

ZSIDAI GROUP CODE OF ETHICS

The purpose of the Code of Ethics is to familiarize all Members, officers, employees, and contractual partners of the Zsidai Group * (hereinafter referred to as the Group) with the moral and ethical standards that the Group considers of paramount importance in its operations. By communicating the values, it shall define the ethical conduct and appropriate standards of behavior expected of the Group and its Members. In order to safeguard, enhance and develop the values, professionalism, reputation, professional and moral integrity and decent human and business conduct that Members represent in and through the Group, the Group has a fundamental expectation that Members will comply with the Code of Ethics, the XXI's Century of Social and Business Life, the Code of Conduct for the protection of the values, professionalism, reputation, professional and moral integrity and decent human and business conduct that Members represent in and through the Group, in their dealings with guests, with each other and with third parties. The Code of Conduct, in accordance with the classical rules of social and business life, of the social and economic life of the European Union, and to refrain from any conduct that could be prejudicial to the hotel or restaurant profession, to any Member or Members or to the Group.

The scope of the Code: extends to all Members, Associate Members, consultants and persons having contractual relations with the Group.

The Group is a professional representative organization, which operates in accordance with the written and unwritten rules of the profession and does not provide any financial support to political parties and political organizations or their representatives.

The Group's Code of Ethics is a code of conduct within the meaning of Act XLVII of 2008.

- Pierrot - Le Pierrot Ltd.
- 21 Hungarian Restaurant - Harlequin Ltd.
- Pest-Buda Hotel and Bistro - Harlequin Kft.
- Baltazár Hotel and Restaurant - V1 Gastronomy Ltd.
- Spíler Original - Gozsdu Gastronomy Ltd.
- Spíler Shanghai - Gozsdu Gastronomy Ltd.
- Jamie's Italian Buda Castle - Trinity Gastronomy Ltd.
- Jamie's Diner - Berlin Felett Kft.
- Spíler Buda - MOM Gastronomy Ltd.
- Fekete Holló Restaurant - Opera Gastronomy Ltd.

- Spíler Biergarden - Dísz tér Gastronomy Ltd.

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I. INTRODUCTION

1.1. The behaviour of business

It is impossible to regulate all aspects of economic life, all the actions of market players, by legal, economic, or power-based means alone. The behaviour of participants established habits, generally accepted and established practices and the behaviour of the individuals involved also play a major role in the development of business life. Success in business requires trust between participants, which is guaranteed by the observance of moral standards. The Code shows which forms of behaviour in the business world are considered ethical and which are less so - or even unacceptable.

1.2. The need to follow moral conduct

As examples from developed market economies show, ethical businesses that respect community interests and values are more successful in the long term than those that disregard the environment. On the other hand, the social responsibility of business is not only to make profits and accumulate wealth, i.e. to achieve business results, but also to serve the common good and to serve communities, large and small. Voluntary and consistent adherence to standards of conduct ensures that business is perceived positively by society.

1.3. Business as a moral activity

The business aims to satisfy the needs of guests, customers, and consumers, to provide its participants with financial support and opportunities for advancement and livelihood, to offer business partners an opportunity to earn income, and to ensure the return and growth of the owners' and investors' assets. Businesses embrace and validate initiatives, provide space and conditions for economic development for social progress. Enterprise is an indispensable institution of the market economy, whose main operating principles are the same as those of democracy: meritocracy, freedom of competition, a level playing field and, through all these, the pursuit of individual goals and the common good. In the light of all these facts, it can be concluded that a business that meets moral requirements fits into the generally accepted order of operation of society.

1.4. Aspects affecting the behaviour of entrepreneurs

Businesses must meet three requirements at the same time. First, they must act in their own business interests; second, they must act in a law-abiding and law-abiding way (including respect for individual rights); and third, they must comply with ethical standards. The Code makes it clear that this triple requirement is simultaneous and universal, and that no one aspect can be temporarily imposed at the expense of the others.

1.5. Increased responsibility of large companies

Large companies play a prominent role in business life, including in public responsibility, and their behaviour is enjoyed or suffered by a wide range of partners and citizens. They are expected to ensure ethical behaviour through management and organisational measures, such as the development of codes of conduct, the formulation of corporate values and priorities, the operation of ethical institutions and committees, the promotion of ethical considerations in public relations, the representation of employees in decisions affecting them, etc.

1.6. Conduct that is contrary to business ethics and integrity is reprehensible even if not prohibited by law

Legally permissible conduct may also be immoral if it harms the interests of the business community, consumers or other important business or public actors in such a way that they are unable to pursue their interests satisfactorily. Conduct which is not expressly contrary to written law is also immoral if it exploits legal loopholes, inconsistencies and inconsistencies in the law and benefits the community or its partners by causing harm.

