KALL Ingredients Ltd.
5211 Tiszapüspöki, Fehértó part 1.

CODE OF ETHICS

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List of changes

Record of changes in content since the previous version.

Amendment number	Paragraph	Description of change
01.		Review; anonymous complaints, Declaration of Relatives - insertion of notes
02.		Compliance program

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1. Purpose of the Regulation

The main purpose of the regulations of KALL Ingredients Ltd. (hereinafter: " the Company") is to provide guidance for ethical and appropriate behaviour and for handling ethical issues.
It is important for both external and internal actors to become stakeholders and influencers of the Code on top of being the employees or stakeholders of the Company.

The Code

- serves to convey owner and manager expectations and fulfil business goals,
- helps prevent violations, supports the realisation and management of ethical issues, ensures compliance with laws, regulations and other legislation,
- reflects the message of predictability and thoughtfulness to colleagues, partners and competitors,
- facilitates cooperation with colleagues, partners, authorities and other institutions,
- introduces our staff the behaviours to follow or avoid.

All in all, the Code of Ethics is not just a collection of written rules. Instead, it defines our day-to-day operations.

2. Scope of the Regulation

The personnel scope of the Code covers all employees of KALL Ingredients Ltd.
The territorial scope of the Code covers the entire operational area of KALL Ingredients Ltd.

3. Responsible person(s)

All employees must be familiar with the Code of Ethics.
The HR Director coordinates compliance with and enforcement of the rules.
It is our employees' duty to contact their superior in case of questions regarding compliance with the regulations.

4. Practical operation

It is the employees' duty to report questionable or illegal actions, which the HR Director and the Managing Director will investigate and, if necessary, take appropriate action.

5. General values - Ethical standards

The general principles form the basis of ethical behaviour expected by the Company. All of these determine the behaviour and corporate culture our staff should follow.

5.1. Compliance with legislation and internal rules

Knowledge of and compliance with legal regulations and internal regulations is a fundamental requirement of the Company and its employees.

5.2. Behaviour at work

The employer's goal is to promote employee loyalty and encourage learning by creating and maintaining a stable, appropriate atmosphere, and a healthy and safe work environment.

Having fair relationships with external and internal partners is the basis of successful and lasting business operations.

In order to achieve this, employees are expected to be sensitive to the needs of external and internal partners. The Company aims to continuously evaluate and develop its products, services, technologies and business processes in order to provide quality, safe and innovative solutions.

KALL Ingredients Ltd. is a committed company where the principles, values and expectations reflect that employees should treat each other and our partners with dignity and respect.

In addition to cooperation and understanding, mutual respect must be the basis of all employment and business relations of our employees.

5.3. Prohibition of negative discrimination

We strictly prohibit discrimination based on race, colour, sex, disability, language, religion, political or other opinion, national or social origin, wealth, birth status or other status. The Company considers this principle to be extremely important and respects it to the greatest extent in its operations.

During operation

The Company

- acts with the same respect and prudence as the employees, makes its decisions solely on the basis of performance, merit, education, trust and recognition,
- treats employees in such a way that during the time of their employment, their abilities are expressed in accordance with the requirements of the job,
- maintains the requirement of equal treatment in the employer-employee relationship.

5.4. Protection of personal information, data protection

In order to protect data, it is the Company's duty

- to ensure that only employees authorised to do so can access data, and they only access said data for business reasons with confidential care
- to ask the employees to make statements or provide information only that is essential to their employment,
- to only request an aptitude test that is necessary to exercise their rights and to fulfil obligations,
- to inform the employee about the handling of their personal data.

There are CCTV cameras operating within company premises, and outbound phone calls and the activity performed on company computers are recorded for the protection of the Company's economic interests.

5.5. Child and forced labour

The company rejects all forms of forced and child labour. All employees and Company partners must apply this principle.

5.6. Prohibition of the use of drugs and the consumption of alcohol

The company opposes the consumption of drugs, the misuse of alcohol and medication. Employees must not enter company premises under the influence of alcohol or drugs.

5.7. Protection of health and safety, protection of the environment

Health and safety is a primary principle in the Company's operations, as is the production and quality of our products and services.

All employees must behave in such a way as to promote the creation of safe conditions and work as per company regulations.

5.8. Prohibition of unfair competition, fair business conduct

The Company supports the value of competition based on fairness and transparency in the market.

Employees of the Company are prohibited from obtaining or using the trade secrets from other companies unfairly. Furthermore, they must not communicate or make these public without authorisation.

The Company refrains from tarnishing the reputation of its competitors or any behaviour that harms or threatens their creditworthiness.

6. Conflicts of interest

A conflict of interest should be understood as any possible conflict of interest arising from working or acquiring an ownership stake in an economic enterprise that fails to be compatible with the economic goals and business aspects of the employer and that does not arise from legislation.

6.1. Conflicts of interest

The Company prohibits any activity that causes or creates the appearance of a conflict of interest between the Company and its employees.

