

**THE CODE OF ETHICS AND BUSINESS CONDUCT**

**of**

**HUNGUEST Hotels Zrt.**



## **1. THE AIM OF THE CODE OF ETHICS AND BUSINESS CONDUCT**

The Code of Ethics and Business Conduct (hereinafter: "the Code") of HUNGUEST Hotels Zrt. (hereinafter: "HUNGUEST", "the Company") contains the rules of conduct, ethics, standards and expectations that contribute to the ethical operation of the Company and its compliance with applicable laws. The Code sets out the values and principles by which our Company envisages and conducts its business and the conduct it expects from its contractual and business partners.

The Code will only achieve its aim if ethical principles and rules are incorporated into everyday operations in such a way that any contrary conduct can be identified, investigated, corrected and possibly sanctioned. This is particularly important because we believe that ethical behaviour contributes to more competitive operations, the Goodwill of the Company and helps to increase employee engagement. We aim to ensure that our business partners are happy to contract and work with us.

As far as our Company's operations are concerned, it is important that through this Code we create and represent values that make guests want to book accommodation in our hotels, whether for business or pleasure. We believe that the most ethical conduct of our employees contributes to our successful and profitable operations.

## **2. THE SCOPE OF THE CODE**

2.1 Personal scope of the Code of Ethics and Business Conduct: the scope of the Code of Ethics and Business Conduct applies to all employees of the Company and in particular:

- former employees, job applicants,
- self-employed persons,
- persons who have an ownership interest in a company; persons belonging to the management, executive, supervisory board of a company, including non-executive members,
- volunteers, paid and unpaid trainees,
- contractors, subcontractors, persons under the supervision and direction of suppliers (including: employees of cooperatives and temporary agency workers) (hereinafter collectively referred to as "Concerned", "Concerned persons")

2.2 Temporal scope: It enters into force on 24 July 2023 and will remain in effect until revoked.

## **3. GENERAL STANDARDS OF CONDUCT**

- Everyone has a duty to comply with and enforce this Code, both in employment and in business relationships.
- Managers shall set an example and lead by acting in an ethical manner. Therefore, they have an increased responsibility to uphold and enforce this Code.
- Employees are required to perform their duties with dedication, using their skills, knowledge, experience, and competence, taking into account the interests of the Company.
- All employees have a duty to safeguard the Company's assets, to make decisions regarding expenses reasonably, with due care, with a good stewardship attitude and with responsibility.
- The wasteful and irresponsible use of the Company's assets and resources is prohibited.

- We have a zero-tolerance policy towards alcohol and mind-altering drug use. The use of drugs and working under the influence of alcohol, drugs and other psychotropic substances is prohibited in the workplace. For information, post-consumption conditions, i.e. post-conditions, following the use of alcohol or drugs may also constitute grounds for being under the influence of alcohol or other mind-altering substances. Our company will endeavour to act with the utmost respect for the rights of the individual in suspected cases of being under the influence of substance use.
- Employees are required to refrain from any form of physical or verbal abuse, both towards employees and other persons.
- In the performance of their employment, employees need to act in accordance with the law and the Company's internal rules, cooperate and bring to the employer's attention any information relevant to the performance of the employment relationship or likely to influence certain decisions of the employer.

#### **4. ETHICAL EMPLOYMENT**

- Our Company is committed to respecting human rights and explicitly expects its employees to do the same.
- Our Company aims to ensure equal opportunities both before and during employment.
- When choosing the form of employment, our Company pays particular attention to choosing and applying the form of contract that best fits the law and our business strategy.
- In its pre-employment and selection process, HUNGUEST strives to conduct a transparent procedure and to treat candidates fairly and to respect the requirement of equal treatment. In the recruitment-selection process, it uses tools and methods that are suitable for objectively assessing the knowledge and competence of candidates and that respect individual rights.
- The selection process avoids questions on data unrelated to the job or employment, e.g. marital status, having children, religious affiliation, political orientation, etc.
- Our company strives to take diversity into account in the pre-employment process and during employment, including vulnerable groups such as women, nationalities, ethnic, religious and linguistic minorities, people with disabilities and their families.
- The Company expressly prohibits child exploitation, modern slavery, forced labour, human trafficking and any conduct that may be construed as a violation of personal liberty, human dignity and human rights. In our activities and within the supply chain, we seek to prevent such activities.
- Our employees are selected and evaluated solely on the basis of their professional competence and performance. Our company expressly rejects any other form of selection, reward, promotion or preference.
- We seek to ensure equal opportunities, development and career progression in the performance of the employment relationship and in the development of the career paths and career programmes of our employees.
- When selecting and appointing managers, we strive to select persons not only in terms of professionalism, but also in terms of leadership skills, who adequately represent the company's values and whose ethical aspects are at least as much a part of their daily operations as the professional ones. They

