

Code of Conduct

DON'T
BE
MEAN

@ **BPiON**

Act with integrity. Follow the law.



Message from the CEO

„Integrity is doing the right thing, even when no one is watching.“

C. S. Lewis

Thank you for allocating enough time to read, review and comment this Code of conduct. We are BPiON, which means Business Process InnovatiON. We are a process and technology driven accounting, HR and payroll outsourcing firm, but foremost we sell TRUST.

Our company's business proposition foundation is to create and maintain trust throughout every interaction with our stakeholders, therefore the essential principals in this Code of Conduct are more than general rules for our actions but are fundamental guidelines how our culture should be lived. Our reputation is based on legendary customer service of individuals we work with and it comes along with the highest integrity, which accelerates our community efforts.

Our world is faster and louder than ever, therefore we truly believe that communities formed around values like integrity are those islands that can create sustainable life-long eco-systems, where every member can return to charge-up.

BPiON means flexibility and fast decision making, since we know that an almost right decision is far better than a no decision. We know that our common belief on integrity, transparency and ethical issues helps us to remain like this.

It is almost impossible to cover every possible situation in this Code, therefore it is important to understand its logic and treat it like a continuously expanding document, where we support you to speak up loudly, if you feel improvements needed.

The basic objective of a Code of Conduct is to define acceptable reactions for situations, which tend to be uncomfortable and challenging for individuals in certain positions, but values of the community can provide feedback for correct actions.

Finally, we encourage everybody to live-love-laugh during your entire life and we really hope that this Code help to do it as a community!

Thank you for living your business and personal life according to the values of this Code!



Kind regards,
Bela Kakuk
CEO

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SCOPE OF THE CODE



This Code of conduct represents more of an eco-system of values, beliefs and recommendation than exact detailed practical guidelines. Good faith actions of people involved in the scope can be guaranteed only if there is no exception for the scope of the Code.

Every employee either full-time or part time falls under the scope of this Code. BPiON demands additional expectations from managers, directors and shareholders (furthermore: “management”). Management should act as role models and walk the talk. Management’s responsibility is to create a culture of open communication, transparency and integrity. They should act according to the spirit of this Code during their personal time as well and through their social media profiles. We can’t officially claim such request, but we believe this is the only way to reach the cultural fit toward our long-term objectives. Managers should not only act according to this Code but act as ambassadors of its content toward employees, vendors, freelancer and other stakeholders.

Managers responsibility also covers to create a working environment which supports open communication and positive collaborative culture, where employees feel comfortable to ask help and support or have their comments taken onboard.

SCOPE OF THE CODE

LANGUAGE

BPiON is a regional company, therefore our primary business language is English. All of our policies should primary be written in **English** and local language translation should be created if needed. All employees can ask local language translation of any internal policies if they feel limited of gathering any information needed for accurate interpretation of the policy.



VIOLATIONS

At BPiON we believe in preventive actions rather than corrective ones. A culture of open communication is the only effective preventive weapon for breach of internal rules and regulations.

Our world is faster and noisier than ever, which creates an environment where alternative route of actions can be tempting for individuals in order to gain short-term advantages over long-term values. Our industry is heavily ruled by policies and regulations, therefore our colleagues should by default know millions of pages of hard rules. On top of it we understand that acting with integrity and implementing the spirit of this Code to everyday life can be sometimes difficult.

To obtain guidance for practical usage of this Code you should always contact your supervisors

- + direct supervisor
- + manager in-charge
- + director
- + HR department
- + any other manager or director

Having the open communication culture, we as management of BPiON promote our colleagues always to speak-up if any explanation of the rules is needed or any level of breach is detected or seemed to be detected.



VIOLATIONS



Beside informal reporting routes we maintain the following official path for reporting Code of Conduct violations and whistleblowing:

Link for Hungary:

<https://app.smartsheet.eu/b/form/13149e25ab6c49c1837763cf868bfcc5>

Link for Poland:

<https://app.smartsheet.eu/b/form/365fb1d4c986497c9c0b8e0e241f147f>

Link for Romania:

<https://app.smartsheet.eu/b/form/404a071448b84ff4a6a4bcb95fc6502b>

General link in English:

<https://app.smartsheet.eu/b/form/5ae32f04775441d08da765b2343bff17>

Action can be made if you report an incident anonymous, however it limits BPiON's ability to investigate the incident and general preventive actions to improve this Code further. Our culture should never penalize actions of reporting, especially since it may even arise from wrong interpretation of the Code. If you believe that your good faith actions may generate any penalty like consequence you should immediately contact BPiON' HR department. If the HR manager/director is involved in the case according to your judgment you should immediately contact any companies local managing director.

