

CODE OF ETHICS AND CONDUCT

WHC Group

October 15, 2025



HA KELL EGY JÓ CSAPAT

EXECUTIVE MESSAGE

Dear Colleague,

We believe that one of the most important pillars of the WHC Group's operations is our commitment to ethical conduct. We are committed to conducting business in a fair and ethical manner, based on an ethical culture and compliance. We aim to encourage and support ethical behaviour, including through personal leadership by example.

The purpose of creating the WHC Code of Ethics and Conduct is to ensure that all our employees are aware of the ethical standards, codes of conduct and behaviour that we consider to be of paramount importance in the operation of the company and that are expected of WHC Group employees.

It is our common interest and objective to strengthen and preserve the ethical foundations of our business operations and to protect our core values.

By following and adhering to the principles of the Code every day, we can lay the foundations for the continued success of the WHC Group.



Péter Berta

Group CEO, Owner



Zoltán Tóth

Founder, Owner



Viktor Göltl

CEO Hungary, Owner



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PURPOSE OF THE CODE OF ETHICS AND CONDUCT

WHC Group, as a leading player in the HR services sector, has to comply with strict ethical and moral standards. The WHC Group can only be successful as the leading HR service provider in Central and Eastern Europe and create significant value if it holds its employees to the same high ethical and professional standards.

The WHC Group operates on the principles of integrity, compliance with legislation, compliance with ownership expectations and respect for the individual. The high level of knowledge, professional experience and outstanding performance of its employees, their commitment to the Group and the values of the company are the foundation of its success, its national and regional recognition and reputation.

The purpose of the Code of Ethics and Conduct is to

- to set out the ethical and behavioural rules applicable to WHC Group employees,
- set out additional requirements for WHC Group managers,
- assist employees to comply with them,
- protect WHC Group employees from attempts to involve them in abusive behaviour, arbitrary employer actions and unfounded liability.

The Code does not set out in full all the standards of conduct expected of Group employees, but merely sets out the main expectations on the more important ethical issues.

The personal scope of the Code covers the WHC Group as an employer and the employees of the WHC Group engaged in temporary employment, recruitment, student, pension, and maternity services, payroll services, and in the provision of these services in a secondment and/or back-up support role.

The Code is valid from October 15, 2025, until revoked:

- at WHC Group headquarters, branches and subsidiaries,
- in the context of their employment outside the locations defined in a)
- at employment-related events, functions, social media (e.g. company Christmas party, team building training), outside the locations specified in point 1.

Behaviour contrary to the expectations set out in the Code of Ethics and Conduct may lead to liability in the WHC Group, not only in cases of intent but also in cases of negligence.



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OUR MISSION

WHC Group's mission is to connect the labour market. We offer companies a workforce and a full range of innovative HR services to help them achieve their goals.

For employees, we provide quick help to find the best job for them to thrive. Our caring approach gives companies the opportunity to find good team members and employees the opportunity to find good jobs and communities.

OUR VISION

Our values define who we are: how we run our business, how we live our daily lives.

At WHC, we work to create a workforce based on human values. People focus, customer and colleague satisfaction has been our priority since the company was founded, and we have never changed.

Creating value is the foundation of our company culture.

OUR COMPANY VALUES, WHICH ARE THE FOUNDATION OF OUR CULTURE

The human factor is a key component of WHC Group's success and recognition: the work of dedicated colleagues with high professional skills, the development of a people-oriented corporate culture, and the ability to adapt to an ever-changing environment.



Group employees must contribute to long-term success not only through their expertise and performance, but also through their commitment to the Group's brand and its positive image.

This requires ethical behaviour and corporate values that reflect and reinforce our reputation both inside and outside the company.

Customer orientation

We provide a high quality, accurate and personalised service to meet our clients' needs.

We strive to know and understand our clients.

We cultivate personal relationships with our clients, with an emphasis on building trust.

We focus on solutions rather than obstacles.

We are available to our clients, responding promptly to their enquiries and providing professional justification for a negative response.

We are vigilant in keeping our promises.

Expertise

We support our clients proactively, to the best of our ability, with a solution focus.

We strive to continuously improve our professional knowledge and market expertise.