shall put the interests of the company first in their management activities, to the detriment of individual or personal interests.

- Our company will always act with respect for human dignity and personal rights when terminating employment. In communicating this, it will endeavour at all times to treat the employee fairly, not to insult or humiliate them, and to enhance the reputation of our Company after their leaving the Company.
- In all situations that involve a change in the employer's operations, our Company will strive for transparent, appropriate communication and change management and change management.

## **5. CONFLICTS OF INTERESTS**

- Prospective and current employees are expected to declare (in advance) any future employment relationship, as well as any activity, fact or condition that may give rise to or may result in a conflict of interest or that may in any way harm or jeopardise the economic interests of the employer.
- Employees shall avoid any situation which creates or appears to create a conflict between the interests of the employee and the interests of the Company. If an employee is unsure whether their prospective or future position could give rise to a potential conflict of interest, they should seek advice to avoid a conflict of interest.
- During the employment relationship, an employee shall not, outside working hours, engage in any conduct which, in particular because of the nature of the employee's job, the employee's position in the employer's organisation, is directly and actually likely to damage the employer's good reputation, legitimate business interests or the purpose of the employment relationship.
- A conflict-of-interest situation may be as follows:
  - personal (e.g. subordinate position of a relative, close personal relationship),
  - economic (e.g. an employee has a consultancy or expert contract with the employee's own company or the company of the employee's relative),
  - other conflicts of interest (e.g. a second job which does not provide adequate rest time and adversely affects the worker's fitness for work).
- A personal relationship, business or economic interest shall not influence decisions, either in fact or in appearances. Employees shall avoid situations involving a conflict of interest and refrain from any activity which could in any way prevent them from taking impartial and objective decisions on behalf of the Company.

## **6. PROHIBITION OF DISCRIMINATION**

- Our company prohibits discrimination.
- HUNGUEST is committed to the elimination, prohibition and prevention of all forms and types of discrimination (direct and/or indirect), both at the workplace and at the societal level.
- Direct discrimination shall be taken to occur where, as a result of a provision which has the effect of causing actual or perceived disadvantage to a person or group of persons, based on their
  - a) sex,

- b) race,
- c) skin colour,
- d) nationality,
- e) belonging to a nation,
- f) mother tongue,
- g) disability,
- h) state of health,
- i) religion or belief,
- j) political or other opinion,
- k) marital status,
- l) maternity (pregnancy) or paternity,
- m) sexual orientation,
- n) gender identity,
- o) age,
- p) social origin,
- q) financial situation,
- r) the part-time or fixed-term nature of their employment or other employment relationship,
- s) membership of an interest group,
- t) any other status, qualification or characteristic (hereinafter together referred to as 'characteristic')

is, has been or would be treated less favourably than another person or group of persons in a comparable situation.

- Indirect discrimination shall be taken to occur where a provision which meets the requirement of equal treatment puts certain persons or groups of persons having the characteristics set out above at a significantly greater disadvantage than other persons or groups in a comparable situation were, are or would be in a comparable situation.

## **7. PARTICIPATION IN DECISION-MAKING, REPRESENTATION OF INTERESTS**

- Our company is committed to developing a system of broad employee information and participation in decision-making.
- Our Company supports the emergence of advocacy activities in the organisation and, where such activities are established, facilitates cooperation with such organisations and bodies and expects the same from them and their representatives.

