

## Our corporate governance, quality and sustainability principles and policies

### 1. INTRODUCTION

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This document summarizes the corporate governance, quality, and sustainability principles, rules and guidelines of **Manupackaging Magyarország Kft.**, serving as guiding document for our employees, subcontractors, and business partners.

The management and employees of Manupackaging Magyarország Kft. are committed to a quality-focused mindset and place great importance on environmental protection, compliance with workplace health and safety standards, respect for human rights and dignity, and responsible employment. We support sustainable development and contribute to integrating environmental responsibility into business practices within the company, its immediate surroundings, and more broadly across Hungary and the region.

Although we are a medium-sized small laboured enterprise with low direct and indirect economic, environmental, and social impact, we believe we can effectively contribute to sustainable development. Because every small action counts, and the impact of the whole SME sector is significant in economic, environmental, and social terms.

#### VISION

##### **We protect what matters.**

Through smart and sustainable packaging, we ensure that products remain intact, usable, and protected—while our customers reduce waste and costs.

#### MISSION

We create packaging that protects products and the planet. With our skilled teams and strong partners, we deliver circular solutions that combine performance, quality, and sustainability.

**PROTECTION.  
PERFORMANCE.  
RESPONSIBILITY.**

### VALUES & VALUE PROMISE

- **Quality:** We are committed to delivering and providing products and services of the highest quality, meeting the high expectations of our customers and partners.
- **Innovation:** We strive to continuous improvement and developing our processes, products, and services while remain at the forefront of the packaging industry.
- **Sustainability & responsibility:** In our operations and regarding our products and solutions, we are mindful of environmental, social, and ethical impacts. We continuously improve our performance through responsible and sustainable practices.

- **Environmentally conscious solutions:** We prioritize eco-friendly practices and aim to reduce not only our own but also our customers' and end-users' ecological footprint.
- **Customer-centricity:** The needs of our customers and stakeholders guide our decisions. We aim to provide excellent service and tailor-made solutions.
- **Integrity:** We conduct our business honestly, transparently, and respectfully, building long-term, trust-based relationships. We reject all forms of unfair business practices.
- **Safety:** We are committed to ensuring a safe and healthy working environment for our employees and partners, complying with safety regulations.
- **Human-centeredness:** The well-being of our employees, respect for human dignity, diversity and inclusion, and community development are the foundations of our social responsibility.

### 1.1 OUR OBJECTIVES

- Ensuring high quality in our services and distributed products
- Always considering environmental aspects and reducing our ecological footprint
- Protecting the safety and health of our employees, creating a community based workplace respecting human dignity and responsible employment
- Continuously understanding and considering the needs of clients and other stakeholders
- Achieving development in our sustainability performance and and responsible corporate behaviour
- Adopting a business conduct based on compliance, ethics, transparency, and accountability

### 1.2 OUR CORPORATE GOVERNANCE AND TOOLS TO ACHIEVE OUR OBJECTIVES

Our employees are committed to continuous improvement and transparent, sustainable operations. While we believe in the importance of human commitment, professionalism, and cooperation, we also prioritize transparent and conscious corporate governance, process organization, system operation, performance measurement, and feedback.

To this end, we have articulated our goals and principles in this document and in our supplementary regulations.

- We ensure the continuous development of our established integrated management system and the regular monitoring of compliance. Beyond human commitment, we strengthen our processes, systems, and tools, relying decisions on objective data and information.
- We operate a quality management system certified by an independent third party.
- Our sustainability, quality, environmental, employment, and ethical goals and principles are articulated in policies binding for all employees, subcontractors, and business partners. These are disclosed on our website and contribute to building a sustainable economy and society.
- Our Code of Ethics and Business Conduct is also available as a stand alone policy and is an integral part of our business relations and General Terms and Conditions.
- We continuously monitor legal requirements and strive for full compliance.
- Our Responsible company self-assessment confirms that legal compliance, integrity, and ethical conduct are not only principles but also fundamental in our daily operations.

- We use the internationally recognized EcoVadis sustainability rating system to manage and evaluate our sustainability performance and to facilitate dialogue with our business partners.
- We aim to meet customer and stakeholder requirements through highly qualified professionals, continuous training, and high-level performance.
- We pay special attention to reducing environmental impact, minimizing environmental damage, and preventing pollution—through monitoring innovations, considering their implementation, and promoting sustainability awareness internally and with partners. Although we operate in the spirit of environmental management, we have not yet formalized or certified such a system due to our size and nature of direct impacts.
- We focus on protecting employees' health and physical safety, reducing risks, and achieving high workplace safety—primarily by fostering a culture of prevention and personal responsibility.
- We work with loyal, high-performing employees and tailor working conditions, compensation, and community programs to support their well-being, considering individual needs and life circumstances.
- We expect our contractual partners, subcontractors, and suppliers to accept our integrated management policy goals and principles and conduct their operations accordingly.

### **1.3 INFORMATION, FEEDBACK, AND NON-COMPLIANCE**

We inform our employees and partners about this document and the goals and principles contained therein through the following channels:

- Publicly available on our website
- Provided to new employees as part of onboarding training
- Available on our internal server
- Serves as a core reference document in our quality management system
- Referred to in our General Terms and Conditions

In case of detected non-compliance, suspicious behavior, concerns, or suggestions for improvement, the following channels may be used for reporting: **etika@manupackaging.hu**, or in person, by phone, or by post. If someone wishes to report anonymously, this will be respected throughout the process.

Failure to comply with the provisions of this document may result in disciplinary action depending on the severity, including verbal or written warnings or immediate termination of employment or business relations (stated in details in our disciplinary policy). However, we believe that making mistakes is part of learning and development as humans. Our goal is mutual learning and dialogue, emphasizing shared understanding, identifying potential for improvement, and learning from each case—not punishment, blame, or scapegoating.

Our ethics reporting process is detailed further in the **Code of Ethics** chapter.