It may happen on occasional basis that the person reporting an incident may be involved of developing its corrective action, however we try to isolate the people involved in certain matters to avoid subjective judgements.

Violation of rules in this Code may be penalized. In case of serious breach, penalty can be extraordinary termination of the employment agreement in line with local labour laws. Any penalty should be in line with the circumstances, size, volume of breach. We always provide forum for all employees to defend their actions and comment any management decision or penalty -if any-.

RECRUITMENT

At BPiON we believe that an effective recruitment procedure is the second-best asset beside open communication to create and maintain a culture of transparency. We believe that competences should always be in perfect fit with our culture during recruitment procedures, since values like transparency and integrity are difficult to learn, while our effective training system is there to compensate short-term professional lack of certain knowledges.

Finding the right profile of talents is more difficult than ever. Not only there is a lack of talents to meet the exponential needs of general growth, but our industry is being revolutionized by technology, while the other side of this technology is tempting the new generation for slam dunk short-term advantages over long-term success. The mismatch of talent supply and demand may incite the management to employ people with lower level of professional and soft competences, therefore it is important for us to secure that the following principles are always followed during the recruitment procedures:

- #1** 4-eye-concept: no persons can join BPiON if only one manager was involved in the recruitment procedure
- #2** Every colleague should follow exactly the same recruitment procedure (in line with the official route for a certain position), irrespective their history, seniority or any visibility of their prior career
- #3** No applicant can be subordinated during our selection procedure because of race, colour, religion, gender, age, national origin, look, sexual orientation, disability or any private affiliations
- #4** Although we believe the disruptive nature of technology, no employee should be selected without personal interview

We not only prohibit of discrimination during recruitment process and via the entire lifecycle of employment of our colleagues but believe in the power of a diversive community. Although diversity is power, we should never give any advantage of an applicant due to their affiliation in order to reach higher diversity. Competences and professional knowledge are the key criteria of our selection process.

DISCRIMINATION



One of our founding principles was to create a competence-based company which results success due to its creative, open-minded and diverse workforce. Our industry is being revolutionized and disruptive creative ideas can come from any source, therefore we never tolerate any form of discrimination.

Fair treatment and equality are fundamental rights of every humans. Similar as written in the section of recruitment, no colleagues can be subordinated because of race, colour, religion, gender, age, national origin, look, sexual orientation, disability or any private affiliations. Our employees should enjoy respectful workplaces without any discrimination.

We never tolerate harassment either in a way of physical or verbal misconduct. Harassment -especially verbal- is the most complicated area of this Code. It always falls under the understanding and perception of the private individual receiving the message; therefore, we ask our employees to understand the basic principles of this Code and keep it as everyday' topic for discussion and as a life-long learning exercise.

DISCRIMINATION

Conflicts of interest

Conflicts of interest is different than discrimination. It occurs when private or family interest may influence the right decision. We should avoid creating or maintaining any kind of relations which may interfere sound decision. On the other hand situation may happen (e.g.: romance, family relations, common community memberships, etc.). Whenever you have any doubt whether your relation is in line with the spirit of this Code, report it to the HR department or your supervisor in order to create accurate segregation of duties in order to avoid conflicts of interest. Management should always handle these reports with extra care.

You should always know that the situation which might generate conflicts of interest is not a breach of this Code but failing to disclose is. This is the prime responsibility of each colleagues regarding this topic.

Owning shares (listed or private) is generally not conflicts of interest case, but it is if it represents a part of a Group, which is served by BPiON. You may be aware of certain inside information before it become public. You should never use this insider information for your own or others -especially relatives- financial gain. Misuse of insider information -especially insider trading- is strictly penalized in all jurisdictions and BPiON takes extra care to avoid it. BPiON will always assist with its full power of any governmental investigations against insider trading.

Neither any employee should have business interest in any competitor of BPiON. Competitor means not only companies with the exact same size and activities of BPiON but any companies with similar activities.

BPiON employees should always report if they do or plan to have other employment or employment type relations with other entities even on a charity basis.



WORKPLACE SAFETY & HEALTH



We spend at least third of the day in our office environment, therefore it is crucial to do it having safe and healthy conditions. Meeting local regulations are minimum requirement.

Safe and healthy working conditions are not only responsibility of the company and the management but for all colleagues. Our behaviour and actions are necessary to reach safe and healthy conditions, the following guidelines are minimum requirement.

