

BUSINESS AND ETHICS CODE

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1 STATEMENT OF PURPOSE

This Business Conduct Code ("Code") applies to all employees, officers and directors (hereafter referred to collectively as "Employees") of COOPTECH Ltd., or any of its subsidiaries, affiliates or divisions (hereafter referred to collectively as "COOPTECH"). References to "COOPTECH" and "Company" in this (Code) are to these entities.

This statement of the policy of COOPTECH in the area of business ethics, conflicts of interest and other business conduct is for the guidance of all Employees in conducting the Company's business and in their personal affairs to the extent the latter relates to the Company's Business.

The Code replaces and/or supersedes all prior business conduct policies applicable to COOPTECH.

2 APPLICATION

This Code applies to COOPTECH operations. COOPTECH Employees should adhere to country and local laws and legislative measures in matters not addressed in this Code or where the said laws and legislative measures are more rigorous or restrictive than those set forth in this Code. The Managing Director is responsible for this Code and its implementation.

3 REPORTING VIOLATIONS

Each Employee shall report to the Company's Human Resources Department ("HRD") any violation or suspected violation of this Code as soon as he or she becomes aware of it. The Company will maintain the confidentiality of such disclosures to the extent consistent with the best interests of the Company and its obligations under law.

COOPTECH recognizes that Employees may be unwilling to reveal certain types of offences or torts. For this reason, it provides an anonymous and confidential direct telephone line operated by an independent third party, so that Employees may disclose any illicit behavior in a confidential manner. Details concerning this direct telephone line are found in the last page of this Code.

4 COMPLIANCE

COOPTECH may conduct unannounced internal audits of each of its sites of operation ("Sites") from time to time to ensure compliance with this Code. All COOPTECH personnel shall cooperate fully with such audit efforts.

5 SANCTIONS

This Code will be vigorously enforced. Failure of any COOPTECH personnel to comply with the requirements set forth in this Code shall result in appropriate sanctions and disciplinary action, which may include termination of employment. In some cases, the Company may have an obligation to bring violations of this Code to the attention of appropriate enforcement authorities where violations of this Code may also be a violation of the law.

6 GUIDING PRINCIPLES

6.1 PART I- EMPLOYMENT AND PERSONAL CONDUCT

The Company wishes to foster an environment where all Employees freely communicate with all levels of management. Employee communications frequently concern employment relationships and may take the form of questions, suggestions or concerns. The policy of the Company is one of an Open Door Policy and each Employee is invited to subscribe to it.

6.1.1 EQUAL EMPLOYMENT OPPORTUNITY

It is the policy of COOPTECH to provide equal opportunity for employment promotion to all qualified persons and to prohibit discrimination because of race, religion, color, national origin, sex, sexual orientation, age, or handicap. COOPTECH subscribes fully to the principle of employment equity, and this philosophy is embedded in the Company's principles

In addition, there shall be no segregation or discrimination due to race, religion, color, national origin, sex, sexual orientation, age, or handicap at any of the Company Sites.

It is the responsibility of each Employee to see that these general principles of employment equity are respected.

6.1.2 SEXUAL HARASSMENT IN THE WORKPLACE

COOPTECH prohibits sexual harassment in the Company in any form and undertakes to ensure with the aims to assure that no Employee, male or female, may harass another Employee by:

- Making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature a condition of an Employee's continued employment;
- Making employment decisions affecting the Employee based on whether or not such Employee submits to or rejects such conduct; or
- Creating an intimidating, hostile or offensive working environment by such conduct.

Other sexual harassing conduct in the workplace, whether committed by supervisory or non-supervisory Employees, is also prohibited. This includes: offensive sexual flirtations, advances or propositions; verbal abuse of a sexual nature; graphic verbal commentaries about an individual's body; sexually degrading words used to describe an individual; and the display in the workplace of sexually suggestive objects or pictures.

6.1.3 PSYCHOLOGICAL HARASSMENT IN THE WORKPLACE

COOPTECH prohibits psychological harassment in the Company in any form, to assure respect of dignity and integrity of personnel and applies to any person working directly or indirectly for COOPTECH, regardless of the status of said person.