II. GENERAL PROVISIONS

2.1. Scope of the Code

The Code applies to the Members of the Group. In practical application, the Code applies to senior employees of business entities and to all natural persons whose conduct constitutes the conduct of a Member. The Code shall apply to the Members of the Group in the work of the Ethics Committee. The Members of the Group shall familiarise themselves with the Code with a view to applying the principles and standards set out in it in their activities. Familiarity with the Code shall also constitute an expression of the **Group Members' submission to the provisions of the Code.**

2.2. The relationship between the Code and the legal order

Contractors must act in a lawful and law-abiding manner in their activities. In all matters not provided for or prohibited by law, they shall act in accordance with the moral standards of the Code and established practice and custom. The Code is not contrary to the rule of law and follows customs which have been developed with due regard for the interests of the community. In case of doubt on the part of entrepreneurs as to the correct conduct, the Code shall prevail.

2.3. Link to codes of ethics for businesses and professions

Professional organisations, interest groups and, more typically, larger businesses themselves often draw up codes of ethics, codes of conduct and other documents setting out ethical requirements. In many cases they also operate ethics committees, advocacy, or lobby groups. These arrangements are desirable and **useful** because they serve the cause of honest business. In its own ethical work, the Group recognises and **accepts that** entrepreneurs act in accordance with the standards laid down by their local community or business, if these do not conflict with the Code.

III. THE ETHICAL ENTREPRENEUR

Criteria of ethical behaviour required by the Code

3.1. All tare applies:

- 3.1.1. must act conscientiously and professionally,**
- 3.1.2. meet its written or oral commitments,**
- 3.1.3. demonstrate good faith and good faith business conduct,**
- 3.1.4. pursue its activities with its partners in a spirit of mutual cooperation,**

- 3.1.5. to employ its employees and other workers fairly and equitably and in accordance with the principle of equal treatment,**



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- 3.1.6. **behave in a reliable manner, drawing the attention of their partners to any material fact affecting their legal or business relationship**
- 3.1.7. **meet the legitimate, reasonable, but not unlawful or immoral demands of guests and consumers in accordance with the written and unwritten rules of the profession, to the satisfaction of the guest,**
- 3.1.8. **protect and care for the natural and social environment.**

Respect the privacy and dignity of guests, colleagues, partners, and clients. It does not tolerate discrimination on any grounds, be it age, gender, sexual orientation, race, religion, or disability. Violence or threats of violence, physical abuse, psychological threats, or pressure are prohibited.

3.2. Rules of market conduct

In addition to complying with the laws governing the conduct of the Member's business, the standards of conduct expected of the Member are.

3.2.1. When concluding a contract with each other or with a third party, including the guest, the rules of good faith and fairness must be observed.

In addition to the unfair contract terms set out in various laws, it is unethical, and therefore contrary to the spirit and provisions of the Code, to

- a) after the conclusion of the contract, the Member invokes circumstances which, with due diligence and/or professional knowledge, could have been known before the conclusion of the contract,
- b) A contract is unethical if it is concluded for the purpose of late, partial or incomplete performance, thereby causing material and/or moral damage to others, such as the customer or competitors.
A contract is unethical if the Member plans for the consequences of the default by including the consequences of the default in the price.
- c) An unethical contract is a contract in which the Member does not act in accordance with the terms of the contract if it is for the purpose of buying a tangible or intangible product with the intention of withdrawing it from the market or withholding its use.
- d) It is unethical to enter a contract and to perform work without adequate preparation, qualification, authorization, and expertise, to perform work in a shoddy manner, in an unprofessional manner, not in accordance with the written and unwritten rules of the profession, even if the price or other contractual terms would justify this.
- e) It is unethical to contract for an activity for which all the administrative, licensing and other legal conditions necessary to carry out the activity are not in place and cannot be waived, except for activities which are permanently and substantially different from the business activity of the undertaking
to undertake an activity.
- f) Any illegal activity is also unethical.
- g) It is unethical to enter into agreements and economic relations with illegal market operators, unlicensed contractors and workers, and to obtain, use or transfer goods and services that come from illegal, unlicensed trade.
- h) It is unethical for a contractor to gain financially by damaging the natural environment in the performance of a contract.

3.2.2. Good quality, reliable, safe products and services should only be offered and

marketed, properly informed and for which the Member assumes not only legal but also ethical responsibility

- a) A wider range of pre-sales information and after-sales services should be organized to meet consumers' needs.
- b) The information to which guests, consumers and customers are entitled must be provided in a clearly visible and accessible place and manner and must be acted upon in accordance with the information.
- c) Information should be provided on the method of sale, including any discounts, such as periodic discounts, clearance sales, final sales, markdowns, stock reductions, residual sales, liquidation sales, etc., and, where possible, the reasons for the sale.
- d) Consumer complaints, comments and complaints handling should be made possible and dealt with swiftly and fairly.
- e) It is unethical to deviate from the advertised opening hours of shops, premises or offices intended to serve customers, to send customers to make an appointment, to make a purchase or to provide a service, to refer to internal rules that have not been made known to customers and that are prejudicial to the interests of customers.