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### 3. COMMITMENTS, MEMBERSHIPS, AND COMMUNITY ENGAGEMENT

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**Manupackaging Magyarország Kft.** is committed to sustainability and believes that social responsibility, environmental protection, and economic sustainability are key to our future success and to the well-being of our community. Sustainability is not just a corporate goal but a core value that permeates our operations and decisions. Our aim is to integrate the principles of sustainability into all our activities and actively contribute to both local and global sustainable development.

-  **Economic and ethical commitment:**  
Our company aims to set an example within the domestic and regional SME sector—and the broader business community—by harmonizing successful, efficient, and ethical business operations. We grow through innovation and renewal while maintaining high standards of legal compliance and ethics, thereby creating value for our employees, business partners, owners, and society alike.
-  **Environmental responsibility:**  
We continuously work to reduce our environmental impact. Our focus lies in sustainable resource management, waste reduction, and energy efficiency.
-  **Responsibility toward our employees:**  
At our company, respect for human dignity, the compliance with human and labour rights, ensuring safety and health at the workplace, employee well-being, training and development, as well as family-friendly policies and work-life balance initiatives, all play an important role in our day-to-day operations.
-  **Community involvement:**  
To foster community development and social well-being, our company actively supports social programs and contributes to local communities. We participate in sustainability initiatives that help improve our performance beyond the walls of the company. Employees are also encouraged to volunteer in community projects, environmental efforts, or educational programs that promote sustainability and societal welfare.
-  **Sustainability organizations and communities, our memberships:**  
Our company is a member of various sustainability organizations and communities, which support us in learning about and implementing industry best practices.

✓ **We are members of the Business Council for Sustainable Development in Hungary (BCSDH)** and have signed the Principles of Sustainable Corporate Governance. We actively participate in the life of the community—our company’s Managing Director leads the Circular Economy [Working Group](#).



### The Complex Interpretation of Corporate Sustainability

|   |  |
|---|--|
| <p><b>STRATEGIC APPROACH</b><br/>The management of a company that interprets sustainability in a complex way should draw up its business strategy by integrating long-term, value-creating economic, environmental and social aspects and should provide the resources necessary for implementing such strategy.</p>  | <p><b>ENVIRONMENTAL RESPONSIBILITY</b><br/>The life cycle approach, as well as both economic profit and environmental impact, should inform decisions made by the company. The company should be committed to environmental sustainability and should extend this responsibility to the entire supply chain (suppliers, partners and customers).</p>   |
| <p><b>RESPONSIBLE MANAGEMENT</b><br/>An executive from the top management level of the company should be appointed to be responsible for its sustainability performance. Each member of management, at every level, should be individually responsible for promoting the sustainable operation of the company. The executive incentive scheme should include environmental and social goals as well as economic ones.</p> | <p><b>PARTNERSHIP WITH STAKEHOLDERS</b><br/>The company should cooperate with its stakeholders and maintain open and bilateral communication with them. When stakeholders are impacted by its operations, the company should aim to create mutual satisfaction and long-term cooperation and partnerships. It should set an example by taking advantage of its size and position. When selecting its business partners, it should consider and prioritise sustainability factors. Through professional organisations and extensive cooperation the company should endeavour to integrate into its operations the sustainability principles of regulatory processes and policies.</p> |
| <p><b>ETHICAL OPERATIONS</b><br/>The company should operate in a way that respects the law and is ethical (for example, endeavour to be free from corruption and provide fair employment). The behaviour expected should be recorded in writing, resources should be provided for implementation and enforcement and the policy should extend to all stakeholders.</p>  | <p><b>TRANSPARENT OPERATIONS</b><br/>The company should collect reliable data and information about its activities, economic, environmental and social impacts and performance on an ongoing basis. The information should be made available and the company should inform its partners in a regular and credible way.</p>   |
| <p><b>RESPECT FOR HUMAN VALUES</b><br/>The company should consider the protection of human life and safety, equality and the right to a healthy environment to be basic values and should take them into consideration when business decisions are made.</p>  |  |

The recommendation was drafted by the Business Council for Sustainable Development in Hungary in cooperation with recognized business leaders and sustainable development experts.

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✓ Through our membership in the KÖVET Association for Sustainable Economies, we contribute to the promotion and sharing of environmentally conscious industrial and corporate solutions.

✓ **As members of the Hungarian Business Leaders Forum (MVÜK),** we support a community of open-minded business leaders—committed each other and to the world. Through this network, we work toward shaping a successful, transparent, responsible, and sustainability-conscious economy. Within the community, our company is a member of the Sustainability Working Group and the Competence Center.

**KRÉDÓNK**


Hisszük, hogy az

- értéktérítő kapcsolódások,
- egyen és közösségi felelősségvállalás,
- etikos, fenntartható és problémamegoldó vezetés,
- folyamatos tanulás, fejlődés és megújulás,
- nyitottság, elfogadás, szolidaritás és bizalom és
- pozitív környezeti és társadalmi lábnyomunk

révén tagjainkkal együtt jobbá tesszük a világunk!

to

also



- ✓ Our Managing Director is a member of the Hungarian Sustainability Professionals Network (HSP Network)—a community of sustainability managers equipped with the latest professional knowledge, committed to supporting each other's development and success, and actively promoting the transition of the business world to a green and inclusive economy. Additionally, he teaches the Sustainable Packaging module as part of the Certified Sustainability Manager training at the Sustainable Business Academy.




