

# Code of Corporate Conduct

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## Code of Corporate Conduct

This Code is intended to provide general guidance to be followed by all MILIPOL Corporation employees and representatives, in accordance with applicable local laws or regulations. Where conflicts exist with local policy or regulations the requirement containing the higher standard of ethical conduct shall apply.

Code of Corporate Conduct.

MILIPOL Corporation has a policy of taking all reasonable steps necessary to protect the confidentiality of all information relating to possible misconduct to the maximum extent legally permissible. We also have a policy of ensuring that there will not be any retaliation against someone for good faith reporting of an activity that he or she believes to be a violation of this Code.

MILIPOL Corporation reserves the right to update or otherwise change this Code of Corporate Conduct at any time.

## Core Ethical Values

MILIPOL Corporation is committed to doing the right thing always. Sometimes this means making difficult choices, even when no one else will know. MILIPOL Corporation places a priority on its ethics and compliance program. The Code is specifically designed to promote accountability, integrity, and respect while deterring wrongdoing.

The ethics and compliance program is not a stand-alone initiative. Throughout this Code and throughout our workday we see senior level commitment to our values, many points of contact for discussing ethical concerns, regular compliance training, the inclusion of ethical principles in our performance appraisal and leadership development programs, and many other formal and informal forms of communication about our guiding principles. Our values are all around us: they are intrinsic to the MILIPOL Corporation work environment; they give us strength; they sustain our vitality. At MILIPOL CORP, ethics is in the air we breathe.

Following are just a few of the values MILIPOL Corporation emphasizes:

#### Accountability / Responsibility

Accountability is a fundamental ethical value with broad implications. It is about admitting to our mistakes and praising others for their achievements. It requires humility, courage, and forthrightness.

At MILIPOL Corporation we hold ourselves accountable for everything we do. This means taking personal responsibility for our actions and decisions as individuals, teams, and as a corporation. It requires clear expectations, making sure that everyone knows the rules and the goal; creating a level playing field. Only then can we candidly measure our performance, acknowledge our shortcomings, and celebrate our success.

#### Diversity

Diversity is a commitment to valuing people for their differences. This goes beyond prohibitions against discrimination and harassment. It means seeking out new perspectives, bringing together the wisdom of others, and cultivating participation. At MILIPOL Corporation, diversity requires acknowledging the importance of distinct points of view and different ways of thinking and striving to build a workforce that mirrors the world in which we do business.

#### Fairness

Fairness is a commitment to apply ethical standards and reasoning to our decisions affecting other people, to treat them equitably; the same way we would wish to be treated in a similar situation.

At MILIPOL Corporation we are fair in our interactions with others, including: employees, communities, government regulators, suppliers and customers.

#### Good Citizenship

MILIPOL Corporation is committed to being a good corporate citizen in the many communities in which we operate all over the world. MILIPOL Corporation embraces our social responsibilities by supporting sustainable development and continually finding ways to give back to the communities in which we work.

As a corporation MILIPOL Corporation strives for open and transparent business climates free from corruption, bribery, or any unlawful attempts to influence customer decisions. MILIPOL Corporation reports to all internal and external stakeholders with candor, clarity, accuracy, and completeness.

As good citizens, we must be stewards of the planet's resources and work to leave the environment better than we found it.

## Honesty / Truthfulness

To be honest is to be truthful in everything one says and does. This means more than refraining from lying. It includes telling the whole truth even when doing so is difficult. At MILIPOL Corporation our commitment to honesty is reflected in accurate books and records, including maintaining the security of personal, MILIPOL Corporation confidential, and government classified information.

## Inclusion

Inclusion is the act of embracing and celebrating diversity. We thrive with the contribution of fresh thinking and the infusion of new ideas and must actively work to draw them out. At MILIPOL Corporation this requires us to solicit input, listen to debate, and take other opinions into account. Inclusive processes enable us to make better decisions, create stronger plans, and allow us to rise to a higher level.

## Integrity

Integrity is constantly, predictably, and reliably living our ethical principles in our words and actions. It results from consistent decisions to act ethically in difficult situations.

As MILIPOL Corporation employees, integrity drives us to adhere not only to the letter, but also to the spirit of applicable laws and MILIPOL Corporation policy. In fact, MILIPOL Corporation seeks to raise the bar, by holding ourselves to the highest standards of ethical behavior, and to do the right thing always.