It is seriously unethical to use or threaten to use any form of physical or psychological violence against a guest for any reason. It is not unethical to use physical violence if it is used in a legitimate defense or in the case of a red flag, provided that the violence used is proportionate to the behavior or threat that gave rise to it.

It is seriously unethical to force or harass a guest.

It is seriously unethical for any member of the staff of a Member to behave in an establishment of another Member in a manner that does not conform to the generally accepted rules of social intercourse and the hotel/restaurant profession, or to violate any provision of the Code of Ethics of the Association.

3.2.3. Suppliers, subcontractors, and other market participants with whom the Group has a relationship should work together in mutual good faith and fairness.

- a) A Group member in a seller/supplier position shall judge the financial strength and capabilities of customers according to the same principles of judgment as he/she applies to his/her own purchases.
- b) Relations with suppliers should consider and value mutual interests and opportunities. Suppliers are the most exposed to the risks of dominance and are therefore the most likely to be unethically prevented or compensated. These are mostly dishonest operations such as bribery, personalized and concealed reimbursements or benefits or attempts to do so. The Member should not accept these opportunities and should instruct its employees to do so.
- c) It is unethical to bribe public and corporate purchasers by giving them a valuable personal gift, money, or other benefit for choosing a particular supplier or product or service.
- d) It is unethical to fail to disclose, delay in disclosing or limit the disclosure of material information necessary to assess the availability of financial collateral and the recovery of claims. It is unethical behavior to evade efforts to recover legitimate payment claims by concealing the source of those claims.

3.2.4. A trade secret must not be obtained, used or disclosed to others without the consent of its owner.

- a) Information about business partners obtained in bilateral transactions must be treated as trade



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secrets and must not be disclosed to third parties.

- b) Members should take the necessary measures to protect their business secrets, oblige their employees to do so and draw the attention of their partners to the protection of their secrets.
- c) It is unethical to use, illegally reproduce or distribute copies of copyrighted products, such as software, without the permission of the copyright or user right owner. When distributing copyrighted products, attention should be drawn to the prohibitions or restrictions on reproduction.
- d) It is prohibited to manufacture or supply documents, designs or specifications obtained or obtained for commercial purposes.
- e) The list of Group Member partners working on competing or similar transactions is a trade secret. It is not fair to identify, influence or entice others' customers, or to solicit others' orders.
- f) Secrets obtained through business negotiations or other business relationships should be used only in the context of the relationship between the two parties and only for the purpose for which they were disclosed.
- g) It is reasonable and desirable that the partners mutually sign confidentiality agreements indicating the scope, purpose and timing of the use to which they may put the information obtained.

3.2.5. The reputation of business partners and competitors must be respected, and it is unethical to spread unfounded bad news or distrustful information about them or to misrepresent real facts.

- a) You must not unduly challenge, damage or jeopardies the reputation, creditworthiness, business reliability or solvency of another trader to third parties or the public.
- b) It is unethical to knowingly discredit other entrepreneurs. This should include the defamation or suggestion of defamation of other businesses, their managers or representatives, their activities, products, and services.
- c) It is unethical to make unfounded rumors about the bankruptcy, closure, insolvency or liquidation of another business, the risk of insolvency, the unsuitability or dangerous nature of products and services.
- d) It is unethical to present specific products or services of others for advertising purposes as having qualities inferior to those advertised.

3.2.6. Relations with competitors

- a) Maintain a fair relationship with partners in the same profession, market, and area of interest. This includes respecting and understanding the business interests and aspirations of others.
- b) Trade secrets must not be violated in obtaining information about competitors' business conduct and results.
- c) It is unethical to corrupt honest competition by creating bad publicity, gaining, and exploiting undue advantage.
- d) Professional recognition of the achievements of competitors strengthens the prestige of the profession.
- e) A merger between competitors is unethical if it aims to exclude or restrict competition in the market.

3.2.7. In the context of competition in the labour market, it is unethical to recruit if it is aimed at explicitly weakening the business potential of the partners.

- a) It is unethical to seduce key people from other entrepreneurs in order to weaken their

viability and competitiveness. It is unethical for a Member to take over whole groups or departments from another, against the latter's intention, and thereby significantly weaken the other entrepreneur.

- b) It is unethical to force an employee to break his or her employment contract and to take on the resulting disadvantages and to make promises that differ significantly from normal labor market conditions.
- c) It is a seriously unethical form of recruitment if the purpose is to learn a business partner's secrets, e.g. to lure or entice customers.

3.2.8. It is not permitted to organize boycotts against contractors, to prevent or participate in the marketing of goods or services of others or to make it impossible to sell the goods of others.

