to the appropriate forums, both internal and external.

**Accountability controls** ensure that the persons responsible for decisions and actions are clearly defined and that the organisation operates with accountability at all levels.

Topic (with links)	Key stakeholder "pairs"	Primary risk	Nature of controls <sup>1</sup>	Combined category
	Employee – Suppliers / Authorities			
2.2.2 <a href="#">Anti-money laundering and countering the financing of terrorism</a>	Employer – Authorities / Government agencies	Legal / compliance	Compliance, detective, reporting	Financial integrity and adherence to global security standards
2.2.3 <a href="#">Avoiding and managing conflicts of interest</a>	Employee – Employer	Reputational	Preventive, accountability, corrective	Transparency and responsible handling of conflicts of interest
2.2.4 <a href="#">Media and press relations</a>	Employer – Media	Reputational	Preventive, reporting	Responsible public communication and protecting the corporate reputation
2.2.5 <a href="#">Consumer protection</a>	Employer – Clients / Customers	Legal / compliance	Compliance, detective, corrective	Protecting customer interests in a lawful and ethical manner
2.2.6 <a href="#">Supplier relations</a>	Employer – Suppliers	Partner / supplier	Preventive, detective, accountability	Ethical and reliable cooperation with suppliers
2.2.7 <a href="#">Competition law compliance and fair market conduct</a>	Employer – Competitors	Legal / compliance	Compliance, preventive, reporting	Fair market competition and lawful business conduct
2.2.8 <a href="#">Compliance with international trade and sanctions policies</a>	Employer – Authorities / Government agencies	Legal / Compliance	Compliance, Detective, Preventive	Adhering to international trade norms and sanctions
<b>2.3 Protecting our values – Safeguarding the assets, data and reputation of AutoWallis</b>				
2.3.1 <a href="#">Protection of shareholder interests and disclosure of transparent and reliable financial data (financial integrity)</a>	Employer – Shareholders / Owners	Financial / capital markets	Compliance, Reporting	Maintaining shareholder trust and reliable and transparent financial operations
2.3.2 <a href="#">Protection of corporate assets</a>	Employee – Employer	Financial / operational	Preventive, Detective	Responsible and trustworthy use of corporate assets
2.3.3 <a href="#">Protection of trade secrets</a>	Employer – Suppliers	Partner / supplier	Preventive, accountability	Preserving the confidentiality of business information and competitiveness
2.3.4 <a href="#">Prohibition and prevention of insider trading</a>	Employee – Shareholders / Owners	Legal / compliance / capital markets	Compliance, preventive, reporting	Protecting inside information and safeguarding shareholder interests

<i>Topic (with links)</i>	<b>Key stakeholder "pairs"</b>	<b>Primary risk</b>	<b>Nature of controls<sup>1</sup></b>	<b>Combined category</b>
2.3.5 <a href="#">Protection of intellectual property</a>	Employer – Employee; Employer – Competitors	Strategic	Preventive, compliance	Protection of intellectual property as a driver of innovation and value creation
2.3.6 <a href="#">Protection of personal data</a>	Employer – Clients / Customers	Legal / IT / cybersecurity	Compliance, detective, corrective	Proper protection and use of personal data while ensuring legal compliance
2.3.7 <a href="#">Our IT security</a>	Employer – Employee	IT / cybersecurity	Preventive, detective, corrective	Safeguarding IT systems to ensure business continuity and data integrity



## 2 AutoWallis Group – Our ethical values

### 2.1 *Respect, safety and responsibility – The foundations of working together*

AutoWallis Group aims to shape the company's future together with its committed and motivated Employees in a work environment built on mutual trust, respect and dignity. In addition to respecting the fundamental rights of our staff, we are committed to fair employment, supporting professional development and acting as a caring and responsible employer.

#### 2.1.1 *Protection of human rights, prohibition of child and forced labour and discrimination based on gender and other factors*

##### 2.1.1.1 *Protection of human rights*

The operations of AutoWallis Group are based on respect for human rights and the principles of fairness and tolerance, both in relationships among Employees and in their relationships with their employer. We are committed to the prevention and elimination of all forms of discrimination. Any violation of human rights or any manifestation of discrimination is considered a particularly serious ethics violation.

Accordingly, we expect our Employees to:

- a) not discriminate against anyone, particularly on the basis of gender, age, ethnic origin, skin colour, marital status, religious, political or ideological beliefs, disability, sexual orientation, native language, national or social origin, financial, birth or other status, or any other protected personal characteristic;
- b) make their decisions solely on the basis of merit, performance and work-related considerations;
- c) maintain workplace and business relationships based on openness, trust, respect, cooperation and mutual appreciation;
- d) not share or distribute content that may offend others;
- e) immediately report any instances of intimidation, harassment or any illegal or unethical behaviour;
- f) express their political and religious beliefs as individuals in accordance with the provisions of this Code of Ethics;
- g) take a firm stand against all forms of discrimination and human rights violations.

Our commitment is further demonstrated by our support for the [Universal Declaration of Human Rights of the United Nations](#) and the [European Convention on Human Rights and Fundamental Freedoms](#).

AutoWallis Group refrains from all types of abusive and retaliatory conduct that would unlawfully place its Employees at a disadvantage in connection with its business activities, such as withholding wages, denying sick leave or failing to provide daily rest periods.

AutoWallis Group firmly rejects all forms of forced labour, child labour and unethical employment practices, both in its own operations and those of its business partners.

##### 2.1.1.2 *Prohibition of discrimination*

Respect for diversity and ensuring equal treatment are among the core values of AutoWallis Group. These principles permeate our organisational culture, day-to-day operations and decision-making processes. We are committed to ensuring that the principles of individual freedom and equality are adhered to in every aspect of our operations.

We expect all of our Employees to respect the dignity, private life and personal rights of others. AutoWallis Group does not tolerate or condone any form of the following:

- a) direct or indirect discrimination;
- b) harassment;



- c) unlawful segregation;
- d) retaliation;
- e) instructions to do any of the above; and
- f) humiliating or aggressive conduct.

Direct discrimination occurs when a provision or measure results in a person or group being treated less favourably (whether due to an actual or a perceived characteristic) than another person or group in a comparable situation. Such characteristics may include, in particular:

- a) gender, gender identity, sexual orientation, pregnancy, parental status or childlessness;
- b) racial background, skin colour, nationality, native language;
- c) disability, health;
- d) religious, ideological, political or other opinion;
- e) age, marital status, social or financial status;
- f) type of employment (e.g., part-time, fixed-term);
- g) membership in representative bodies; or
- h) any other protected personal characteristic.

Indirect discrimination occurs when a seemingly neutral regulation or practice puts individuals or groups possessing any of the above characteristics at a disadvantage, even if the rule itself does not differentiate between people.

## **2.1.2 Workplace behaviour – The principles of a respectful and safe work environment**

### **2.1.2.1 General rules of conduct**

AutoWallis Group is committed to fostering a workplace culture that is built on mutual respect, safety and responsibility. We expect all Employees to respect the human rights of others in their day-to-day interactions, treat one another with respect and cooperate with one another, and resolve conflicts peacefully and with a willingness to compromise.

We are dedicated to creating a psychologically safe environment where all employees feel empowered to speak up, ask questions, share ideas, and acknowledge mistakes without fear of judgment, embarrassment, or retaliation.