## AMIBEN HISZÜNK

Krédónk minden tag és partner számára megfogalmazza azon értékeket, melyek mentén a fenntarthatósági szakemberek közösségét és szakmáját működtetni és építeni szeretnénk. Összeköt minket néhány alapfeltevés, működési mód és cél, amiben osztozunk:

|   |  |   |
|---|--|---|
| <h3>ÖKOLÓGIAI ELKÖTELEZŐDÉS</h3> <p>Hisszük és tudjuk, hogy zárt ökológiai rendszerben működünk és ennek megfelelően alakítjuk életmódunkat, tervezzük munkánk hatásait és erőforrás-felhasználásunkat. A növekedés helyett a fejlődés modelljeit, megoldásait keressük és hirdetjük.</p> | <h3>ÉRINTETTI SZEMLELET</h3> <p>Folyamatosan törekszünk az érintettek azonosítására, szempontjaink feltárására és megértésére, azok döntéshozatali folyamatokba való hatások integrálására, az egyenrangúság és kölcsönösség mentén.</p> | <h3>NYITOTTSÁG</h3> <p>Megőrizjük és alázattal gondozzuk az új tudásra, megoldásokra, megközelítésekre valamint a folyamatos tanulásra és fejlődésre való nyitottságunkat.</p>  |
| <h3>ETIKUSSÁG</h3> <p>Valljuk, hogy a cél nem szentesíti az eszközt, így munkavégzésünk és együttműködéseink során magas etikai szándékokra törekszünk és folyamatosan reflektálunk azokra, nyitottan a visszajelzésekre és aggályokra.</p>   | <h3>VÁLTOZÁSZEVETÉS</h3> <p>Gondossággal kombináljuk a holisztikus és rendszerszerű látásmódot, a pragmatikus és cselekvésorientált megoldáskeresést, a teljesítmény és hatásmérést munkánk során.</p>                                   | <h3>EGYÜTTMŰKÖDÉS</h3> <p>Hisszük, hogy az együttműködés nem csak szükséges, de sikerkritérium a verseny mellett és kiegészíti azt. Elkötelezettek vagyunk egymás segítése és sikereinek ünneplése mellett, és ennek érdekében folyamatosan fejlesztjük az empátiát, szolidaritást, kölcsönösséget, sokszínűséget és inkluzivitást.</p> |
| <h3>ELSZÁMOLTHATÓSÁG</h3> <p>Transzparensen, objektív és mérhető tényekre, adatokra alapozzuk következtetéseinket, megnyilatkozásainkat. Aktívan fellépünk a megtevendő zöld kommunikáció (zöldre mosás) ellen.</p>   |  |   |

- ✓ We embrace the [10 principles of the UN Global Compact](#) and integrate them into our operations.

## THE TEN PRINCIPLES

of the United Nations Global Compact



HUMAN RIGHTS



LABOUR



ENVIRONMENT



ANTI-CORRUPTION

- 1 Support and respect the protection of internationally proclaimed human rights.
- 2 Not be complicit in human rights abuses.
- 3 Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 4 Support the elimination of all forms of forced and compulsory labour.
- 5 Support the effective abolition of child labour.
- 6 Support the elimination of discrimination in respect of employment and occupation.
- 7 Support a precautionary approach to environmental challenges.
- 8 Undertake initiatives to promote greater environmental responsibility.
- 9 Encourage the development and diffusion of environmentally friendly technologies.
- 10 Work against corruption in all its forms, including extortion and bribery.

## 4 QUALITY POLICY

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### 4.1 OUR QUALITY MANAGEMENT PRINCIPLES

In order to achieve our objectives, we strive to operate an effective quality management system that guarantees the consistent and impeccable quality of our products and services, ensures continuous improvement, and consequently increases our partners' satisfaction.

Therefore, we identify and describe our processes, define their interrelations and characteristics, monitor customer and user requirements, and develop these processes as necessary.

The management of Manupackaging Magyarország Kft. takes full responsibility for ensuring that all activities are performed under controlled and supervised conditions in compliance with current legal regulations. To uphold this responsibility, we monitor legal changes affecting our processes and implement improvements accordingly. We maintain both preventive and corrective management controls embedded into our processes, as well as risk analysis and evaluation procedures.

In the realization of our activities and strategic goals, we place special emphasis on aligning the individual performance targets of our employees with the objectives of Manupackaging Magyarország Kft. Our internal culture must reflect the values important to the organization and foster continuous organizational and individual development. To ensure this, we publish our strategic goals, involve our colleagues in the planning, execution, control, and evaluation of tasks aimed to achieve these goals, and recognize and reward their individual performance.

We expect our subcontractors and suppliers to accept our quality policy principles and operate accordingly, which is why we make our Quality Management Manual available to them.

All employees are responsible for the quality of their own work, for preventing faulty services, and for eliminating improperly executed activities. Accordingly, we identify the root causes of irregularities and act swiftly to eliminate errors.

We expect each of our employees to contribute to the realization of the above quality policy and to the success of Manupackaging Magyarország Kft. with their personal knowledge and sense of responsibility.

***“Protection, Performance, Responsibility.”***

### 4.2 OUR CUSTOMERS' AND END USERS' RIGHT TO QUALITY INFORMATION

Across the entire value chain, our company considers its social responsibility in terms of both its impacts and opportunities. The health and safety of our customers and end users is of utmost importance, which is why we deliver our products safely, accompanied by accurate instructions and information. Our products do not contain materials or characteristics that pose occupational health and safety risks, but – as with any product – proper usage is key.



We provide public access to corporate governance, quality, and environmental information related to both our products and our operations, and offer more detailed information upon request to support mutual understanding and development.

Even in value chains operating under the highest quality standards and requirements, errors may occur—especially in today's complex supply chains and in corporate cultures where development and progress are valued more highly than prohibiting mistakes. A culture that allows mistakes increases openness, accountability, creativity, and innovation in the medium term, which is why our company is committed to it. Should any quality or other issues arise concerning our products, we respond immediately, and in severe cases, initiate a product recall. Together with our employees and partners, our goal is to ensure impeccable product quality and fair, partnership-based, quality-assured, and accountable cooperation throughout our operations.