A conflict of interest arises when

- the employee or his family member benefits illegally from the employment,
- the employee requests the Company's resources, partners, and suppliers to achieve personal goals, except for activities approved in writing by the Managing Director.

Employees must disclose possible conflicts of interest and must notify the Functional Manager and the HR Directorate by filling out the FE1_SZ-040 Declaration of Relatives form.

If there is no written permission by the Managing Director,

- the employee may not perform employment-type activities outside the Company,
- an employee may not become or be the owner or manager of a business that is related to the Company for business purposes.

Employees may not use the Company's name or purchasing power to obtain personal discounts or volume discounts, or to pursue any other private activity without the approval of the Managing Director.

6.2. Protecting the Company

It is the employees' obligation to promote the Company's values to the best of their abilities both financially and mentally.

Employees must not

- take advantage of opportunities that conflict with the Company's scope of activities,
- use the Company's property, information, position for their own purposes,
- act as a competitor to the Company,
- carry out commercial and sales activities for private purposes during working hours and on company premises.

6.3. Business gifts

Employees must recognize and reject situations in which others try to influence them by providing them with advantages. They should also refrain from influencing others by offering favours or benefits.

Gifts, entertainment opportunities and services - with the exception of those written in the management instructions - must not be accepted or offered.
Keeping in mind management instructions, these offers can only be accepted and made if they are of small value (2.000 Ft), serve business purposes, adapt to employment tasks and do not influence business decisions.
Employees must not accept or give money and monetary gifts.
All such cases must be discussed with the Functional Manager and the HR Director. Failure to do so will result in an ethical disciplinary offence.

6.4. Family and business relationships

Employees must not work with or provide services to anyone with whom they deal or have a relationship through their position at the Company.

Employees must notify the Functional Manager and the HR Director immediately if they learn that their close relative works for or provides services to a competitor, customer, contractual party, or supplier partner.

6.5. Selection of suppliers

The Company's relationship with suppliers and business partners is based on mutual trust. All suppliers and business partners must be treated fairly.
All information related to the relationship between the Company and suppliers is considered confidential.

The Company must take into account that

- suppliers must be selected based on merit,
- conflicts of interest and favouritism must be avoided,
- suppliers should be supported to learn about the company's ethical principles and expectations.

Employees must notify the Functional Manager and the HR Director if they notice any ethically inappropriate behaviour on a supplier's part or if they receive a business invitation from them.

6.6. Political and community relations

The Company respects the religious beliefs, political views and worldviews of employees but expects them not to jeopardise the Company's positive perception or denigrate the Company in their public functions outside the Company.

Employees may not use the company's material or other assets outside their work. Their activities must always be in line with the Company's principles.
If an employee engages in political activity, he/she may do so only in their own right and in their own name.

6.7. Ethical investment

Employees may make personal investment decisions but these decisions may not be based on employment in the Company or any other relationship therewith.

6.8. Confidentiality obligation

Employees must keep the business secrets they learn during their employment, basic information about the employer and their activities. This is the duty of all employees.
In addition, employees must treat all information that come to their attention in connection with the performance of their tasks confidentially. They may not disclose any information to an unauthorised person which could cause adverse consequences for the employer, one of their partners or another person.

7. Economic responsibility and asset protection

7.1. Economic abuse

Economic abuse is defined as any abuse that is aimed at obtaining an intentional or premeditated unauthorised benefit through fraud or other unethical means, including in particular:

- falsifying or changing documents,
- irregularities induced in reporting, financial funds or assets,
- approving or accepting payment for undelivered products.

If an employee is found to have taken part in these kinds of activities, he/she will be held liable under criminal, civil or labour law, including dismissal or disciplinary proceedings.
The Managing Director may waive the initiation of such procedures.

7.2. Asset protection

It is the employees' duty to protect the Company's assets and use them exclusively for business purposes. They must take responsibility for the appropriate and economical use of company devices.

8. Violation of the regulations of this Code

Violation of the provisions of the Code may result in liability under labour law, civil law, or criminal law.
Possible legal consequences include warnings, disciplinary procedures, and the termination of employment.

9. Compliance program

Any person or organization subject to this Code is obliged to report to the person, responsible for the compliance of the Code, with the information that he / she has encountered or is aware of, which is highly disturbing to the basic working conditions and is contrary to the Code of Ethics or the actions conflicting the Law.
The person who is responsible for the Code shall ensure that the complaint is handled in accordance with the procedures of the Notification system, and provide a summary of the complaint to the Managing Director.
Breach of this Code may result in a punishment or cause reason for termination. If the breach of the Code is accompanied by law breaking or any offense, it may also be a subject to criminal proceeding or statutory investigation according to relevant law.

If the Code does not provide guidance for a specific situation and ethical behaviour is unclear, the person concerned must contact the person responsible for compliance with this Code.

10. Attachments

FE1_SZ-040 Declaration of Relatives