## Quality

MILIPOL Corporation has built its reputation on product and service quality. But quality means more than freedom from defects. Quality speaks to doing everything to the best of one's ability and striving to better meet the needs of our customers. At MILIPOL Corporation it means producing products that are safer, last longer, and run cleaner.

## Respect

Respect is a commitment to honoring the inherent worth of every individual and celebrating human potential. At MILIPOL Corporation our commitment to respect requires us to maintain workplaces where people are treated well and afforded all of the rights they are entitled to both under law and company policy. We are each responsible for fostering a workplace which is safe, free from discrimination and harassment, and affords employees equal opportunity to pursue their goals.

## Ethical Decision Making

„MILIPOL Corporation recognizes that all employees encounter ethical challenges in their work. This Code is intended to help you recognize and resolve those challenges.”

When faced with a business decision that appears to have ethical overtones, here are several questions you should ask yourself to determine if your actions are proper:

- 1) Am I adhering to the spirit, as well as the letter, of any applicable law or MILIPOL Corporation policy?
- 2) Would I want my actions reported on the front page of a newspaper?
- 3) What would my family, friends or neighbors think of my actions?
- 4) Will there be any direct or indirect negative consequences for MILIPOL Corporation?
- 5) Are my actions consistent with the overall values set forth in this Code and MILIPOL Corporation Corporate Policies?

If you remain uncertain about what to do, stop and ask for help. Refer to the relevant section of this Code. Speak with your supervisor or, if you prefer, communicate with any of the other points of contact indicated in this Code.

### Point of contacts

Your supervisor is the first person you should contact if you have questions about anything in this Code or if you have a problem. In some cases you may feel more comfortable discussing the matter with someone other than your supervisor. You may contact any of the following on a confidential basis for the purpose of discussing any issue related to the Code:

Your company's layer: Zoltan Beres Dr.

Your company's human Resources expert: Zsoltne Kelemen

Your company's controller: Erika Szabo Gerencserne

## Accuracy of Records

„If you are ever tempted or asked to make a representation — either in a document or in oral communication — that is other than fully accurate, do not do it.“

We adhere to the highest standards of honesty. It is essential that the internal and external reports and documents MILIPOL Corporation creates, makes public, or provides to the government or customers, constitute full, fair, accurate, timely, and understandable disclosures. If you are unsure about how to represent information in a MILIPOL Corporation report or document, contact one of the listed points of contact for guidance.

Part of our commitment to honesty is the assurance that all of MILIPOL Corporation's financial transactions are lawful and are made for the purposes stated and as authorized by MILIPOL Corporation. There is no acceptable reason for making a false representation on behalf of MILIPOL Corporation either orally or in writing.

You may use MILIPOL Corporation funds or assets for lawful and proper purposes only. You may only transfer or use MILIPOL Corporation funds or assets for the purpose for which they were approved.

Questions regarding this policy or any other aspects of MILIPOL Corporation's financial accounting, record keeping or auditing should be addressed to your Company's Controller. If you have a concern or complaint regarding accounting, financial records or auditing at MILIPOL Corporation, you may also report it on a confidential basis to any of the additional points of contact previously listed in this Code.

### Antitrust

A dynamic and thriving economy is built on fair and open competition. This means every competitor has a fair opportunity and that all competitors compete under the same rules. MILIPOL Corporation will compete energetically, ethically, and legally in the global marketplace. The quality and value of our products and services will determine our success. We will not engage in activities that unfairly limit trade or exclude competitors from the marketplace.

Many countries have laws that govern unfair competitive practices — often called antitrust laws. Failure to comply with antitrust laws may destroy the trust of our customers and business partners, resulting in legal sanctions and a damaged reputation. To promote free and fair trade, we will adhere to the letter and spirit of all antitrust laws in countries in which we do business. Generally, antitrust laws prohibit the following behaviors:

- Agreements with competitors to fix prices or boycott customers or other third parties
- Agreements to restrain or restrict competition
- Fixing prices at which customers resell products or services
- Unlawful tying, which is an agreement to sell one product or service but only on the condition that the buyer also purchases a different product or service from the seller.