## **8. WAGES AND OTHER BENEFITS**

- Our company strives to ensure that the remuneration of its employees is determined fairly and equitably when developing its remuneration policy.
- In all cases, remuneration should be commensurate with the individual effort and performance of the employee. In addition, the Company should take into account industry benchmark data, current labour market conditions, geographic and territorial considerations.
- In providing benefits, efforts should be made to ensure that they are composed of elements that are aligned with labour market trends, corporate culture and are geared towards employee engagement.
- In the choice of other elements of remuneration, care should be taken to ensure that tax considerations are properly taken into account when determining the remuneration package.

## **9. CREATING A WORKING ENVIRONMENT BASED ON HUMAN DIGNITY, MUTUAL RESPECT AND PSYCHOLOGICAL SAFETY**

- The relationship with employees, irrespective of the form of employment, shall be based on respect for human dignity and full respect for individual rights.
- We strictly prohibit harsh and cruel treatment of employees and other employees.
- The Company is committed to creating a corporate culture in which the psychological safety and well-being of employees and the development of a trust-based working environment are a priority.
- Our Company is open to and strives to implement programmes and conduct surveys that promote and support a corporate culture in which employees can express their opinions, satisfaction, commitment or lack thereof, or any violation thereof.
- HUNGUEST strives to ensure compliance with the above not only in words, but through real measurements, dialogues and open-door operations.
- The Company expects all its managers to set an example of how to create a workplace environment in which values, honesty, integrity, fairness and transparency can be achieved, where employees feel welcome, safe and confident to work and in which the best performance can be achieved.
- Our company strives to create and implement a corporate culture where making mistakes is not a crime, where there is an opportunity to own up to mistakes, where each employee takes responsibility for the work they do in their own job role, in their own position, and where the goal is to correct mistakes and find common solutions, rather than blaming others and pointing fingers.
- Our company, in designing its organisational structure, strives to create internal relationships that are appropriate to the checks and balances, to set up, build, operate and measure back control points and lines of defence.

## **10. FEEDBACK CULTURE**

- We expect our managers to be attentive to communicating effectively with employees, based on clear and objective feedback. Employees should be aware of the expectations of the Company, those of managers in general, and in the definition of specific jobs, in the course of their work. Managers should give employees the opportunity to ask questions and to obtain as much information as possible to help them to perform their work better and more effectively.
- Our company strives to operate transparently, to create a corporate culture in which feedback on performance is as prompt and objective as possible, and to encourage improvement and development.
- It is in the Company's interest to strive to do things as well as possible, but to do this it is essential to communicate and provide feedback on the work being done, whether it is to an internal "customer" (employee) or an external contractor.

- Both positive and negative feedback should be given in a way and style that does not violate the privacy rights of the employee or other stakeholders and, in the case of negative feedback, encourages them to perform better. When giving feedback, avoid using flowery language, vague references and avoid ambiguity where possible.
- Management behaviour that "listens" to the employee and does not give the employee a chance to improve and correct mistakes is not encouraged.

## **11. CORPORATE WELL-BEING POLICY**

- Our company has always considered it important, but since the outbreak of the Covid-19 pandemic, it has placed even greater emphasis on health awareness and the preservation of workers' health, not only in terms of occupational health and safety aspects required by law, but also beyond.
- We pay particular attention to creating a clean, safe and healthy working environment at a level commensurate with the capabilities of the industry.
- We recognise that employee wellbeing increases efficiency, promotes teamwork, influences company culture, reduces time off work and helps to retain employees. That's why we encourage programs and outreach that focus more attention on employee health and make both managers and employees more mindful of their well-being, physical, mental, physical, emotional, and career.
- Effective stress management and work-life balance are also key, and we strive to achieve these. We also strive to avoid and prevent potential burnout among employees. We try to provide the tools to identify these and to provide the support needed to promote employee well-being.
- In a changing macro- and micro-environment, we attach particular importance to management behaviours and employee activities that support the highest possible levels of corporate and individual well-being. For this reason, we explicitly condemn negative and damaging patterns of behaviour that run counter to this direction, that harm, destroy and poison at both corporate and individual levels.