Alcohol or illegal drugs are never tolerated in the office environment. Moderate alcohol consumption is allowed during company events, but each employee should be aware that moderate is subjective for each individual and alcohol should never influence our ability to make clear and responsible decision at any time of our life.

We keep waste in a selective way and hazardous materials should always be removed from the office asap.

All electronic equipment should be used according to their instructions, should be switched off for non-operating periods of the day (e.g.: night) and maintained regularly. Whenever a new equipment is purchased or leased, BPiON must contract for its accurate maintenance as well.

WORKPLACE SAFETY & HEALTH



Fire safety instructions should be followed continuously. Fire protection regulations should be in line with the local regulation and should be the scope of a different policy. All employees should receive fire protection training on a regular basis (at least annual and during the joining procedure)

BPiON has a clear desk policy, as part of our Office policy. Not only because we support open-space environment, but clear desk policy is a minimum step toward healthy environment and minimize risk of safety incidents. Each employees' responsibility is to notify other colleagues for the clear-desk policy in case of any violation.

We should comply with all applicable environmental regulations and energy saving principles. We know that our industry is not a heavy polluting one, therefore understand that our small contribution to a less polluted environment is a significant responsibility of our community.

We love animals, however their place in the office is always a controversial topic, due to people and the office environment absorbing them differently.

More importantly, we must bound by the rules our landlord, which explicitly says that it is not allowed to bring in animals into the office.

GIFTS & ENTERTAINMENT



BPiON believes that all colleagues should have the communications skills (gifted or trained) in order to get direct contact with the clients. Our service delivery proposition is based on our colleagues' communications skills to reach the extra mile for our clients; therefore everybody can be in contact with clients and the extra care is sometimes honoured by small gifts. Small gifts are accepted by BPiON until they are in line with the sections of this Code.

Gift can have various profiles, like small value items, travels, meals, services, discounts, events. A gift can never create an obligation or expectation for any liability of BPiON or the private individuals receiving the gift as direct contributors of BPiON' success.

CASH or any CASH EQUIVALENT (e.g.: shares, crypto currency, etc.) can NEVER be accepted.

SMALL VALUE is defined as less than EUR 100 per occasion and its other currency equivalent.

If gifts are given on a frequent basis (at least 3 times in 6 months) it should raise doubt that the giver is expecting favour or try to influence certain decisions, therefore we ask all colleagues to report these incidents.

Our recommendation when receiving small value gift is to share with the community first. BPiON's success is never based on one individual's effort, therefore any pride is to be shared as well.

BPiON marketing department is responsible to control our appearances and participation of any event as a BPiON representative is under the scope of this regulation. No attendance can be accepted without the knowledge and documentation of the marketing department. According to the current rules of BPiON either the CEO or the local managing director has to approve all attendances. Cases other than this normal route is a breach of sections of the Code and has to be reported according to the general rules.

It may happen that you meet a business partner or a future business partner or any stakeholder-like person during a private event. We ask all of our colleagues to act with good business sense at all events when this may happen. We demand extra care of managers at any events since they must act as role models and ambassadors of BPiON at any time.

If you have any doubt whether the gift or entertainment is in line with this Code, we particularly request our colleagues to ask support from the supervisor or HR department.



COMMUNICATION, LOBBYING POLITICAL ACTIVITIES

BPiON invest heavily to build its brand according to the long-term strategic objectives. Building a brand is a long and effortful journey where transparency and integrity are always challenged by external forces and reputation can easily be damaged in case of miscommunications. In order to minimize the risk of miscommunications only representatives of BPiON are allowed to speak on behalf of BPiON.

We are aware that nowadays it is difficult to control every publicity around our company, especially on social media platforms, where we have limited control, therefore it is very important to follow our marketing guidelines. Colleagues should have separate private and business profiles on social media platforms. BPiON's marketing department is to decide how visualization of BPiON's brand on any social media platform of colleagues should look like. BPiON marketing department provides daily instructions for colleagues about new content on any sites to be shared and the way how it should be shared. We incite our colleagues to create creative introduction for our corporate contents, however it should always be business format.

We definitely can't detail each and every business format guideline, however good examples can be seen on BPiON' social media platform, such as:

#1: "Amit az elhatárolt veszteség számításról mindenképpen tudni érdemes. Nézze meg rövid összefoglaló vlogunkat, az írásos gyakorlati útmutatóért pedig kattintson a kommentben szereplő blog linkre!"