## Business Courtesies

A business courtesy is a gift or service (whether in money or in kind) provided to or received from a business associate. In certain situations it may be appropriate to give limited, non-cash business courtesies. Gratuities paid to non-government employees in appreciation for exceptional service are allowed but they must be reasonable and consistent with the service provided. Such gratuities must not be intended to encourage the recipient to commit an unlawful act or to improperly discharge a job duty. We do not seek to improperly influence the decisions of our customers, suppliers, or fellow employees by offering extravagant or otherwise inappropriate business courtesies, nor do we accept such courtesies from suppliers. There are many government customers with very stringent rules, for whom any business courtesy is absolutely prohibited.

MILIPOL Corporation employees and their family members are generally not permitted to accept any business courtesy or other benefit of any type (this includes meals, entertainment and tickets) regardless of value that is offered in connection with MILIPOL Corporation business.

There are only three exceptions to this general prohibition. Employees may accept:

- Limited refreshments and meals, such as coffee, pastries and a working meal, when these items are provided during a business meeting.
- Reasonable and infrequent meals and entertainment (but not travel or overnight lodging) when offered by a MILIPOL Corporation customer or business associate (but not a supplier or prospective supplier) for a legitimate business reason and when local custom or practice would make it inappropriate to decline the offer.
- Promotional business items with only token value, although it is our policy to discourage receipt of gifts of even token value.

Other exceptions must be specifically approved in writing on a case-by-case basis by the CEO of MILIPOL Corporation or the CEO's designee.

Employees may not defeat the intent of this Code by using their own personal funds to pay for any gift, meal, entertainment or other benefit under circumstances where it would be a violation if MILIPOL Corporation were to make the same payment.

## Definition of Supplier or Vendor

A supplier or vendor is any business that furnishes, or is in a position to furnish, materials, equipment, supplies, or services of any kind to MILIPOL Corporation or any of its Companies or Value Centers. Services include, but are not limited to, banking, insurance, advertising, transportation, construction, auditing, engineering, consulting, testing, and legal counsel.

## Government Business

- Many governments have laws and regulations regarding offering business courtesies to government officials, or offering courtesies to, or receiving courtesies from subcontractors on a government contract. Laws in various countries differ. Contact your Lawyer for guidance.

This section and the section dealing with Government Procurement are interrelated and should be read together.

- Do not offer anything of value to any government employees, politicians and their staffs, or to any subcontractor on a government contract, without the prior approval of your Legal expert. Exceptions might include limited on-site food and beverages, such as coffee and pastries. You may not accept any such item from any subcontractor on a government contract without the prior approval of your lawyer of the company.
- Report any offer of a fee or kickback from any party to the lawyer of the company. Asking for or accepting a fee or kickback may be a criminal act. (Make sure you also read the specific rules under the Government Procurement section of this Code.)

## Non-Government Business

It is permissible to offer infrequent, reasonable, and appropriate non- government business related meals or simple entertainment that does not involve travel or overnight lodging.

- Any business gift we propose to give must be legal in the country where it is given and must be of nominal or token value unless prior approval is received. Sales or marketing representatives may make business gifts of their regular MILIPOL Corporation products or promotional items for the purpose of generating business goodwill. Moreover, when practical, any gift you give as a business courtesy should include the MILIPOL Corporation name, logo, or other similar Company identification.
- Regarding meals and entertainment, you may offer infrequent, reasonable, and appropriate meals or simple entertainment (which may not involve travel or overnight lodging) provided that the activity has a clear business purpose. Any activity that might be considered lavish or extravagant is not permitted. The guideline for reasonable and appropriate must be normal industry practice in your

locality consistent with local legal requirements. Your CEO will approve any exception to these provisions.

- Any offer to you of a gift or other business courtesy that exceeds nominal or token value, or that seems inconsistent with common business practices, should be refused and immediately reported to your supervisor. Employees must also immediately report any offers of cash, a fee, or kickback to the lawyer of the company. Common sense and good judgment must be exercised when accepting business-related meals or anything of token value to avoid any perception of impropriety or conflict of interest.

### Gifts between Employees

Employee recognition and reward are important to MILIPOL Corporation. We have many programs to recognize employee achievement and career milestones (e.g., service anniversaries, retirements, etc.). Where MILIPOL Corporation funds are used in support of these activities the following restrictions apply:

- All such activities and gifts should be approved by your management.
- Costs of the events and gifts should be appropriate to the nature of the activity. Extravagant or lavish gifts or events should be avoided.
- MILIPOL Corporation funds may not be used to purchase personal gifts between individual employees (e.g., retirement, birthday or holiday presents).

