



Business Conduct Policy

December 2022

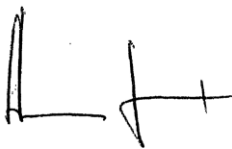
Dear Colleagues,

at CEE Catering HoldCo Kft. (the companies comprising CEE Catering HoldCo Kft. trading under the brands Delirest, Primirest and Deliservices, herein the "Group") our vision is to be a valued employer and trusted hospitality partner. The trust that our employees, clients, and customers place in us is fundamental to our reputation and the long-term success of our business. The Business Conduct Policy (BCP) codifies our commitment to conducting business fairly: treating everyone – customers, colleagues, suppliers and sub-contractors, as well as the wider community – with honesty, integrity and respect.

The BCP applies to us all, including employees, senior leaders, regional and executive directors, and anyone acting on the Group's behalf. Every one of us is responsible for protecting the Group's integrity and reputation. Thank you for reading and complying with the BCP and for your commitment to acting with integrity every day.

Working together, we will continue to do great things for our people, our partners, our communities, and the planet.

Thank you,



Janos Nyerges



Szilard Szabo



Our Mission & Vision

Our group of companies delights clients and customers in the CEE region through world-class contract food and support services.

We are market leaders and torchbearers for industry-leading compliance standards, outstanding health and safety systems and exceptional service quality.

Our vision is to build happier, healthier and more sustainable communities while growing our market position.



CORE VALUES

 CEE Catering

 Delirest

 Deliservices

 Primirest

Our 5 Core Values

1. We prioritize Health and Safety above all else.

Guaranteeing that our food is safe to consume and that our employees are protected at work.

2. We are always striving for improvement.

Every service offered, every experience created, and every human interaction has our customer's satisfaction in mind. We have a passion for quality, but we are not complacent and are always pushing to do better.

3. We are leading in governance.

Our industry-leading compliance standards give our clients peace of mind. This includes clear record-keeping, international audits, internal audit systems, a zero-tolerance policy for corruption, fully-employed staff, and transparent supply chains.

4. We have integrity and are transparent.

We build trust by being a reliable and accountable partner, we are ready to share our books with our clients. Suppliers can count on us, we respect their interests and pay on time. We foster open communication among employees.

5. We are proud to be result oriented.

Being profitable allows us to invest in the best resources and team members to provide outstanding service and to work towards our vision of happier, healthier and more sustainable communities.

Contents

Introduction	6
The BCP Applies To Everyone	
Compliance With The Laws	
Raise Concerns And Report Suspected BCP Violations	
Our Commitment To People	7
Human Rights	
Workplace Health And Safety	
Employment And Equal Opportunity	
Harassment/Bullying	
Our Business Practices And Standards	8
Conflict Of Interest	
Competition And Antitrust	
Reporting And Accounting	
Bribery And Corruption	
Money Laundering	
Gifts And Hospitality	
Our Company Assets	13
Brand Protection	
Information Security	
Data Privacy	
Our Interaction With The Environment, The Public, And The Government	15
Environment	
External Communications	
Social Media	
Community And Charitable Gifts	

ABOUT OUR BUSINESS CONDUCT POLICY

Protecting the Group's integrity and reputation is everyone's responsibility. Any unethical actions, no matter how minor, can harm the Group and impact us all. Our Business Conduct Policy (BCP) outlines the legal and ethical standards that all of our employees, and anyone acting on the Group's behalf, must follow. The BCP provides the guidelines and resources to conduct business ethically and in compliance with the laws in every country in which the Group conducts its business.

THE BCP APPLIES TO EVERYONE

Compliance with the BCP is mandatory. This means taking personal responsibility for doing the right thing and speaking up about any conduct that might violate the BCP, company policies, or any law.

The Group holds its suppliers, vendors, contractors, and consultants to the same standards as itself. To do business with us they must all comply with our Supplier Code of Conduct.

Those who fail to comply with the BCP, fail to disclose suspected violations, fail to cooperate with an investigation of a possible violation, or knowingly make a false report may be subject to disciplinary action up to and including termination of employment.