## **12. PROHIBITION OF HARASSMENT, ABUSE OF POWER, AND RETALIATION**

- The Company expects its employees to treat one another with mutual respect and to settle disputes in a manner consistent with the rules and customs of professional conduct and social interaction, both in internal and external (client, contractual) relations.
- HUNGUEST will not tolerate harassment or any other degrading, humiliating, offensive, intimidating acts, conduct or behaviour. Everyone within the Company and its wider community shall be treated with courtesy and respect.
- Harassment is defined as conduct of a degrading, sexual or other nature, the purpose or effect of which is to create an intimidating, hostile, degrading, humiliating or offensive environment, particularly towards a person.
- Harassment may be manifested both when the conduct is linked to a protected characteristic and when such a characteristic cannot be identified.

The latter may constitute an abuse of power or other conduct contrary to other legislation.

- Harassment or abuse of power may in particular take the form of:
  - using obscene language, degrading or abusive language, behaving in a verbally aggressive manner,
  - shouting, threatening, scaring without reason, with expected sanctions or punishments,
  - using degrading, insulting, derogatory language,
  - blocking or cutting off communication channels, such as total or partial blocking of communication from either party when initiated, non-response to telephone calls, e-mails, deliberate avoidance of the other,
  - making untrue statements about a person, spreading rumours, misrepresenting a fact, "character assassination",
  - exclusion, exclusion from meetings, projects, joint work,
  - hostile behaviour, creating an environment, spreading malicious rumours,
  - manipulative behaviour aimed at creating a negative, unfavourable or negative opinion or value judgement of the other person,
  - abuse by granting or authorising leave,
  - arbitrary and unjustified impossibility of carrying out tasks, or holding people to account,
  - refusing to provide information necessary for the performance of duties, or deliberately withholding information,
  - unpredictable, inconsistent management style, unpredictable expectations not really necessary for the performance of the work or manifestly unrealistic expectations,
  - subjective performance appraisal based on non-objective facts, based on personal dislike or previous conflict,
  - unjustified and ungrounded verbal or written warnings, rewards or incentives of any kind, or exclusion from pay increases,
  - any conduct tending to or putting the employee in a position to resign or terminate their employment,
  - any reorganisation or organisational change by the employer which conceals a possible personal conflict, conflict or animosity and which may be considered an abuse of power.
- In particular, sexual harassment can take the form of:
  - inappropriate comments, typically of a sexual or external nature, which are not communicated in an appropriate or appropriate manner or content, or which may contain any kind of evaluation or scoring, excluding thoughtful compliments or comments with exclusively positive content. The latter may, however, also constitute sexual harassment if the receiving party has previously made it clear to the other party that such compliments or remarks are particularly disturbing and the other party has not respected this request.
  - violation of others' physical, sexual integrity, body boundaries, establishing intentional and unwanted sexual contact, unnecessarily close physical proximity,
  - coercion of the person concerned to engage in sexual activities, directly or indirectly, without their consent,



- demanding, exploiting or requiring sexual activity, courting, flirting, in order to obtain or obtain professional advancement, removal or other professional objectives,
  - making offensive statements of gender stereotypes, repeated unwanted comments or references of a sexual nature,
  - transmitting or posting written or pictorial material of a sexual nature in the work environment or in an environment related to the workplace.
- Harassment may be of a more serious nature, but the systematic, persistent, "pestering" nature of certain less serious conduct constitutes, or may constitute, workplace and/or sexual harassment, which the Company will not tolerate or tolerate in any circumstances.
  - The conduct of harassment is typically intentional and may take either active or passive forms.
  - Where a supervisor harasses a subordinate and abuses their authority in the employment relationship, it is considered to be a more serious form of harassment and will be sanctioned accordingly.
  - Similarly, any harassing behaviour towards a supplier, third party or contractor which may be considered harassment may also be harassment.
  - Any conduct which, individually or in the aggregate, may constitute or lead to harassment must be identified by anyone in the organisation and must be reported through any channels of their choice. Such conduct cannot be minimised and investigation cannot be ignored.
  - Retaliation is conduct that causes, seeks to cause or threatens to cause legal harm to a person who objects or initiates ethical, judicial or administrative proceedings or who participates in any such proceedings, on the grounds of unlawful conduct or conduct that is contrary to this Code or a breach of the requirement of equal treatment.