We focus on deadlines, minimising errors and achieving quality results. We report and correct any errors without delay.

We know the exact needs of the client and attend meetings prepared.

We share our expertise and knowledge.

At the end of a project, we look back on the tasks and evaluate our work.

Collaboration

We work together as a team to achieve our goals.

We support our colleagues' initiatives, suggestions for improvement and other solutions.



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We establish clear workflows, setting out precise tasks and responsibilities.

We strive to ensure that decisions and processes are transparent and realistic, and we share our decisions and the reasons for them.

We listen to and respect each other's opinions.

We see each other as teammates, not competitors.

We are open to understanding each other's problems.

Willingness to help

We ask for and give each other help to provide the highest possible quality of service to our clients.

We also support each other in personal and professional development and in achieving individual goals.

We openly report to our manager when our own or our colleagues' workloads exceed expectations.

If we have spare capacity, we offer to help our colleagues.

We look out for each other: we listen to colleagues who come to us, and treat their problems confidentially.

We are attentive to each other.

Open, honest communication

We strive to work with our clients and colleagues on the basis of honesty, trust, empathy and respect.

We believe in the importance of continuous, mutual feedback.

We emphasise positive feedback.

We give and receive negative feedback not as criticism but as an opportunity for improvement.

Conflicts of interest and differences of opinion are openly acknowledged and mutually resolved.

Confidential information will be treated with appropriate discretion.

OUR CODE OF BUSINESS ETHICS, WHICH SETS OUT HOW THE GROUP OPERATES AND THE STANDARDS OF CONDUCT EXPECTED OF OUR EMPLOYEES

The Code of Ethics and Conduct sets out rules of conduct, principles and requirements that go beyond legal standards to promote the responsible operation of the WHC Group and to which all employees, temporary or other workers and persons acting on behalf of the WHC Group are expected to adhere.



The role of every employee in the Group and the personal example of managers are key to creating an ethical culture.

The WHC Group is committed to the following business principles, which define the way the Group

operates and the standards of conduct expected of its employees.

1. Protecting human rights

At WHC Group, we are committed to respecting the human rights of all stakeholders, and in return, we expect the same from them. We are dedicated to the Universal Declaration of Human Rights, the related international conventions, the fundamental conventions of the International Labour Organization, and the ten principles of the United Nations Global Compact. These encompass a wide range of civil, political, economic, social, and cultural rights, including the following:

- the right to human dignity;
- the right to life;
- the right to liberty and security of person;
- the right to the highest attainable standard of health;
- the right to just and favourable conditions of work;
- the right to just and fair wages and to decent living conditions;
- the right to an adequate standard of living;
- the right to freedom from all forms of forced or compulsory labour;
- the right to freedom from child labour;



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- the right to freedom from discrimination;
- the right to freedom of expression.

Respect for human rights includes, but is not limited to, adherence to company policies, relevant laws and regulations, stakeholder engagement and promoting the well-being of the communities in which we operate. We support the protection of human rights and condemn all forms of human rights abuses.

Equal treatment and diversity

The WHC Group is committed to eliminating all forms of discrimination and recognises the value of diversity. We support cultural diversity and the development of an international team and business community. The Group is committed to prohibiting and preventing discrimination of any kind, including but not limited to discrimination based on race, colour, sex, age, language, religion, political or other opinion, ethnic, national or social origin, property, birth, sexual orientation or other status, such as marital status or number of children.

Our internal recruitment and selection process is conducted fairly, in accordance with the requirement of equal treatment, and any termination of employment is handled in a humane manner.

Human dignity and mutual respect

At WHC Group, we are committed to creating a working environment based on mutual trust, where everyone who works for the Group is valued and everyone's human dignity is respected. The conduct of all employees is guided by mutual respect and shared interests in common goals. WHC Group employees and departments work closely together and consider it important to keep each other well informed.

The Group promotes dialogue, exchange of views, sharing of initiatives and ideas among employees through internal communication.

Employees are not permitted to engage in any conduct (whether verbal or physical) that violates the dignity of any person or creates an intimidating, hostile, degrading, humiliating, offensive, offensive, humiliating or offensive environment, including, in particular, harassment of a sexual or other nature. Sexual harassment, defamation, abusive language or remarks and defamation constitute serious violations of human dignity.

