

**CODE OF
ETHICS
2025**

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Introduction

Every day we experience the impact of market changes around us and the expectations of our environment on our work. Our effectiveness will be determined even more in the future by how quickly and to what quality we are able to respond to new challenges and the ever-changing needs of our clients.

The worthy and unified representation of our Company requires that we always provide our services to the highest standard, everywhere and at all times. For this, it is also necessary that we perform our work in accordance with behavioural norms that we all feel are our own. A corporate environment and culture built on a uniformly held set of ethical standards underpins and supports our effectiveness. Knowing the Code of Ethics of our Company and applying its principles is the interest, obligation and responsibility of all our employees.

The Code of Ethics does not provide an answer to every question that arises, but it is an important element of the system supporting an ethical culture, in which the personal example of managers plays a prominent role.

Complying with the ethical standards set out in the Code is in our common interest. We can only meet competitive market challenges in the long term if, at both an individual and corporate level, we are committed to conducting our activities with integrity, irreproachable business conduct and consistency.

Our Company is committed to increasing business effectiveness, the key to which is the satisfaction of our clients. Our fundamental goal is to ensure a permanently positive business operation. This also determines the desirable forms of behaviour that the Code of Ethics frames. It is important that all our employees become acquainted with these expectations, identify with their content, and apply their principles in their daily work.

Budapest, 1 October 2025

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I. PURPOSE AND SCOPE OF THE CODE OF ETHICS

The Code of Ethics sets out a unified system of ethical principles and rules of conduct expected of the Company's employees.

Its purpose is to:

- summarise and define the principles of ethical and expected conduct, and the behavioural and conduct standards to be followed;
- provide assistance to employees in making the right decisions;
- provide guidance for the assessment and resolution of ethically questionable situations;
- provide an appropriate basis for preserving the existing values of EPDB Nyomtatási Központ Zrt. and creating new ones.

The Code of Ethics of EPDB Nyomtatási Központ Zrt. (hereinafter: the Company) applies uniformly to all employees of the Company. Efforts must be made to ensure that all those acting in the name of the Company, for its benefit and at its responsibility, accept and apply the provisions of the Code of Ethics as binding upon themselves. It is the task of direct managers to acquaint all employees with the ethical principles and rules of conduct and to ensure their compliance. Every employee is obliged to know the Code of Ethics and to comply with its provisions.

The normative system of this Code of Ethics is to be applied from 1 October 2025.

II. GENERAL VALUE SYSTEM – PRINCIPLES OF ETHICAL CONDUCT

The general principles constitute the basis of the ethical conduct expected by the Company. Their joint acceptance and knowledge determine the culture of conduct and work to be followed.

1. Compliance with laws and internal rules:

A fundamental expectation of the Company's employees is knowledge of and compliance with the relevant statutory requirements and internal regulations. Within these regulated frameworks, employees must act flexibly, proactively, and with a focus on problem-solving.

2. Integrity, fair business conduct, honour, reliability, good faith:

The simultaneous presence of these ethical values is a basic requirement in the conduct and working relationships of employees.

Every employee of EPDB Nyomtatási Központ Zrt. is obliged to avoid or report any situation in which a conflict between the interests of the employee and the Company may arise, or even create the appearance of such a conflict.

Accordingly, the pursuit of personal advantages at the expense of the Company's interests is not permitted, in particular:

- seeking to obtain personal advantages by using the Company's tangible assets, intangible assets or services;
- seeking to obtain personal advantages by representing the Company and exploiting the Company's reputation;
- using business relationships for the purpose of personal gain.

3. Expertise, quality work, innovation:

The Company's expectation of all its employees is that they continuously develop their professional knowledge, skills and abilities, and perform their work professionally and to a high standard. In order to successfully adapt to a changing environment, they should be open to receiving and applying new products, services, technologies, systems and processes. With a desire for improvement, they should take a proactive approach to improving efficiency and effectiveness, and embrace the challenges associated with innovation.

4. Commitment to preserving and growing the Company's material and intellectual assets:

- Good reputation

The Company's good reputation — thanks to the work of its employees — has been achieved through its services, by winning and maintaining the trust of its clients; the acquired good reputation obliges us to continuously strengthen and maintain it. Let us not abuse it!

- Intellectual property

The professional knowledge accumulated since the Company's establishment and the intellectual products created by employees represent an invaluable and irreplaceable value, the protection, development and utilisation for the benefit of the Company of which is the task and responsibility of all employees.

