

i-Cell Mobilsoft Zrt. Code of Ethics

2019

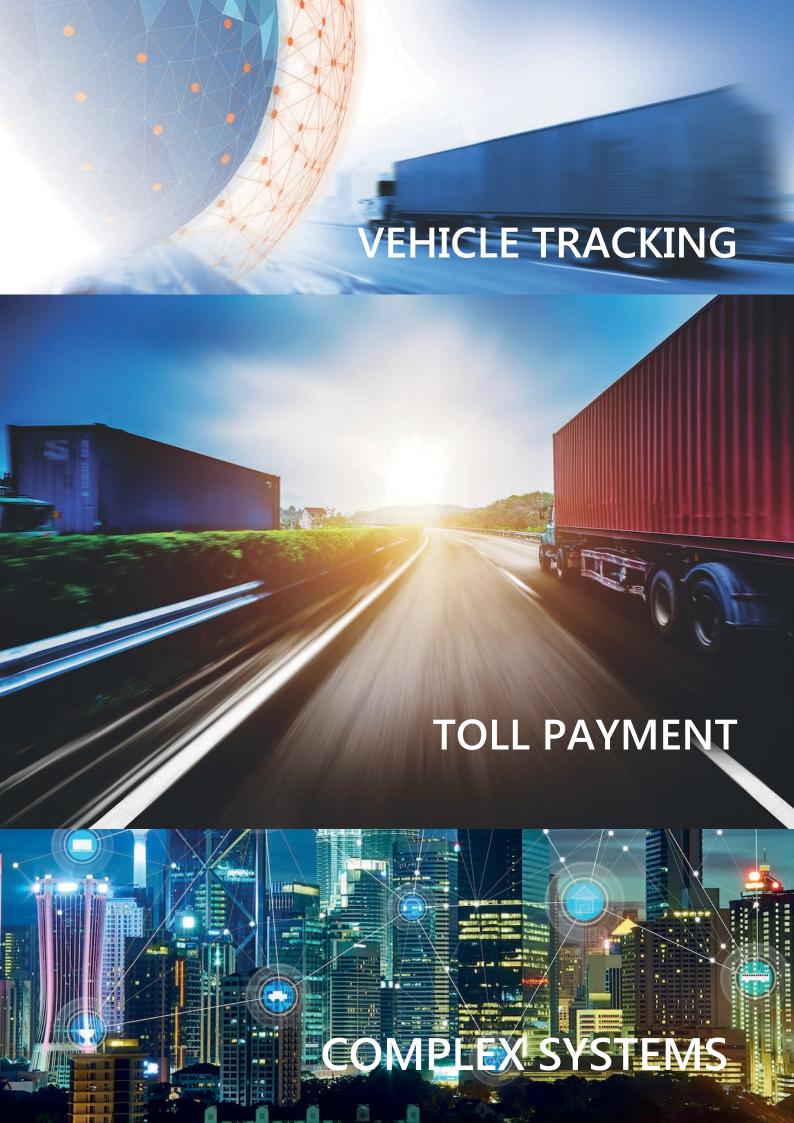


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A MESSAGE FROM OUR CEO

i-Cell Mobilsoft Zrt. is one of Hungary's leading IT development workshops. Our values: innovation, stability, well-balanced operations, a wide range of services, a high standard of value creation.

Our present and future success is founded on the positive business relationships we establish with our partners. This requires day-to-day dedication and continuous improvement from our highly trained employees, who act according to the highest standards of ethics and transparency. Moral and professional integrity is of utmost importance to us when selecting our team members, as well as at every stage of our operation.

As an ethical and law-abiding company, our entire leadership and all of our employees are committed to full compliance with all relevant legislative provisions. We have a zero tolerance policy for bribery, and we strongly support anti-corruption efforts.

Our operations are characterized by transparency and the application of prudential principles, and we believe that operating in accordance with ethical standards can contribute significantly to us improving our performance and enhancing our competitiveness.

Gábor Emőri Chief Executive Officer

CHAPTER ONE

Our Values and Mission Statement

OUR VALUES AND MISSION STATEMENT

The way we live, the way we work, and the way we think:

Integrity

We consistently act with fairness and honesty.

Trust and Openness

We trust our staff, and we welcome and accept ideas and opinions.



innovation

We Believe in Continuous Development

We believe in innovation, we continue to strive and develop ourselves, we have faith in improvement without limits, and we do not know the meaning of the word "impossible".