Our employees are expected to take care of their appearance and wear appropriate attire, especially when interacting with clients and when representing the WHC Group. As a general requirement, aesthetically pleasing, well-groomed appearance, clean clothing, discreet and tasteful attire appropriate to the workplace, avoiding clothing that is too open, transparent, too short or not appropriate for the workplace.

Privacy and personal data protection

The Group is committed to respecting people's right to privacy and the confidentiality of their personal data. We only collect and store personal data that is necessary for the effective operation of the company in accordance with the law.

The WHC Group also expects all its business partners to act in accordance with the terms of any contract with the WHC Group or any of its members in relation to the processing of personal data.

Fair employment practices

At WHC Group, our most important asset is our employees. We are committed to the development of our employees and to ensuring an appropriate work-life balance. We are committed to lawful and fair employment and respect for labour principles, and we expect the same from our business partners and external stakeholders. We will not tolerate any form of forced, compulsory, bonded or child labour, or other forms of unethical employment such as withholding wages, denial of sick leave or daily rest, or abuse of alternative forms of employment.

The Group is committed to implementing a fair employment and remuneration policy in accordance with the relevant legislation.

Compliance with legislation

We are committed to ethical conduct and to complying with laws, regulations and government rules that apply to our activities. We are committed to operating within the law.

We believe that full compliance with regulations is not only a legal obligation, but a pillar of business culture.

1. Fair business conduct



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We are committed to fair market conduct, conducting our business in accordance with fair competition standards and in compliance with applicable laws. We will refrain from harming business competition, from damaging the reputation of any of our business partners, and from any conduct that undermines the credibility of our competitors. Accordingly, we are responsible for the fair conduct of our business in the performance of our duties.

We strongly oppose any form of corruption that undermines confidence in the legitimate operation of the company, distorts competition and tarnishes the reputation of the WHC Group.

The WHC Group is committed to fair market conduct and competition and requires its employees to conduct themselves in accordance with the provisions of Act LVII of 1996 on the Prohibition of Unfair Market Conduct and Restriction of Competition.

2. Anti-corruption and anti-fraud

The WHC Group does not engage in any form or tolerate any form of corruption (including bribery, kickbacks, extortion, abuse of power for personal gain, undue advantages and gifts provided with the intention to influence).

All employees are expected not to solicit, accept, offer or give improper advantages in the course of or in connection with their work, whether for their own benefit or for the benefit of the company or a third party.

Bribery and the acceptance of bribes, in all its forms (economic, official, judicial or administrative), is a criminal offence and is firmly rejected by the WHC Group.

It is economic bribery to give or promise an undue advantage to a person acting for or on behalf of an entity or to a person entitled to act independently for or on behalf of an entity or to another person acting for or on behalf of an entity in order to breach a duty.

It shall be an acceptance of economic bribery if a person requests or accepts an undue advantage or a promise of an undue advantage or agrees with the requestor or acceptor of an undue advantage given or promised to a third person in connection with his or her activities for or on behalf of an entity.

It shall constitute bribery to seek to influence a public official by giving or promising an undue advantage in connection with his or her activities to him or her or to another person in consideration of his or her activities, or to give or promise an undue advantage in order to



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induce the public official to breach his or her official duty, exceed his or her powers or otherwise abuse his or her official position.

In judicial or administrative proceedings, bribery is committed when a person gives or promises to give or promises to give an undue advantage to or in respect of another person in order to prevent the exercise of his legal rights or the performance of his duties in judicial, arbitral or administrative proceedings.

Gifts and hospitality

At WHC Group, we provide or accept only business courtesies, gifts and hospitality of no significant monetary value and of infrequent occurrence, which are never intended to unfairly influence decision-making.

Gifts and hospitality should only be given without expecting anything in return and should not give the impression that they are intended to influence impartial decision-making.

