

House of Music Hungary Public Nonprofit Ltd
Code of Ethics and Conduct
for Partners and Visitors

2025

1. The Purpose of the Code

The House of Music Hungary Public Nonprofit Ltd (hereinafter: HMH) contributes to the diversity of cultural life and to the discovery and deepening of musical experiences. In order to authentically fulfil this role, it is crucial for everyday operations at the HMH to be governed by the institution's effective ethical principles, which also requires the personal contribution and cooperation of partners and visitors involved in a legal relationship with the HMH.

This Code of Ethics and Conduct (hereinafter: Code) is a list of ethical expectations and standards considered by the HMH to be of key importance and which contain the HMH's internal convictions and ethical commitments with respect to appropriate business, consumer and employee conduct and provide both a framework and guidance for the establishment and maintenance of a positive and ethical business and work environment, defining the correct models of conduct to be followed in practice. This Code is intended to function as both a compass and a credo in promoting correct situational understanding and ethical decision-making, action and conduct.

2. The Scope of the Code

The HMH expects its managers and employees to adhere to this Code in their professional and personal conduct, and it expects the same from business entities and other organisations in a legal relationship with the HMH, their employees and collaborators, and any persons acting on their behalf or in their interest (hereinafter, collectively: 'Partners'), as well as – in such cases where the given rule can be construed as applicable – visitors to the HMH's exhibitions and lectures, concerts, public events, classes held at the HMH, or natural persons, legal entities and other organisations without legal personality purchasing/using goods/services sold by the HMH either on-site or online (hereinafter: 'Visitors'). By making this Code public, the HMH ensures that its Partners and Visitors are adequately informed about its content and significance.

3. Ethical Misconduct

Ethical misconduct is defined as any intentional or negligent act or omission that is contrary to core values or generally expected standards of behaviour and which is not in accordance with the provisions of this Code.

The consequences of an act of ethical misconduct are determined in accordance with the applicable legal provisions and the internal procedure mentioned in Article 12. Such

consequences may range from a verbal warning to the termination of the legal relationship or business relationship.

In the event that any HMH Partner – or any employee thereof, or a person acting on its behalf or in its interest – or any Visitor to HMH violates the provisions of this Code or the related legal statutes in connection with a business relationship with HMH, or in a manner that may negatively affect the reputation, business perception, or market position of HMH, HMH reserves the right to take the necessary measures to clarify the circumstances and remedy any proven violations, to conduct the necessary investigative procedure and – based on the results of this procedure – to terminate the related contract(s) or business relationship in accordance with the law applicable to the given relationship or the stipulations governing the contract.

Should any question, dilemma, or suspicion of ethical misconduct or conduct contrary to the Code arise in relation to a specific situation, you can request guidance by sending an email to mzhhr@zenehaza.hu or filing a report as per Article 12.

4. Protection of Human Dignity and Ensuring Equal Treatment

The HMH is committed to supporting the right to human dignity and the principles of equal opportunities and mutual respect.

Every individual shall be treated equally and shall have the same opportunities, regardless of gender, race, skin colour, nationality, ethnic origin, mother tongue, disability, health status, religious or ideological beliefs, political or other opinion, marital or parental status (including pregnancy), sexual orientation, gender identity, age, social origin, financial situation, the part-time or fixed-term nature of their employment or other work-related legal relationships, membership in an interest group or any other status, attribute or characteristic.

Prohibition of Harassment and Violence

It is a fundamental obligation to respect the right to human dignity and to promote mutual respect. Any form of harassment – including offensive remarks, unwanted sexual advances or verbal comments expressing such, or any behaviour that may lead to the creation of an intimidating, hostile or offensive work environment – is strictly prohibited.

The fundamental human right to human dignity and the principle of mutual respect require that everyone refrain from disseminating views that are likely to undermine the humanity and dignity of and respect for another party.

A key value at the HMH is open communication within the appropriate framework, during which the principle of mutual respect must be observed at all times.

All persons must be treated with dignity and respect. Both verbal or physical violence are prohibited, as is condoning violent behaviour as a model to be followed.

5. Protection of Reputation

The HMH includes among its key values those of excellence in performance and professionalism, which is reflected in the quality of the work performed, in both the core professional and support areas.

In carrying out this work, it is a fundamental obligation to protect the reputation of the both the HMH and all Partners, Visitors and other persons or organisations.

The requirement to protect reputations implies that any conduct that leads to illegal acts, damages the perception or reputation of the HMH or others (including in particular the assertion or spreading rumours of damaging, untrue fact, or the misrepresentation of a true fact) or which causes a potential conflict of interest, must be avoided. In the course of both their professional activities and in their private lives, all involved parties are expected to refrain from damaging the reputation of the HMH or others when publicly expressing their opinions.

6. Fair Competition

It is prohibited to engage in conduct that violates the applicable laws regarding unfair market practices and restriction of competition. The HMH must never conduct its public interest and business activities unfairly, and in particular not in a manner that violates or endangers the legitimate interests of Visitors, Partners, or its competitors (e.g. other cultural organisations) or in a manner that violates the requirements of business integrity, which the HMH also expects of itself.

It is prohibited to compromise the integrity of any competition, bidding or auction in any way.

7. Anti-Corruption and Transparency

The HMH has zero tolerance for any form of corruption or bribery, or any attempt to engage in such activities.