COMPLIANCE WITH THE LAWS

It is Group policy to comply with the laws in each country the Group conducts business. This includes, but is not limited to, compliance with employment, labour, and workplace rules; data privacy, cybersecurity, environmental, antitrust, gifts and entertainment; and/or anti-corruption/anti-bribery laws. Every Group employee and any person or entity acting for the Group must adhere to the restrictions and standards imposed by those laws and regulations.

RAISE CONCERNS AND REPORT SUSPECTED BCP VIOLATIONS

If you become aware of a possible violation of the BCP or any law, or even the appearance of a violation, you must report the incident. Raise your concerns promptly, because the longer we wait to address the concern, the more serious the situation may become. Potential BCP violations can be reported through the following channels:

- your Line Manager,
- your legal team,
- Group Legal (Legal and Compliance Manager),
- your/Global HR team,
- your local senior management team, and
- The Group's FaceUp Hotline.

THE FACEUP HOTLINE

The FaceUp Hotline is the Group's confidential reporting program. It is accessible to everyone, open 24/7, 365 days a year, and independently managed by the Group's Legal and Compliance team. FaceUp empowers anyone to raise concerns or allegations of potential misconduct in the knowledge that each issue will be assessed, followed up, and where appropriate, investigated.

For more information or to raise a concern, [visit our FaceUp portal](#).



Our Commitment to People

HUMAN RIGHTS

All of our work to support people is underpinned by our values and our commitment to human rights as set out in the Universal Declaration of Human Rights and in line with the UN Guiding Principles on Business and Human Rights.

WORKPLACE HEALTH AND SAFETY

Our people are our most valuable asset. They are key to the success of the business. It is our moral obligation to safeguard each other, our customers and the environment by operating an injury free, healthy workplace serving food that is always safe to eat and that minimizes our environmental impacts. Health and safety is our number one operational priority.

We have developed minimum operating standards and behaviours, under which we will:

- seek to prevent injury to any employee, customer or contractor, and
- ensure that every employee is properly trained to safely perform their work.

EMPLOYMENT AND EQUAL OPPORTUNITY

The Group is committed to a policy of equal treatment for all employees and prospective employees. Our policy is to hire, promote, compensate, discipline, and make all other personnel decisions without regard to race, colour, religion, national origin, age, sex, gender, pregnancy, sexual orientation, gender identity, genetic information, disability, or other classification protected by applicable law.

HARASSMENT/BULLYING

We expect that all employees should be treated fairly and with respect. We will not tolerate harassment or bullying of any kind in the workplace against our employees or our suppliers, business partners or clients.

Please make sure you always abide by these basic rules:

- do not make jokes about race, ethnicity, religion, age or sexual orientation,
- do not spread malicious rumours or use email, voicemail or other means to transmit derogatory or discriminatory comments, and remember:
- offensive, intimidating, insulting or malicious behavior of any kind will not be tolerated.

All forms of harassment or abuse are against BCP policy and will not be tolerated. If you are being bullied or harassed, or are aware that someone else is, please speak to your Line Manager, HR Team or another senior member of staff. Alternatively you can reach out through the FaceUp Hotline.



Our Business Practices and Standards

CONFLICT OF INTEREST

Employees must take care to ensure that no conflict of interest – actual or perceived – arises between their duty as a Group employee, and any interests outside of work. Conflicts of interest can arise in many ways, including the following.

I. other work interests and affiliations

Undertaking employment for other companies whilst employed by the Group, or being affiliated to other organizations that may be considered a competitor of the Group or a client, contractor or supplier to the Group, can create conflicts of interest.

Some arrangements of this kind are never permissible: you should not work or provide services for any company or organization that you deal with in your role in the Group. If you are considering taking on additional work outside of your Group company that may result in a perceived or actual conflict of interest, you should disclose this to your Line Manager and seek their prior written approval.

II. working with close relatives

If you become aware that a close relative works for or provides services to a competitor, client, contractor or supplier, you should discuss the matter with your Line Manager. As a general rule, a relative should not have any business dealings with you and where at all possible, with anyone in your business unit or anyone who may report to you.

Info: Who is a close relative under the BCP?