Corporate loyalty

At the WHC Group, we avoid conflicts of interest. We protect the company's interests, assets, business secrets, and intellectual property. Avoiding conflicts of interest A conflict of interest is considered if the employee's personal relationship, participation in external activities, or interest in another business actually or apparently biases his decisions. A conflict of interest is also considered if the employee's duties or position provide an opportunity for additional personal gain - beyond compensation for his work by the employer - for the employee or his relative, or if the employee prioritizes his personal interests or the interests of his relative in a case where you should prioritize your job duties and your responsibilities towards the WHC Group. The possibility of making a profit in itself is sufficient to create a conflict of interest situation. All employees must avoid situations in which their personal interests may conflict or appear to conflict with the interests of the WHC Group. All employees are obliged to disclose any existing or potential conflict to the employer.

Maintaining the good reputation of WHC Group

Our employees must refrain from any behavior that could adversely affect the reputation of the WHC Group, both at the workplace and outside the workplace. The good reputation of the company group is based on its real merits, so it is the duty of all employees to introduce,



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protect and represent them to contractual partners, suppliers, customers, and third parties related to the WHC Group. The WHC Group's contractual partners, suppliers, and customers, as well as third parties in other relations with the WHC Group, must follow a non-discriminatory, ethical procedure. The WHC Group expects its employees to behave in a manner worthy of the company's ethical standards, especially if their activities or persons can be associated with the WHC Group in any way. Our employees may not exercise their right to express their opinions in any way, including social media interfaces, in a way that seriously injures or endangers the good reputation, legitimate economic and organizational interests of the company group.

Compliance with occupational safety regulations

It is the duty of all employees to comply with the health and safety regulations for work, which are governed by the safety, work and fire protection rules. It is strictly forbidden to consume alcohol, illegal substances, drugs or other mind-altering substances, to appear under their influence or to abuse them (for example, offering, transferring, selling, etc.) Cultured, moderate alcohol consumption is allowed on formal occasions and at workplace events. Employees of the WHC Group are obliged to pay attention to environmental protection and energy saving aspects and the prevention of energy waste during their work and their stay in the buildings of the company group.

Environmentally and Energy-Conscious Work Practices

WHC Group is committed to minimizing any potential negative environmental impacts arising from its activities. To this end, the company strives to conduct its professional operations in an environmentally conscious manner, taking environmental considerations into account and working to minimize its ecological footprint within reasonable limits. WHC Group employees and subcontractors are required to be mindful of environmental protection and energy-saving considerations, as well as the prevention of energy waste, in the course of their work and while present in the company's facilities.

Protection of corporate assets

The employees of the company group must take responsibility for the integrity, proper, economical and efficient use of the company's assets entrusted to them or to which they have access.

All employees and authorized persons may use company funds, tangible assets and resources only for legitimate and approved business purposes. Portable and home business



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devices issued to employees (such as laptops and mobile phones) are the property of the WHC Group and must be used with appropriate care.

Confidentiality and data protection

Information, data and knowledge are critical assets for the WHC Group. All employees are responsible for protecting the confidentiality, integrity and accessibility of data created, received, modified, transferred, shared, stored or used within the company group or during the business relationship with the WHC Group, regardless of their actual location and form of appearance (electronic, paper-based, other format, etc.).

Confidential information includes financial information, trade secrets, service fees and pricing policy, sales volumes and profit results, business strategies and business plans, contract information, customer data and all other non-public information about the WHC Group.

Confidential information must be protected, handled carefully, and not shared with third parties or the public unless specifically authorized to do so.

The obligation to protect confidential data also exists after the termination of the employment relationship. This also applies to information shared with us by customers and our partners.

Reliable business relationships and social responsibility

At the WHC Group, we are committed to responsible and sustainable business management, building business relationships based on trust and responsible communication. We take their economic, social and environmental impact into account in our business decisions and in the management of our resources and infrastructure. Business partnerships An honest and fair approach with customers, suppliers and other business partners is the basis of successful and long-lasting business relationships. Accordingly, we pay attention to the needs of customers, suppliers and business partners, and our relationships with them are based on mutual trust and respect. The WHC Group is committed to complying with all contractual obligations. In written and oral communication with third parties (partners, suppliers, customers, other business partners) who have a contractual relationship with the WHC Group, as well as with third parties potentially entering into a contractual relationship (including applicants for the job advertisement), compliance with basic standards of courtesy is a basic requirement. The WHC Group expects its employees to provide WHC Group



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customers and potential customers with sufficient, accurate, real and understandable information about its services in a timely manner.

