



## Code of Ethics

### A letter from the owners

*The RTG Corporate Responsibility Ltd., as a company name, is composed of our initials. Since 2006, when we founded our company, we have been working to create value for our clients and the broader environment in the diverse professional areas of sustainability.*

*As a consulting company, we pay special attention to ensuring that our professional independence remains inviolable, and that our work always gets carried out at the highest possible level. This is dictated by our internal ethical standards and is also in the interest of our clients. We do not provide any supplementary activities or services during a given period for a company where we have received an auditing/assurance assignment.*

*We proudly represent RTG and take ownership of all work performed by us, whenever possible, with attribution. In every project undertaken by RTG, at least one of us has been involved in the implementation. Throughout the operation of the company, we consider it of paramount importance to consistently implement and convey lawful and ethical practices.*

*Tamás Radnai and Gabriella Tóth*

### 1. Scope

The scope of the Code of Ethics extends to the founders, employees (regardless of their form of employment), and partners (including clients and suppliers) of RTG Corporate Responsibility Consulting Ltd. (hereinafter referred to as RTG), as well as those connected in some way with RTG.

### 2. Compliance with regulations

At RTG, the commitment to integrity begins with compliance with laws and other regulations. We are familiar with and adhere to the legal requirements and regulations that frame the environment of our business operations. We respect both the letter and the spirit of written rules.

### 3. Commitment to sustainability

The primary goal of RTG is to operate a successful business through the independent professional representation of the spirit of sustainability. For the founders and employees of RTG, sustainability is not only a business principle but also an important value in their personal lives – enabling us to be credible service providers.

### 4. Fair competition and ethical business operation

Our cooperation with our partners is built on trust and mutual benefits in accordance with competition law. We are committed to ethical and fair competition. We make independent business decisions and do not engage in prohibited collaboration or coordination of our operations with



competitors. We refrain from behaviors that could harm the reputation of our partners or competitors' credibility.

We do not tolerate behaviors that violate fair competition during negotiations and tenders.

We adhere to all contractual obligations we undertake.

We do not withhold payments rightfully due to our partners in bad faith, unlawfully, or without justification.

Every client assignment is equally important to us. We only take on tasks that we can fulfill on time and with maximum professional dedication. We adhere fully to the contractual requirement, ethical code, and data protection regulations of our business partners.

#### **5. Confidentiality, information security, protection of business secrets, and safeguarding intellectual property**

During the course of its activities, RTG places special importance on the security of information entrusted to us or shared with us. We are committed to ensuring the integrity and confidentiality of business information by implementing appropriate technical security solutions, the maintenance of which is the responsibility of every person involved in RTG's work.

RTG's IT tools and mail system can only be used for the benefit of the company. RTG's business solutions and methods represent the property of RTG.

We respect the intellectual property of others. We will not obtain, or seek to obtain trade secrets or other proprietary or confidential information through improper means. We do not engage in the unauthorized use, copying, distribution or alteration of protected intellectual property.

The appropriate use of personal data is contained in RTG's Data Protection Policy.

#### **6. Anti-corruption**

One important element of ethical operation is the principle of zero tolerance towards corruption. RTG has a clear and unequivocal stance against all forms of corruption.

It is prohibited to directly or indirectly offer, promise, give, request, or accept any unfair advantage or benefit. In order to ensure or expedite regular procedures, we do not allow the payment of bribes (or 'kickbacks') to official personnel or employees of economic entities or their relatives.

#### **7. Gifts and hospitality**

We do not give or accept gifts that may be considered an unfair business incentive, or reasonably appear to be so, or violate any law or the relevant ethical guidelines of the other party.

In accordance with general business practices in the market, we may offer occasional gifts or hospitality, provided that it does not violate the ethical guidelines of the other party, is not excessive, not frequent, does not establish a pattern, and does not create the impression of influencing business decisions. Under no circumstances do we give or accept cash, cash equivalents, securities, gift cards, or any form of payment. The cash equivalent value of gifts given to or received



from the same partner within one year should not exceed the limit set in the other party's ethical guidelines or 50.000 HUF.

#### **8. Respect for Human Rights**

RTG respects and supports the principles outlined in the Universal Declaration of Human Rights adopted by the United Nations. We do not tolerate any unjust, unlawful, or dignity-violating discrimination beyond performance-based distinctions related to work.

#### **9. Diversity and equal opportunities**

RTG respects the diversity of individuals and the freedom of their opinions. RTG considers any form of discrimination based on nationality, gender, skin color, ethnic or social origin, genetic characteristics, language, religious or cultural affiliation, political views, financial status, disability, age, or sexual orientation as unacceptable.

#### **10. Fair employment practices**

RTG is committed to lawful and fair employment practices, as well as ensuring work-life balance. RTG ensures compliance with minimum wage and working time regulations, in accordance with the law.

RTG provides a safe, ergonomic work environment for its employees. The work environment at RTG is free from any form of violence, intimidation, or harassment.

#### **11. Political engagement and contributions**

RTG supports only those non-profit organizations and participates in the work of entities whose activities serve the cause of sustainability. Neither RTG nor its owners engage in the activities of political parties, and their donations do not support the activities of political parties.

#### **12. Inquiry, complaint, feedback**

The owners of RTG are open to clarifying any questions, concerns, or complaints, especially those related to the Code of Ethics. Our contact information can be found on the <https://rtg.hu/en/contact> page. It is also possible to submit a complaint to our company anonymously by mail. Both owners will be informed of every complaint, and if necessary, an external partner will be involved in the independent resolution of the complaint.

The non-anonymous complainant will receive a response regarding the results of the investigation within 30 days.