We consider that a “close relative” would include a spouse, partner, parent, stepparent, child, stepchild, sibling, stepsibling, nephew, niece, aunt, uncle, grandparent, grandchild or in-laws.

If you think you have a conflict of interest, or if you are aware of a potential conflict of interest involving you or another employee, immediately disclose the situation to your Line Manager, HR or the FaceUp Hotline. If you have any questions about conflict of interest, contact your HR team.



COMPETITION AND ANTITRUST

All our employees and representatives must comply with laws that prohibit unfair business practices and promote vigorous competition that is free from collusion. Violation of antitrust laws can carry substantial legal consequences, including potential criminal repercussions, for the Group and the employee.

I. price-fixing/restricting competition/ resale price maintenance

Antitrust laws forbid competitors from colluding to fix prices or restrict competition, as well as from agreeing not to compete in certain areas/ businesses. Even discussion of these topics with competitors can be problematic and pose substantial legal risk.

Similarly, each separate entity in a distribution chain must be free to set resale prices independently and according to prevailing market conditions. We must not take any action that fosters, directly or indirectly, the unlawful exercise of control over resale prices.

II. predatory pricing

Motivation is key. We can lower prices in an effort to stimulate business but cannot do so with intent to drive a competitor out of business.

III. conferences and trade shows

You should be especially cautious when attending conferences, trade shows, or other meetings where you may have contact with competitors to avoid even the appearance of unfair business practices. If topics related to current or potential clients are mentioned at any meeting with any competitor, you must remove yourself from the situation immediately and report the incident to your local or the Group's legal team. Areas of concern include but are not limited to pricing, bidding, territorial or customer allocation, or refusal to deal.

YOU MUST NEVER:

- DISCUSS OR AGREE WITH A COMPETITOR on anything related to the terms and conditions of sales or services to customers, such as prices, discounts, or warranties.
- COORDINATE BIDS WITH A COMPETITOR, including agreeing to refrain from bidding, to bid at a certain price, or to submit a bid that is intentionally less favourable than a competitor's bid.
- DIVIDE OR ASSIGN SALES TERRITORIES, customer services, or product lines with a competitor.
- PARTICIPATE IN ANY REFUSAL to deal with specific customers or suppliers.



REPORTING AND ACCOUNTING

We must ensure that our books and records are complete, accurate, honest, and timely, following the basic rules:

- All records must be accurate and complete, and they should allow an accurate view of the business at any point in time.
- Supporting documentation should be collected at the time of a transaction.
- Accounting records and documentation should be retained in accordance with local legal and fiscal requirements, but in any case, for not less than six years.
- Annual financial statements and documents relating to acquisitions and other significant transactions should be kept permanently.
- Fully co-operate with any internal or external audits, making sure that you provide the auditors with accurate information and allow them unrestricted access to documents and colleagues (subject always to legal constraints).

You must never:

- **FALSIFY ANY RECORD** – financial or non-financial.
- **DISPOSE OR OTHERWISE TRANSFER** any Group assets without proper documentation and applicable authorisation under the Authorization Procedure.
- **MAKE ANY FALSE OR MISLEADING** accounting entries or expense claims.
- **DESTROY INFORMATION** to conceal bad practices.

If you are concerned that correct financial processes are not being followed or that any kind of false or misleading entries are being made, you should promptly report your concerns to your Line Manager. If you are uncomfortable raising the matter with your Line Manager, consider speaking to your local Finance Director, HR, or use the FaceUp Hotline.



BRIBERY AND CORRUPTION

Bribery or corruption in any form is unacceptable and we are committed to transparency in all our business dealings. Most countries have laws that prohibit corruption. A breach of any of these laws is a serious offence which may result in fines for the Group and imprisonment for individuals.

Bribery is the giving or receiving of a gift, payment or other benefit, in order to obtain a commercial advantage. A bribe need not actually be paid, it is sufficient that it is asked for or offered. A bribe can be an issue irrespective of whether it involves private industry or government.

The Group complies with anti-bribery and corruption laws in every jurisdiction in which it operates, and the Group prohibits any payment to anyone who may influence a business decision. This is particularly important in our dealings with governmental, federal, state, public and local authority officials in any country.