Public life, politics

WHC Group does not wish to participate directly in political activities, and does not formulate political goals. The company group recognizes the right of its employees to take a political role and does not prohibit them from engaging in political activities. At the same time, they may not engage in political activity on behalf of the WHC Group or in a way that conflicts with the interests of the WHC Group. As an employee, based on our citizenship rights, we can engage in social, political and public activities, however, it must be clearly stated that we are acting as a private individual and not as an employee of the WHC Group. It is forbidden to create even the appearance that such activities are carried out on behalf of the WHC Group. It is forbidden to engage in political activity at the workplace or during working hours, including activities aimed at influencing the political views and beliefs of employees.

Social media use

All our employees must use social media responsibly and carefully, taking into account that third parties can also associate posts and activities made in private life with the WHC Group, its values and corporate culture. Accordingly, our employees must strive to separate their private and business, work-related activities. Our employees must also refrain from any expression on social media that could adversely affect the good reputation of the company group. We expect our employees to behave in accordance with the ethical standards of the company, even as private individuals, in social media, especially if their activities or their person can be associated with the WHC Group in any way, or may give the impression that they are acting on behalf of the company group, or express an opinion. Our employees must show respect and acceptance of others' religious, national, ethnic, sexual, political and worldview affiliations in social media:

- They must refrain from racist expressions and content suitable for inciting hatred.
- They must respect the constitutional and statutory rights of others.
- They must also show respect towards the competitors of the company group
- Unreal, intentionally misleading or false information may not be provided
- They must refrain from publishing material that is illegal or encourages illegal activity



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- They must avoid vulgar, obscene, defamatory or defamatory expressions. The names, logos, trademarks, and contacts of WHC Group companies may not be used for private purposes. Our employees can designate the WHC Group as their employer only until the end of their employment relationship, the last day they work.

Social responsibility

The WHC Group is committed to operating as a socially responsible company. We strive to support projects, organizations and individuals that reflect our values, as well as the voluntary activities of our employees. We establish cooperation exclusively with companies operating according to the principles applied in our business practice in a regulated and transparent manner. In order to maintain trust in the company group, we operate a transparent and regulated sponsorship and public donation system.

5. Additional obligations of WHC Group managers

The expected standards of behavior apply to all employees of the WHC Group, additional special expectations apply to employees in senior positions. The managers of the WHC Group make every effort to ensure that employees are familiar with the rules of the Code of Ethics and Conduct. Employees are supported to raise ethical questions and problems in good faith and not be subject to any retaliation.

Personal example

The managers of the WHC Group must set a personal example in fully complying with the principles of the Code of Ethics and Conduct, their managerial responsibility is to maintain the culture of ethical operation, and to comply with the principles and regulations of the Code. They must demonstrate exemplary and guiding behavior, and they must ensure the creation and provision of a supportive and appreciative community spirit, a workplace atmosphere open to cooperation and enabling efficient work. Managers must specifically take into account the principles of the WHC Group Code of Ethics and Conduct in all decisions and behavior. It is particularly important for leaders to set an example in the area of appropriate tone, use of words, actions, gestures, and communication.

The WHC Group expects its managers, in addition to the implementation of strategic goals and interests, to strive to establish an appropriate level of cooperation with all companies and organizational units of the group, to work together efficiently, and to observe ethical and respectful behavior.



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Support, maintaining an ethical workplace environment

The managers of the WHC Group must pay attention to providing the employees with suitable conditions for performing professional work of the expected standard, as well as a safe, harmonious and trusting workplace atmosphere. They must provide employees with the information necessary for effective work, promote effective cooperation among employees, set clear and achievable goals for them, and regularly evaluate the results achieved, fully taking into account the requirement of equal treatment. The managers of the company group can make their personal decisions and evaluate the activities of subordinates only on the basis of professional merit, performance, and work-related factors. By personal example, they must strive to create a workplace atmosphere that promotes appreciative and supportive community, cooperation, and efficient work, and resolve potential conflict situations.