

 	POLICY		
	CODE OF CONDUCT		
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1. Introduction

The Code of Conduct of FF Co. Ltd. (hereinafter referred to as the company) is a binding document for all managers and employees, which also forms the basis of the company's business relationships. The Code defines the company's obligations and sets out the expectations that ensure that employees can perform their work in a responsible and supportive environment in line with the company's core values.

The Code provides guidance to employees on making the right decisions and taking the right actions. At the same time, it serves as a reminder that violating the rules can cause damage not only to the company, but also to employees and partners, and may result in legal consequences if necessary.

Therefore, the provisions of the Code of Conduct apply equally to all employees.

1.1. General principles, legal and regulatory basis

The ethical guidelines set out in this Code of Conduct are based on international principles. These include the United Nations (UN) Global Compact (see Appendix), the conventions of the International Labour Organization (ILO), and the UN Universal Declaration of Human Rights. In addition, the company takes into account the UN conventions on the rights of children and the prohibition of all forms of discrimination against women, as well as the Organisation for Economic Co-operation and Development (OECD) guidelines for international businesses.

The company takes into account and complies with the principles of the UN Global Compact and strives to achieve its objectives. FF Co. Ltd. is committed to fully complying with its social responsibility obligations in all its activities.

The company undertakes to always take into account and comply with the applicable laws and other relevant regulations of the countries in which it operates in the business activities and decisions. The company treats the business partners fairly, comply with the contracts, and adapt responsibly to changing circumstances.

2. Corporate Ethics

2.1. Bribery and corruption

In relations with business partners (customers/clients, suppliers) and government institutions, the interests of the company and the individual interests of employees must be strictly separated on both sides. All activities and decisions must be free from irrelevant considerations and personal interests. The applicable provisions of criminal law relating to bribery and corruption must be observed at all times.

Punishable acts in connection with public officials

FF Co. Ltd. and its employees are prohibited from offering any personal benefits – in particular financial benefits such as payments, loans or regular gifts – to public officials (e.g. civil servants or employees) in order to secure an advantage for the company, its employees or third parties.

Punishable acts in business conduct

In the course of business, it is prohibited to offer, promise, give or accept any personal advantage, whether in cash or otherwise, in order to obtain a business advantage for another party. Similarly, it is not permitted to demand or accept personal advantages from business partners.

The managers and employees of FF Co. Ltd. are prohibited from offering, promising, demand, grant, or accept gifts in the course of business with the intention of influencing the business relationship in an impermissible manner, or where there is a risk or possibility that they may jeopardize the professional independence of the business partner. Gifts and invitations that are customary in business and remain within the bounds of hospitality, propriety, and courtesy are not generally considered illegal or objectionable.

2.2. Competition regulation and prohibition of anti-competitive behavior

FF Co. Ltd. respects the rules of fair competition. Accordingly, the company complies with all applicable laws that protect and promote competition, with particular regard to the applicable antitrust law and other laws regulating competition.

In the dealings with competitors and in the business conduct, there are prohibited any agreements or activities that artificially influence prices or business conditions, divide up sales territories or customer bases, or hinder free and fair competition. Similarly, agreements between customers and suppliers that restrict the freedom of customers to determine their own prices and business conditions when reselling are also prohibited.

2.3. Conflict of interest

Any situation that could give rise to a conflict of interest or the appearance of a conflict of interest between FF Co. Ltd. and its business partners must be avoided.

2.4. Trade secrets and data protection

FF Co. Ltd. expects its employees to fully respect trade and business secrets and to handle them responsibly in the course of their work. Confidential information and confidential documents may not be disclosed to third parties or made available in any other way, except in cases where someone has been authorized to do so or where the information is considered to be publicly available.

The company is committed to protecting individuals' personal data and respecting their privacy. In its operations, it handles the personal data of all affected parties, including employees, customers, partners, and suppliers, in accordance with applicable laws, in particular the European Union's General Data Protection Regulation (GDPR) and domestic data protection regulations.

3. Human rights and employee rights

3.1. Human rights

FF Fémfeldolgozó Co. Ltd. respects and supports internationally recognized and proclaimed human rights.

3.2. Non-discrimination, equal opportunities and inclusion

FF Co. Ltd. undertakes to comply with applicable laws in all cases in the course of its activities and to take decisive action against all forms of discrimination. It pays particular attention to ensuring that its employees are not subjected to harassment, including verbal, non-verbal, physical, sexual, online, mobbing, discriminatory, or power harassment. FF Co. Ltd. Rejects all forms of workplace violence, threats, intimidation, or other behaviors that violate the dignity or comfort of its employees. It takes care to ensure that its employees are not discriminated against on the basis of their gender, race, disability, ethnic or cultural identity, religious or philosophical beliefs, age, or sexual orientation. Such behavior is contrary to corporate values and may result in disciplinary action.