#2: "Make progress, not process. - Process due diligence – CASE STUDY 🔍 What kind of factors can induce the necessity of a workflow due diligence? What can be in the focus of a process due diligence? What are the phases of the project? What are the pros of the revision of the financial processes? All answers are included in our case study. Read it. ENG: <https://lnkd.in/eHbqvpD> HUN: <https://lnkd.in/eiuzQzJ> [#processduediligence](#) [#processtransformation](#) [#processautomation](#) [#bpion](#) [#casestudies](#)"

#3: "At BPiON, we believe that a new generation outsourcing service provider has a duty to provide a proper technology background of its services guaranteeing to tackle any challenges of compliance issues like GDPR, incorporate it to essential daily processes of our Clients, avoiding that absurd situation of generating any extra costs because of legal compliance. [Bela Kakuk](#), CEO of BPiON shares details about it in his new blog post. [#gdprcompliance](#) [#smarttechnologies](#) [#accountingservices](#) [#payrollservices](#) [#digitization](#) [#outsourcing](#) [#bpion](#)"

Communication on external media platforms should never include any confidential information.

COMMUNICATION, LOBBYING POLITICAL ACTIVITIES



Political activities

Every private individual can have their own personal political affiliation. BPiON never supports and tolerates political ideas in our business activities and common community events, especially if they discriminate others. All employees should know not to express any political opinion under BPiON's brand.

Memberships

Colleagues can be members of any communities, but these should never be accompanied with BPiON only with the approval of the management. Examples of approved memberships are usually professional, academic or charity ones. We are proud of those colleagues having academic or charity titles.

Lobbying

Lobbying activities are accepted only if they are done in line with the local rules, global standards and management are informed beforehand. Lobbying never consists of bribery or any corruption activity.

FAIR SALES, PROCUREMENT PURCHASES

Procurement procedures of our services are fundamental part of the finance industry. BPiON must be ready for fair sales and procurement procedures. Scope and price of our services should always be in line with client's expectations.

Fair is a subjective definition - in terms of sales and procurement procedures, by fair we mean the following.

Scope and intended solutions should always represent the scope of our believed proposition and we should never sell services, which we believe are not useful for our clients.

The price of our services should always reflect the time and cost allocated to the services. There can be "rate card price" services, but these should always be distinct in our offers (e.g.: domiciliation services).

We try to deliver simple and visible price proposals; however – being a complex service - the content and sub-categories should always be visible for the clients in order to get a good understanding of our fees. BPiON colleagues must keep daily timesheet on the work allocated to every client. There are instances where we have contractual obligation to provide detailed analysis of time spent on certain engagements in case of client need. We work transparently toward every client and our profit should be generated by economies of scale and effective service delivery methods.

BPiON always supports non-disclosure agreements as part of tenders.



FAIR SALES, PROCUREMENT PURCHASES



Our profession is regulated by strict know-your-customer (KYC) rules, which BPiON should comply with. We never take engagements with any risk of violating local or global anti-money-laundering regulations. We greet the regulators' efforts to bring more visibility of money transfers.

BPiON is a regional company with international engagements, therefore try to comply with all global trade controls and economic sanctions. Our Holding entity is a Hungarian registered entity, in case global economic sanctions are against each other, we must act as a Hungarian registered entity.

BPiON follows fairness during its purchasing procedures as well. Personal friendships may not influence our purchase decisions, but lack of history of certain vendors should never be a differentiator. BPiON will always support the flow of new solutions, new ideas and as such give chance to new ventures, in other words start-up ventures, since we know and experienced that market trust can only be built with good client references and their support. Personal recommended vendor engagements should never be longer than a period of 12 months and should never have longer termination periods than 60 days.

We support the anti-corruption activities of all governments and are committed to full compliance with all such laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Bribery is never tolerated at BPiON.

Agency type agreements are accepted until the terms of the engagements is documented according to the local rules. Our profession - especially payroll - is accelerated by global agencies, which subcontract local business services.

CONFIDENTIALITY

Confidentiality is the essence of our service and trust of our clients. Our colleagues should do their work with the utmost confidentiality and they should be aware of our contractual obligations toward our Clients.