### **4.3 OUR CUSTOMERS' AND END USERS' RIGHT TO EXPRESS THEIR OPINIONS**

We value all feedback, especially regarding any actual or potential problems, concerns, dilemmas, or development opportunities related to our products or operations. Comments may be submitted via email to [etika@manupackaging.hu](mailto:etika@manupackaging.hu), in person, or by postal mail—and we assess the relevance of every submission. Complaints may be submitted the same way, and we commit to evaluating their relevance within 72 hours. For relevant complaints, we conduct a root cause analysis to prevent recurrence and to improve our processes and operations.

| Our quality-related objectives:   |
|---|
| <ul style="list-style-type: none"> <li>▪ Satisfied and returning customers, positive recommendations and references</li> <li>▪ Zero product recalls</li> <li>▪ Fast (within 72 hours) and relevant responses to complaints and feedback</li> <li>▪ ISO 9001 certification and successful audit (by 2025)</li> <li>▪ Keep number of customer complaints below 40 yearly</li> </ul> |

## **5 ENVIRONMENTAL POLICY**

### **5.1 OUR ENVIRONMENTAL RESPONSIBILITY**

Manupackaging Magyarország Kft. continuously monitors and evaluates the environmental impacts of its activities and services, and strives to improve them, despite our direct environmental impact being very low. Our approach to consider throughout the whole lifecycle and value chain plays an important role in our decisions, along with weighing the balance between economic benefits and environmental impact.

Our company is committed to sustainability, with the goal of minimizing negative environmental impacts in our operations, promoting a greener future, and supporting ecological balance. We believe that everyone has a role to play in mitigating climate change risks and impacts, and that climate adaptation is a shared responsibility.

We operate an informal environmental management system, which means we are aware of and manage the environmental impacts and risks arising from our operations and products. To this end, we have implemented the guidelines and measures detailed below.

### 5.1.1 Our products and services

Our goal is to find cutting-edge solutions to the packaging challenges of the business world and to improve the safe, healthy, and environmentally conscious storage, transportation, and distribution of products requiring packaging. We take our responsibility seriously and are committed to advancing the cause of sustainable packaging, in line with the waste hierarchy principles (prevention, reduction, reuse, recycling, disposal) and promoting environmentally friendly solutions. For this, we consider it essential to operate and maintain business relationships based on trust and credibility, so that we can operate in a transparent and accountable economy.

We offer our partners and customers also environmentally friendly, sustainable solutions in the packaging materials and technologies market. Sustainable packaging not only protects the planet but can also reduce business costs in the long term. For us, sustainable packaging means using and offering materials and solutions that minimize environmental impacts while ensuring product protection and efficient transportation.

**Our goals and tools include:**

- **Proportion of green portfolio in our product range:**
  - Maintain and increase the share of environmentally conscious solutions in our product portfolio
  - Identify and incorporate innovations and developments that fit our product and service portfolio
  - Increase the sales volume of our private-label products based on proprietary formulations
- **Awareness and behaviour change to promote green product market growth:**
  - Participate in professional training and customer awareness raising activities to develop knowledge and experience in green packaging
  - Develop and use educational marketing materials and case studies to increase the share of greener solutions in our product portfolio
- **Reducing ecological footprint related to products:**
  - Improve the environmental characteristics and impacts of products through collaboration with innovative and committed suppliers and trading partners
  - Inform our customers about proper packaging waste management
  - Extend product life, improve information availability, support conscious use and decision-making through supplementary services (e.g. servicing, repair, testing, etc.)

In order to offer increasingly progressive environmentally conscious solutions in our product portfolio, it is essential to source sustainably, seek out and collaborate with suppliers that are environmentally aware and innovative. Furthermore, we commission contract manufacturing of sustainability-related products based on our own know-how and formulations.

**More details:**

<https://manupackaging.hu/rolunk/#brxe-yyetsh>

<https://manupackaging.hu/esettanulmanyok/>

### 5.1.2 Environmentally conscious office operations

Due to our size and office-based operation model, our direct environmental footprint is low, so we focus on a few key topics and impacts:

- Office waste
- Paper usage
- Fuel consumption

#### **Waste prevention and recycling**

Our company aims to promote waste recycling and reduce the amount of waste sent to landfills. For this purpose, we have implemented selective waste collection in all office environments:

- We collect different types of waste (paper, plastic, glass, metal, biodegradable waste) in clearly labeled, separate containers.
- We organize annual waste reduction awareness events for our employees.

#### **Reducing emissions from transportation**

To reduce CO<sub>2</sub> emissions from transportation, we have implemented the following measures:

- **Support for public and sustainable transportation:** We encourage our employees to use public transportation. The company contributes to monthly transit passes to promote environmentally friendly commuting.
- **Remote work enabled through digital solutions:** To reduce workplace travel, we promote telecommuting and online meetings so that employees don't need to commute daily. We require only one day of mandatory office presence per week; the rest is handled through remote work, mainly home office (see further information in our Distance working policy).

#### **Paper consumption reduction and recycling**

Our goal is to minimize paper use and paper-based documentation in the office, promoting digital solutions:

- **Digital document management:** Whenever possible, we carry out workflows in digital format and encourage minimizing paper-based documentation. Internally, we aim to reduce material use—especially office paper—and print only when required.
- **Continuous monitoring:** Together with our employees, we continuously assess where traditional printing can be replaced by digital processes.
- **Recycling of office paper waste:** We recycle paper waste from the office whenever possible.

### 5.1.3 Energy efficiency and reduction of energy use

Manupackaging Magyarország Kft. treats energy efficiency as a top priority, even though our leased office service does not provide tailor made, consumption based data on our energy consumption.

All of our company devices and electronic equipment are optimized for energy-efficient operation where possible:

- **Energy-efficient lighting:** Our office lighting uses LED technology, which significantly reduces energy consumption and lasts longer, thereby generating less waste.
- **Automatic lighting control:** The office building where we lease our space is equipped with motion-sensor lighting systems, ensuring lights are used only when needed.

