

# CODE OF CONDUCT

## VR Solutions Hungary Kft.

**Effective date:** 2022.12.01.

**Approved by:** Executive Management

**Applies to:** all employees, officers, contractors, interns, temporary staff, and business partners acting on behalf of VR Solutions Hungary Kft. ("Company").

### 1. Purpose and Principles

VR Solutions Hungary Kft. is committed to conducting business with integrity, transparency and respect for people and the environment. This Code of Conduct ("Code") sets out the minimum standards expected in all Company activities and relationships, including when delivering products and services to customers and partners.

### 2. Scope and Compliance with Laws

All covered persons must:

- comply with all applicable laws and regulations (including labour, health & safety, environmental, tax, export control/sanctions, and anti-corruption laws);
- comply with this Code and relevant Company policies and procedures;
- cooperate with lawful audits, assessments and due diligence requests from customers and other legitimate stakeholders.

### 3. Respect for Human Rights and Fair Treatment

The Company respects internationally recognised human rights and expects the same from all persons acting on its behalf. We do not tolerate:

- forced, bonded, or involuntary labour, or human trafficking;
- child labour or any form of exploitation;
- harassment, bullying, violence, discrimination or retaliation.

Employment must be voluntary and based on written terms where required by law. Freedom of association and collective bargaining rights will be respected in accordance with applicable law.

### 4. Wages, Working Time and Working Conditions

We are committed to fair working conditions:

- wages and benefits must meet or exceed legal requirements;
- working hours and overtime must comply with legal limits;
- all personnel must be treated with dignity and respect.

## **5. Health, Safety and Wellbeing (HSE)**

We maintain a safe and healthy workplace and, where relevant, safe project sites. Everyone must:

- follow safety instructions, risk assessments and training requirements;
- report incidents, near misses, hazards and unsafe conditions promptly;
- use appropriate protective equipment and comply with VR/AR-specific safety practices (e.g., safe physical spaces, hygiene protocols, user safety briefings, equipment maintenance).

## **6. Environmental Responsibility**

We strive to reduce our environmental impact and comply with environmental laws. We encourage:

- responsible procurement and waste reduction (including e-waste where applicable);
- energy efficiency and environmentally conscious project execution;
- prevention of pollution and responsible handling of materials.

## **7. Business Integrity and Anti-Corruption**

The Company operates with zero tolerance for bribery and corruption. Covered persons must not:

- offer, give, request or accept bribes, kickbacks or improper advantages;
- make facilitation payments (unless permitted by law and explicitly authorised by Company policy);
- use third parties to circumvent these rules.

All payments and business records must be accurate and complete. We expect integrity in all dealings with public officials and private counterparties.

## **8. Gifts, Hospitality and Conflicts of Interest**

Gifts and hospitality may only be offered or accepted if they are:

- infrequent, modest, legitimate, and culturally appropriate;
- not intended to influence decisions or create the appearance of undue influence;
- fully compliant with applicable laws and customer rules.

Conflicts of interest must be avoided. Any actual, potential, or perceived conflict must be disclosed promptly to management/compliance and managed transparently.

## **9. Fair Competition**

We support free and fair competition and comply with antitrust/competition laws. Covered persons must not engage in:

- price-fixing, market allocation, bid-rigging, or exchange of competitively sensitive information;
- misleading or unfair market practices.

## **10. Data Protection, Confidentiality and Information Security**

We protect personal data, confidential information and intellectual property belonging to the Company, customers and partners. Covered persons must:

- process personal data lawfully and securely (including compliance with GDPR where applicable);
- protect customer/partner confidential information and trade secrets;
- use Company and customer systems responsibly and follow cybersecurity requirements;
- report suspected data breaches or security incidents immediately.

## **11. Product/Service Quality and Responsible Use of Technology**

We aim to deliver high-quality, reliable services and products. We will:

- maintain appropriate quality assurance and documentation for deliverables;
- manage risks associated with VR/AR deployments (user safety, accessibility where feasible, and appropriate content standards);
- avoid misleading claims regarding performance, safety, or outcomes.

## **12. Responsible Sourcing and Third Parties**

Where we engage subcontractors or suppliers, we will apply risk-based due diligence and expect them to meet standards consistent with this Code. We may require subcontractors to:

- adhere to human rights, labour, HSE, environmental and integrity principles;
- provide evidence of compliance when reasonably requested.

## **13. Speaking Up and Non-Retaliation**

We encourage everyone to raise concerns in good faith. Reports can be made to:

- **Line Manager**, or
- **Company Contact (Compliance/HR):** [name, email], or
- **Confidential channel:** [hotline/email/webform, if available].

Retaliation against anyone who reports concerns in good faith is prohibited.

## **14. Investigations, Corrective Actions and Consequences**

The Company will assess reported concerns promptly and fairly, take appropriate corrective actions, and cooperate with lawful requests from relevant authorities and customers.

Violations of this Code may result in disciplinary action up to and including termination of employment/contract, and may be reported to authorities where required.

## **15. Ownership and Review**

This Code is reviewed periodically and may be updated to reflect evolving legal requirements and customer expectations, including responsible business partner standards.

**VR Solutions Hungary Kft.**

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**Signed:**

**Debrecen, 2022.12.01.**

  
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Managing Director  
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