Employees may not use their own or MILIPOL Corporation funds to:

- Support activities or purchase gifts intended to influence management decisions.
- Associate MILIPOL Corporation with events contrary to the Tolerance section of this code.

These restrictions do not apply to MILIPOL Corporation-sponsored programs. Local guidelines should be established identifying acceptable events and gifts (e.g., departmental lunches, milestone and holiday gifts, etc.) Your Human Resources expert can help determine if a gift or event is appropriate and what approvals are required.

### Conflicts of Interest and Corporate Opportunities

A conflict of interest occurs when personal interests interfere with or may be perceived by others as interfering with your ability to exercise your judgment objectively in the best interests of MILIPOL Corporation. Conflicts of interest can occur in any MILIPOL Corporation occupation. Very often they occur when MILIPOL Corporation employees make decisions on behalf of the company or have a financial interest in an organization that wants to do business with MILIPOL Corporation. They can also result from certain personal relationships as discussed in the "Relationships between Employees" section of the Human Resources section of this Code.

MILIPOL Corporation understands and respects employees' rights to engage in activities outside of their jobs. These activities, however, should not divide your loyalties. Avoiding actual or apparent conflicts of interest creates and sustains the trust of our customers, employees, business partners and the public. Therefore, Directors, employees, consultants, agents and representatives must avoid actual or potential conflicts of interest.

If you consider undertaking any activity, including an investment, that may create an actual or apparent conflict of interest, you must seek approval of the activity in advance from your supervisor or from Human Resources expert.

Examples of Potential Conflicts Involving Employees:

- Contracting with a supplier managed by a close friend or family member.
- Working independently as a consultant to a supplier or customer.
- Having a private business on your own time if you perform work that is similar to work that you perform at MILIPOL Corporation or that MILIPOL Corporation might be interested in performing.

Employees, officers and directors have a duty to advance the legitimate interests of MILIPOL Corporation when the opportunity to do so arises. Generally, employees, officers and directors are prohibited from using corporate property, information or position for personal gain or to compete with MILIPOL Corporation. More specifically, they are prohibited from taking for themselves (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position unless, after full and fair disclosure, the opportunity has been offered to and rejected by MILIPOL Corporation.

## Consultants

All consultants must be approved in accordance with MILIPOL Corporation Corporate Policies, and consulting agreements must be controlled to protect MILIPOL Corporation confidential information. A formal written agreement must be prepared by the lawyer of the company prior to retaining any consultant to perform work for MILIPOL Corporation. These agreements must contain a detailed statement of work, a clear description of all amounts to be paid, and all specific provisions covering conflicts of interest, standards of conduct, government business ethics, confidentiality obligations, ownership of intellectual property and special provisions in foreign agency agreements. The use of consultants or lobbyists in the government relations area requires consultation with the MILIPOL Corporation CEO.

Consultants must be paid in the name of the party identified on the agreement, in the location where the services are performed and in local currency unless specific exceptions are approved by the lawyer of the company.

All consultants must be informed about and agree to follow this Code of Corporate Conduct with respect to activities that affect MILIPOL Corporation domestic and foreign businesses, employees or capital and securities markets.

### E-mail, Internet and Information Technology

„Use the same care, caution, and etiquette in sending e-mail messages as you do in all other written communications.”

As a MILIPOL Corporation computer user you should use information technology for responsible and authorized business purposes. You should be familiar with and follow MILIPOL Corporation Information Technology policies. This includes keeping all passwords confidential and appropriately reporting suspected security violations in keeping with local law and policy.

Make sure your MILIPOL Corporation e-mail is professional and appropriate to the circumstances. Specifically, MILIPOL Corporation will not tolerate abusive, obscene, offensive or profane e-mail. In addition, because the e-mail system is a Company resource, MILIPOL Corporation may, in certain circumstances, have a need to examine and, therefore, reserves the right to read, view and copy any e-mail communications.

Anyone who has been provided a connection to the Internet is provided such connection for business use. Do not download any data that is unprofessional, inflammatory, illegal, or inappropriate for business use. Employees should not abuse access to the Internet for personal purposes. Computer systems are increasingly capable of reviewing all Internet activity. MILIPOL Corporation may be required to conduct such a review, and evidence of abuse of MILIPOL Corporation-provided Internet facilities may result in termination of the Internet connection and disciplinary action. You should consult your Company policies regarding Internet usage for further information. (Refer to MILIPOL Corporation Information Security Policy 70-02 for further guidance.)