- a) In addition to exclusive contracts, it is unethical to encourage others to directly disrupt relationships with competitors or other business partners by promising to replace them.
- b) It is unethical to set, maintain, enforce, or compel prices that are excessively or disproportionately low or high. In determining this, account must be taken, inter alia, of the price, fair profit, cost of production, cost of acquisition, other factors affecting pricing and market conditions, and the effect of the unethical price on other businesses.

3.2.9. In public relations (PR) and advertising, it is unethical to mislead, misinform, misinform, misinform, or misrepresent the product or service.

- a) Misleading consumers to misrepresent an unlabeled product or service, including by providing incomplete information or by providing unfounded or incomplete indications of its characteristics. Excessive advertising containing unfounded comparisons is misleading.
- b) It is unethical to refer in advertising to advantages over the named services or goods 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 favorable terms.
- c) It is unethical to advertise services or products that cannot be accessed, and the nature of the restrictions must be disclosed.
- d) It is unethical not to disclose information that is important to business partners, to guests, customers, clients; the Member has a duty to inform about its services and products. Information on prices and conditions of application and payment must be complete.
- e) In service or commercial establishments, accommodation facilities where there is customer or guest traffic, only the description of services or goods that are available on the premises or the description refers to places of purchase is allowed.
- f) In the context of personal selling and sales promotion, the sales person must fulfil all the information obligations that are the responsibility of the trader.
- g) In the case of goods and services that are harmful, dangerous, or hazardous or present other risks for users, these facts must be pointed out.
- h) Advertisements and marketing based on gambling passions should also refer to the value, nature and odds of winning prizes. Prize draws and competitions should be conducted with the involvement of a notary and the public.
- i) It is unethical to place on the market a product or service for which the legislation or administrative authorization does not allow, on the basis of a specific, misleading interpretation of the legislation or administrative authorisation. In particular, it is unethical to offer legal constructions which are not transparent to the majority of customers and which put the customer



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at risk or cause unforeseeable disadvantage.

j) It is unethical to give the false impression of a particularly favorable service or an occasional purchase opportunity, or to show a reduction in the level of the occasional discount that is not in relation to the price charged.

3.2.10. The exercise of economic dominance in market relations and the abuses that go with it are not acceptable.

- a) It is unethical to use a dominant position to influence the relationship with other entrepreneurs to the detriment of a third party, for example by threatening to cancel orders if others are served, or by claiming exclusivity as a customer.
- b) It is unethical to prevent other entrepreneurs from using the sources of supply or sales that are most favorable to them.
- c) It is an abuse of dominant position to refuse to conclude a contract without good cause. Such an overriding reason could be, for example, persistent late payment by the buyer, or exhaustion of capacity or stocks.
- d) It is unethical for those in a dominant position to impose their own contractual requirements on others, even though it is only to their advantage.
- e) A dominant position is the exploitation of a situation on terms other than those agreed, asserting oneself in a way that leaves the partner no alternative.
- f) Abuse of dominance is the acceptance of a promise that is not legally enforceable (e.g., a promise of convenience) and does not constitute a satisfactory or enforceable assurance in favor of the weaker party.
- g) It is an abuse of power to expect performance without a contract or to refuse to enter a contract even if your partner accepts the terms.
- h) It is a dominant position to require longer than normal or reasonable bidding, to require unilateral price freeze clauses in long-term agreements, to ignore the deterioration of interests brought about by adverse legislative changes.
- i) The unfair exercise of dominance includes requiring consideration before performance by refusing to give performance guarantees or other assurances, and unjustified or unilateral limitations on the assumption of liability for performance of the contract.
- j) Unilateral dominance is the acceptance of a delivery schedule, range or volume units that is not technically justified. Pressure to ignore legitimate demands or to tolerate unfavorable agreements and situations is not acceptable. It is also the use of dominance to restrict the right of a counterparty to seek judicial or other remedies.
- k) A dominant position can be considered to exist if someone uses the influence of public authorities, municipalities, or other public authorities to force a contractor to sign a contract against his interests.

3.2.11. The prohibition of the use of dominance as unethical behaviour.

- a) It is unethical to include in a contract with a partner (such as customers, clients, customers, contractors) a term that serves only the unilateral interests of the Member to the detriment of the other contracting party.
- b) It is unacceptable to unilaterally stipulate the interpretation of the contract, to reserve the right to unilaterally modify it, to leave the assessment of performance under the contract to the contractor and to limit the consumer's rights in the event of a breach of contract.
- c) It is unethical to oblige a partner to fulfil its contract, including its payment obligations, if the contractor fails to do so.



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d) It is unethical to oblige a partner to fulfil ancillary obligations, such as providing data, which, if not fulfilled, will result in the loss of rights despite payment.