- **Office temperature regulation:** Our offices are equipped with thermostat-controlled heating systems, so heating in winter and air conditioning in summer are used only to the extent strictly necessary.

Using renewable energy is a key part of our climate action efforts. We rely on the national average energy mix and, regarding our rented offices, we can set expectations toward the building operator and owner, but we remain dependent on their strategies and commitments.

The following topics are not material or relevant to our direct impacts, but we recognize their importance to the broader economy and periodically reassess their relevance:

- Responsible chemical management
- Water withdrawal and consumption
- Water quality
- Air quality
- Soil quality
- Noise pollution
- Water pollution
- Responsible use of minerals
- Land use, biodiversity, and animal welfare

All employees play a role in achieving the above objectives, and we strive for our corporate operations to serve as a model for others. These measures are not only environmentally important, but they also contribute to the long-term sustainable development of our company.

#### Our environmental responsibility goals:

- Near paper-free office operations (digitization of invoicing, payroll, orders by 2028)
- Calculation of direct greenhouse gas emissions (Scope 1–2) by 2026 and setting reduction targets
- Increase revenue from environmentally certified products to 10% by 2027
- ISO14001 certification and successful audit by 2027
- Annual staff-engaging environmental conservation activity
- Yearly customer-involving campaign encouraging green purchasing decisions, supported by tree planting (linked to a cause related marketing campaign)
- Provide comprehensive sustainability training covering basic knowledge to all employees from 2025 onward
- Hold a leading position and knowledge base in the sustainable packaging industry and participate in related education and professional discourse

## 6 RESPONSIBLE EMPLOYMENT, HEALTH, SAFETY AND WELL-BEING

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Manupackaging Magyarország's commitment extends beyond environmental concerns to include social responsibility. The well-being, health, safety, and development opportunities of our employees are of paramount importance, and we aim to provide a workplace that offers the best environment and opportunities for our staff.

We are committed to creating a work environment that promotes employee well-being and productivity while respecting individual needs and rights. Through these measures, we not only increase employee satisfaction but also contribute to more sustainable and ethical corporate operations. Accordingly, we apply the following principles and measures.

### 6.1 WORKING CONDITIONS AND FUNDAMENTAL RIGHTS

#### 6.1.1 Respect for fundamental human rights and dignity

Our company is committed to ensuring respect for fundamental human rights and the enforcement of equal opportunities for all employees, partners, and stakeholders. This corporate policy guides our daily operations and ensures that all company activities and relationships comply with ethical, legal, and societal standards.

Manupackaging Kft. integrates respect for fundamental human rights into all activities and decisions, with particular focus on the following principles:

- Every employee's dignity and right to respectful treatment.
- Rejection of all forms of discrimination, including on the basis of race, gender, religion, ethnicity, sexual orientation, or any other grounds.
- Ensuring the right to free choice, voluntary employment, and a safe working environment for all employees.
- Providing opportunities for collective bargaining and freedom for association (e.g., the right to join unions).

Our company is committed to ensuring equal opportunities for all employees, regardless of background, gender, age, religion, ethnicity, sexual orientation, or any other characteristic. Recruitment, working conditions, promotions, and professional development are based on the principles of equal opportunity.

We set zero tolerance regarding forced labor, child labor, or any other violations of human rights in our value chain. Such practices are unacceptable and contradict the ethical standards and principles upheld by our company.

**Forced labor:** It is strictly prohibited to employ or facilitate forced labor in any form. All our employees are hired voluntarily and of their own free will, and we ensure that working conditions are suitable, safe, and respectful.

**Child labor:** We unequivocally reject child labor and ensure that no individual under the age of 18 is employed, except where permitted by law (e.g., internships or vocational training in accordance with local laws). In such cases, minors may not be engaged in hazardous work at or through our company.

We expect all our business partners and supply chain members to commit to these principles and guarantee that their activities align with ethical standards.

Any business relationship that does not comply with the expectations regarding fundamental human rights will be subject to immediate review and potential termination. The company will take necessary action in all such cases to ensure the rights of its employees, partners, and stakeholders are protected.

We are committed to creating a non-discriminatory, inclusive workplace. To support this, our employees receive informational materials on:

- Diversity and the prevention of discrimination
- Prevention and management of harassment
- Eliminating unconscious bias

### 6.1.2 Employment security and psychological safety

Our company provides responsible and predictable employment for all employees, while respecting the need for equality, diversity, and physical and mental safety.

Through conscious planning, careful resource management, and the establishment of long-term customer relationships, our company ensures stable employment. Employees are informed of organizational changes at least 15 days in advance. In the case of temporary economic or financial difficulties, we aim to find transitional employment solutions (e.g., part-time work). All employees are employed legally, and their full salaries are paid via bank transfer under official contracts. We avoid fixed term employment and non-guaranteed working time employment relationships.

By building a resilient corporate culture and operations, we strive together to respond to the challenges of a changing business and social environment.

### 6.1.3 Employee safety and health

Manupackaging Magyarország Kft. pays special attention to the physical and mental health and safety of our employees, to provide the best possible working environment. We provide access to yearly health check-ups to monitor employees' health continuously beyond legal requirement.

- **Regular risk assessment:** We review employees' work environments in compliance with legal regulations to identify and manage potential health and safety risks in a timely manner.
- **Risk management programs:** Preventive measures are implemented based on identified risks.
- **Regular health screenings:** Annual medical screenings are provided to support preventive health care and the early detection of possible health issues.
- **Workplace safety:** All employees are required to participate in occupational health and safety, fire safety, and accident prevention training upon joining the company and during legally mandated occasions. The following basic trainings ensure awareness of workplace conditions and safety requirements:
  - **Occupational safety training:** Mandatory for all employees to ensure safe working conditions and prevent workplace accidents.
  - **Fire protection training:** Covers the basic rules of fire protection and emergency procedures.