Employees are required to:

- a) start work at the designated place and time, and be fit for work;
- b) devote their working time to performing work and be available to their employer during working hours;
- c) carry out their tasks personally with due care and expertise and in compliance with applicable rules, regulations and instructions;
- d) cooperate with their colleagues and perform their work in a way that does not jeopardise the physical safety of others, does not disrupt work and does not cause material or moral damage to the Group or any third party.

We listen to our staff, taking their feedback and expectations into account when shaping the workplace environment and working conditions. Our goal is to maintain the engagement and motivation of our Employees while supporting their professional and personal development. In addition, we respect their private life and are committed to promoting their physical and mental well-being.

Appearance is also part of a professional atmosphere. Employees' clothing must be neat, clean and appropriate in the context of the work environment, the occasion, the conventions of the community of AutoWallis Group or the social expectations surrounding the event in question. AutoWallis Group recognises that the attire and appearance of Employees are forms of self-expression, but they must not be provocative, offensive or inappropriate according to the majority view within the community of



AutoWallis Group or social conventions. AutoWallis Group reserves the right to require Employees to follow mandatory dress codes for specific roles, events, meetings or workplace situations.

---

***We do not tolerate any form of harassment, abuse, intimidation, oppression, exploitation, violence, discrimination, racism, sexism or homophobia. Every staff member has the right to work in a safe, supportive and dignified work environment.***

---

Anyone who witnesses or experiences inappropriate behaviour is required to report such behaviour without delay to their supervisor or to the contact persons specified in the Code of Ethics, in accordance with **Section 4** of the Code. Managers and supervisors bear a heightened duty to exemplify ethical conduct, foster a culture of respect, and respond swiftly and appropriately to any form of misconduct. They are expected to manage concerns with discretion and professionalism, ensuring confidentiality and taking all necessary measures to prevent retaliation.

#### **2.1.2.2 Prohibited workplace conduct**

For the purposes of this Code, harassment<sup>2</sup> is defined as any sexual or other conduct violating human dignity that is related to a person's protected characteristic<sup>3</sup> and has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive workplace environment. Examples of harassment include:

- a) dissemination of materials that are offensive, sexual or suggestive in content;
- b) offensive or humiliating jokes, innuendo, or mocking based on gender, race, religion or other grounds;
- c) unwanted physical or verbal attention (e.g., following, pestering, touching);
- d) sexual propositions or suggestions that imply career advancement in exchange for sexual favours;
- e) inappropriate gestures or insults relating to bodily pleasures;
- f) intrusive questions regarding sensitive information (e.g., sexual orientation, religion, ethnic background).

Abuse refers to extreme verbal or physical conduct in the workplace that is typically directed at one or more Employees and is intended to cause, or results in, serious harm to the person's dignity, self-esteem, ability to perform work or mental well-being. Examples of abuse include:

- a) shouting, use of obscene language or a threatening, humiliating or degrading tone of voice;
- b) mocking an Employee's abilities, appearance or personality, including, in particular, public shaming;
- c) a disproportionate or unreasonable level of control, constant or unfair criticism;
- d) formulating unrealistic or inconsistent expectations, repeatedly assigning tasks that are impossible to complete;
- e) spreading false or malicious information or rumours about the person involved.

Intimidation is a form of abuse in which the perpetrator deliberately seeks to establish or maintain a position of power over another individual or group. This behaviour often involves the use of emotional,

---

<sup>2</sup> Section 222 (1) of the Criminal Code: **Harassment**: "Any person who engages in conduct intended to intimidate another person, to disturb the privacy of or to upset, or cause emotional distress to another person arbitrarily, or who is engaged in the pestering of another person on a regular basis, is guilty of a misdemeanour punishable by imprisonment not exceeding one year, insofar as the act did not result in a more serious criminal offence."

<sup>3</sup> Under the law, "**protected characteristics**" include, among others, the person's gender, racial origin, skin colour, health, marital status, sexual orientation, gender identity, age and financial status.



verbal, physical or psychological tactics with the aim or effect of influencing, silencing or intimidating the other party.

Typical forms of intimidation may include, among others:

- a) outbursts of anger, threats, or the use of offensive or demeaning remarks;
- b) implicit or explicit references to disadvantages in the workplace (e.g., denial of promotion, negative performance reviews or other retaliatory actions);
- c) exerting verbal, physical, psychological or symbolic pressure, as well as aggressive behaviour (in unprovoked situations).

**Retaliation** refers to any conduct resulting in discrimination against an Employee for raising a grievance, submitting a report, participating in a procedure or having a professional disagreement or difference of opinion with their manager or superior. In addition, retaliation also includes any unjustified and disproportionate disciplinary action that is not based on a lawful and fair procedure. Retaliation may be direct or indirect, overt or covert.

Examples of retaliation include:

- a) assigning tasks which are humiliating, degrading or unrelated to the role in question;
- b) deliberately excluding someone from team activities, meetings or professional discussions;
- c) restricting career or development opportunities or unreasonably overlooking someone for promotion.

Unacceptable workplace behaviour can take many forms, ranging from simple verbal insults to sexual harassment, discrimination or even physical aggression. While it is not possible to list each and every one of these, the examples above can help Employees of AutoWallis Group identify and prevent such situations.

AutoWallis Group encourages all of its Employees to report such behaviour immediately through the channels specified in the Code of Ethics. These reporting channels are designed to allow for the submission of anonymous reports as well, thereby protecting the personal safety and interests of whistleblowers.

### **2.1.3 Rules of political and religious engagement**

The business activity of AutoWallis Group is built on independence, transparency and political neutrality. We believe that all Employees should have the right to the freedom of opinion and expression with regard to their political and religious beliefs and the right to be engaged in such activities. However, as a politically and religiously neutral organisation, AutoWallis Group is not involved in any political or religious activities and does not provide support to political parties, political organisations or candidates and religious groups.

Accordingly,

- a) we do not donate to or sponsor political or religious events;
- b) we do not provide resources (e.g., equipment, infrastructure or working time) for such purposes;
- c) we do not wish to influence the personal beliefs of our Employees.

We believe it is important to monitor political events and developments, particularly when they may directly affect our operations. However, we do so only as observers.

AutoWallis respects the right of Employees to express their political and religious beliefs, provided that it does not compromise workplace neutrality, violate the rights of other Employees, or disrupt order and productivity in the workplace. Any political or religious agitation, evangelisation or any other activity that



puts others under pressure, involves unsolicited influence or interferes with work is prohibited in the workplace.

Employees may engage in political activities solely as individuals and at their own responsibility and expense, while clearly distancing such activities from AutoWallis Group. In case of political involvement, it is particularly important that they:

- a) do not use the name, branding or assets of AutoWallis Group (e.g., computers, phones, company letterhead, branded company vehicles, etc.);
- b) do not create the impression that AutoWallis is committed to any political party or ideology;
- c) always act in a manner that is consistent with the ethical principles of AutoWallis Group.

All Employees of AutoWallis Group are required to maintain a politically and religiously inclusive, tolerant and conflict-free workplace environment. This is essential for mutual respect and smooth and professional collaboration.