As data became one of the most valuable assets, our world is tempting to share information first. We understand that external impacts may push our employees to interpret confidentiality in an elastic way, but confidentiality is never for negotiation for us. We sell TRUST, which is built in ages, but may collapse in a minute. We must provide the highest level of confidentiality towards our clients, therefore this is contractual obligation for BPiON and all of our colleagues must know the wording of our up-to-date General Terms and Conditions document (furthermore "GTC") available on the following internal link: [ENG GTC](#), such as:

#1 The Party who obtains Confidential Information during the performance of the Agreement may not disclose the Confidential Information of the Party transferring such information or the Affiliates thereof without the written consent of the other Party, with the exception of the recipient Party's Affiliates, sub-contractors and consultants, but may only disclose Confidential Information required for the performance of their tasks related to this Agreement to them. The receiving Party shall ensure that all those involved are bound by confidentiality obligations none less onerous than the present provisions.

#2 The recipient Party will, in as far as reasonably possible, immediately upon receipt of a written request from the disclosing Party: (i) destroy all Confidential Information (and all and any copies thereof or of any part thereof); and (ii) expunge all Confidential Information from any computer, word processor or other similar device into which it was programmed, provided that these obligations will not extend to any notes, analyses, memoranda, minutes or other internal corporate documents, prepared by the receiving Party or on behalf of the receiving Party or by any of the authorized recipients which are based on, derived from, contain or otherwise make reference to the Confidential Information.

#3 The recipient Party shall be permitted to retain all or any portion of the Confidential Information in accordance with the confidentiality obligations specified herein, to the extent required by Applicable Law or the receiving Party's internal retention requirements. The recipient Party shall be entitled to retain copies of any computer records and files containing Confidential Information which have been created pursuant to automatic electronic archiving and back-up procedures and which are not immediately retrievable as part of day-to-day business.

#4 Confidential Information will remain the exclusive property of the disclosing Party.

CONFIDENTIALITY

It is not always easy to determine whether any information was already in public, therefore we incite our colleagues not to share any business information or ask your direct supervisor, manager or any members of the management of BPiON if any further clarification of the Code is needed.

Data and asset security is not under the scope of this Code, but nevertheless to say you should protect data and assets of the company and clients with extra care in line with our IT policy .



INTELLECTUAL PROPERTY

BPiON is a process and technology driven outsourcing company. We believe that our people and the combination of their knowledge and expertise and their life-long challenging attitude creates a unique selling point of our services against our competitors. Intellectual properties (furthermore: “IP”) creates significant value for our company and our clients, therefore every colleague should know its characteristics and our contractual obligations toward the client.

IP can never belong to one private individual, except it is undoubtedly created and registered according to the rules. We believe that we create new ways of process flows and connectivity of technologies on the field of regional accounting, HR and finance, therefore those assets are deemed to be IPs and defended, even if we do not register each and every IP according to the regulations. We believe that IPs are always creative product of the community itself, therefore hardly belong to one private individual in our profession. These rules do exist even following termination of employment agreement and they should include similar sections of reference of this limitation.

Our General Terms and Condition document clarifies IP and our approach toward the Clients accordingly:



INTELLECTUAL PROPERTY

Intellectual Property Rights

#1 All Intellectual Property Rights of a Party existing prior to the Effective Date shall remain the exclusive property of that Party. Neither this Agreement nor any disclosure made under the Agreement grants any rights to the other Party or Parties in respect of such pre-existing Intellectual Property Rights.

#2 The Client retains all Intellectual Property Rights in the Client Material. The Client grants BPiON a non-exclusive, royalty-free, non-transferable and non-sub-licensable right to use the Client Materials during the term of the Agreement for the sole purpose of performing the Services. The Client shall indemnify, defend and hold BPiON and BPiON Affiliates harmless against any claims from third parties based on the assertion that the Client Materials infringe third party Intellectual Property Rights. The Client shall make BPiON aware in advance if the Services would affect any intellectual property of a third party and provide appropriate licenses to the BPiON to facilitate a lawful Service provision under the pain of full indemnification.

#3 All Intellectual Property Rights relating to the Products and to the databases managed with BPiON's software tools, the rules and methodology of storing data shall be held by BPiON or BPiON's respective Affiliate or the licensor thereof. BPiON grants the Client a non-exclusive, royalty-free, non-transferable and non-sub-licensable right to use the Products explicitly made available to the Client during the term of this Agreement. BPiON shall indemnify, defend and hold the Client and the Client Affiliates harmless against any claims from third parties based on the assertion that the Services or the Products infringe third party Intellectual Property Rights.