Always report any suspicions or knowledge of improper payments being offered or received via the FaceUp Hotline or the HR Team.

YOU MUST NEVER:

- OFFER or make any unauthorized payments.
- ATTEMPT TO INDUCE anyone to do something illegal or improper.
- OFFER OR ACCEPT MONEY (or anything of value), or gifts, for obtaining contracts or business.

MONEY LAUNDERING

Money laundering is the process of concealing illicit funds or making them look as though they are legitimate. Money laundering and the financing of illegal activities are criminal acts.

It is Group policy not to accept payment for goods or services performed under contract from our clients (as opposed to end-customers) in cash. We would usually expect payments from clients to be drawn on bank accounts held in the name of the invoiced client. Any payment that a Group's company makes to a supplier or other third party must also be made to a bank account titled in the name of the contracted third party.

Any exceptions to this must be pre-approved in writing by either your local legal team or your Finance Director. It is the responsibility of local management to ensure that the Group company conducts its business in accordance with all local legal requirements, including compliance with any currency reporting requirements.



GIFTS AND HOSPITALITY

Providing gifts or entertainment to clients or suppliers or accepting gifts or entertainment from clients or suppliers can create the appearance of a conflict of interest. However, modest and appropriate entertainment, such as business meals or attending local events with clients, can be a productive part of a business relationship, provided that the entertainment is not excessive and does not create the appearance of impropriety or violate the law.

In addition, there are many laws that prohibit providing even modest gifts or entertainment to a government employee, such as an official or employee of a state university, public school district, county hospital, police department, or government-owned business.

You must follow the Group's Gifts and Hospitality Policy in considering whether it is appropriate to provide or receive a gift or entertainment to or from a client, potential client, supplier, or government official.

YOU SHOULD NEVER give, offer, receive or approve any:

- gifts or hospitality involving third parties involved in any competitive bid or tender process that you are – or may be considered to be – involved in,
- gifts or hospitality that would be illegal under local laws such as offering a gift to a government official which may be seen as a bribe under local law; please ensure you are familiar with your local legal obligations,
- payments of cash (or cash equivalents) or paying someone else's personal bills or expenses; any hospitality that might be in breach of this Business Conduct Policy or that may be considered indecent or inappropriate as part of a business relationship or which may have a negative effect on the Group's reputation.



Our Company Assets

BRAND PROTECTION

The Group respects copyrights owned by others and permits the use of copyrighted materials only as allowed by law or through an agreement. You must never make copies, reproduce, resell, or transfer software or its supporting documentation unless you are authorized to do so by the license agreement for that software.

YOU MUST NEVER:

- copy documents and materials without specific permission to do so,
- knowingly infringe a patent, trademark or other intellectual property right of any third party,
- use any third party's confidential information unless you are authorized to do so in a signed confidentiality agreement that meets local internal guidelines, and
- load any unlicensed software on any Group computer or other equipment.

If you have any questions about copyright or software licensing, please contact your Line Manager or your local legal team.

INFORMATION SECURITY

The Group's systems – that is our IT hardware, software, office equipment, telephone and email system – are all intended to be used for conducting Group business. Each user is required to use the facilities in a professional and responsible manner at all times. In order to protect both the Group and the individuals using our IT systems, you should always ensure that your use of the Group's IT systems: (i) does not break the law in the country where you are working; (ii) does not risk bringing the Group company name into disrepute; and (iii) does not cause damage or disruption to the Group's business.

FOLLOW THE BASIC RULES:

- do not install or use any unauthorized hardware or software on any Group system,
- protect any username or password that you are allocated and do not share them with others,
- do not access or download, create or forward emails, documents or images that may cause offence, distress or harassment to others,
- restrict your use of Group systems for personal use to a minimum.

CONFIDENTIALITY

No employee should disclose any confidential information relating to any Group company or its business outside the Group without specific authority to do so. Where confidential information is to be disclosed to another party, it should be released only under the terms of a written confidentiality agreement or undertaking entered into with the other party.