## 2.1.4 Environment, Health and Safety (EHS)

Environment, Health and Safety (EHS) is an integrated approach and practice aimed at preserving the physical and mental health of Employees, providing a safe work environment, and preventing, mitigating or eliminating risks associated with work. All employers are required to ensure that the work environment complies with applicable occupational health and safety regulations, while Employees are responsible for following the rules, reporting hazards and protecting their own safety and that of others.

As an industry leader, AutoWallis Group is committed to setting an example in protecting the health and safety of its Employees as well. The safety of all our Employees is our top priority ("Safety First").

The Group is required to provide the conditions for a safe and healthy work environment in accordance with applicable laws and internal policies. When organising work, we strive to guarantee that Employees can fully exercise their rights and fulfil their obligations in a safe and supportive environment. We also aim to support the professional development of our Employees and help them maintain a healthy work-life balance.

Our Employees are expected to:

- a) *EHS awareness*: comply with EHS rules, and perform only the kind of work for which they have the necessary qualifications and experience, and only when their health allows them to do so without risk.
- b) *responsible conduct*: immediately report any accident, injury, hazardous situation or environmental incident, and not work or allow others to work if unfit for work.

## 2.1.5 Responsibility based on environmental, social and governance (ESG) principles

**E**nvironmental, **S**ocial and **G**overnance (ESG) principles represent an assessment and governance framework that covers the sustainability, social responsibility and ethical compliance aspects of the operations of companies and organisations.

AutoWallis Group is committed to accomplishing its ESG objectives as an integral part of, and in accordance with, its corporate strategy. As a regional leader in the industry, our aim is to set an example in successfully aligning economic interests with environmental and social responsibility.

AutoWallis Group reviews and, if necessary, updates its sustainability goals on an annual basis, adapting to a changing economic, technological and social landscape. In doing so, we pay particular attention to mitigating our operational risks and meeting the requirements of our customers, Employees, partners and the environment.





In our business decisions, we focus strongly on ethical, social and environmental considerations, such as increasing the ratio of electric and hybrid vehicles in our own fleet (for our carsharing, long-term lease and rent-a-car services), installing electric chargers and solar panels, increasing the energy efficiency of the properties owned and leased by us, and using green energy.

Our focus areas for sustainability include:

- a) *Climate action* – We are committed to reducing the impacts of climate change, which is why our operations are centred on low-emission technologies and energy-efficient solutions. We prioritise environmentally friendly mobility and aim to significantly increase the share of renewable energy. We support the mitigation of climate risks through our innovative and digital solutions.
- b) *Valuing and developing our Employees* – We support the professional and personal development of our Employees, which also includes expanding their knowledge of sustainability. We place strong emphasis on diversity, equal opportunity and creating a safe and healthy work environment. Our goal is to foster an ethical, inclusive and supportive corporate culture.
- c) *Responsible business conduct* – As part of our social responsibility efforts, we actively support local communities and engage in open and transparent dialogue with all stakeholders. We regularly share reliable information on our sustainability performance.
- d) *Environmentally conscious waste management* – We manage the waste generated in the course of our activities responsibly and strive to reduce its environmental impact. We seek to achieve higher recycling rates and apply the principles of a circular economy.

In the long run, we aim to play an active and responsible role in the local communities where we operate. We directly contribute to the development and well-being of these communities through job creation, investments, tax payment and support of local organisations.

We focus on open dialogue with residents, non-governmental organisations and local governments, and we continuously and rigorously monitor the impact that our operations have on the environment.

We expect our Employees to:

- a) communicate with the members of communities in an authentic, open and honest manner;
- b) comply with the internal ESG policies of AutoWallis Group, thereby helping to mitigate environmental, social and governance risks arising from operations.

Information on reporting ESG-related concerns can be found in [Section 4](#) of this Code.

## 2.1.6 Rules on side jobs and external activities

AutoWallis Group acknowledges that its Employees may be involved in legitimate personal or income-generating activities outside of working hours. However, such activities must not compromise the quality of their work within the company and must not be in conflict with the business interests of AutoWallis Group.

External activities must not involve:

- a) the use of AutoWallis Group's assets or resources,
- b) the use of confidential information,

unless prior written approval has been obtained from the management.

Any secondary activity that could result in unfair competition or a conflict of interest or pose a threat to the interests of AutoWallis Group in any way is prohibited.



All Employees are required to notify their immediate superior and **HR Business Partner** in writing in advance if they intend to engage in any income-generating secondary activity.

## 2.2 Integrity in business – Establishing lawful and transparent relationships

Our Employees are not permitted to engage in any activity, whether on behalf of AutoWallis Group or independently, that violates industry or commercial laws, other applicable regulations or the core principles set out in this Code. We pay special attention to legal compliance throughout our operations and fully cooperate with all competent authorities, including those overseeing industry and commercial activities. During regulatory proceedings, we provide the necessary information, support and access to the extent required to successfully conduct the procedure.

AutoWallis Group is committed to responsible business conduct and legal compliance in every country in which it operates. We expect our Employees to comply with all local laws, rules and contractual obligations, and to obey the spirit of our Code of Ethics. Any suspected infringements or violations should be reported with confidence and without fear of retaliation, and one way of doing so is through our [whistleblowing line](#). Details of the available reporting channels are provided in Section 4 of this Code. This is our shared responsibility, since maintaining ethical behaviour safeguards the long-term security and credibility of our organisation.

### 2.2.1 Anti-corruption, fraud and bribery

AutoWallis Group has **zero tolerance** for all forms of corruption and bribery, particularly in its government relations and business relationships. This principle applies equally to all Employees and external partners.

We manage our procurement and business relationships in a transparent manner and in accordance with our internal policies. In selecting and working with partners, we also take our ethical standards into consideration.

We expect our Employees to:

- a) act with integrity and without undue influence in all government relations and business relationships;
- b) neither accept nor offer any kind of advantage or benefit intended to influence decision-making, and to avoid any situation that could create the appearance of corruption (our position on gifts is set out in Section 2.2.1.1);
- c) ensure that any consultants, intermediaries or other third parties they work with also comply with anti-corruption rules.

#### 2.2.1.1 Bribery

Bribery,<sup>4</sup> which is a criminal offence, is committed by anyone who:

- a) promises, offers or gives an undue advantage, such as money, gifts, or other benefits, to a person acting on behalf of a company, including AutoWallis Group, in order for that person to breach their work duties, to influence their decisions, or to gain other undue advantages;
- b) on behalf of or representing a company, including AutoWallis Group, requests, accepts or agrees to accept an undue advantage or the promise thereof, either for themselves or another party, or agrees that a third party should receive an advantage in order for them or another party to abuse their entrusted power, breach duties or make a biased decision.

---

<sup>4</sup> A detailed definition is provided in Section 2 of our Anti-Bribery and Anti-Corruption Policy, which was prepared in line with the United Nations Convention Against Corruption.



The prohibition of corruption applies to both the public and private sectors.

A "**business gift**" is a gift given in the context of business, official, professional, diplomatic or religious relations related to the giver's activities (goods or services provided free of charge or at a discount, or vouchers specifically redeemable for such goods or services). From the perspective of AutoWallis Group, the provision of business gifts and entertainment of modest value (one that does not result in indebtedness) is generally accepted practice as a means to promote goodwill and professional relationships between business partners, provided that it serves a legitimate business purpose and does not create the appearance of bribery, i.e., the giver does not expect any form of compensation (e.g., a discount, business deal, etc.) in return. Cash or cash equivalent payment instruments, such as vouchers or gift cards, cannot be provided as business gifts. Business gifts cannot be given to the company's own employees, as employees are not considered business partners.