### **13. CONFLICT MANAGEMENT**

- All employees have a responsibility to cooperate in their work and to do their utmost to ensure the successful and efficient operation of the Company.
- If a conflict arises in any working relationship or situation, the parties concerned shall first resolve it between themselves.
- In the event that conciliation between the parties is not successful, they shall refer the matter to the first joint supervisor, who shall understand and investigate the conflict situation and seek assistance (HR, legal, coaching, psychological, etc.) as necessary.
- In the event that the manager fails to take appropriate steps to resolve the situation and, as a result, the retention of employees fails and/or turnover increases in the department, the manager may be held liable.

### **14. COMMUNICATION, PRESS, SOCIAL MEDIA**

- In its internal communication, our Company strives to establish and operate communication channels and interfaces that give employees equal access to information relevant to their jobs.

- All employees are encouraged to communicate ideas that will help the Company's operations to decision-makers in the appropriate way, thus contributing to the more effective operation of HUNGUEST.
- The Company expects all employees to use the official Company branding elements in their work. All documents representing the Company shall comply with these requirements.
- The Company aims to publish full, comprehensive and reliable information about its activities through all media. Our aim is to develop good professional relations with the press and to strive for transparent and balanced communication.
- Communication on behalf of the Company to the media requires a high degree of care and a thorough knowledge of legal and media issues and accordingly is only permitted and may only be conducted through Company Marketing and Communications Director.
- The Company's social media presence is handled by Company Marketing and Communications Director.
- Employees' presence on social media is part of their private lives and is respected by our Company. At the same time, employees are not allowed to act on behalf of the Company on social media, publish, share, disclose trade secret information, refer to the Company or portray the Company in a manner that is contrary to its values and interests.
- Employees whose use of social media is specifically part of their job duties shall communicate with due care and diligence, as directed by their supervisor and in accordance with internal policies. In this case, too, employees may only share information that is not a trade secret (unless exempted by the employer) and is in the best interests of the Company.
- All employees have a duty to enhance and protect the reputation of the Company. It is forbidden to state or report any fact that could damage or endanger the reputation of HUNGUEST, its social image, in front of contractual partners, customers, in the press, social media, in private, in private or in public.
- It is prohibited to publish or share on social media (even in small or closed groups) any content, regardless of its form (image, sound, etc.), which may directly or indirectly damage the reputation of the Company, its business partners, competitors or employees.
- If an employee posts, blogs, communicates, expresses opinions on social media or any online platform, they shall endeavour to ensure that their activity is not directly or indirectly associated with HUNGUEST as the Employer. As an Employee, make it clear that it is your own opinion.
- On professional websites (e.g. LinkedIn), employees may upload content and information about themselves that is consistent with their activities at the Employer and that is truthful.

## **15. PURSUING POLITICAL ACTIVITIES**

- Our Company does not formulate political goals and does not express political opinions, expectations or ideologies towards employees or external contractual partners.
- Employees have a constitutional right (the right to vote) to participate in politics, but such activity is strictly limited to individuals and not on behalf of the Company.

- If any employee engages in political activity, they are expected to do so outside the workplace, during working hours, using the Company's working facilities and infrastructure. An employee's political activity as a private individual should not give rise to a conflict of interest with their job or employment.