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- e) It is unethical for a Member to withdraw from a contract if the contract does not give the partner this option. If the partner has already provided a service without consideration, the Member may withdraw from the contract only if it pays for the service provided.
- f) The contractor cannot exclude liability in the event of damage to the life, physical safety, property, or health of the partner.
- g) An extension of a fixed-term contract will not be accepted if the partner has not made a declaration because he had an unreasonably short period of time to do so.
- h) Any change to the provisions of a contract with a partner may only be made by bilateral agreement.
- i) In the performance of the contract with a partner, the contractor's liability for its own subcontractors is reduced only if the partner participated in the selection of the subcontractor.

3.3. Internal relations between businesses

- 3.3.1. The interests of the business's owners, investors, depositors and creditors must be protected.**
- 3.3.2. The company's data and records must be clear, clean and correct.**
- 3.3.3. Employees must be employed with respect for human dignity, their personal rights and their abilities and health.**
- 3.3.4. Remuneration of staff must be fair and equitable.**
- 3.3.5. It is unethical to discriminate, to ignore the requirement of equal treatment, to harass. Discrimination against employees is acceptable only on the basis of the existence and fulfilment of conditions of employment (experience, qualifications, performance, etc.).**
- 3.3.6. Employees must be given the opportunity to speak up for and defend their interests.**
- 3.3.7. Workplaces should be healthy, safe, and cultured. The Member shall endeavour to prevent damage to health, environmental damage and pollution to minimise. Consider the technological and ecological guidelines, health, environmental and occupational safety regulations that apply to your activities.**
- 3.3.8. Employers should ensure that their employees are suitably qualified and prepared to carry out the tasks assigned to them.**
- 3.3.9. Employees and employers are mutually expected to be loyal to each other and to participate in solving each other's problems.**

3.4. Relations with the business environment and local communities

- 3.4.1. It is the duty of all stakeholders to ensure that the competition, the participation in the competition and the evaluation are fair.**
 - a) Collusion between competitors, in the course of tendering, bidding, auctions, with the advertiser, the judge or any other insider influencing the decision, is not allowed.
 - b) It is forbidden to publish a call for competition at a time or under conditions which make it obvious that meaningful competition is impossible.
 - c) In a private or invitational competition, parties with equal chances should be invited and the composition of the participants should be avoided in such a way that the winning or losing position of one of the parties can be predicted.
 - d) It is forbidden to make a bid that favours another participant (e.g. by promising to win) or

that is intended to render the tender ineffective.

- e) During the tendering process, it must be ensured that all bidders receive the same information. Invitations, invitations and tender documents must be available to all parties at the same time. Supplementary or additional information shall be provided to all parties.
- f) If the tenderer does not have sufficient financial resources or does not intend to conclude a contract or intends to do so only to a limited extent, this must be stated in the invitation to tender.
- g) The contract which is the subject of the invitation to tender may not be combined with the execution of other works beyond the terms of the invitation to tender.
- h) Late or informal tenders may not be taken into consideration. The possibilities for making up any deficiencies must be published in the contract notice or communicated to all participants equally and simultaneously.
- i) Tenders submitted by the tenderer or by companies participating in the tender procedure should not be taken into consideration.
- j) The order, criteria and methods of evaluation should be made clear in the call for applications. Only the successful tenderer may be awarded a contract, and no conditions other than those of the tender may be imposed unilaterally or by pressure.
- k) If the contract concluded differs from the terms of the invitation to tender or if it subsequently needs to be substantially amended, a new invitation to tender must be issued.
- l) It is expected that the contracting authorities will notify all participants in the tender procedure of the outcome of the evaluation of the tenders.

3.4.2. Unlicensed businesses are particularly dangerous for partners and other entrepreneurs.

- a) The exercise of certain entrepreneurial activities requires special licenses, which are a prerequisite for the exercise of the business and serve to ensure the security of the partners.
- b) It is risky, dangerous, and unethical to perform services without the necessary specific authorizations.
- c) It is unethical to circumvent the law.

3.4.3. Assistance in the event of an emergency, accident, damage, or similar situation is expected.

- a) It should also be seen as helping if the partners in the relationship act fairly towards each other.
- b) It is unethical for a Member to use or exploit damage (such as force majeure) or tragedy to displace or destroy a business partner or competitor that has occurred outside the scope of its business activities.
- c) If the injured party requests it, it is fair to renegotiate the terms of the contract.
- d) Victims cannot take advantage of their situation and can only receive fair assistance up to the amount of their direct damage.

3.4.4. Damage to public property, natural resources and treasures, and excessive and unjustified use or strain on them are not allowed.

- a) In addition to the legal requirements, care must be taken to minimize the impact on the natural environment. Damage to the environment must be restored.
- b) Business organizations must integrate environmental protection into their management, strategy and daily practices, and limit emissions of harmful substances and impacts.
- c) Care must be taken to ensure that the waste generated is managed and reusable.
- d) Nor can excessive pollution be allowed to endanger the environment. The use of

processes, methods, materials, and other sources that damage the environment should be avoided.

e) In the field of environmental protection, wrongdoing in the activities of others should be reported.

f) Businesses that have a significant impact on the environment should monitor, measure, and analyse these impacts and develop and implement plans to reduce them.