In accordance with Hungarian law, we have established the following minimum standards, which all of our Subsidiaries must comply with. Deviations are allowed only to accommodate local regulations, and only if they result in stricter rules:

The following must NOT be considered business gifts (hence prohibited):

- c) cash equivalent payment instruments;
- d) securities and rights relating to securities;
- e) vouchers that are redeemable freely without restriction;
- f) natural or cultured pearls, gemstones, semi-precious stones, precious metals;
- g) metal items plated with precious metals and goods made from them; and
- h) faux jewellery.

From a tax perspective, business gifts and business entertainment expenses are considered benefits and, in most cases, business-related expenses. However, in cases where the gift is not related to the company's business or income-generating activities, the applicable tax rules may vary by country. Further rules are set out in the **AW\_Gift and Business Entertainment Policy**, and Employees may also contact the Compliance Department of AutoWallis Group.

If we are the recipients of a gift or business entertainment, then we are not subject to tax reporting obligations. However, before accepting, we must assess the appropriateness of the gift (i.e., whether it can be accepted) in line with the detailed rules of the **AW\_Gift and Business Entertainment Policy**. In case of any uncertainty, the Compliance Department of AutoWallis Group is available to assist Employees.

Additional related policies and tools available to Employees on the AutoSpoiler platform:

- a) AW\_Anti-Bribery and Anti-Corruption Policy;
- b) AW\_Gift Register;
- c) AW\_Whistleblowing Policy (with the whistleblowing platform outlined in Section 4).

In case of any questions regarding the above, our Employees can contact us by email at [compliance@autowallis.hu](mailto:compliance@autowallis.hu).

## 2.2.2 Anti-money laundering and countering the financing of terrorism

We are committed to the prevention, detection and elimination of all forms of money laundering (Anti-Money Laundering or AML). For this reason, we only enter into business relationships with reputable clients operating legitimate businesses whose capital originates from legitimate sources.

At both the Group and Subsidiary levels, we apply anti-money laundering control and risk assessment mechanisms aimed at identifying risks in a timely manner and taking the necessary actions.



Typical indicators of suspected money laundering include:

- a) providing false information when opening an account;
- b) cash payments or excessive payments followed by refund requests;
- c) unusual orders, payments or transactions that are not aligned with the client's activity;
- d) complex and non-transparent business arrangements;
- e) transfers to or from unrelated countries;
- f) transactions that are deliberately structured to evade registration or reporting obligations.

We expect our Employees to act with awareness and responsibility in the course of business activities and when entering into agreements to help prevent money laundering and terrorist financing, particularly by:

- a) understanding and recognising red flags that indicate money laundering, as outlined in previous sections of this Code and the related training materials;
- b) applying the KYC/KYS (Know Your Customer/Know Your Supplier) approach, including timely due diligence and sanctions list screening of partners;
- c) identifying the Ultimate Beneficial Owners (UBOs) of business partners, i.e., the individuals who ultimately exercise control over a legal entity;
- d) verifying the background of incoming payments, particularly the sender and the purpose of the transaction and the source of funds;
- e) keeping up-to-date on the specific AML requirements relevant to their area of expertise (e.g., reporting suspicious transactions).

Money laundering can occur in any type of business relationship, including transactions with customers, suppliers, distributors, agents and other third parties.

AutoWallis Group has developed detailed anti-money laundering rules and training materials, which are available on the AutoSpoiler platform:

- a) AW\_Anti-Money Laundering Policy
- b) AW\_Anti-Money Laundering Training

In case of any questions regarding the above, our Employees can contact us by email at [compliance@autowallis.hu](mailto:compliance@autowallis.hu).

### **2.2.3 Avoiding and managing conflicts of interest**

Preventing conflicts of interest and ensuring that decision-making processes are objective and impartial are also among the key ethical principles of AutoWallis Group. Personal or business interests must not influence one's work or business decisions. All new Employees must sign a declaration of no conflict of interest, and for our senior staff, a review of circumstances that may give rise to conflict of interest must take place at least every three years.

We expect our Employees to:

- a) refrain from establishing business relationships through their own enterprises (except for the typical transactions of everyday life) with partners with whom they maintain an official relationship in the course of their work;
- b) not invest in companies they have been directly or indirectly involved in selecting, evaluating or preparing business decisions for, with the exception of publicly listed companies;
- c) enter into business relationships with competitors, suppliers or clients through their own enterprises or take on executive roles in external businesses only if they have obtained prior written approval (except for the typical transactions of everyday life);



- d) immediately report if a close relative of theirs holds a position at a partner company that is involved in the Group's decision-making, or if an employment relationship is established where they manage or evaluate a close relative;
- e) act with particular caution in transactions involving themselves or family members when acting as senior employees, and to discuss such cases with the Group's compliance organisation in advance.

In circumstances that give rise to conflict of interest, the **person exercising the employer's rights** must be notified in advance to ensure transparency and allow appropriate measures to be implemented.

#### 2.2.3.1 Recruitment – preventing nepotism

AutoWallis Group is committed to using selection and development practices that are based on equal opportunity and transparency. The participation of family members in the recruitment process is permitted; however, all candidates must go through the same stages of objective selection, avoiding all forms of favouritism. The hiring of a relative of a senior employee requires the prior approval of the CEO.

AutoWallis Group also ensures that its remuneration systems comply with legal requirements, and aims to retain employees demonstrating exceptional performance and to support their professional development.

AutoWallis Group has developed detailed rules for preventing and handling conflicts of interest, which are available on the AutoSpoiler platform:

- a) AW\_Conflict of Interest Policy
- b) AW\_Declaration of No Conflict of Interest

In case of any questions regarding the above, our Employees can contact us by email at [compliance@autowallis.hu](mailto:compliance@autowallis.hu).

#### 2.2.4 Media and press relations

Maintaining the reputation of AutoWallis Group and the perception of its brand is our shared responsibility that is reflected in the behaviour of every Employee. Our external and public communications, including the use of social media, must be authentic, respectful and aligned with the core principles of the Code of Ethics.

Only designated individuals are authorised to communicate with the press and the public, and all information intended for the media must be approved by the **Marketing & PR Department** and, depending on the target audience and nature of the data, by the **Director of Investor Relations** of AutoWallis Group. The senior management of AutoWallis Group and the Subsidiaries may engage in such communications in accordance with the publicly available AW Disclosure Policy (found at [www.autowallis.com](http://www.autowallis.com)) following the established "**Disclosure Protocol**", without the need for the step described above.

Only transparent, accurate, non-misleading, reliable and approved information may be shared, while observing our corporate values, maintaining confidentiality and adhering to insider information rules. Consistency, accuracy and verifiability are requirements in all forms of corporate communication.

In a crisis situation, all relevant information must be immediately forwarded to the senior management, and the communication guidelines provided by them must be followed carefully ("crisis communication").