E-mail and internet-based communications are governed by international trade regulations. You must never send export controlled information in an e-mail if you have not confirmed that the recipient is authorized to receive the information. For example, governments of countries where we operate control electronic and other transfers of certain information to non-citizens of those countries (even within the borders of the same country).

Individual MILIPOL Corporation employee e-mail accounts may not be reviewed without pre-approval from the MILIPOL Corporation Chief Information Officer, the MILIPOL Corporation CEO.

## Environment, Safety and Health

MILIPOL Corporation is committed to maintaining a leadership role in protecting human health and the environment. We will promote and protect the health and safety of our employees, the environment, and the communities in which we operate. Therefore, we will strictly adhere to all applicable laws and regulations relating to environmental protection and workplace health and safety.

You must immediately report the following incidents to your Company's senior management:

- 1) a fatality or ESH-related hospitalization,
- 2) environmental contamination or
- 3) a health or potential safety issue that may subject MILIPOL Corporation or its employees to serious harm or adverse public attention.

You must also comply with applicable national and local laws and regulations regarding reporting. Company senior management receiving any such report shall follow MILIPOL Corporation Corporate Policy in making further reports.

Many environmental, safety and health laws and regulations are complex. If your work includes ESH responsibility, you must familiarize yourself with the requirements of relevant laws and regulations, including record keeping. (See MILIPOL Corporation Environment, Safety & Health (ESH) Policies for more detail.) If you have any questions, contact your Companies Management.

## Government Investigations

„It is our policy to fully cooperate with any appropriate government investigation. If you or someone you supervise learns about a possible government investigation or inquiry inform your Lawyer immediately.“

### Specific Guidelines

- 1) Never destroy any MILIPOL Corporation documents in anticipation of a request for those documents from MILIPOL Corporation investigators, any government agency, or a court. Documents include electronic media such as disks, computer-stored information, and e-mail transmissions.
- 2) Never alter any historical MILIPOL Corporation document or record.
- 3) Never make any untrue or misleading statement to any MILIPOL Corporation or government investigator.

4) Never try to influence any other employee or person to provide incomplete, false or misleading information to any MILIPOL Corporation or government investigator.

5) If any government inquiry arises through a written subpoena or a written request for information (such as a Civil Investigative Demand), you must submit the subpoena or written request to your lawyer of the company immediately, before any action is taken or promised.

6) If you are approached outside the workplace by a government investigator, you have the right, if you wish, to consult with the lawyer of the company (or, if you prefer, your own private legal counsel) before speaking with the investigator.

As permitted, MILIPOL Corporation will assist employees in cooperating with government investigations.

### Government Procurement

„This section and the section dealing with Business Courtesies are interrelated and should be read together.“

In many instances, conduct that is commonplace and legal in the commercial sector may violate laws and regulations that pertain to government contracts. MILIPOL Corporation does business with companies all over the world and with government in country. We are committed to conducting business with all companies and governmental agencies — be they national, state, provincial, or municipal — and their representatives ethically and in compliance with applicable laws and regulations.

Violations of applicable standards may result in penalties and fines, as well as debarment or suspension from government contracting, or possible criminal prosecution of individual employees or MILIPOL Corporation. Such violations could damage our reputation and stockholder value.

Although this Code lists many specific guidelines, employees, consultants, sales agents and marketing representatives must be aware that government contracts are subject to numerous rules and regulations too detailed to be fully addressed by this Code.

„Check with your Lawyer before offering anything of value to any government employee or subcontractor on a government contract.“

Therefore, if your work involves government contracts, including U.S. Foreign Military Sales programs, you should contact your supervisor or your Export, Company Legal or Security expert to ensure that you are aware of all relevant laws and regulations.

## Human Resources

### Drug & Alcohol Policy

To remain competitive in today's business environment, it is essential that we make the best decisions. Reaching good decisions requires clear thinking. Therefore, we expect all our employees' judgments to be clear and unimpaired by drugs or alcohol.

### Specific Guidelines

(Contact your Human Resources expert for additional information.)