Psychological harassment is defined as vexatious conduct, appearing in the form of behaviors, words, acts, omissions or repeated gestures that are hostile and damage dignity and physical or psychological integrity of a person and lead in a harmful work environment, Nevertheless, a single serious behavior may also constitute a psychological harassment, should it damage and produce a continuous and harmful impact on the person.

6.1.4 HEALTH AND SAFETY

The operating manager of each COOPTECH Site shall assure compliance with health and safety laws and regulations in force in any county where we operate to ensure, in conformity with such laws and regulations, that safe and healthful working conditions exist for all Employees at the Site and for any other person working directly or indirectly for COOPTECH. Unsafe conditions observed by Employees or by any other person working directly or indirectly for COOPTECH shall be promptly reported to the person responsible for the Site.

6.1.5 INTERNET AND EMAIL USE

Employees are prohibited from using COOPTECH computers, computer services or internet services for personal profit or gain or for any illegal activities. Employees are not to send or receive mail or other communications, files, or programs containing offensive or harassing statements. This includes but is not limited to sexually oriented messages or images as well as comments based on race, national origin, sex, sexual orientation, etc. Inappropriate e-mails received should be deleted immediately upon discovery. The contents of all messages, software and hardware are the property of COOPTECH and will be monitored at the Company's discretion.

6.1.6 FRAUD, BRIBERY AND KICKBACKS

6.1.6.1 Fraud: COOPTECH Employees shall not employ or participate in dishonest methods or schemes for the purpose of obtaining personal or business advantage or reward, including methods involving fraud, deceit and any action that does not comply with laws and regulations in force.

6.1.6.2 Bribes and Kickbacks: in most jurisdictions, the law prohibits, amongst others, the payment of any bribes, kickbacks or other illicit forms of payments. COOPTECH Employees shall not in any way offer, give, solicit or receive any bribes, kickbacks or other illegal or improper payments, transfers or receipts.

6.1.6.3 Gifts: COOPTECH Employees and members of their immediate families shall not accept directly or indirectly, any service, payment loan, discount (except those offered to COOPTECH Employees generally), entertainment or travel (except when it is customary and of nominal value), vacation or pleasure trip, gift (other than one of nominal value which is customarily offered), or gift of money in any amount from suppliers of materials or services.

6.1.7 INSIDER INFORMATION AND INFORMATION DISCLOSURE

The related rules aim to make the Company's Employees aware of the way the Company discloses its information, as well as of the rules Employees must respect when they are considered as insiders within the meaning of the law, or when they hold or are aware of inside information related to the Company.

6.1.8 MAINTAINING A DRUG-FREE WORKPLACE

COOPTECH regards drug abuse as a serious business and social problem and will by no means tolerate it, in order to ensure the health and safety of its Employees and to ensure compliance with the law, COOPTECH will strictly enforce, through the following guidelines:

- The possession, use, sale or manufacture of illegal drugs, controlled substances, or the paraphernalia associated with such illegal drugs or controlled substances for purposes other than their legally permitted use, or the unauthorized use of controlled substances on COOPTECH Sites, or outside COOPTECH Sites while on official business, is absolutely prohibited. Violations will result in disciplinary action including discharge.
- Off-the-job illegal drug use which could adversely affect an Employee's job performance or which could jeopardize the safety of other Employees, customers, or the public is proper cause for administrative or disciplinary action including discharge.
- Employees who are convicted of illegal off-the-job drug activity will be considered in violation of this Policy and subject to disciplinary action including discharge.

6.1.9 MAINTAINING AN ALCOHOL-FREE WORKPLACE

The laws prohibit alcohol use at work unless specifically authorized by the Company. Employees shall not work while under the influence of alcoholic beverages.