We expect our Employees to:

- a) refrain from speaking on behalf of AutoWallis Group, unless they have explicit written authorisation to do so in line with the Disclosure Policy;





- b) not share any document or information that is confidential, misleading or potentially harmful to the company;
- c) avoid voicing any personal opinion that could be interpreted as the official position of AutoWallis, unless expressly authorised.

While we respect that social media is also a part of private life, we expect our Employees to act carefully and maintain a responsible online presence, which means that they should:

- a) only share content that is accurate, truthful and not misleading;
- b) indicate that they are employed by the company, and only comment on topics related to their field of expertise;
- c) refrain from disclosing, commenting on or expressing opinions about confidential information, information that is not yet public or insider information (e.g., financial data, any information on potential acquisition targets, ongoing negotiations or future partnerships, the launch of new brands or legal disputes);
- d) pay attention to the legitimate use of copyrights, trademarks and visual or audiovisual materials;
- e) immediately rectify any misunderstanding in case of an error, and, if sensitive data have been disclosed, immediately notify the Group **Marketing & PR Department** and the **Director of Investor Relations** and, if necessary, the **Group Compliance Department** or the **Data Protection Officer**.

How we act on social media platforms, online message boards and thematic groups affects our company's reputation. Protecting the value of our brand is in our best interest and is a collective responsibility of all of us.

## 2.2.5 Consumer protection

AutoWallis Group is committed to maintaining fair, transparent and ethical relationships with consumers. In dealing with consumers, we do not engage in business practices that are unfair or provide unilateral advantages, do not influence consumer decisions in an unethical manner, and do not restrict their freedom of choice regarding goods or services.

We distance ourselves from any business activity that goes against the interests of consumers and could seriously or repeatedly harm or jeopardise the reputation of AutoWallis Group.

Our primary goal in communicating with consumers is to provide clear, unambiguous and detailed information. We avoid language that is difficult to understand or potentially misleading, as well as any information that could be deceiving. Our contractual terms and conditions always adhere to the principles of good faith and fairness: they are clear and unambiguous and aim to create and maintain a balance between the rights and obligations of consumers.

We firmly believe that the foundation for long-term business success is consumer trust, which can only be gained through responsible and ethical corporate conduct.

AutoWallis Group has developed a comprehensive policy to ensure the consistent interpretation and integration of the extensive consumer protection legislation into its operations, which is available on the AutoSpoiler platform:

- a) AW\_Consumer Protection Policy

In case of any questions regarding the above, our Employees can contact us by email at [compliance@autowallis.hu](mailto:compliance@autowallis.hu).



## 2.2.6 Supplier relations

AutoWallis Group selects its business partners, suppliers and service providers based on transparent, objective and legitimate criteria, while following the principles of fair competition and eliminating conflicts of interest at all times. The relevant departments are also involved in the selection process in every case, and the process complies with the applicable internal policies.

We aim to establish long-term and reliable relationships with our suppliers based on mutual respect and integrity. We only work with partners who:

- a) comply with applicable laws and the internal policies of AutoWallis Group;
- b) share our commitment to integrity;
- c) possess the necessary qualifications and relevant experience to deliver the goods or services subject to the contract;
- d) are familiar with and adhere to our Code of Ethics, or have their own equivalent code of ethics that aligns with the expectations of AutoWallis.

When establishing business relationships, we assess the reliability of our partners according to the principle of proportionality and the set of criteria defined in our Procurement Policy. In any contractual relationship, we require, among other things, legal compliance, environmental awareness and the protection of confidential data and personal information.

Red flags that may indicate supplier-related risks include:

- a) *the suspicion of labour rights violations* arises when there are signs of child or forced labour at the supplier's premises, or if working conditions are unsafe;
- b) it is a sign of a *lack of environmental compliance* if the supplier fails to manage environmental impacts or clearly disregards environmental regulations at its premises, during manufacturing or when selecting its suppliers;
- c) it might be a sign of an infringement when the supplier does not possess the *necessary permits* or documents or fails to comply with the relevant local and international regulations;
- d) *the suspicion of money laundering* arises when the source, purpose or method of payments is not transparent or the funds transferred to or from the company are disproportionately large compared to the scale of operations;
- e) *conflict of interest* arises when undisclosed personal or business relationships exist between the supplier and Employees of AutoWallis;
- f) it is a sign of *low professional credibility* if the supplier lacks relevant experience or references, or clearly fails to meet expectations regarding standards of quality;
- g) *supply chain security* may be threatened if the supplier does not implement adequate security measures or fails to ensure the safe handling of products and processes;
- h) it is a sign of a *violation of ethical standards* if the supplier offers gifts, benefits or other inducements to Employees of AutoWallis Group in exchange for business benefits.

AutoWallis Group operates a whistleblowing system and an ESG complaint handling system (as detailed in [Section 4](#) of the Code), which allow our Employees, customers, suppliers and partners to report potential misconduct or inappropriate behaviour in a confidential manner (even anonymously).

## 2.2.7 Competition law compliance and fair market conduct

AutoWallis Group is committed to free and fair competition, and we build our business relationships exclusively on market performance, merit and full compliance with applicable laws.

Any agreements or coordinated practices that prevent, restrict or distort economic competition are prohibited. This includes, in particular:



- a) direct or indirect fixing of purchase or sales prices or any other business terms;
- b) coordination aimed at dividing markets or sources of supply;
- c) restriction of technological development;
- d) sharing of sensitive information with competitors in a way that is not public;
- e) creating barriers to entry for potential competitors.

Exercising caution is particularly important when interacting with competitors, since even implied or unspoken agreements or actions that merely appear to distort competition may be considered infringements.

Any conduct that aims to distort competition or results in competition being distorted not only damages the company's reputation, but can also lead to legal consequences, including severe fines, liability for damages and even criminal liability.

In markets where AutoWallis Group or any of its Subsidiaries is in a dominant position, any abuse of such dominance is prohibited. This includes, in particular:

- a) demanding unreasonable advantages or forcing the acceptance of unfavourable terms in business relationships;
- b) restricting sales or technological development at the expense of consumers;
- c) applying different terms when dealing with business partners in transactions that are identical in value or nature;
- d) making the conclusion of a contract conditional upon obligations that the other party must meet which are not related to the subject of the contract, either by their nature or according to commercial practice.

AutoWallis Group expects its Employees to act with fairness in the marketplace. In this regard, they must, in particular, refrain from any conduct that could discredit or harm the reputation of competitors, keep trade secrets confidential in all cases, and not obtain or use non-public information from other companies without authorisation.

AutoWallis aims to maintain competitiveness, strengthen integrity and ensure compliance with all legal requirements, which can only be achieved through the awareness and responsible conduct of our Employees.

AutoWallis Group has developed detailed internal regulations setting out the rules for competition law compliance:

- a) AW\_Competition Policy

In case of any questions regarding the above, our Employees can contact us by email at [compliance@autowallis.hu](mailto:compliance@autowallis.hu).

## **2.2.8 Compliance with international trade and sanctions policies**

AutoWallis Group complies with domestic and international regulations regarding export controls, economic sanctions and customs laws at all times. We pay particular attention to ensuring that all cross-border transactions conducted as part of our international operations are legitimate and fully aligned with the applicable regulations.