## **16. PROTECTION OF PHYSICAL AND INTELLECTUAL PROPERTY, USE OF COMPANY ASSETS**

- All employees have the duty to safeguard the Company's assets and property interests. Employees have a duty to protect and make proper and reasonable use of Company property in the course of their work.
- Employees, suppliers, contractors and customers of the Company shall protect the property and integrity of the Company and use it properly, economically and efficiently.
- All employees and relevant persons shall use the Company's funds, tangible assets and resources only for official purposes in accordance with internal regulations.
- Any equipment provided to employees for work purposes (e.g. notebook, mobile phone, car, fuel card, business debit card) is the property of or belongs to the Company and shall be used with reasonable care, as intended and economically.
- The unauthorised use, copying, distribution of information, solutions, protected intellectual products, in particular copyright works, which are the intellectual property of the Company is prohibited. Intellectual property created by an employee in the context of their employment is considered to be the intellectual property of the employer.
- It is prohibited to download from the Internet, copy, store or transmit material that is not related to the work or the Company's activities, in particular torrent content, sexual content and material that may offend or insult others.
- Documents stored on the server network and material stored on employees' computers and related to their work or the Company's operations are the intellectual property of the Company and may not be downloaded for personal use, copied to a personal medium or used for any other non-work related purpose.

## **17. PROTECTION OF BUSINESS SECRETS AND INFORMATION**

- Employees are obliged to keep confidential any data or information that comes to their knowledge in the course of their work and relates to any activity of the Company. The employee's obligation of confidentiality shall continue indefinitely after the termination of his/her employment with the Company. Increased breaches of confidentiality include, but are not limited to, any agreement between the employer and the employee regarding the salary.
- Any data or information relating to the activities of the Company which is not intended for the public shall not be disclosed or made available to third parties. An employee may disclose information which is a trade secret in the course of their employment to another party only if the disclosure, its purpose

and the scope of the trade secret to be disclosed have been expressly approved in advance by their superior and the other party has given a written confidentiality undertaking in advance.

- A trade secret is a secret fact, information or other data and the compilation thereof which is related to the economic activity of the Company, which is not publicly known or not easily accessible to the persons carrying out the economic activity concerned, and which therefore has a pecuniary value, and which is not known in its entirety or as a set of its elements, and the holder of the secret acts in a manner that is normally expected in the given situation in order to maintain its secrecy. Protected knowledge (know-how) means technical, economic or organisational knowledge, solutions, experience or assemblages of such knowledge, solutions or experience which are trade secrets, and which are recorded in an identifiable form.
- The Company processes data lawfully and complies with the data protection rules in force at any given time.

## **18. ANTI-CORRUPTION GUIDELINES**

- The Company is committed to transparent and accountable management and operations.
- The Company rejects all forms of corruption. All employees are expected to comply with the following guidelines in the course of their work.
- It is not permissible for a Company employee to give, offer or promise, directly or indirectly, anything of value or advantage to any person who may influence a matter in order to induce that person to breach their duties, to perform their functions in a biased manner or to give others an improper advantage. Company employees may not use their personal property for such purposes.
- Likewise, it is prohibited for a Company employee to accept anything from anyone in return for a breach of duty, a dishonest performance of duties, or an improper benefit.
- The Company rejects all forms of "bribes" to accelerate or influence the course of business and prohibits the practice of such bribes to its employees. Furthermore, any agreement or understanding that could in any way violate the anti-corruption policy contained in this clause is prohibited.
- Bribery and corruption can take many forms, such as any item or service of value offered or accepted to a person or a relative. This may include in particular:
  - cash or cash equivalents,
  - benefits in kind,
  - the provision of discounts or rebates on either goods or services,
  - the use of a motor vehicle,
  - travel expenses,
  - a loan,
  - unusually high commission,
  - a charitable donation,
  - fictitious contract,
  - a direct or indirect promise or offer of a business advantage,
  - use of recreational facilities,
  - the provision of tickets or gift vouchers,