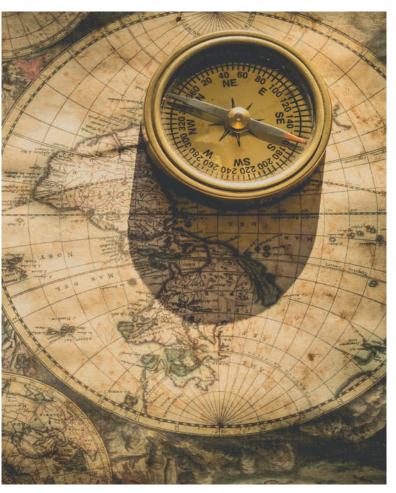
Social Responsibility

We work hard to protect our planet, facilitate individual development, and support social communities.

CHAPTER TWO

Introduction

INTRODUCTION



What is Expected of Our Leadership

In addition to compliance with the established standards, our leadership must also set an example and create a working environment where employees are made aware of the standards and requirements to be met. We must foster a creative workplace atmosphere, where employees can feel confident in turning to their superiors with any questions or concerns they may have.

Our Code of Ethics

Our Code of Ethics provides guidance and assistance in our daily work, helping us act in an ethical and law-abiding manner. It demonstrates the values we believe in, as well as the standards that we must adhere to.

What is Expected of Us

Our integrity, reputation and recognition in the world are all based on the decisions we make every day. As employees, we need to be aware and act in the spirit of the policies and controls put in place by our Company. We may never intentionally act against regulations, hide any such acts, or influence others to behave contrary to the rules.

guidance

CHAPTER THREE

Our Colleagues - Our Team

OUR COLLEAGUES - OUR TEAM

Respecting Others in the Workplace

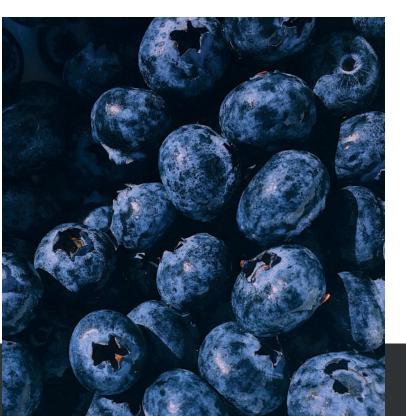
The diversity of our employees is our strength. We strive to create an open, inclusive and encouraging working environment, while respecting the individuality of every employee. Our company prohibits all forms of discrimination. These include, but are not limited to, discrimination based on sex, age, marital status, disability, skin colour, nationality, citizenship, religious beliefs, sexual orientation, etc. Our goal is to maintain a working environment where all employees are treated with respect and dignity. No form of harassment, either verbal or physical, is ever acceptable. Our Company ensures the protection of employee data, complies with all relevant legal requirements, and likewise enforces such compliance on the part of others.





Maintaining an accident-free workplace culture is a top priority. We are constantly reviewing, controlling and acting to minimize risk.

We expect our employees to always arrive at their workplace in a condition fit for work. Working or arriving for work under the influence of alcohol or drugs is never permissible, and any such behaviour shall be subject to labour law sanctions.



CHAPTER FOUR

Resource Management, Expected Conduct During Operations

RESOURCE MANAGEMENT, EXPECTED CONDUCT DURING OPERATIONS

Protection of Corporate Assets

The responsible use and adequate protection of our devices, as well as avoiding the unauthorized use of such devices is something we expect from all of our employees.

Information and Communication Systems

Every employee is responsible for protecting the technological resources needed for performing their work to the highest standards. The use of corporate resources can never obstruct the fulfilment of jobrelated responsibilities, and they may not be used for activities contrary to our corporate goals.

When taking advantage of the potential of social media, let us not forget about the interests of our Company or our goals, and let us always consider the risks involved.



resources

Confidential Information and Intellectual Property Rights

It is our duty to protect any confidential information we are made aware of during our work. Confidential information may only be used and processed for work-related purposes, taking into account the appropriate levels of eligibility. Particular care should be taken to protect workplace premises, computers and documents, keeping in mind that protecting confidential information against unauthorized disclosure is of paramount importance.