- Company assets

The protection of the physical and data assets owned by the Company — e.g. databases, tangible assets, real estate, vehicles — is served by careful, proper use, and conduct applying the principles of economy and cost-effectiveness.

Every employee — to the extent of their authority — is responsible for protecting the Company's property and other material and intellectual assets (tangible assets, intangible assets, licences, intellectual property, confidential information, brand value, information systems, etc.) from loss, misappropriation, damage or misuse, and is also responsible for their proper and careful use.

The use of the Company's tools and assets by other unauthorised persons is not permitted.

All employees of the Company are responsible for using Company-owned tools and resources only to the extent necessary and justifiable for the performance of work, and for always keeping and applying the principle of responsible management when using them.

The use of the Company's tools and assets contrary to the Company's interests or for the purpose of personal gain is not permitted.

5. Tolerance and equal treatment:

Among employees, not only direct and indirect discrimination is unacceptable, but also harassment, unlawful segregation, retaliation, and instructions to that effect.

The working environment created must be free from all forms of harassment, intimidation, humiliation, shaming, exclusion, discrimination, inappropriate tone and offensive language, both in relations between employees and in manager-subordinate relationships, as well as in relations with partners and clients. Conduct, provisions and measures that violate the human dignity of employees and clients, or of the employees of partners, whether verbal or written, are not permitted.

The employer considers any physical conduct between employees and in the employee-client relationship, even the mildest manifestation of physical violence, to be unacceptable.

Employees and clients of the Company must not suffer harm on account of their gender, racial origin, skin colour, nationality, national or ethnic minority membership, mother tongue, possible disability, state of health, religious or ideological conviction, political or other opinion. They must not be subject to discrimination on account of their marital status, maternity (pregnancy) or paternity, sexual orientation, gender identity, age, social origin, financial situation, the part-time nature or fixed-term duration of their employment or other legal relationship for the purpose of work, or their membership in a representative body.

Harassment — and thus prohibited conduct — is conduct violating human dignity, the purpose or effect of which is to create an intimidating, hostile, degrading, humiliating or offensive environment against a person.

6. Cooperation, strengthening community spirit:

The Company expects all its employees to cooperate continuously with a spirit of helpfulness in pursuit of shared goals, and to build and maintain good working relationships.

Employees must build their working relationships on the principles of cooperation, openness, trust, mutual recognition, respect and support for one another.

III. GENERAL NORMS OF CONDUCT

Employees of the Company are obliged to comply with the provisions of the Code in the workplace and during work in accordance with the following norms.

1. The most important characteristics of employee conduct:

- identification with the Company's goals;
- professional preparedness, development of competences, knowledge and abilities required for the job;
- desire for continuous development, openness;
- being informed, sharing information, taking initiative;
- dedication, commitment;
- accountability;
- performance-, quality- and success-orientation;
- internal motivation;
- ability for continuous change and transformation, internal mobility;
- good faith, fair conduct and cooperation, trust in one another, community building, solidarity;
- respect for the fundamental human rights of others.

2. General rules of external appearance:

All employees are obliged to appear at their designated workplace in a state fit for work, neat and clean. Dress should support the corporate value of reliability, professionalism and mutual respect. Work attire must be clean, ironed, compliant with regulations, and the hairstyle, hands and nails must be well-groomed, appropriate to the occasion and the wearer. Attire must always be suitable for the workplace, tidy, cultured and discreet for all job roles. Provocative or unkempt clothing must always be avoided. A simple, understated, restrained appearance, in good taste, should be the aim.

Tattoos and body piercings visible on employees' bodies that overstep the bounds of good taste must be covered with clothing wherever possible.

Provisions relating to work attire can be found in the Work Attire Policy in force at any given time.

3. Basic expectations regarding the working environment and work performance:

- Every employee is responsible for not using working hours for private purposes;
- During work, every employee must behave in a manner that does not harm or endanger their own or others' physical integrity, health, or the environment;
- By learning and applying the principles and practice of occupational safety, health protection and environmental protection, efforts must be continuously made to reduce and eliminate health, accident and environmental risks;
- The conditions for safe and accident-free work performance that does not cause environmental risks or damage must be ensured and maintained, and others must also be made aware of this;
- Maintaining the integrity of the working environment and tools, caring for them, keeping them clean and ensuring orderliness is an expected requirement of everyone;
- Compliance with technological and safety regulations during work processes is a basic expectation of every employee;
- In the event of accidents or extraordinary events, employees must contribute by their conduct primarily to saving lives and, secondly, to preserving assets, to the objective clarification of circumstances, and to the prevention and avoidance of similar events; the protection of capacity to work, health and physical integrity is everyone's personal responsibility. Employees must report to work in impeccable, work-ready condition (the consumption of alcohol, illegal substances, narcotics or other psychoactive substances, or performing work under their influence or abusing them, is prohibited);
- Efforts must be made towards economical energy use.