Materials, energy, and other resources used by the business must be used sparingly so that waste and losses do not have a negative impact on the environment.

The Member shall behave ethically to ensure that the impact of its activities on the environment is appropriate, and shall strive to conserve energy, reduce waste, recycle and use environmentally friendly equipment. Reduction of waste, recycling and waste manage by-products and waste in accordance with the law.

g) Damaging and destroying the living environment should only be allowed within a controlled framework.

h) Living nature should be left intact as far as possible, and the necessary maintenance and protection should be carried out as far as possible without chemicals.

i) Businesses that process products from the living world or test their properties should take particular care to avoid unnecessary suffering.

3.4.5. Support for local communities, schools, health, social care, sport, culture, the arts and other public benefit endeavours is expected of all Members to the best of their ability.

3.4.6. Support for physically or mentally disadvantaged clients

Members should take special care to ensure that guests and customers with disabilities, mobility impairments or other disabilities are able to access the restaurant and hotel building easily and receive service and care appropriate and dignified to their situation.

IV. OTHER CONTACTS RELATED TO ENTREPRENEURIAL WORK

4.1. Corruption of persons exercising public authority or having an influence on the exercise of public authority is prohibited.

4.1.1. Persons acting on behalf of public authorities are treated with the same respect as other business partners.

Corruptly influencing, soliciting, encouraging, or having an interest in corrupting the proceedings of a public authority is prohibited.

- a) Contractors may not make offers or offer benefits to public employees or civil servants to better interpret or assess their work or accounts, to speed up their affairs or to invest in them.
- b) Not only the fact of bribery cases, but also the reputation of such cases is very damaging for entrepreneurs, so it is justified to clear up suspected corruption cases.
- c) It is reasonable and recommended that major contracts, especially in public procurement, should contain clauses that exclude corruption or statements that exclude bribery. Publicly funded contracts should be transparent.
- d) No bargaining with representatives of the public authorities shall be of such a nature as to lead to a personal advantage or interest of the officials acting, even if it were indirect. In relation to public authorities, mutually beneficial arrangements should be interpreted with particular care to avoid any suspicion of corruption.

4.2. Relations with professional, sectoral, and territorial organizations

4.2.1. Business participation in professional organizations supports market positioning and fair representation and is a useful form of professional and public life.

In using the Code, it is appropriate to consider professional ethical standards even if the firm or contractor is not a member of the professional body.

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

- a) It is unethical for positions in professional and regional organizations to offer informational advantages, sometimes tender opportunities, or other opportunities for a wider range of entrepreneurs to directly use to strengthen their market position and win business.
- b) It is unethical for them to use information or authority acquired in social or public office as inside information for their own or their affiliated companies, by marginalising others. In this context, it is also reprehensible to create a favourable position for one's colleagues by passing on or leaking information that is considered confidential.

4.2.3. Organisations acting on behalf of and for market players, especially consumer representatives, do useful work for the community.

- a) Organisations representing the interests of the opposing or complaining party should play a significant role in resolving problems relating to the conduct of businesses. It is reasonable to get to know their views and seek common solutions.
- b) When judging ethical problems, similar cases and precedents should be taken into account in order to ensure uniformity.
- c) For similar or related issues, it is possible to draw on solutions developed jointly or previously and to ask other professional organisations to represent them.

4.2.4. The Group's officers are expected to conduct themselves in a manner consistent with the Code.

- a) Persons acting on behalf of Members of the Group shall act conscientiously in their official capacity and other work for the Group but shall not benefit from any advantage in connection therewith.
- b) No person should act in a manner that is incompatible with his or her function in the Group in any matter concerning his or her own business or person.
- c) Group officials are also expected to act with due care when there are circumstances in their sphere of interest that may give rise to bias or partiality. In such cases, it is appropriate for the Group representative to request a replacement on the grounds of bias.
- d) In public roles, functions undertaken, public involvement should not be a reason to prioritise your own business.

4.3. The Member's public appearances, press and other public appearances.

- a) Public outreach and the provision of accurate information to the public on all matters of concern to the wider public is expected.
- b) Public information should include a fair presentation of the Member's business situation, opportunities, and prospects.
- c) It is unethical for the public media, in the context of news that is accessible to everyone, to present an untrue picture that encourages or suggests that partners and investors act against their interests.
- d) It is unethical to publicly present unsubstantiated business situations that lead investors, suppliers, creditors to take actions other than realistic.

It is unethical for a Member to display or threaten to display on social networking sites any statement or communication that is offensive, offensive or prejudicial to the interests of the Group or any Member.