6.2 PART II- GENERAL BUSINESS PRACTICES

6.2.1 CONFLICTS OF INTERESTS

All Employees of COOPTECH have a duty to COOPTECH to work in the best interest of the Company and to fully participate in its objectives and goals. No Employee should put himself or herself in a position where his or her actions or personal interests may be in conflict with those of COOPTECH. While it is not possible to discuss every circumstance that may lead to a conflict of interest, the following are examples:

The holding by an Employee, or any member of his or her immediate family, without written approval of the Managing Director or of any person designated by the latter, of any financial interest in any enterprise that has material business dealings with COOPTECH (e.g. competitors, suppliers, and customers) or which engages in any field of activity engaged in by the Company.

Acting as a director, officer, employee or otherwise for any business or other institution with which COOPTECH has a competitive or significant business relationship without the written approval of the Managing Director, or any person designated by the latter. An Employee should report to the Managing Director, or any person designated by the latter, any situation where members of the Employee's immediate family hold positions which are likely to involve a conflict between the interests of COOPTECH and those of another institution.

- Competition with COOPTECH in the purchase or sale of any kind of properly, tangible or intangible; or diversion from COOPTECH, for the Employees own direct or indirect benefit of a business opportunity in which COOPTECH has or is likely to have an interest.
- Use of COOPTECH assets (funds, facilities, property, know-how, or personnel) by an Employee of COOPTECH for other business or personal endeavors from which the Employee might materially benefit.

6.2.2 ANTITRUST AND COMPETITION LEGISLATION COMPLIANCE

Employees must respect the antitrust and competition legislation, as well as all the associated policies, procedures, regulations and practices that are in force in countries (including provinces, states or other forms of jurisdictions) where COOPTECH operates.

Any doubt or question regarding the respect of antitrust and competition legislations must be submitted to the Company's Managing Director.

6.2.3 ACCOUNTS AND RECORD KEEPING

COOPTECH's books, records and accounts shall be maintained in accordance with all applicable accounting rules and regulations. All transactions affecting assets, liabilities, shareholders' equity,

revenues and expenses will be recorded on a timely basis in detailed journals and be traceable through the general ledger and resulting financial statements.

Under no circumstances will any off-the-books finds or other unrecorded assets be maintained, No false, misleading or artificial entries shall be made in any financial books, records or accounts. No payment on behalf of COOPTECH shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.

Each Employee shall promptly advise financial management of the Site of any inaccuracy or deficiency in the accounting records.

6.2.4 ENTERING INTO CONTRACTS AND OTHER BINDING COMMITMENTS

COOPTECH Employees who receive or generate contracts, subcontracts, purchasing orders, letter agreements or other binding commitments are responsible for assuring such documents are concluded according to applicable rules and policies and are in compliance with the policies in force at the time of signature, in particular the [Authority Level Policy](#).

6.2.5 ENVIRONMENTAL POLICY

COOPTECH recognizes the importance of preserving the environment, conserving global resources and protecting human health, COOPTECH is committed to taking strong initiatives in these areas by complying with environmental laws and regulations in force in all of the countries where COOPTECH operates.

Each employee is expected to adhere to the spirit, as well as the letter, of this Code, Employees have a special obligation to be aware of environmental, health and safety risks and standards and to advise general management of any adverse situation that comes to their attention.

All complaints received by any facility from any state or federal agency alleging that COOPTECH is not in compliance with any environmental law or any permit issued under any environmental law shall be promptly reported to the Company's Legal Affairs Department.

6.2.6 PRODUCT SAFETY

Employees have a special obligation to be aware of safety risks and standards for our products and to advise senior management of any adverse situation that comes to their attention.

Political Contributions

COOPTECH is aware that several countries have laws governing the practice of political contributions (gifts, subscriptions, loan of buildings or equipment, direct payment of invoices, etc.), and even prohibiting such practices. Thus, no COOPTECH funds, goods, services or personnel must serve as a

political contribution to a candidate, a political party or any person closely or remotely related to this party, within an election campaign or in the normal course of the operations or activities pursued for the financing of a political party, without authorization from the Managing Director. The above prohibitions are not intended to discourage Employees from making personal contributions to the candidates, parties or committees of their choice. Under no circumstances shall Employees be reimbursed in any way for personal contributions.