#### 6.1.4 Working hours

Our company fully complies with current labour law regulations regarding work scheduling. At Manupackaging Magyarország Kft., full-time employment is defined as a maximum 40-hour workweek with two rest days. For part-time roles, contractual agreements apply. The company does not encourage regular overtime. We are committed to maintaining a work-life balance. Overtime is always voluntary, and refusal to work overtime must not result in dismissal or any disadvantage.

Our goals:

- Prevent overtime
- Minimize its frequency and exceptional occurrence
- Reorganize processes, tasks, or resources in case of persistent overload
- Ensure voluntariness
- Compensate extra efforts (in time and/or remuneration)
- Comply with the current Labor Code

Managers are responsible for tracking overtime and ensuring fair compensation. Employees have access to annual performance reviews and open communication channels with management, including the CEO, to report concerns. This policy reflects our commitment to fair and people-centered labour practices.

We require business partners in foreign countries to oblige their own working time regulations and strive for ILO guidelines.

#### 6.1.5 Remuneration and benefits

We regularly assess employee performance and provide appropriate incentive systems:

- **Decent Work:** We ensure competitive compensation and benefits that foster a fair working environment and support personal and professional development.
- **Bonus System:** A performance-based bonus system encourages the achievement of goals and outstanding performance.
- **Fair Wages:** We offer fair and competitive wages that reflect the value of the work, employee skills and performance, and market conditions. Our goal is to ensure that no one has to rely solely on minimum wage or a basic compensation level close to it (110%) for livelihood.

**Available benefits include:**

- Base salary
- Performance-based bonus
- Health screenings
- Public transport support
- Eyeglass reimbursement for screen-based work
- Family and community programs



## 6.2 EQUAL OPPORTUNITIES, DIVERSITY, INCLUSION, AND WELL-BEING

### 6.2.1 Diversity and inclusion

Manupackaging Magyarország Kft. aims to provide a workplace that values human diversity, where all employees can develop and work equally, regardless of background, gender, age, religion, sexual orientation, or other characteristics. Our policy promotes inclusion, equity and diversity, with special attention to employee well-being.

Our objective is to create a workplace where all employees are treated with respect, and equal opportunity principles prevail. We provide an inclusive environment where people from diverse backgrounds are valuable team members. We offer ongoing training and awareness programs to ensure equal opportunities for all.

Diversity and employee well-being are integral to our corporate culture. We focus on providing equal development and satisfaction opportunities for all social, gender, and ethnic groups.

- **Gender balance:** We strive for a balanced gender ratio at all levels. We aim to promote gender equality and continuously provide leadership opportunities for women. Job appointments are based on knowledge, experience, and competence, regardless of biological or social gender.
- **Accessible workplaces:** We create barrier-free environments to ensure that all employees have access to workplace opportunities.

#### **Mentoring and support groups:**

To facilitate workplace integration, we provide professional mentoring and onboarding opportunities for new employees, when needed, to ensure that each newcomer can successfully adapt to the corporate culture. Our company is committed to supporting the workplace inclusion of vulnerable groups (e.g., people with disabilities, ethnic minorities, older employees) and to promoting fair treatment and equal opportunities for all. Through the following measures, we support the successful integration of employees from vulnerable groups.

#### **Employee well-being:**

To promote employee well-being, we implement measures that support a healthy work-life balance, apply family-friendly policies, and aim to address individual needs aligned with the different stages of the employee lifecycle. Our goal is to provide a supportive environment for all employees that fosters long-term satisfaction and motivation.

#### **Measures supporting family life and work-life balance:**

- Flexible working hours and remote work options
- Family-friendly initiatives (e.g., maternity/paternity leave, flexibility for school events, including half-day leave)
- Support for caring for elderly parents/relatives
- Special attention and measures for integrating mothers with small children (e.g., returning from maternity leave under optimal conditions and maintaining a supportive environment for work-life balance)

We encourage all employees to suggest improvements and report if company policies are not properly implemented. We always take corrective actions when necessary, even based on employee feedback.

## 6.2.2 Flexible employment and remote work

We support flexible work arrangements to ensure optimal work-life balance:

- **Remote work opportunities:** Employees may work remotely up to four days a week. This location-independent option reduces workplace stress and increases employee satisfaction. The specifics are outlined in our internal remote work policy.
- **Part-time employment:** We support part-time work to provide development opportunities for those who cannot work full-time due to family or personal reasons. We ensure that part-time employees have access to development resources and equal career-building opportunities.

Our goal is to build a culture of trust between managers and employees, where performance is judged based on results rather than visibility or physical presence.

## 6.2.3 Performance evaluation, training and development, and career management

Our goal is to provide every employee with the resources necessary for their personal and professional development. Career management and continuous training are key components of our corporate strategy, as they contribute to employee satisfaction, growth, and the competitiveness of the company. The following principles define our approach to career management, training, and development.

|  |  |
|--|--|
| Performance measurement and evaluation | Individual performance evaluation: We provide annual performance evaluations for every employee, during which the management and the employee jointly review achievements and set future goals. Through regular evaluations and feedback, we offer ongoing support and guidance to foster employee development.  |
| Training and development               | <ul style="list-style-type: none"> <li>• <b>Mandatory and work related training:</b> We provide training required by law, including safety training and job-specific compulsory courses.</li> <li>• <b>Maintaining and improving skills:</b> We support the development and upkeep of the knowledge and skills necessary for work, including participation in language courses and communication skills training to ensure our colleagues remain competitive even in an international context.</li> <li>• <b>Development opportunities:</b> We offer a variety of training programs to support our employees' professional development.</li> </ul> <p>Sustainability-related education: We promote sustainability awareness and behavior through knowledge-sharing and community building initiatives.</p> |

|                   |  |
|-------------------|--|
| Career Management | We consider it essential that every employee can develop and perform their work in line with their knowledge, capabilities, and ambitions. Due to our small size and flat organizational structure, we support career advancement not through traditional hierarchical promotions but by offering job enrichment, project involvement, and opportunities to participate in educational or conference presentations for knowledge and experience sharing. |
|-------------------|--|

To support sustainability, we provide all employees with the opportunity to attend free or paid sustainability training (recommended for all employees: **HEPA Sustainability e-learning** course from the Export Academy Knowledge Centre). The aim of the training is to enable employees to work more consciously and responsibly, minimizing environmental impact and contributing to a sustainable future. We also organize or provide access to ad hoc sustainability knowledge-sharing, awareness-raising, or behavior-changing programs and trainings.