4. Behavioural norms expected in cooperation within the Company:

- Building a correct, mutually respectful partnership relationship;
- Applying results and effective solutions serving the Company's interests;
- Complete sharing of information necessary for work performance with those entitled to it, strengthening the drive for cooperation;
- Personal accountability in connection with decisions;
- Recognition of each other's achievements.

5. Basic expectations regarding communication:

The basic expectations of communication between employees and between managers and subordinates, in consideration of and in accordance with the Communication Policy in force at any given time, are in particular:

- a polite tone, an objective style;
- clear, precise, comprehensible formulation;
- When dealing with partners unfamiliar with the technology, it is advisable to avoid technical terms used only within the Company, or if their use is absolutely necessary, a comprehensible explanation is required and expected;
- efforts should be made towards open, clear, two-way, direct, trust-building external and internal communication, and mutual, respectful communication between colleagues and between managers and subordinates.

6. Client-centred approach:

- All employees of the Company must strive to win client satisfaction through their conduct and work. To achieve this, the employee must focus all their attention and knowledge on the quality service of clients and the development of a shared business partnership;
- The client relationships of the Company's employees should be characterised by attentiveness, respect, professionalism, objectivity, precision, speed and compliance with deadlines. Polite, patient, yet consistent and resolute conduct must be displayed in the Company's representation;
- Efforts must be made to ensure that the client's needs — in accordance with the principles of business ethics — are met to the maximum extent within the framework of the Company's performance obligations, and that the service-oriented nature of the activity is maintained;
- When handling any complaints or conflicts, courtesy, openness to the client's problems, as well as composure and objectivity, and a client-focused approach whilst protecting the Company's interests, are required. Efforts should be made to resolve verbal complaints immediately in a reassuring manner;
- Clients must be informed on the basis of statutory requirements, the General Terms and Conditions, internal regulations, and in the case of contractual partners, on the basis of the content of the contract; references to internal standards or technological requirements may not be made;
- Employees must not settle any conflicts or disagreements that arise between them in front of clients, and negative comments about the Company, any of its organisational units, managers or employees must be avoided.

7. Corporate loyalty:

Employees should be characterised by commitment to EPDB Nyomtatási Központ Zrt. and a love of the profession. It is the duty of all employees to preserve and enhance the Company's reputation. Commitment not only means identifying with the Company's organisation, but also accepting that responsible and dedicated work is required to maintain a good reputation.

Employees should be exemplary: in their official conduct and private lives, they should bear in mind that the entire activity of the Company can be judged through them, and they should strive to ensure that this judgment is positive. They must not engage in conduct that damages the Company's authority.

Conduct in internal working relationships:

- a fundamental expectation is the employees' personal and professional competence, as well as responsible conduct;
- all forms of refusal to cooperate must be avoided, in particular the withholding of information necessary for the performance of work or the delaying of joint decision-preparation;
- loyalty to the Company is expected, and therefore it is not permissible for employees to influence the decision-preparation process or those participating in it in a manner contrary to the Company's interests and goals.

IV. NORMS OF MANAGERIAL CONDUCT

Employees holding managerial positions bear special responsibility in complying with and enforcing ethical standards. Their activities and conduct fundamentally determine the work of those under their direction and their commitment to the Company. It is therefore necessary to define, beyond the general standards, the norms of conduct expected of managers.

The most important characteristics of managerial conduct:

- displaying exemplary conduct in every respect, which serves as a model to be followed for all colleagues of the Company;
- identifying with the Company's current strategic and business objectives and values;
- continuously informing employees about the Company's objectives;
- ability for continuous change and transformation;
- consistency, dynamism, motivation;
- implementing effective, balanced and proportionate task and work distribution appropriate to the abilities and expertise of employees, applying the principles of delegation and involvement broadly within the organisation they manage;
- rapid and precise decision-making, accountability for decisions;
- receiving and supporting initiatives from employees and other managers, and providing feedback on them;
- creating a working atmosphere that promotes the improvement of individual employee performance;
- encouraging outstanding performance, acknowledging it;
- a polite, resolute tone, unambiguous, open and honest communication;
- formulating correct and constructive criticism, openness to employee observations;
- supporting the organisational integration, individual professional development and internal career path of employees;
- empathy towards employees;
- consideration of the employee's interests on the basis of fair assessment, and
- discrimination is prohibited.