#4 Subject to clauses above, all right, title and interest in the Work Product shall exclusively be vested in the Client or the Client Affiliate. Client (Affiliate) is not entitled to re-sell or otherwise transfer, publish or make available, quote or make use of, the Services or Work Product delivered by BPiON to any third party except for Affiliates or within its own group of companies. In lack of such separate agreement to the contrary, intellectual property license shall cover the use thereof by Client, its employees, agents and sub-contractors or its Affiliates only, with a prohibition to make it available in any way for further use by third parties including in particular, other existing or future service providers. BPiON shall indemnify the Client and Client Affiliates in relation to any claims from third parties that are based on the assumption that the Work Products infringe an Intellectual Property Right of the third party in question.

#5 BPiON, including its employees who perform Services pursuant to the Agreement, may perform similar or comparable services and functions for third parties, and may use know how, ideas, expressions, skills and experience acquired by them before and while rendering the Services to perform such other third-party assignments.

Please also refer to your respective employment contract, where there is a separate section transparently and diligently detailing how IP rights are being handled.

WHISTLEBLOWING

BPiON promotes ethical behavior, risk management, and stakeholder trust, all of which are essential for long-term success and sustainability.

Employees and third parties can report whistleblowing in various situations where they witness or suspect unethical, illegal, or inappropriate behavior within the organization.

Some common occasions when an employee might report whistleblowing include:

Fraud or Financial Misconduct: Instances of embezzlement, accounting fraud, bribery, insider trading, or other financial irregularities.

Corruption: Cases of bribery, kickbacks, conflicts of interest, or other forms of corruption involving employees, management, or external parties.

Harassment and Discrimination: Incidents of harassment, discrimination, or retaliation based on factors such as race, gender, age, religion, disability, or sexual orientation.

Health and Safety Concerns: Unsafe working conditions, environmental hazards, violations of health and safety regulations, or failure to address employee health concerns.

Misuse of Company Resources: Unauthorized use of company funds, assets, or intellectual property for personal gain or other improper purposes.

Regulatory Violations: Breaches of laws, regulations, or industry standards related to areas such as data privacy, consumer protection, environmental compliance, or product safety.

Ethical Violations: Any behavior that goes against the company's code of conduct, values, or ethical standards, including conflicts of interest, dishonesty, or abuse of power.

Retaliation: Instances where employees are subjected to retaliation, harassment, or adverse treatment for reporting wrongdoing or cooperating with investigations.

Additionally, employees should feel empowered to report any concerns they have, even if they are uncertain about whether a specific situation constitutes whistleblowing.

As mentioned in #Violations section, you can report here:

Link for Hungary:

<https://app.smartsheet.eu/b/form/13149e25ab6c49c1837763cf868bfcc5>

Link for Poland:

<https://app.smartsheet.eu/b/form/365fb1d4c986497c9c0b8e0e241f147f>

Link for Romania:

<https://app.smartsheet.eu/b/form/404a071448b84ff4a6a4bcb95fc6502b>

General link in English:

<https://app.smartsheet.eu/b/form/5ae32f04775441d08da765b2343bff17>

WAIVERS

We know that to live according to this Code and to million other policies and regulations are not easy, therefore would like to confirm our colleagues that in case of reasonable circumstances waivers can be given by the management of BPiON. Waivers can never be full exception of the Code and can imply on limited numbers of actions for a limited period of time, upon discretion of the parties giving the waiver and signing such document. Waivers should be documented properly and should always be signed by 2 management persons (one should be the local MD) and the CEO.



DECLARATIONS



ACKNOWLEDGMENT DECLARATION

Undersigned, I hereby declare that I have read and understood BPiON's Code of Conduct. I accept to deliver tasks of my job description in line with its paragraphs and defend the interest of BPiON in line with the spirit of this Code.

I do understand that in case of doubt, Management or HR department of BPiON should be contacted for further instruction and I am aware of all contact details of those individuals.

I do understand that compliance with this Code requires reporting violations according to the instructions, even if the breach was done by any of my supervisors, management or shareholders.

I do understand that this Code may require reporting of certain conflicts of interest, personal affiliations.

I do understand that this Code may require compliance with certain branding elements of BPiON on my personal social media platforms, until they include BPiON as a current employment or significant part of my business career or content represented on the social media platform.

I do understand that personal and business profiles, communication and opinion must always be separated according to the rules of this Code.

Date: 2024 month day

Signature:

BUSINESS INTEREST REPORT FORM

Please list all companies you involved in more than 25% business interest:

- 1.
- 2.
- 3.

Please list all companies you act as Managing Director, company manager or directorial role:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.

Are there any memberships, activities in which you or your close family members are engaged that could potentially conflict with the business interests of BPiON or any of its affiliates?