All affected parties are entitled to report concerns in a safe manner through HR or the ethics reporting channel. The company expects its business partners to treat employees with respect, dignity, and courtesy. It encourages its business partners to support a culture of diversity and inclusion and to provide equal opportunities to all their employees.

3.3. Prohibition of forced labor and exploitation

FF Co. Ltd. strongly rejects all forms of forced labor. The company does not employ or tolerate any practices that violate the freedom or dignity of employees, including, but not limited to, debt bondage, involuntary prison labor, labor related to human trafficking, and other forms of modern slavery. In its operations, the company pays particular attention to ensuring that its suppliers and partners also comply with these principles.

3.4. Prohibition of child labor and protection of young workers

FF Co. Ltd. respects the UN's fundamental principles on human rights and children's rights and is committed to preventing all forms of child labor. The company fully complies with relevant international conventions, in particular those relating to the minimum age for employment and the prohibition and elimination of the worst forms of child labor (e.g., ILO Convention No. 182). Where national legislation imposes stricter requirements, the company considers their application to be binding.

When employing workers under the age of 18, FF Co. Ltd. ensures that they are not exposed to dangerous, strenuous, or unhealthy working conditions. Young workers, including students, perform tasks similar to those of entry-level workers and receive fair and equitable remuneration for their work.

4. Work

4.1. Working conditions

FF Co. Ltd. ensures that working conditions comply with applicable laws, in particular provisions relating to occupational safety, health protection, and labor law. The company creates a working environment for its employees that complies with occupational safety requirements and promotes physical and mental well-being; ensures non-discriminatory and fair treatment for all employees; promotes work-life balance and the professional development of employees; supports the functioning of complaint and feedback mechanisms; takes into account the special needs of employees, such as those with disabilities or parents with young children.

The company is committed to the continuous improvement of working conditions and regularly reviews them to ensure the safety, satisfaction, and performance of its employees.

4.2. Working hours

FF Co. Ltd. fully complies with the applicable legal provisions on working hours and rest periods when organizing work and scheduling shifts. The company ensures that all employees are entitled to at least one rest day in every seven-day period, as specified in the Labor Code.

4.3. Wages and benefits

FF Co. Ltd. ensures that the wages paid to employees, including overtime pay and other benefits, meet or exceed the minimum requirements set out in the applicable laws and regulations, in particular the Labor Code. The company is committed to fair and transparent wage practices that promote the financial appreciation and motivation of its employees.

5. Health and safety

5.1. Occupational safety and health

FF Co. Ltd. is committed to maintaining a safe and healthy working environment. The company provides working conditions that comply with applicable national legislation and, where necessary, exceed those requirements. It takes appropriate preventive measures to prevent accidents, health hazards, and other risks in the workplace.

The company provides employees with the personal protective equipment necessary for their work and regularly informs them about the hazards associated with their work and how to manage risks. The company's goal is for all employees to be able to perform their work safely and in an informed manner.

FF Co. Ltd. guarantees employees the right to refuse to work if it would be unsafe or harmful to their health. The company encourages employees to immediately report any potential risks or dangerous situations.

The company pays particular attention to the safety of protected groups, especially pregnant women and nursing mothers. It takes reasonable and immediate measures to ensure that the employees concerned are not exposed to a hazardous working environment and, where possible, are assigned to tasks that do not pose a health risk to them.

5.2. Emergency preparedness

FF Co. Ltd. has identified and regularly assesses potential emergency situations. The company has developed an emergency plan and response procedures aimed at protecting human life, the environment, and property, as well as minimizing any damage. The company's goal is to ensure that all employees are familiar with emergency procedures and can act safely when necessary.

Emergency drills are conducted at least annually or as often as required by applicable local regulations. The emergency plan includes, among other things, the use of appropriate fire detection and firefighting equipment, the provision of clear, unobstructed and well-marked escape routes, safe access to exits, and the contact details of persons to be notified in the event of an emergency.

5.3. Accident management

FF Co. Ltd. continuously monitors workplace accidents and illnesses and pays special attention to their prevention and management. The company operates a regulated procedure for reporting, investigating, and documenting health and safety incidents and near misses. The purpose of this process is to identify risks, learn lessons, and prevent future incidents.