As a significant market player in the region, we strive to act in line with the following:

- a) we comply with customs requirements applicable to import and export activities, including the proper classification of goods and obtaining the necessary permits;
- b) we only work with authorised customs agents and ensure that all government licenses required for export are obtained;



- c) we do not enter into business relationships with countries, organisations or individuals that are subject to sanctions or associated with state-sponsored terrorism;
- d) we take all reasonable steps to ensure that the products sold or exported are not involved in prohibited end-use, particularly for military or nuclear purposes (e.g., the export ban concerning Russia and Belarus).

We expect our Employees to:

- a) always take existing sanctions into account when making business decisions;
- b) be particularly cautious whenever a business opportunity involving sanctioned countries or entities arises;
- c) follow partner due diligence procedures, including watchlist screening.

AutoWallis Group has developed detailed rules regarding the sanctions to be considered by AutoWallis:

- a) AW\_Sanctions Policy

In case of any questions regarding the above, our Employees can contact us by email at [compliance@autowallis.hu](mailto:compliance@autowallis.hu).

## **2.3 Protecting our values – Safeguarding the assets, data and reputation of AutoWallis**

We respect the tangible and intangible assets owned by AutoWallis Group and use them exclusively for business purposes in support of the company's goals. Private use is only allowed if expressly permitted by the relevant internal policies.

### **2.3.1 Protection of shareholder interests and disclosure of transparent and reliable financial data (financial integrity)**

AutoWallis Group aims to create long-term value for its shareholders through excellent business performance and sustainable operations. An essential prerequisite for doing so is the accurate, transparent and legally compliant handling, reporting and disclosure of financial data.

To this end, we expect our Employees to:

- a) *ensure the accuracy and lawfulness of accounting processes*: all financial transactions must be recorded with the proper authorisation, accurately and in full, in accordance with the applicable accounting standards;
- b) *avoid misleading practices*: recording fictitious events, producing false documents, reporting non-existing assets or distorting data for any reason (for instance, to meet performance targets) are prohibited, as is encouraging others to do so;
- c) *comply with internal policies and controls*: processes must be carried out according to internal procedures, with active cooperation during internal and external audits. The necessary documents and information must be provided, and control mechanisms must be maintained that reliably reflect business transactions and prevent and detect erroneous transactions;
- d) *rely on up-to-date and reliable data*: reports prepared for the management, investors, regulatory authorities and other stakeholders must be based solely on accurate and complete information;
- e) *support decision-making in a responsible manner*: management decisions must be based on financial analyses that take into account all available facts and both short- and long-term risks;
- f) *protect the company's assets and data*: financial, physical and intellectual property, as well as business records and documents, must be retained or disposed of in accordance with the applicable regulations;
- g) *avoid unethical or suspicious transactions*: in case of a suspicion, the Group Compliance Department must be contacted immediately. This includes situations where:



- i. financial results appear to be inconsistent with underlying performance; or
- ii. there is a suspicion of bypassing review and approval procedures; or
- iii. only incomplete or misleading information is available on the details of a transaction, etc.

The accuracy of financial and sustainability (non-financial) reporting is not only a legal requirement, but also the foundation for the company's credibility and long-term competitiveness. It is essential to ensure that all financial and business reports, whether for internal or external use, are up-to-date, accurate and complete, thereby supporting rational decision-making and transparent operations.

Responsibility for accurate financial and sustainability reporting is not limited to the finance, accounting and ESG departments, since every Employee is responsible for contributing to the accuracy of records and compliance with internal controls. The same rules that apply to external reports are also applicable to financial statements for internal use.

### 2.3.2 Protection of corporate assets

AutoWallis Group uses all of its assets and resources to achieve the company's objectives. We expect our Employees to use the tangible and intangible assets provided to them, such as office equipment, vehicles, tools, portable work devices (e.g., laptops and mobile phones) and equipment supporting remote work, in a responsible manner and for their intended purpose.

In accordance with the rules established by AutoWallis Group, the following apply to the assets it owns:

- a) certain assets may be issued by AutoWallis only upon signing a handover form, in which the Employee acknowledges receipt and accepts financial responsibility for their condition;
- b) AutoWallis Group's **IT Security Policy** must always be complied with, particularly when using digital assets (*see Section 2.3.7 for details*);
- c) unauthorised and unlawful use must be avoided, and personal use must be limited;
- d) personal use, such as making phone calls, is acceptable only if it does not violate the provisions of the Group's IT Security Policy, does not negatively affect work performance, and does not result in additional costs for the company;
- e) economical and efficient solutions that preserve resources over the long term should be preferred;
- f) any improper use, theft or waste of AutoWallis Group's physical or financial assets must be reported immediately when discovered by an Employee.

The responsible use of assets is a shared obligation of all Employees, which helps the company operate efficiently, optimise costs and preserve the condition of assets.

### 2.3.3 Protection of trade secrets

Protecting its intellectual property and trade secrets is of utmost importance to AutoWallis Group. We expect our Employees not to disclose, whether intentionally or out of negligence, any confidential or non-public information to third parties, including ideas, know-how, trade secrets and other protected data. At the same time, we are committed to respecting the intellectual property rights of others.

In addition, our Employees are expected to:

- a) not use or disclose confidential information obtained from a previous employer or other external party;
- b) install only fully licensed and legitimate software on the Group's computers (with the assistance of IT administrators), and only if such software is necessary for performing work or improving efficiency;





- c) not use information owned by a third party unless they have written permission or received approval from the Group's Legal/Compliance Department and the source of such information is properly referenced;
- d) not use any materials (e.g., trademarks or audiovisual content) for which they have not obtained prior consent from their owner;
- e) refrain from any activity that infringes on copyrights, trademarks or other intellectual property rights;
- f) save, download or copy documents only if their legitimate use is guaranteed.

Any non-public information that has economic value and for which reasonable measures have been taken to maintain confidentiality is treated by AutoWallis Group as a trade secret. Types of data and information considered trade secrets include:

- a) client data
  - i. non-public data identifying customers or their contact details or business activities;
  - ii. offers, price lists and brochures prepared by AutoWallis;
  - iii. correspondence with customers;
- b) business know-how
  - i. information related to product and service development (copyright protection, etc.);
  - ii. internal process descriptions, system designs and proprietary software;
  - iii. templates (e.g., contracts or delivery documents);
  - iv. marketing and training materials, expert opinions and position statements;
- c) data related to business operations:
  - i. customer and supplier contact details, contracts, invoices and performance certificates;
  - ii. mailing lists and statistical and administrative records.

Information that forms part of business know-how may exist in both physical and electronic form, and so the format of such information is irrelevant to the content of business know-how. Employees acknowledge that business know-how or parts thereof may be protected by copyright belonging to AutoWallis Group.

It is important to note that the trade secrets and intellectual property of AutoWallis Group may be used exclusively in connection with the Employee's job duties and solely for the benefit of AutoWallis. Any other use requires written authorisation or must be based on a contract.

## 2.3.4 Prohibition and prevention of insider trading

**Insider trading occurs when critical non-public information that is not yet available to the public is used by someone for financial gain.** Such infringements include, for example, cases where an Employee uses internal, non-public information to conduct transactions (buying or selling, entering into options or futures contracts, or securities lending) involving shares or other listed products, either in their own name or through a third party. A similarly serious ethical breach and violation of the law is passing such confidential information on to another person who can reasonably be assumed to use it in on-exchange or over-the-counter (OTC) trading.