4.4. Self-restraint is expected before bankruptcy and liquidation

- a) If the Member's situation makes it likely that compulsory measures, bankruptcy, or liquidation proceedings may be taken in the near future, it is not fair to assume obligations whose fulfilment is at least doubtful in the changed situation.
- b) An exception to the above is the special measure for crisis management. In this case, however, business partners can be expected to be informed of the increased risks so that they can both consider and prepare for them. This information should not, however, unduly risk the distressed business.
- c) It is unethical, before or during the enforcement measures, to take out assets, assets and resources to cover debts, or to transfer them to other companies, thereby making creditors impossible.
- d) However, it is unethical for partners to take advantage of the firm's straitened situation, to terminate normal business relationships without preparation, to tighten up significantly the conditions that have been established and fixed, and to take any other action that makes the situation of the distressed entrepreneur even more difficult.

4.5. Data protection, confidentiality

It is ethical for a Member to handle the confidential data of its partners, employees and guests



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securely and to strictly comply with data protection rules. It will treat information about business partners obtained through bilateral agreements as trade secrets and ensure that

such information is not disclosed to third parties without the client's permission.

V. ENTRY INTO FORCE, PROCEDURAL AND IMPLEMENTING RULES

5.1. Entry into force

This Code of Ethics is a code adopted by the Group's Members' Committee.

5.2. Procedural rules

Appendix 1 to the Code is a document entitled Principles of the Code of Conduct of the Ethics Committee. It sets out the legal framework for ethics procedures, the procedures to be followed, the scope of competence and jurisdiction, the types of ethics decisions and sanctions that may be taken, their enforcement, appeals and other procedural matters.

The Principles of the Rules of Procedure are used uniformly by the Members.

VI. PRINCIPLES OF THE ETHICS COMMITTEE'S RULES OF PROCEDURE

6.1. Powers and responsibilities of the Ethics Committee

6.1.1. The Ethics Committee of the Jewish Group (hereinafter referred to as the "Group") (hereinafter referred to as the "Ethics Committee") shall have the power to conduct ethics proceedings in respect of any breach of the Code of Ethics, any dispute between two or more Group Members or any dispute involving a Group Member in connection with the observance, interpretation or application of these rules.

The Ethics Committee shall not decide on any property claim.

The Ethics Committee is composed of three members. The three members of the Committee shall be appointed by the Electoral Board. The permanent member of the Committee is the Group HR Manager. The other two members of the Committee are appointed by the Board of Trustees and are professionally recognised directors with sufficient experience. The Committee may, on a case-by-case basis, involve a legal expert in its work.

The candidate becomes a Member of the Commission upon acceptance. The Commission shall elect its Chairperson from among its Members.

6.1.2. The Commission is responsible for initiating the procedure.

6.1.3. If judicial or other official proceedings are pending in respect of the merits of the ethics case, the Ethics Committee may terminate its proceedings or suspend them until the proceedings are finally terminated.

6.2. Initiation of the Ethics Committee procedure

6.2.1. The Ethics Committee shall initiate proceedings on request or on its own initiative.

6.2.2. The Ethics Committee may initiate proceedings ex officio if a member of the Committee or an official of the Group so requests.

6.2.3. The procedure is initiated by a written request to the Ethics Committee.

The application must contain all facts and data relevant to the assessment (decision) of the case, but at least:

- a) the name, residence and registered office of the initiator and the person complained against,
- b) the relevant information necessary for the assessment of the ethics case, and
- c) evidence relating to the case (invoice, contract, copy of letter, etc.).

6.2.4. If the application does not comply with point 6.2.3, the Ethics Committee shall return it to the initiator of the procedure, indicating the deficiencies and setting a deadline for completion. If the time limit for rectification has expired without result, the procedure shall be terminated on the day following the expiry of the time limit.

The procedure is deemed to have been initiated when the Ethics Committee receives a complete



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application.



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6.2.5. If one year has elapsed since the unethical act, conduct or activity referred to in the request, the Ethics Committee may refrain from taking any action or applying any sanction.

6.2.6. Upon receipt of the request, the Ethics Committee will examine whether the matter falls within its competence and jurisdiction. If it lacks competence or jurisdiction, it shall forward the request to the chamber or organisation having competence or jurisdiction, informing the initiator at the same time.

6.2.7. The Ethics Committee shall send the request to the person complained against without delay, requesting him/her to state his/her views on the matter in a reply and informing him/her that the absence of a reply does not prevent the investigation of the case.

6.3. The investigator

6.3.1. The Chairman of the Ethics Committee, or the Member appointed by him, shall appoint an investigator from among the Members of the Committee, who shall be responsible for the careful investigation of the ethics case, for hearing the parties and for obtaining the information necessary for a decision.

6.3.2. The investigator or, if necessary, the investigators should be appointed from among the members of the Committee with professional and local knowledge, depending on the subject of the ethics case.

The investigator may propose to the chairman that an expert from among the members of the Group be called.