- business meals,
- a leisure, cultural or sporting event.
- Business gifts or favours are widely used either as an expression of goodwill or to strengthen a bona fide working relationship between business partners.
- Gifts, entertainment, and catering will generally only be accepted or offered if they are not lavish or excessive in the circumstances and to the employees and are on a voluntary and casual basis.
- However, a gift should never be cash or a substitute for cash. Furthermore, the purpose of the gift shall never be to unduly influence decision making, nor shall it appear to outside observers to do so, as this would be contrary to the Company's anti-corruption rules.
- Any gift given with the intention of undue influence is a bribe, regardless of its value.
- Bribery can take place in various circumstances, for example during a tendering and/or contracting process. In order to assess whether a particular action constitutes a bribe, all relevant circumstances must be taken into account. The giving, offering, soliciting or receiving of bribes indirectly through a third party is also prohibited if the person concerned knows or ought reasonably to know of the unlawful conduct of the third party.
- Where a gift cannot be refused as a matter of courtesy or for practical reasons (for example, it has already been delivered and returning it is not reasonably practicable), it is for the employee's line manager to decide whether to allow the gift to be kept or whether it should be donated to charity or other community purposes.

## **19. FRAUD**

- Fraud, including the falsification of financial and non-financial data and statements, money laundering, is also prohibited. Our company aims to have anti-fraud processes in place to reduce the risk of fraud and to identify prohibited conduct.
- Fraud includes any intentional misrepresentation, including the intentional misrepresentation or concealment of facts or circumstances, with the purpose of inducing others to act in order to gain an advantage and thereby cause harm. Fraud may also occur without personal deception, where persons or parties collude to obtain unlawful gain by circumventing due process by creating a false appearance of a business or transaction.
- Our Company is committed to combating fraud and will not tolerate such practices.
- To protect HUNGUEST's core values, assets and reputation, it is everyone's personal responsibility to act in good faith and in compliance with applicable rules and regulations.

## **20. LIASING WITH CONSUMERS, GUESTS**

- Our company always strives to ensure that the hotels it operates meet the quality standards expected for their rating.
- HUNGUEST is committed to presenting a true and fair view of its service in the use of advertising in connection with its activities and to be free from any

false or exaggerated claims, including the concealment of material information about the service or the Company.

- We endeavour to ensure that guests staying in our hotels receive the care they expect and that this is accompanied by the highest possible standard of service for the category of accommodation.
- We respect the confidentiality of information about our customers and guests and respect their privacy.

## **21. LIASING WITH COMPETITORS**

- Our company will at all times strive to comply with the rules of fair competition in its dealings with competitors.
- We expressly refrain from directly or even indirectly discrediting the reputation of competitors.
- We will never use unauthorised means in providing information about the position and plans of competitors and will at all times act and act in good faith and fairly.
- We believe in healthy competition, and our competitors encourage us to maintain our vigilance in the market and to constantly raise the level of our services, in line with the expectations of our customers.

## **22. LIASING WITH SUPPLIERS, CONTRACTUAL PARTNERS**

- HUNGUEST seeks to build long-term, mutually beneficial relationships with suppliers based on trust.
- In all cases, we strive to comply with contractual terms and conditions and to pay suppliers on time and as contracted.
- At the same time, our Company also expects our contractual partners and suppliers to act ethically, to uphold the values and to fulfil their contractual obligations as set out in this Code.

## **23. CORPORATE SOCIAL RESPONSIBILITY**

- The Company strives to promote community service through programs, donations and actions to promote the development of the community and environment in which it operates.

## **24. SUSTAINABILITY**

- Our Company recognises its responsibility in the use of natural resources, the alteration of the environment and the emission of harmful substances.
- Our Company operates a number of hotels that are adjacent to and/or exist in an ecosystem with one of our key natural resources (e.g. Lake Balaton, Bükk, etc.). We therefore pay particular attention to environmental protection aspects in the conduct of our activities. Thus, we strive for a harmony between the built and natural environment that interacts with the opportunities

provided by nature in a way that does not exploit them but uses them in a way that is appropriate to the objectives and in the interest of nature conservation.

- In designing its work environment, the Company takes into account the protection of people and the environment, the use of recycled materials, the introduction of technologies and procedures to reduce waste emissions.
- Our Company strives to use renewable energy sources for sustainability and to operate efficiently and cost-effectively.
- When renovating and modernising hotels, we strive for solutions that do not unnecessarily exploit the natural environment.
- When sourcing food and selecting suppliers, it seeks to give preference to local producers and to source local ingredients.