6.2.7 EXPORT CONTROLS AND INTERNATIONAL BOYCOTTS, RESTRICTED COUNTRIES AND PARTIES.

The operating manager of each COOPTECH Site shall ensure that any information furnished to the government of any country, or to companies retained to facilitate COOPTECH export transactions, must be truthful, accurate and complete. This includes information as to the technology in question and as to the economic value of the exports.

The controller responsible for each GLY Site is also responsible for taking into consideration any restrictions pertaining to specific countries or third parties (customers, financial institutions) which may prohibit or limit that particular COOPTECH Site in its business with such country or third party. Certain anti-boycott, export control and embargo legislation may even prohibit an employee working at a COOPTECH Site from trading with certain restricted countries due to such employee's citizenship, residency or similar status. Any issues relating to such restrictions should be discussed with the local controller, operator.

6.3 PART III - CORPORATE ASSETS

6.3.1 IMPROPER USE OF CORPORATE ASSETS

The assets of COOPTECH constitute much more than our equipment, inventory, corporate funds, or office supplies. They include designs, drawings, software codes, trade secrets, financial data, and other information about COOPTECH. These assets are only to be used for the benefit of COOPTECH. They may not be used for the personal gain of Employees or others. Each Employee is responsible for making sure that COOPTECH assets are used only for valid Company purposes. Thus, Employees may not transfer any COOPTECH assets to other people or firms, except for duly authorized transactions. Misappropriation or waste of COOPTECH equipment, tools, materials, supplies or other assets is a violation of this Code. In the event that assets no longer needed in the business are sold to Employees, such sales must be approved by management and supported by proper documentation.

6.3.2 TRADE SECRETS AND CONFIDENTIAL INFORMATION

Employees shall take all steps necessary to appropriately safeguard COOPTECH's trade secrets and proprietary or confidential information. Proprietary or confidential information includes any information which is not generally known to the public and which is useful or helpful to COOPTECH and/or which would be useful or helpful to competitors. Common examples include financial data, sales figures, new product information, manufacturing methods, customer and supplier lists, information

concerning corporate acquisitions or divestitures, capital investment plans, supplier prices, engineering data and drawings, and computer software and data stored in our databases.

6.3.3 PROTECTION OF THE COMPANY NAMES, TRADEMARKS AND LOGOS

COOPTECH's Trademarks are assets of considerable value. However, in order to preserve their validity to the Company, their use must comply with these laws of the governments that have granted trademarks registration to certain words, names and symbols. The following rules shall be followed in all countries: Always use trademarks in a distinctive manner, such as by capitalization or by placing the word or symbol in quotes, ex. ("C-Former®").

6.3.4 SOFTWARE AND COMPUTER MATERIAL

Other than, software developed by COOPTECH's Employees, the Company only uses licensed commercial software. COOPTECH does not own this software or its related documentation and, unless authorized by the software developer, does not have the right to reproduce it. Generally, it is necessary to purchase one software program for each workstation unless a multiple use license agreement is entered into with the manufacturer. COOPTECH Employees shall not make, acquire, use, resell, or transfer unauthorized copies of computer software. Software for which COOPTECH did not obtain a licence or that was not developed by its Employees cannot be installed on a computer belonging to COOPTECH. With regard to network software or software installed on multiple workstations, their usage must be consistent with the provisions of the licence agreement. Backup copies are only allowed if authorized by the manufacturer.

6.3.5 ETHICS LINE

Integrity is the very pillar of COOPTECH's corporate governance and that is why, during the course of his or her employment with the Company, each Employee must do everything possible to ensure that this Code is respected. The Company provides an avenue for all COOPTECH Employees to report suspected improper financial or ethical activities. COOPTECH wishes each and every Employee to feel free to provide any comments regarding such matters by calling the direct telephone line at or online at www.openboard.info/COOPTECH to leave a confidential and anonymous message.

Integrity is the responsibility of each Employee.

Dunaharaszti, 27 June 2024



Balázs Vigh
Managing Director