In order to reduce risks, FF Co. Ltd. carries out regular occupational safety inspections. The occupational health care provided to employees contributes to health preservation and rapid response. The company ensures that trained medical personnel are present in every production department and during every shift, and that first aid equipment, such as first aid kits, is available so that care can be provided immediately in the event of an accident.

5.4. Hygiene

FF Co. Ltd. ensures basic hygiene conditions for employees during their time at work in accordance with the relevant health and safety regulations. The company's goal is to provide employees with a clean, safe, and healthy working environment that contributes to their well-being and efficient work performance.

Within this framework, it ensures, among other things: the continuous availability of clean and safe drinking water; hygienic, regularly maintained washrooms and toilets; adequate lighting in areas necessary for work; effective ventilation and air quality; and a comfortable temperature maintained in the working environment.

6. Environmental protection

6.1. Environmental protection

FF Co. Ltd. is committed to protecting the environment, keeping in mind the principles of sustainability and responsibility towards current and future generations. In its operations, the company pays special attention to full compliance with environmental legislation and actively supports measures that contribute to the preservation of natural values. The company encourages and recognizes its employees' environmentally conscious thinking and initiatives that promote sustainable development.

6.2. Resources, emissions, waste management

FF Co. Ltd. pays special attention to the efficient and economical use of the resources it consumes in its operations, including energy, water, and raw materials. It strives to reduce consumption through regular monitoring and targeted measures, thereby contributing to the reduction of its environmental impact.

The company has identified the emissions generated during its operations – whether they are substances released into the air, water or soil – and is actively working to minimize them. It is committed to reducing direct and indirect greenhouse gas emissions and enforces this expectation on its business partners as well.

In the field of waste management, FF Co. Ltd. treats wastewater in accordance with legal requirements, ensuring that it is discharged into the municipal sewer system in the appropriate quality. Hazardous and non-hazardous waste is collected separately at designated storage sites at the workplace and plant of , ensuring that it does not enter the environment. Waste is only transferred to licensed partners for further treatment or disposal, thus ensuring responsible and safe waste management.

6.3. Handling of chemicals

FF Co. Ltd. pays special attention to the safe handling, storage, and labeling of chemicals, which it carries out, in accordance with regulated internal processes. When selecting chemicals, the company aims to use substances that pose the least possible risk to health and the environment. FF Co. Ltd. is committed to complying with the REACH and RoHS directives and clearly communicates this expectation to its partners.

The up-to-date management and availability of safety data sheets at the places of use ensures that all employees have direct access to the necessary information and instructions to reduce the risks associated with chemicals.

6.4. Environmental permits

FF Co. Ltd. has obtained environmental permits in accordance with local legal requirements and operates in compliance with the obligations set out in the permits.

7. Expectations of suppliers

FF Co. Ltd. undertakes to clearly inform its direct suppliers of the principles set out in Chapter 3 of the Code of Conduct. The company actively supports compliance with these principles among its suppliers and promotes their practical implementation by all possible means.

FF Co. Ltd. expects its suppliers to also follow the requirements set out in this chapter of the Code of Conduct, thereby contributing to responsible, transparent, and sustainable business operations.

8. Compliance and enforcement

FF Co. Ltd. undertakes to familiarize all its employees and persons employed by it with the principles and obligations set out in this Code of Conduct. The company's goal is to ensure that all stakeholders are aware of the values and expectations represented by the code and conduct their activities in accordance with them.

The company continuously strives to align its operations with the principles of the Code of Conduct. To this end, it regularly reviews and, if necessary, modifies its internal guidelines and processes, thereby ensuring the consistent and effective enforcement of the code in corporate practice.

9. Requesting assistance, reporting options

For FF Co. Ltd., compliance with laws, regulations, and internal rules is an essential principle of responsible business conduct. The company respects legal requirements and prohibitions in all circumstances, even if this may result in short-term business difficulties or disadvantages. The purpose of this Code of Conduct is to promote a deeper understanding of the company's culture and operating principles.

There may be complex situations in which employees cannot find clear guidance in the available documents. In such cases, employees are expected to discuss the issue with their immediate supervisor or the legal representative of FF Co. Ltd.

The company also provides the opportunity for anyone to report possible violations of laws or internal regulations by email or telephone, even anonymously. It considers the protection of areas such as competition law, capital market regulation (including insider trading), corruption, fraud (deception, embezzlement), tax evasion, and violations of the Code of Conduct to be particularly important.

FF Co. Ltd's representative:

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10. Appendixes

Appendix 1: The United Nations Global Compact – The Ten Principles

Appendix 2: Internal Regulations on Human Rights

Appendix 3: Equal Opportunities Policy

Appendix 4: Disciplinary Regulations