AutoWallis Group is committed to fair trading in publicly listed securities and requires strict and full compliance with laws prohibiting insider trading.

Insider trading and market manipulation are criminal offenses and may carry severe legal consequences. We expect our Employees not only to fully comply with insider trading laws, but also to refrain from any conduct that could raise the suspicion or create the appearance of misuse of insider information.

In addition, our Employees are expected to comply with the following:



- a) trading in securities issued by AutoWallis Nyrt. while in possession of insider information is prohibited;
- b) sharing such information with third parties (any person not included in the permanent insider list of AutoWallis Nyrt. or the transaction-specific insider list for the given project) is prohibited;
- c) disseminating false or misleading information, especially for the purpose of manipulating prices and market decisions, is prohibited;
- d) even within AutoWallis Group, insider information may only be shared with authorised persons and to the extent required for work, and only if the necessary permission has been obtained, in accordance with the policy on the prohibition of insider trading and market manipulation (MAR policy);
- e) insider information must be protected from unauthorised access and accidental disclosure.

In case of any questions regarding whether certain information qualifies as insider information, Employees must contact the **Director of Investor Relations** of AutoWallis Group. For further information, we recommend consulting our publicly available policy on the topic:

- a) Insider Trading and Market Manipulation Policy

### 2.3.5 Protection of intellectual property

We protect the intellectual property rights of AutoWallis in order to safeguard our competitive advantage and ensure legal compliance. Therefore, we expect our Employees not to disclose any non-public information, trade secrets, ideas or other protected content to third parties, whether intentionally or inadvertently. At the same time, AutoWallis Group itself is fully committed to respecting the intellectual property rights of others.

We expect our Employees to:

- a) actively avoid infringing upon the intellectual property rights of others;
- b) use confidential information belonging to others only if they have proper authorisation to do so, such as a written contract or explicit approval from the Legal Department of AutoWallis Group;
- c) refrain from using materials (e.g., audio or video clips, online content or trademarks) for which they do not have the necessary permissions for legitimate use;
- d) install computer programs on devices owned by the Group only if the company has a valid license for them, or if such programs can be lawfully used without charge;
- e) copy, download or save documents only if these are properly licensed and there is no suspicion of copyright infringement.

Any intellectual property developed by Employees as part of their work during their employment with AutoWallis, including, in particular, copyrighted works, inventions, know-how or other innovations, constitute the property of AutoWallis Group, in accordance with applicable laws. This is included as a standard clause in employment contracts, and even more so within the job descriptions outlining the Employees' relevant responsibilities. This ensures that Employees make their decision to enter into their employment contract under clear and transparent conditions, without requiring a separate document or subsequent declaration to be signed.

Protecting confidential information and intellectual property is particularly important for AutoWallis Group. Accordingly, strict rules apply to the handling of information, not only in dealings with external partners, but also between companies within the Group. Any unauthorised use or disclosure of such data may lead to legal consequences. The use of appropriate confidentiality agreements (e.g., Non-Disclosure Agreements or NDAs) can guarantee legitimate and secure information sharing when communicating with Subsidiaries or third parties (e.g., financial institutions).



## 2.3.6 Protection of personal data

AutoWallis Group collects and processes personal data solely for specific legitimate business purposes, in line with the principles of fairness and legality. We are committed to fully complying with applicable data protection laws, particularly the provisions of the General Data Protection Regulation of the European Union (GDPR).

The lawfulness, confidentiality, integrity and availability of the processing of personal data are guaranteed by AutoWallis Group's internal **Privacy Policy (Processing of Personal Data)**. Personal data may be accessed and processed only by authorised Employees and our data processors, and even they may only do so to the extent required by the business purpose, and only if accessing and processing such data is necessary for performing the tasks and activities assigned to them.

To guarantee a high level of data protection, Employees who process personal data as part of their work must complete mandatory data protection training upon hiring and every two years thereafter, and on an ad hoc basis whenever necessary.

All Employees and contractual partners of AutoWallis Group are expected to:

- a) understand and comply with data protection laws and the provisions of AutoWallis Group's Privacy Policy to the extent required;
- b) process personal data with due care and in accordance with the principles of data processing, in a manner that is transparent to data subjects;
- c) collect and record only the minimum amount of personal data that is absolutely necessary to complete their task;
- d) not disclose the personal data of Employees, business partners or customers of the Group to third parties unless expressly authorised to do so, and even then they must do so only via secure channels (e.g., encrypted email);
- e) only have access to personal data that they are authorised to see, or if necessary and justified from a business perspective;
- f) retain personal data only for as long as required by law or the internal policy. Once this period expires, the data must be securely and permanently deleted from the systems;
- g) apply the principle of *Privacy by Design* when designing and developing any new service (product) or internal process that involves the processing of personal data and, to this end, consult the Data Protection Officer of AutoWallis Group if needed;
- h) immediately report any privacy incidents and issues or suspicions thereof to their immediate superior, and assist in resolving them whenever possible;
- i) immediately forward all privacy-related enquiries received by AutoWallis Group to the data protection representative of the given Subsidiary or to the Data Protection Officer of AutoWallis Group ([adatvedelem@autowallis.hu](mailto:adatvedelem@autowallis.hu)).

## 2.3.7 Our IT security

The protection of its own data and digital and IT assets and those of its business partners and Employees is of particular importance to AutoWallis Group.

To guarantee information security and data protection, we expect our Employees to:

- a) use electronic communication systems only to the extent they are authorised to do so, and not forward or handle data for which they lack authorisation;
- b) refrain from storing or forwarding any content that goes against the values of AutoWallis, such as violent, hateful, obscene or harassing material or material promoting terrorism. Such content (e.g., material received via unsolicited emails) must be deleted immediately and must not be shared in any form;



- c) not leave confidential information or valuables unattended and avoid discussing such matters in public places. We require the implementation of and adherence to a Clean Desk Policy, meaning that corporate data must be handled according to their level of confidentiality, and paper documents must be locked away and computers shut down at the end of each workday;
- d) immediately report any information security or cybersecurity incidents (e.g., data loss, threatening messages or suspicious activity) or vulnerabilities to their immediate superior, the Group IT Officer, or at least the Compliance Department of AutoWallis Group and/or the Data Protection Officer;
- e) fully comply with the IT Security Policy of AutoWallis Group and participate in mandatory training;
- f) not search for, store, send or publish content, such as pornographic images, texts or video recordings, that promotes violence, hate, terrorism or intolerance, or content that is harassing, obscene or threatening in nature. If such material is received (e.g., via email), it must be immediately deleted from all devices;
- g) keep passwords confidential and never share them with others, and use strong, unique passwords for each service;
- h) be vigilant about suspicious emails and links, and never enter their login credentials on unknown or untrusted websites;
- i) install only software approved by the Group on work devices;
- j) use only secure, password-protected networks and connect to the company VPN whenever possible when working remotely;
- k) pay attention to the physical security of the workplace and not allow unidentified individuals to enter restricted office areas.

While respecting the relevant data protection and privacy regulations, AutoWallis Group reserves the right to access company-owned computers and mobile phones, as well as the data stored on them, within the boundaries of the law.

AutoWallis Group only permits the use of trusted and approved software and applications. Installing applications that are not approved, especially those intended for processing confidential data, on the devices of AutoWallis Group is prohibited.