V. OTHER CASES VIOLATING ETHICAL AND LAWFUL CONDUCT**1. Conflict of interest:**

Human and market conduct that conflicts with or endangers the interests of EPDB Nyomtatási Központ Zrt. violates ethical conduct. The integrity of business life depends greatly on how successfully personal entanglements and networks of relationships and interests influencing decisions can be eliminated. All employees are obliged to avoid and report every situation and

activity where a conflict of interest may arise between their corporate and personal, family or economic activities.

The detailed rules on conflicts of interest are contained in the Conflict of Interest Policy in force at any given time.

2. Acceptance of gifts, exclusion of corruption:

Employees of the Company may neither directly nor indirectly accept or request any benefit, money, gift or advantage from those connected with them or the Company that is capable of influencing their impartiality or judgment.

A benefit, gift or advantage is any service in kind, entertainment, hospitality, loan or other thing, favour or deferral representing material, existential or moral value, or the promise thereof, in particular one with a monetary value, to which access could be gained without consideration or at a price significantly lower than its value.

Manifestations within the scope of business courtesy, such as small (promotional) gifts or hospitality, are only permissible if they are of modest value and are not capable of exerting influence: of inducing the person concerned to commit an act of dereliction of duty, or to refrain from a certain act. If an employee receives a promise or offer — directly or indirectly — of an advantage including a gift, favourable treatment or hospitality that exceeds the level of customary modest business attention, they must refuse it and immediately notify their superior and the Compliance department.

Corruption, the provision of unlawful advantages, collusion and the exertion of pressure — directly or through the involvement of a third party — for the purpose of obtaining personal or professional advantages for oneself or others, are prohibited.

All employees of the Company must refrain from forms of conduct that may create the appearance of active or passive corruption (the giving, requesting, or acceptance of an unlawful advantage or the promise thereof), or that may become part of activities directed towards it. Accordingly, it is advisable to avoid every situation and relationship that may be capable of calling into question one's freedom from influence.

The workplace manager and the Compliance department must be notified of every case of suspected corruption through the reporting channel! (Contact details of the Compliance department can be found in Chapter IX of this Code).

It is recommended to help our business partners to become acquainted with the Company's ethical and quality requirements, since the business relationship must be based on integrity, transparency and mutual trust.

3. Damaging the Company's reputation:

Any public statement or action that harms or casts in a negative light the activities, employees or good reputation of the Company is unacceptable. This applies to statements made in the online sphere (especially on social media) or in other areas of private life

4. Disclosure or leaking of information constituting a trade secret:

In the course of the Company's operations, numerous data and documents are created — e.g. business and strategic plans, contracts, agreements — that constitute trade secrets. The disclosure of these confidential documents and information to the public or to competitors is strictly prohibited. The employee is obliged to maintain the trade secrets they become aware of in the course of their work, as well as fundamental information relating to the Company and its activities. Furthermore, they may not communicate to an unauthorised person any data that came to their knowledge in connection with the performance of their job, the communication of which would have adverse consequences for the Company or another person, or which could endanger the Company's legitimate business and economic interests.

The Company's legitimate expectation of the managers and employees concerned is that they protect trade secrets that come to their knowledge. Anyone who becomes aware that a trade secret may have become or is at risk of becoming accessible to an unauthorised person, or if a document containing a trade secret has presumably been lost, is obliged to report this to the Company's data protection officer. (Their contact details can be found in Chapter IX of this Code.)

5. Prohibition of deception and abuse:

- It is not permissible to intentionally provide false information or communicate data to deceive clients, business partners, competitors or employees. A correct, unambiguous and professional answer must be given to every question;
- Abusing the trust of clients, using the information and data received for other purposes without the client's permission or approval (e.g. including in a database) is a serious legal and ethical violation; the secure handling and delivery of data, information and assets entrusted to the Company in accordance with the General Terms and Conditions and individual contracts is the guarantee of clients' trust. Preserving this is a fundamental interest and duty of every employee of the Company, and therefore everything reasonably expected of them must be done to prevent and stop external violations of law and internal abuses;
- To facilitate this, the Company operates an anonymous whistleblowing channel, the contact details of which are contained in Chapter IX of this Code.