The HMH opposes all forms of illegal behaviour, corruption, bribery and efforts aimed at obtaining an undue advantage at the expense of others. It requires both Partners and Visitors to observe the same principle. The HMH adheres to its anti-corruption principles even if doing so places it at a disadvantage or deprives it of a business opportunity, or forces it to suspend or terminate a business relationship.

The HMH rejects activities that lead to the acquisition of undue advantages, and also refrains from all forms of behaviour of this nature that may even only create the appearance of such, and expects the same from its Partners and Visitors.

The HMH prohibits all persons acting in its name, on its behalf or in its interest in any way from offering, giving, requesting, accepting or receiving any undue advantage.

The HMH only permits the giving of symbolic gifts of low value and the acceptance of reasonable, necessary hospitality, and expects the same from its Partners, taking into account the following limitation: the HMH has set the maximum value of gifts to be declared at HUF

50,000/person/occasion. Gifts, including in the form of hospitality, in a value exceeding this amount may be accepted after approval from senior management, if it is not possible to refuse them or donate them to charitable causes.

Hospitality must not be provided for its own sake: it must take place in the context of a business meeting or representative event; hospitality for the sole purpose of entertainment is not permitted.

Business gift-giving is permitted only if it takes place in accordance with the rules of business customs and business ethics, meaning that no gift, including in the forms hospitality, event invitations or other benefits may be given to a third party, even within the above limit, if it could – or even if it could merely be perceived to – directly or indirectly affect a business transaction.

The HMH makes donations for charitable purposes, and therefore encourages its Partners to, instead of giving gifts, make donations of the same value in support of deserving causes, to help those in need, or for any purpose that reinforces their commitment to social responsibility.

HMH Partners are expected to act in good faith, in accordance with the relevant rules and regulations, and to support the fight against fraud by refusing to tolerate fraudulent business practices or to involve themselves in the use of funds that support or derive from criminal activities, are of concealed origin or are used to support terrorism, and by complying with the relevant anti-money laundering regulations. The HMH expects its Partners to take measures to demonstrate their transparency and integrity.

The HMH is also committed to transparent operations, which ensures that its decisions, procedures and communications are comprehensible, consistent and available to all stakeholders.

It strives to communicate clearly and honestly with its employees, Partners, Visitors and the public, with particular attention to issues that affect its legal, moral or financial interests.

8. Conflicts of Interest

HMH Partners are expected to avoid situations that may result in or create the appearance of a conflict of interest in connection with their legal relationship with the HMH.

The HMH expects its Partners to refrain from establishing any relationship with HMH employees or other third parties (e.g. HMH's legal representative, the employees thereof, or its supervisory board members) that results in a conflict of interest or may create the appearance of influencing business decisions.

Partners are expected to notify the HMH in writing if they become aware of any situation resulting in a potential conflict of interest affecting the HMH, in particular if any of their members, senior officers, supervisory board members or employees, or their close relatives as defined by the Civil Code (spouses, direct relations, adopted, step- and foster children,

adoptive, step- and foster parents or siblings) are senior officers, supervisory board members or employees of the HMH, or a person in a contractual relationship with the HMH engaged in an activity falling within the scope of the main activity of the given Partner.

The HMH investigates any reported conflicts of interest according to its internal procedures, based on which it takes any necessary measures needed to eliminate such.

9. Political Non-Partisanship

The HMH expects its Partners to refrain from any activities that might raise doubts about the political neutrality of the programmes.

The HMH does not allow its premises to be used by political parties or organisations directly affiliated with political parties, and it follows the principle of political non-partisanship in conducting its activities, events, and presentations.

10. Protection of Intellectual Property

The HMH respects and protects intellectual property rights, in particular copyrights, patents, and trademarks, and expects other parties to treat its own rights in this regard with the same respect.

11. Environmental Protection

The HMH is committed to sustainable development and environmental awareness. These principles are of paramount importance to all decision-making and executive levels of the HMH.

The HMH is likewise committed to complying with and enforcing the applicable environmental regulations and places great importance to assuring a responsible environmental approach in all of its business and work processes and planning and decision-making activities.

12. Reporting Conduct in Conflict with the Code

Any behaviour or omission violating the rules set forth in this Code, or the observation of signs indicating such, can be reported by sending an email to mzhhr@zenehaza.hu.

The HMH examines and handles incoming reports in accordance with the rules of procedure set out in the Regulations on the Internal Abuse Reporting System (hereinafter: Regulations), with the exception that, contrary to the provisions of the Regulations, in such cases the subject of the report will be an instance of ethical misconduct, while the person making the report can be any natural or legal person. The provisions of the Regulations also apply to the confidential treatment of the data of the reporter(s) and the report, and to the protection and handling of personal data, subject to the differences detailed below.

In the event of an instance of ethical misconduct or the suspicion thereof, if a Partner's senior officer or employee or another person involved in the relationship on behalf of the Partner refuses to participate in the investigation of the report, or obstructs or fails to facilitate the procedure, or if the existence of any ethical misconduct is established as a result of the investigation, the HMM shall be entitled to terminate (cancel or withdraw from) any agreement, business relationship, legal relationship or cooperation with the Partner with immediate effect in a manner consistent with the provisions of the relevant contract or order.