We design and protect the company's IT systems, networks, devices, processes and services to resist unauthorised access, data theft and data loss. We apply multi-layered security measures and monitor IT resources for legitimate business purposes, in accordance with legal requirements, in order to:

- a) ensure business continuity;
- b) comply with regulatory requirements;
- c) protect the information of AutoWallis Group and its partners.

External partners processing data on behalf of AutoWallis are required to implement information security measures that meet our corporate standards, and we regularly review and assess these.

### **Ethical use of artificial intelligence by AutoWallis Group**

The use of artificial intelligence (AI) offers opportunities to improve efficiency and innovate our services within AutoWallis Group. However, the use of these technologies is only permitted in an ethical and responsible manner and in compliance with the most stringent privacy and security requirements. We expect our Employees to:

- a) never provide any confidential information or personal data when using AI tools;
- b) use only AI tools intended for businesses (those that require a subscription);
- c) use generalised and anonymised examples instead of specific and confidential data when AI assistance is needed to solve a problem (data minimisation and anonymisation);



- d) be critical of and review all text, code, data or suggestions generated by AI before use. AI can make mistakes or provide inaccurate or outdated information, and it is always the Employee who is ultimately responsible for the quality and accuracy of their work.

In case of any IT-related questions, our Employees may contact IT Helpdesk by email at [support@editus.hu](mailto:support@editus.hu).

### 3 Implementing and enforcing the provisions of the Code of Ethics

AutoWallis Group places strong emphasis on ensuring that all Employees are familiar with the contents of the Code of Ethics. To this end, we organise regular training courses in e-learning format, as well as in-person or online sessions where participants can ask questions. The training is repeated every two years and is mandatory for new Employees within four weeks of hiring. Following the training course, participants take a test and confirm in writing that they have understood the provisions of the Code and agree to be bound by them.

The Code of Ethics was approved by the **CEO** of AutoWallis Group in line with Resolution No. 2/2023. (VII.19.) of the Board of Directors. The Code expresses the Group's commitment to transparency, a respectful working environment and operations that are free from harassment and violence.

The **Group Compliance Officer** is responsible for the development and review of the Code. The annual review must be carried out by the deadline specified in the Policy Review Plan. Ad hoc revisions and amendments may be made in response to changes in the business environment, organizational structure, or applicable legislation, if such changes affect the provisions of the Code. The document is available to everyone on the Group's official website, and for employees via the [AutoSpoiler](#) platform. The dissemination of the contents of the Code of Ethics and the organization of related training sessions also falls within the responsibilities of the Group Compliance Department, particularly upon the introduction or amendment of the Code, or when new employees join the Group.

AutoWallis Group ensures compliance with the provisions of the Code of Ethics and promotes and maintains ethical conduct through an independent ethical governance structure consisting of the Group Compliance Department and the Ethics Committee. Breaches of the Code of Ethics are jointly investigated by the **Group Compliance Department** and the **Ethics Committee**, in accordance with the **Rules of Procedure of the Ethics Committee** (that is available to all employees on the [AutoSpoiler](#) platform).

The members of the Ethics Committee act independently in their decision-making; within the framework of their employment relationship, they cannot be instructed or otherwise influenced in their capacity as members. The Ethics Committee is responsible for providing guidance on ethical conduct in both general and individual matters, and for taking a position on issues related to the interpretation of the Code. Based on its experience, it may propose improvements to the Code or recommend employee training programs. Every elected member of the Ethics Committee is committed to supporting the ethical operation of the AutoWallis Group.

The Code of Ethics of AutoWallis Group is binding upon all of us, and adherence to it is a shared responsibility of every Employee and stakeholder. While the core principles of the Code provide guidance for everyday operations, they cannot cover every possible scenario; in such cases, common sense and a consistent application of ethical principles are needed. In these situations, a few simple questions can help make the right decision:

- A. Would I take responsibility for the decision?
- B. Is the decision in line with the provisions of the Code of AutoWallis?
- C. What would others think about this decision, either inside or outside AutoWallis? Could it harm the reputation of AutoWallis Group if it became public, either locally or internationally?





The Group **Compliance Officer** of AutoWallis Group is responsible for the overall application and enforcement of the Code. Therefore, the Compliance Department should be contacted if one is still unsure how to assess an issue after answering the above questions. Employees of AutoWallis Group may contact the Compliance organisation directly, even in private, if they encounter an ethical or moral issue affecting them in the workplace. For written communications, we recommend using the email address [compliance@autowallis.hu](mailto:compliance@autowallis.hu). This email address is accessible only by the **Group Compliance Officer** and the **Compliance Expert** (Compliance Department), who keep all information received via this email address confidential and guarantee the secrecy and confidentiality of the identity of whistleblowers.

## 4 Violations of the provisions of the Code of Ethics

Compliance with ethical standards and laws is a fundamental requirement for the long-term and sustainable operation of AutoWallis Group. Any violation of the provisions of the Code may, depending on the severity of the case, have negative consequences under labour, civil or even criminal law, including termination of employment or, in the case of a contracted partner, termination of that partner's engagement or other contract under civil law.

Ignorance of laws or internal regulations does not exempt individuals from liability arising from their violation. All reports submitted through any of the channels listed below will be investigated. Given the potential substantive overlap between ethical and compliance-related matters, cooperation between the Ethics Committee and the Group Compliance organization is warranted in most investigations. Each reported case is classified based on individual assessment, and the investigation is led by the organizational unit that has the appropriate competence and authority based on the nature of the matter.

Violations of the Code must be reported immediately through one of the following channels:

- a) the immediate superior;
- b) through the whistleblowing platform of AutoWallis Group (<https://autowallis.com/visszaelesbejelentes/>);
- c) directly to the Group Compliance Department ([compliance@autowallis.hu](mailto:compliance@autowallis.hu)), which is a secure and accessible channel through which internal and external stakeholders can receive guidance and raise ethical concerns;
- d) the Data Protection Officer in privacy matters ([adatvedelem@autowallis.hu](mailto:adatvedelem@autowallis.hu));
- e) with regard to the topics outlined in Section 2.1 of the Code of Ethics, it is also possible to contact the Ethics Committee directly (via <https://autowallis.com/esg-panaszbejelentes/> or by postal mail).

Employees should not fear any form of retaliation for submitting a report as they are protected by law in this regard (the Whistleblower Protection Directive<sup>5</sup>), and reports may also be submitted anonymously.

The whistleblowing system is available to anyone. If used, AutoWallis Group will follow the procedure set out in the rules of procedure (**AW\_Whistleblowing Policy**) accessible through the reporting platform, in accordance with the Directive. Submitting anonymous reports is also possible; in such cases, the whistleblower can track the status of their report using a system-generated identifier at a later time. Further details, including the effective Whistleblowing Policy and the Privacy Notice, can be found on the reporting platform, which is available via the websites of all Subsidiaries of AutoWallis Group.

---

<sup>5</sup> Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law



AutoWallis Group allows anyone to report ESG risks and breaches of ESG obligations as well. The reporting platform for doing so and the **ESG Complaint Handling Policy** regulating the submission of reports are also publicly available at the following link: <https://autowallis.com/esg-panaszbejelentes/>.



# AutoWallis

