



**La Paloma Kft.**  
H-1031 Budapest, Monostori út 10  
HUNGARY  
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## LA PALOMA Ltd. CODE of ETHICS

Our core values shape our corporate culture and define the character of our business, as well as guide our behaviour. All our employees are expected to act accordingly in representing our Company in all business situations.

At LA PALOMA Kft., we consider the following core values to be binding: Knowledge, professionalism, trust, honesty and authenticity, as well as product quality.

All our employees must carry out their work to the best of their ability, in full respect of the law, with goodwill and the utmost respect for their internal and external working relationships.

The benefits of the balance of knowledge, tradition and innovative ability that our Company has accumulated are put to the benefit of our customers above all else. We are on our way to becoming a knowledge-intensive Company that behaves ethically in all our working relationships.

The essential elements of corporate culture:

### Ethical business practices

With all our partners (customers, clients, suppliers, subcontractors, consultants, as well as others) we are aiming for a win-win situation. We also expect our business partners to comply with our business principles. In all our economic activities, we must act in good faith and with care in the pursuit of fair profit. Our Company will never enter into an obligation that is foreseeable at the time of contracting that it cannot be fulfilled. Only good quality, reliable products and services should be offered and properly informed, and responsibility should be taken for them.

Information important to business partners must not be withheld or disclosed to unauthorised persons. The dissemination of false information is not allowed. It is unacceptable to enter into a contract without adequate preparation, training and expertise, to act in an unprofessional and poor quality manner, without applying the essential skills of the profession. No contract may be concluded if the necessary official authorisations and other legal conditions are not available.

### Business confidentiality:

You must not obtain, use or disclose a trade secret without the consent of the owner of the trade secret. Data relating to employees and consumers must be kept confidential. The list of competitors or partners in similar businesses is a trade secret. It is not fair to use such trade secrets to identify, influence or induce others to place orders, or to obtain orders from others in this way. Secrets obtained through business negotiations or other business relationships should be used only in a relationship between the two parties and only for the purpose for which they were disclosed.

### Defamation:

The reputation of business partners and competitors must be respected, and it is not permitted to spread unfounded bad news or information about them that gives rise to mistrust or misrepresent facts in any way or context. You must not damage or compromise the reputation, credibility or business reliability of another business by making untrue statements of fact, misrepresenting a fact or in any other way. It is unfair to spread unfounded rumours about the bankruptcy, closure, insolvency or liquidation of another business, its insolvency, the threat of insolvency, or the unsuitability or unsafe nature of its products and services.



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#### Competition:

Maintain fair relations with partners in the same profession, market and area of interest. This includes respecting and understanding the business interests and aspirations of others.

We are dedicated to ethical, fair and vigorous competition. We will sell LA PALOMA Ltd.'s products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for LA PALOMA Ltd. or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Trade secrets cannot be violated in obtaining information about competitors' business conduct and results. It is unfair to influence honest competition by creating bad publicity and gaining undue advantage. Professional recognition of a competitor's achievements enhances the prestige of the profession as a whole. Cooperation between competitors that aims to exclude or restrict competition in the market is not acceptable.

In the context of competition in the labour market, it is unfair to entice labour if it is aimed at explicitly weakening the business potential of the partners. Seduction of labour is a serious offence if its purpose is to learn the secrets of a business partner, e.g. to lure or entice customers.

It is unethical to set, maintain, enforce, or compel prices that are excessively or disproportionately low or high. In determining this, account should be taken, inter alia, of the price, fair profit, cost of production, cost of acquisition, other factors affecting pricing and market conditions of the product or service (including substitutable products and services), and the impact of the unethical price on other businesses.

#### Compliance with legislation, contracts

It is a fundamental requirement for our Company and our employees that we always act in accordance with applicable laws, business and ethical standards and their contractual obligations.

#### Management of internal information

Our internal records must always be kept accurately, and all relevant information and data relating to the business must be recorded and processed without alteration or whitewashing. Employees should refrain from disclosing inside information to anyone, including friends and family.

#### Relations with customers, clients

In all dealings with our customers, we expect our staff to behave with courtesy, respect, honesty and integrity. Treat people who come to us the way they would want to be treated in a reverse situation.

In public relations (PR) and advertising, it is expected that customers are informed in a fair and relevant context.

It is unacceptable to mislead customers.

It is not allowed to refer in advertising to advantages over the named goods or services of others, especially if there is no real basis for doing so, even if it only refers to, for example, a wider choice or more favourable terms..



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Information that is important to customers and clients should not be withheld, and the entrepreneur has a duty to provide information about his products and services. In particular, information on prices and conditions of application and payment must be complete.

Unfairly unilateral advantage should not be given to customers. Changes to the provisions of contracts may only be made by bilateral agreement.

The opinion of our customers is important to us and we take it into account when developing our activities, which is why you can expect fast, correct complaint handling and consultation based on mutual trust.

Relations with control bodies, authorities, public services

Corruption of persons holding public office or exercising influence over them is prohibited.

Corrupting official procedures and encouraging unlawful conduct are not allowed.

No employee shall offer any sum of money or other improper gift or gratuity to any official for the purpose of soliciting business.

Values, knowledge-base

Every employee has a duty to do his or her job to the best of his or her ability, and to contribute to the knowledge base of the Company through practical experience. They are expected to constantly train and develop themselves in accordance with the pace of development of the profession, which management can support by various means, without discrimination.

Employees must be committed to the company's goals, which are constantly communicated to them by management. Active participation in improving the functioning of the Company is mandatory. By sharing experience and information within the organisation, we strive to continuously improve the effectiveness of our activities in meeting customer requirements and improving customer satisfaction.

Relations with professional, sectoral and territorial organisations

Positions in professional and regional representative organisations must not be held directly for commercial gain.

Employee relations

Ensure that relations with employees are based on full respect for human dignity and individual rights. Our Company is an equal employment/affirmative employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behaviour. Any employee who feels harassed or discriminated against should report the incident to his or her manager.

Discrimination or harassment of any kind in employment is prohibited; this applies in particular to discrimination on grounds of race, sex, religion, nationality, age or health not related to the job. Employees also need to be aware of the expectations of good business practice that apply to their job and apply them conscientiously. If anyone is not clear about something, they should ask for help before they act. Employees and employers are mutually expected to protect and safeguard the company's property and assets, to be loyal to each other and to seek to solve each other's problems.

No one has the right to ask any of our employees to break the law or go against the company's values, policies or procedures. In the case of misconduct, warn each other to uphold the expected standards.



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### Health and environmental protection

The management of the Company is not willing to endanger health or safety at work for reasons of profitability, commercial or any other interest. We take environmental considerations into account in all our economic decisions, and we need to continuously improve the environmental awareness of our staff by setting clear rules and setting personal examples. We ensure that the environmental impact of our products and activities is appropriate, we innovate our services to reduce their negative impact on the environment, we strive to save energy, reduce and recover waste, keep records based on real data and file returns.

### Business integrity

Our Company does not accept, and does not give – directly or indirectly – bribes or other unfair advantages in order to obtain business, market or financial benefits. Our employees do not offer or accept gifts or payments for business, market or financial gain. All such offers must be reported immediately to senior management.

### Conflict of interests

The Company expects its employees to avoid personal activities and financial interests that may conflict with their commitment to their work.

We must never use property or information of LA PALOMA Ltd. for personal gain or personally take for ourselves any opportunity that is discovered through our position with our Company.