Our company is committed to upholding the highest ethical standards. It is mandatory for all employees to participate in corporate Code of Ethics training. Upon joining, new employees must read the Code of Ethics and review the accompanying training materials. The code addresses issues such as corruption, bribery, and other ethical concerns. Our aim is to ensure that employees understand company values and are equipped to make ethical decisions in their daily work.

| Our objectives regarding employee treatment:  |
|---|
| <ul style="list-style-type: none"> <li>▪ More than 50% of employees make use of remote work, up to 4 days per week</li> <li>▪ Part time employment is available for those who need it by demand if occupation allows (expected 1-2 people)</li> <li>▪ Gender balance in leadership roles aligned with the total male-female ratio</li> <li>▪ Zero workplace accidents</li> <li>▪ Low absenteeism rate</li> <li>▪ High employee satisfaction with active participation in company affairs and community programs</li> <li>▪ Employment of a person with reduced work capacity or a disability by 2027</li> <li>▪ Unconscious bias training for all employees and managers by 2026</li> <li>▪ 100% documented participation in quality performance evaluations</li> <li>▪ Annual review of occupational health and safety risk assessments</li> <li>▪ At least 90% participation rate in preventive health screenings among eligible employees</li> </ul> |

## 7. CODE OF ETHICS AND BUSINESS CONDUCT

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### Message from our managing director

One of the core principles of Manupackaging Magyarország Kft.'s operations is our commitment to ethical behaviour. Our goal is to ensure business conduct and integrity that is based on fairness, an ethical culture, and compliance.

In the long term, we can only be successful if we take responsibility for our decisions and actions—both personally and on corporate level. Our employees must act lawfully, ethically, and in the best interest of the company in all situations.

Thank you for supporting our values and contributing to maintaining proper business practices. This means for us not only providing high-quality and fairly priced products and services but also acting with integrity, honesty, and transparency at all times.

Our Code of Ethics and Business Conduct applies to all our current employees, non-employee workers, and business partners, including subcontractors, suppliers, and customers.

Together with our employees and business partners, we aim to build an economy and business environment based on mutual respect, responsibility, and accountability.



A handwritten signature in black ink, reading "Arató Gábor".

Gábor Arató  
managing director

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## 1. Introduction

This Code outlines the ethical principles and business conduct guidelines that define our operation and business relationships. It applies to all our colleagues, including executives, employees, non-employee workers, subcontractors, and consultants. We expect all our business partners to respect these principles.

Our commitment to integrity and ethical behaviour is grounded in trust and credibility, which can only be achieved through ethical business practices. Leaders have a particular responsibility to set an example through their own behaviour.

## 2. Our purpose

Our aim is to develop cutting-edge solutions to the packaging challenges of the business world and improve the quality, safety, health, and environmental aspects of storing, transporting, and distributing demanding products. We take our responsibility seriously and are committed to promoting environmentally conscious packaging, in alignment with the waste hierarchy (prevention, reduction, reuse, recycling, disposal) and the dissemination of eco-friendly solutions. We believe that building trust- and credibility-based operation and relationships is necessary to exist in a transparent and accountable economy.

We express our commitment within professional communities as well:

- **UN Global Compact:** While our company has not formally joined the UN Global Compact due to its small company size, we fully consider and apply these ten principles.
- **BCSDH Sustainable Corporate Management Guidelines:** We are a member of the Business Council for Sustainable Development in Hungary (BCSDH), and we uphold its expectations regarding transparent and ethical operations, responsible corporate governance, partnerships, and respect for core values.
- **MVÜK Code of Ethics:** Our Managing Director is a member of the Hungarian Business Leaders' Forum (MVÜK), and is committed to ethical leadership, value-based relationships, personal and collective responsibility, openness, acceptance, solidarity, and trust-based management.

## 3. Our ethical and business conduct values



Honesty



Integrity



Respect for Others



Responsibility



Reliability



Accountability



Lawfulness



Meritocracy



Culture of Learning from Mistakes

Our Code of Ethics and Business Conduct is an integral part of our Corporate Sustainability Governance Policies manual and complementary we have additional internal guidances on specific topics to strengthen our corporate responsibility governance and due diligence.

#### **4. Our Code of Conduct**

This Code of Conduct supports understanding of Manupackaging's values, guidelines, ethical principles, and key legal elements. It cannot address every question or situation, but provides a shared foundation that guides everyday behaviour, decision-making, and shapes our identity.

If an employee or business partner observes unethical or improper behaviour or intent, they are required to report it to the Managing Director. Such reports are handled confidentially, and no retaliation shall occur against those who report concerns in good faith.

The company ensures a procedure is in place to allow all stakeholders to report concerns securely and confidentially about issues such as corruption, bribery, undue advantage, information security incidents, false invoicing, harassment, or other unethical conduct addressed in this document. Reports are treated confidentially, and whistleblowers are protected against retaliation.

*Reporting Methods:* Reports can be submitted via email at [etika@manupackaging.hu](mailto:etika@manupackaging.hu), by mail, or in person/by phone, specifying the subject, preferably addressed to the Managing Director.

*Investigation Process:* All reports are received by the Managing Director, who pre-evaluates their relevance. For cases requiring investigation, a three-person committee—comprising internal or external members—will be involved to ensure objective, impartial decision-making.