6. Competition:

Competition between individuals or organisational units that harms efficient and effective work performance, the Company's interests and reputation, and competition for individual advancement, as well as the withholding of information that assists cooperation, are not permitted. Exceptions to the above are competitions organised by the Company and conducted within a regulated framework for development purposes, which help employees share good experiences with one another.

VI. PUBLIC APPEARANCES

The rules relating to the Company's communication are set out in the Company's Communication Policy in force at any given time.

VII. SOCIAL RESPONSIBILITY

At the centre of EPDB Nyomtatási Központ Zrt.'s social responsibility are its commitments to sustainable development, health protection and environmental protection. In its socially responsible operation, the Company places special emphasis on environmental awareness.

The Company expects employees to protect their environment during their work, to ensure the selective collection of waste, the appropriate handling of hazardous waste, to pay attention to water and energy efficiency, to strive for the economical and careful use of raw and auxiliary materials (e.g. fuel, paper). To the extent possible, they should give preference to recyclable materials and products.

The business activity of EPDB Nyomtatási Központ Zrt. is built on everyday human relationships; therefore, in the course of its operations, social sensitivity necessarily manifests itself with regard to both clients and employees. The Company places special emphasis on ensuring equal opportunities, career management, and the inclusion of persons with changed working capacity. It expects appropriate conduct from its employees in this regard.

VIII. COMPLIANCE ACTIVITIES

For EPDB Nyomtatási Központ Zrt., the Compliance Department of Magyar Posta Zrt. carries out the tasks related to compliance and the whistleblowing system in order to ensure the application of the principles set out in the Code of Ethics, the investigation of reports, and the formulation of measures, proposals and recommendations; the detailed regulations relating thereto can be found in the relevant Compliance Policy.

IX. REPORTING AND HANDLING ETHICAL VIOLATIONS

Violation of the provisions of the Code of Ethics constitutes an ethical offence. In the event of an ethical offence being committed, the employer may apply employment law measures against the employee, in proportion to the manner and severity of the violation of the relevant regulations and in accordance with the rules governing the employment relationship.

If an employee experiences conduct in their working environment in connection with which a violation of the Code of Ethics of EPDB Nyomtatási Központ Zrt. may arise, they may make a report to the Compliance department, which will investigate the report and take measures to stop the unethical conduct.

Reports may be made at the following contact details:

Contact details of the Compliance department:

- complianceosztaly@posta.hu
- Magyar Posta Zrt. Compliance Department, 1540 Budapest

Contact details for whistleblowing:

- complianceosztaly@posta.hu
- Magyar Posta Zrt. Compliance Department, 1540 Budapest

The investigation of ethical matters is most effective when the reporting person shares all available information about the case.

Anonymous reporting of ethical problems is possible; however, the investigation will only take place if the information necessary for the investigation, the formulation of a position, or the making of recommendations is available, can be obtained, or, in the absence thereof, has been made available by the reporting person. To this end, the reporting person must — while maintaining anonymity — provide their contact details. If the information necessary for the investigation cannot be obtained and the reporting person has not provided their contact details, the anonymous report will be rejected.

The employee must not suffer any direct or indirect disadvantage as a result of the report. If the employee observes conduct on the basis of which they have reasonable grounds to assume that — on account of the ethical report — they, another reporting person, or another person involved in the investigation of the report, has been subjected to an adverse consequence, they must immediately contact the Compliance department.

X. CLOSING REMARKS

Knowledge of and compliance with the expectations set out in the Code of Ethics enables employees to perform their work on the basis of a unified system of ethical requirements. The daily application of uniformly held values greatly contributes to the development of the Company's corporate culture and to the creation of a better working environment.

The content of the Code of Ethics must be communicated to all employees of EPDB Nyomtatási Központ Zrt. and made accessible on the Company's internal intranet. It must be made accessible and known to clients and partners on the Company's website.

The employees of EPDB Nyomtatási Központ Zrt. belong to a Company with a long history, rich traditions, continuously renewing and competitive. They should be proud of the values espoused in the Code of Ethics, of work done with integrity, and of the well-deserved trust received from clients, partners and owners.

Budapest, 1 October 2025

EPDB Nyomtatási Központ Zrt.

Ágoston József Gellér
Chief Executive Officer