Employees must not distribute, possess or use illegal or unauthorized drugs or alcohol on MILIPOL Corporation property, on MILIPOL Corporation time, in connection with MILIPOL Corporation business, or in a manner that may effect performance of MILIPOL Corporation responsibilities.

Employees whose behavior, judgment or performance is impaired by drugs or alcohol will be prohibited from entering the MILIPOL Corporation premises or engaging in MILIPOL Corporation business. Violators of MILIPOL Corporation's drug and alcohol policy will be disciplined appropriately, including possible termination.

### Employment and Medical Records

MILIPOL Corporation's relationship with employees is built on trust and respect. To maintain these relationships and earn employee loyalty, it is important that we keep personal information, especially employment and medical records, confidential.

Employment records of MILIPOL Corporation employees can only be disclosed to MILIPOL Corporation employees who have a substantial and legitimate need to know or require the information due to legal process. MILIPOL Corporation employees with access to these files must take reasonable steps to keep them confidential in accordance with the MILIPOL Corporation Corporate Policy.

MILIPOL Corporation employees' medical records are confidential and private. These medical records are kept separate from all other MILIPOL Corporation employee records and will not be released to any person unless required by law or based upon a written release from the MILIPOL Corporation employee concerned.

(Note: Data required by governmental agencies, such as accident investigations and training records, are not included in employee medical records.)

### Relationships between Employees

MILIPOL Corporation encourages team building and positive interaction between employees. While it is understood that many long-term relationships are formed at work, MILIPOL Corporation must be careful to avoid the perception of an improper

relationship between MILIPOL Corporation management and anyone in their reporting chain, particularly where career or compensation outcomes can be directly or indirectly influenced. Should such a relationship develop MILIPOL Corporation leaders should consider the potential of perception of possible coercion, favoritism, or other conflict of interest and discuss appropriate actions with the Human Resources expert to ensure appropriate levels of equity.

A similar concern extends to other employee relationships. As a general rule, supervisors and managers should not ask or allow employees directly or indirectly in their reporting chain to perform paid or unpaid work for them outside of MILIPOL Corporation. Such a relationship creates a potential conflict of interest and can lead to perceptions of favoritism, even where none exists. Examples that have caused difficulty in the past are repairs to the boss's home, personal legal or accounting work, babysitting, and errands unrelated to MILIPOL Corporation business.

„Men and women throughout MILIPOL Corporation should treat one another with courtesy, dignity, and respect, regardless of gender.“

MILIPOL Corporation managers, supervisors and executives must be alert to the possible presence of sexual harassment in the workplace, and must take appropriate steps to prevent sexual harassment. You can make complaints about sexual harassment to your supervisor, the Human Resources expert, lawyer of the company, anyone else in management, or CEO. Any complaints must be promptly, fairly, and thoroughly investigated. There will be no retaliation for truthfully reporting sexual harassment or participating in the Company's investigation of a complaint.

Perpetrators of sexual harassment will be promptly disciplined, up to and including termination.

#### Tolerance

MILIPOL Corporation strongly supports each employee's right to his or her personal beliefs and values. However personal beliefs outside of those covered by our Code should not be imposed on others in the workplace.

Employees should not use company communications tools (letters, e-mail, bulletin boards etc.) or facilities to advocate personal religious, ethnic, political, sexual, or other potentially sensitive personal preferences. Employees who are responsible for MILIPOL Corporation's corporate charitable contributions should be sure that MILIPOL Corporation's contributions are not used to promote sensitive personal issues of this nature.

#### Workforce Inclusion and Diversity

At MILIPOL Corporation we strive to provide a workplace where all have an equal opportunity to work, advance and contribute to our success. Therefore, it is MILIPOL Corporation policy to ensure equal employment and advancement opportunity for all qualified individuals without distinction or discrimination because of age, color, gender, gender identity, national origin, physical or mental disability, race, religion,

sexual orientation, or any legally protected personal characteristic. (Government security rules may restrict certain work to specific individuals based on government selection criteria.)

This policy applies to all employees worldwide and applicants for employment and to all aspects of the employment relationship. These inclusionary principles must be communicated periodically to all employees. MILIPOL Corporation businesses shall apply the intent and provisions of this policy consistent with all relevant and applicable local laws.

Every employee is responsible and accountable for adhering to our global workforce inclusion and diversity policy. You can address any concerns regarding this policy to your supervisor or Human Resources expert or the MILIPOL Corporation CEO.