6.3.3. In the course of his/her proceedings, the investigator shall attempt to reach a settlement between the opposing parties, which he/she shall submit to the Ethics Committee for information, together with his/her report.

6.3.4. After hearing the parties as necessary, clarifying the facts of the ethics case and obtaining evidence, the investigator prepares a report summarising the substance of the ethics case and proposing a decision to be taken by the Ethics Committee.

6.4. Preparation of the Ethics Committee hearing

6.4.1. The chairman is responsible for preparing the hearing. Based on the investigator's report, he shall take any necessary action to complete it, to supply any missing information or evidence, and to take all necessary measures to enable the Ethics Committee to take a decision after a single hearing.

6.4.2. If the President considers the matter appropriate, he shall convene a meeting of the Ethics Committee.

6.4.3. The President shall invite the Members of the Commission to the hearing by sending them the investigation report. The parties and other interested parties shall be invited, if they have requested it in advance or if it is necessary for the decision of the case, with a warning that their absence shall not prevent the hearing and the decision being taken, and that the Commission shall decide in their absence based on the facts and information available to it.

6.4.4. The Group's designated representative may take part in the work of the Ethics Committee,



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without any decision-making powers.

6.5. Ethics Committee deliberations

6.5.1. The Ethics Committee will consider the ethics case in a hearing, which will result in a decision.

6.5.2. In exceptional cases, where the ethics case is simple and the parties do not object, the President may, on a proposal from the Investigator, approve the settlement reached by the parties without a hearing, and inform the Ethics Committee of this at its next meeting.

6.5.3. The hearing is open to the public and the parties and other interested parties may attend. The President may order a closed hearing at the request of any party. Representation shall be governed by the relevant provisions of Act CXXX of 2016 on the Code of Civil Procedure.

6.5.4. The quorum of the Ethics Committee shall be a majority of its members.

6.5.6. After the hearing has opened, the investigator will present the substance of the ethics case and the documents available. The Ethics Committee may, at the request and expense of any party to the dispute, hear an expert or witness, or may itself request the assistance of an expert or witness.

6.5.7. The parties or their representatives and other interested parties may present their views on the case, ask questions to each other and to the investigator, expert, or witness present.

6.5.8. The ethics case shall be concluded, if possible, in one hearing within 90 days of the initiation of the procedure under point 6.2.4.

6.5.9. Minutes must be taken of the meeting, including the time and place of the meeting, the names of the participants and the statements made. The minutes shall be signed by the chairman of the meeting and by the court reporter.

6.6. Conflict of interest

6.6.1. A person who has a personal or pecuniary interest in the Ethics Committee, or is otherwise biased, may not act as a member of the Ethics Committee as an expert invited by the Committee in an ethics case, unless he has informed the parties, and no party has objected to his person in view of this.

6.6.2. The persons listed in Section 6.6.1. are considered to have a conflict of interest and are excluded from the procedure, in particular if they are related to any of the parties to the procedure (Civil Code § 8:1) or have an employment relationship or any contractual relationship with any of the parties.

6.6.3. The member of the Ethics Committee and the invited expert shall immediately inform the Chairperson of the Ethics Committee of any conflict of interest affecting him or her. The President shall inform the Members of the Commission of any conflict of interest affecting him or her.

6.7. Decision of the Ethics Committee

6.7.1. The Ethics Committee shall take a reasoned decision based on the facts established during its proceedings. The decision shall be taken by an open vote of the



members present and by simple majority.

by a majority of votes.

In the event of a tie, the chairman shall have a casting vote.

6.7.2. The decisions of the Ethics Committee are presented at the next meeting of the Electoral Board and, after approval by the Electoral Board, circulated to the parties and other interested parties. If any of the parties lodges a complaint against the decision of the Committee, the Arbitration Committee shall decide.

6.7.3. The Ethics Committee in the event of a breach of the Code of Ethics:

- a) warn the parties in a decision and notify its decision to the parties in writing,
- b) in more serious or repeated cases, make the warning public, considering on a case- by-case basis the scope and manner of its publication,
- c) may initiate the temporary or permanent withdrawal of certain intra-group services, benefits or exclusion from the Member Group. Such exclusion must be approved by the Board of Trustees.
- d) initiate the necessary action with the competition supervisory body or other authority,
- e) in serious or repeated cases, take the necessary measures to suspend the exercise of the activity for a specified period,

6.7.4. The decision may be published in a Group publication, in a local or national newspaper, on radio or television, stating the substance of the ethics case, the decision taken, and the name of the Group member censured.

The initiator of the procedure may be named in the disclosure only if it has given its prior consent.

The Group may lay down in its Rules of Procedure, within the framework of these Rules, further detailed rules, on the initiation of proceedings, the investigation of the ethics case, the hearing, the decision, time limits and the duties of the member of staff of the managing body assigned to the Ethics Committee.

Date of entry into force of the Code: 01 December 2023.