If you are required to disclose confidential information under the terms of an order of any competent judicial, governmental, regulatory or supervising body, you should first notify your local or the Group's legal team and seek their approval before making the disclosure.

Employees should not use the Group's confidential information for their own personal advantage or for a friend or relative.



DATA PRIVACY

As a business, the Group holds personal data about employees, our clients, suppliers and other third parties. It is crucial that we ensure that the confidential nature of any such personal data is kept secure at all times.

Compliance with data privacy regulations is required by law and any failure to comply could result in financial and criminal penalties for both the Group and the individual.

Any personal data that we hold must only be used for business purposes and we must ensure that it is:

- obtained lawfully,
- processed only for the purposes for which it was obtained,
- accurate and relevant to the purpose,
- not held for longer than is necessary,
- stored securely, and
- not transferred to other countries without adequate protection.

If you receive any formal statutory or regulatory requests, or complaints from individuals to access personal information that we are holding in respect of them, you must first refer the matter to your local legal team or whoever locally is responsible for managing data protection issues.

YOU MUST:

- HAVE AUTHORIZATION to access personal data and use such data solely for business purposes.
- ENSURE that personal data is held securely with restricted access.
- NEVER PROVIDE personal data to unauthorized persons in or outside of the Group without the necessary consents and contracts in place to ensure that they also treat the personal data with the same level of confidentiality.



Our interaction with the environment, the public and the government

ENVIRONMENT

The environment is not a sector, but an attitude and approach which represents a necessary part of all of our activities. In short, it is important that employees display environmental responsibility in all areas within their control, regardless of their position. In addition to complying with all relevant environmental legislation, the Group has developed its own common set of behaviours that are being introduced into all our operations. We continue to drive improvement across our business, particularly in the areas of supply chain and environmental performance.

EXTERNAL COMMUNICATIONS

To ensure that we meet our legal obligations, and that our responses are timely, complete, and accurate, the Group channels external inquiries through authorized company representatives.

All media requests for a statement by or on behalf of Group companies must be promptly referred to your local Managing Director. Only the Managing Directors or company spokespeople designated by the Managing Directors are authorized to speak for the Group companies or manage the process.

When responding to any requests from government officials or public regulatory bodies to provide them with any information in connection with an enquiry or investigation, you have a duty to make sure that you are truthful and accurate, and that the Group's legitimate interests are protected. Always contact your local legal team, or contracted lawyers before responding to any request for information in this regard. Group employees are expected to co-operate fully with the investigation. You must not obstruct the collection of information by properly authorized officials or retaliate against anyone who co-operates with the investigation.

In case government officials attend your office or unit and request information:

- contact your local legal team, or contracted lawyers immediately,
- ask to see identification and take a copy of it,
- clarify with the individuals which organization they are representing, what is the nature of their investigation, and
- make sure that the representatives are not left unattended.

SOCIAL MEDIA

When using social media, blogs, discussion forums, online publishing, and user-generated media for business purposes and for personal reasons, all employees must follow the Group's Social Media Policy. Different rules apply when you are using social media on Group's behalf and when you are using it for personal reasons. Only designated Group company spokespeople are authorized to speak for the Group.

When using social media for personal reasons, make sure you comply with all Group policies that might apply to your postings and be careful to protect the Group's confidential and/or proprietary information, as well as the confidential and/or proprietary information of the Group's clients, customers, suppliers, and employees.

COMMUNITY AND CHARITABLE GIFTS

The communities in which we operate our business (and from which we draw our employees) are important to us and we are committed to making a positive contribution to the sustainable development of these communities. Through its donations and sponsorships, the Group aims to improve its impact on the environment in which it operates and the communities it serves to benefit all of its stakeholders.

In case of any charitable contributions, all Group employees are expected to follow these rules:

- comply with local laws and regulations – contact your local legal team if you need assistance in this regard;
- seek prior approval of your Line Manager and the marketing team before any planned external communication and before engaging with potential benefiting parties.
- seek the prior approval if applicable under the [Group Approval Policy](#).



CEE Catering HoldCo Kft.

H-1117 Budapest, Irinyi József u. 4-20.
B épület 5. em., Science Park Irodaház