We must protect and enforce our Company's intellectual property rights. Our Company retains ownership of all intellectual property created with the use of our Company's resources, during working hours, at the expense of our Company, or performed as part of an employees work duties, to the fullest extent permitted by applicable legislation. As we expect others to respect our intellectual property rights, we must likewise respect the rights of others, including compliance with licensing and other intellectual property agreements.

Cases of Conflicts of Interest

At work, we must always act in the best interests of our Company. Conflicts of interest arise when our personal interests may negatively influence our ability to make objective decisions on behalf of our Company. We must avoid any possible situations where conflicts of interest may arise, including the appearance thereof. If any of our colleagues feel that they are in the above situation, or that they may end up in that situation in the future, they should always notify Management and ask for their guidance and help.

Employees may only establish any form of employment or work relationship with third parties with the prior written approval of the CEO of i-Cell Mobilsoft Zrt., and only if such employment will not compromise their performance. Our employees are not allowed to establish any form of employment or work relationship with any third party that qualifies as a competitor of i-Cell Mobilsoft Zrt., and they are obliged to declare if any of their close relatives is a member or employee of a potential competitor, or is acting as a service provider for such companies in the context of a civil employment relationship.

Gifts and Entertainment Allowances

Providing gifts or entertainment allowances, or making offers to that effect is a common practice in the business world, and can serve to promote positive relations between companies, their customers and business partners. However, gifts and entertainment allowances – whether offered or received – can easily engender real or apparent corruption, and should therefore be carefully considered.

courtesy

As employees, we must always check whether the gifts or entertainment allowances we give or are given are permitted under the Company's Code of Ethics, as well as the relevant guidelines, laws and regulations. It is forbidden to provide, offer or accept gifts or entertainment allowances, either directly or indirectly, that may appear to affect a business decision or threaten independent judgment.

Any gifts or other business courtesies of significant value that are offered should always be reported to the CEO or their deputy, and any such benefits may be accepted only after their approval.

CHAPTER FIVE

Focusing on Customer Satisfaction

FOCUSING ON CUSTOMER SATISFACTION

Fair Competition, Fair Treatment

We always pursue competition in an ethically unimpeachable manner, in compliance with the relevant laws and regulations. It is important to us that our actions comply with our own strict standards, which form the basis of our ethical

course of business. Our agreements with our customers reflect our own values, our statements about our products and services are always based on facts and reality, and we never act to deceive any of our existing or potential customers. When selecting suppliers, we look for Partners who respect all relevant laws and regulations, and who identify with and follow our established values.

satisfaction

Safe and High Quality Services

It is our shared responsibility to maintain the trust of our customers and partners by continuously ensuring the safety and high quality of our products and services.



CHAPTER SIX

Our Community and the World, Social Engagement

OUR COMMUNITY AND THE WORLD

Environmental Sustainability

We are committed to compliance with environmental regulations. We work hard to continuously improve our community's quality of life, with sustainability in mind.

Political Activities

Our company is aware of and fully respects everyone's right to participate in and support political activities of their choice, as long as they do it at their own expense and in their free time. The use of our Company's resources for these purposes, or participation in political activities as a representative of our Company is not permitted.

Fight Against Corruption

A fundamental element of integrity in the pursuit of our business goals involves the complete exclusion of any possibility of corruption. We continue to fight and take action against any appearance of these highly damaging types of incidents.

Fight Against Money Laundering and Financing Terrorism

i-Cell Mobilsoft Zrt. will take all necessary measures to prevent money laundering.

community

Social Engagement

We are open to and support cultural, health preservation and community building activities, always keeping the principles of transparency and intended use in mind.

CHAPTER SEVEN

Assistance, Consultation, Notification

ASSISTANCE, CONSULTATION, NOTIFICATION



- Do I understand the expectations correctly?
- Who can help me with resolving a situation in accordance with our standards?
- What is the best approach for a given situation?
- Why is it important to report certain situations, and who should I report them to?

There are many questions that may arise during your work, and you may require assistance or guidance. You should always be able to find someone to turn to who you can trust, and who is happy to help with your queries.

Our HR department and our management are at the service of all our employees. Additionally, our Staff can feel free to send their feedback to:

<u>compliance@icellmobilsoft.hu</u>. Our Management will review and respond to all feedback.

It is important to emphasize that i-Cell Mobilsoft Zrt. strictly prohibits and excludes retaliatory measures against anyone reporting their concerns in good faith.