*Consequences:* Our goal by maintaining this reporting procedure and the investigations is preventing non-conformities, conduct root cause analysis in cases of incidents to prevent repetition, reduction of risks or negative impacts, or if necessary remediation. However, in cases of intentional and severe misconduct identified during the investigation (whether by the subject or the reporting party), termination of employment or business relationship may be warranted.

The company is committed to addressing all ethical matters transparently and ensuring that all employees and business partners are aware of company values and expectations. For ethical issues not covered in the current Code, the company will continuously review and revise its policies to reflect legal changes and industry best practices.

##### **4.1 Compliance with legislation**

All employees are required to comply with applicable economic, labor, environmental, and all relevant legislation and internal policies, ensuring lawful and fair business conduct. We expect employees and partners to stay informed about the latest laws and regulations, align their processes accordingly, and continuously monitor compliance to foster improvement.

#### **4.2 Fair business conduct**

We believe in free and fair competition, open and transparent business practices, and are committed to operating in compliance with competition law and fair market behaviour and rules.

##### **What this means in practice:**



We engage with competitors only in legally permitted ways, reject market-sharing or cartel-related attempts, and provide communication based on verifiable data in marketing and sales, furthermore we ensure access to quality information by stakeholders. When employees move between competitors, we respect and expect adherence to confidentiality obligations.

#### **4.3 Anti-corruption measures**

The company maintains a zero-tolerance policy for any form of corruption. Corruption includes abuse of entrusted power or position for personal gain—such as bribery, nepotism, money laundering, facilitation payments, unauthorized benefits, falsification, and other misconduct.

##### **What this means in practice:**



We reject gifts exceeding 10% of the actual legal minimum wage, do not accept compensation, commission, rewards, or facilitation payments from suppliers or customers. Attempts to influence decisions (kickbacks, bribery) must be reported to the Managing Director. Accepted gifts, if any, must be shared with the team whenever feasible.

#### **4.4 Handling sensitive financial transactions**

The company ensures that sensitive financial transactions are conducted securely, traceably, and ethically. All approvals are documented (digitally or in writing), and payments are made exclusively by authorized personnel through secure banking systems.

##### **What this means in practice:**



Ad-hoc payments require financial or executive approval. Further details are outlined in the internal regulation Financial transactions.

#### **4.5 Confidentiality, data protection, and information security**

Protecting the confidentiality on business information and personal data is of utmost importance. The company is committed to safeguarding third-party data and takes all necessary measures to prevent unauthorized access, disclosure, or misuse. We strictly comply with data protection laws, including the GDPR, and ensure all employees and partners handle shared information with the highest level of care.

##### **What this means in practice:**



Confidential information about clients or partners must never be shared with unauthorized persons, not even in casual conversations. Refer to internal policy IT and information security for further details.



#### **4.6 Respect for human rights and values**

The company respects human dignity and values, and acknowledges its responsibility to uphold human rights. We do not tolerate discrimination, harassment, child labour, or forced labour. We are committed to fair and lawful employment practices and reject discrimination based on gender, age, nationality, religion, disability, political or religious beliefs, sexual orientation, or any personal characteristic. We aim to foster an inclusive workplace and society where everyone can contribute meaningfully within our value chain.

##### **What this means in practice:**



Reports of harassment or discrimination are thoroughly investigated, and corrective and preventive actions are taken when necessary. We do not tolerate any form of unfair treatment, abusive communication, microaggressions, or behaviour that violates human dignity.

#### **4.7 Fair Employment and working conditions**

The company is committed to ensuring a safe, healthy, and fair working environment. Our goal is to prevent work-related injuries and illnesses, support physical and psychological well-being, and promote work-life balance. We endorse a family-friendly workplace atmosphere and policies. Harassment, intimidation, or workplace aggression in any form is strictly prohibited.

##### **What this means in practice:**



We set a goal of zero workplace accidents and ensure good working conditions, organization, and infrastructure. We offer competitive benefits and foster a strong sense of community through team-building initiatives and company culture. Concerns related to working conditions or work-life balance are investigated and addressed with tailored solutions. All employees are officially registered and earn a salary exceeding 105% of the legal minimum wage.

#### **4.8 Environmental Protection**

The company is committed to environmentally conscious operation that support sustainable development. Our goal is to slow climate change by mitigation practices, we strive to minimize our carbon footprint and negative environmental impacts. Through the development and promotion of sustainable packaging solutions, we support our clients in adopting eco-friendly practices.

##### **What this means in practice:**



We encourage green office practices such as energy-saving, minimizing paper usage, and promoting micromobility and public transportation. We help employees adopt more conscious habits through awareness programs.

#### 4.9. Conflict of interest

It is crucial that all decisions serve the company's economic interests while upholding sustainability principles. All employees must avoid conflicts of interest and report potential issues to the Managing Director.

##### What this means in practice:



If an employee or its relative holds a decision-making role at a supplier or customer company, it must be reported to the Managing Director. Employees may not hold positions incompatible with the company's ethical principles or business interests.

#### 5. Closure

This Code is binding for all employees and partners and supports the maintenance of proper business practices. We regularly review the content of this Code and the awareness and trust related to this document and its intentions, and if necessary we take actions to improve.

##### Our objectives regarding responsible corporate governance and business ethics:

- Zero fines related to corruption, money laundering, bribery, or other forms of unfair market conduct
- Training for all employees and managers on the contents of the Code of Ethics, with particular emphasis on anti-corruption, and information and data protection, by 2026
- Zero IT/data/information security incidents resulting in data loss
- Maintenance of a 'Responsible Company' certification
- Ensuring a company culture to speak up and share opinion and ideas

**Clause:**

This corporate policy is applicable to all activities of Manupackaging Magyarország Kft., and is reviewed and updated annually to comply with the latest legal regulations and ethical standards.

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