### Intellectual Property

Patents, trademarks and copyrights prohibit the unlicensed use of a protected invention, identifier (such as a name or logo), or work (such as a photograph, printed materials, or software). Violating such rights, even inadvertently, can result in severe consequences. Our policy is to respect patents, trademarks, or copyrights owned by others and to strictly adhere to all relevant laws and regulations regarding the use and copying of protected material in countries in which we operate.

Therefore, steps should be taken to avoid infringement of non-MILIPOL Corporation patents and/or trademarks, and employees should never knowingly make use of technology patented by another company without permission.

Employees must not make copies of any part of a software program or printed materials from a non-MILIPOL Corporation source unless the copy is an authorized back-up or limited fair-use copy or a license specifically permits the copy to be made. If you are uncertain about whether appropriate permission has been granted, you should consult with your Company's Legal or Information Technology Departments.

## International Business

### General

MILIPOL Corporation works on a global market. The laws we must abide by differ by country. We must know and comply with the letter and spirit of the laws of all countries where we do business and that affect our international operations. We must also be sensitive to the cultures and customs of the countries where we operate and respect the communities and environment where we do business.

Most governments have laws and regulations that restrict trade and business transactions. This is particularly true for trade in goods and services that cross borders or involve interactions between citizens of different countries (even if the interactions occur within a single country). If you deal with international business or with citizens of other countries, it is your responsibility to be aware of situations that may be regulated by relevant governments and to comply with those laws and regulations. Contact your Export or Legal expert if you have any questions.

### Trade Controls (Import/Export)

All governments regulate trade through restrictions on permanent and temporary exports (e.g., license requirements) and imports (e.g., payments of duties) of goods, technology, and services. Some are more restrictive than others. For example, the U.S. and Hungarian governments have significant restrictions on trade in military and related goods, technology, and services, and trade with certain countries.

MILIPOL Corporation will fully comply with all applicable laws and regulations governing exports and imports of goods and services including Special Trade Controls. MILIPOL Corporation must establish trade compliance programs that include local procedures and training programs that include specific organization and employee responsibilities. They must also evaluate/screen their customers, subcontractors, suppliers/vendors, agents, and representatives to ensure that they are not included in any government lists of parties restricted from trade. (For advice about any issues covered in this section, contact your Legal expert or the MILIPOL Corporation CEO.)

You should immediately report any investigation or inquiry by any government organization regarding alleged trade control violations or irregularities to the lawyer of the company and the MILIPOL Corporation CEO prior to taking any action.

### The U.S. Foreign Corrupt Practices Act and Comparable Non-U.S. Laws

The U.S. and most other industrialized countries maintain laws and regulations that prohibit giving anything of value to officials of foreign governments in order to obtain or retain business. MILIPOL Corporation, its employees, agents, consultants, and marketing representatives may not directly or indirectly engage in bribery, kickbacks, payoffs, or other corrupt business practices including offering or giving government personnel incentives to secure an improper advantage. Contact your lawyer of the company before any incentive is offered or if you have questions.

Compliance with these laws and regulations requires our constant vigilance. Specifically, if you as an employee, consultant, marketing representative, or agent suspect that any payment is being used for improper purposes, you must immediately report the situation to your MILIPOL Corporation supervisor and to the lawyer of the company for investigation.

All sales agents, consultants, or marketing representatives must work under an approved prior written agreement that addresses these restrictions. The Corporate Policies outlines the requirements for retaining sales agents or marketing representatives.

„The Hungarian Corrupt Practices Act prohibits giving anything of value to officials of foreign governments. This Act applies to our consultants, marketing representatives and agents, as well as our employees. Your lawyer of the company and the MILIPOL Corporation CEO are available to assist you about trade control policy and procedures.”

## Boycotts

To boycott a country is to refrain from buying from or dealing with that country as a means of protest. Hungarian government regulations prohibit all MILIPOL Corporation operations, including those outside of the Hungary from participating in trade and related boycotts of specified countries' goods and services, other than those sanctioned by the Hungarian government.

For example, some countries are engaged in a boycott of Israel and Israeli companies. Some countries try to enforce this boycott in their contracts and other business dealings. Participation by MILIPOL Corporation in a specified boycott is a violation of law and would subject us to fines and other penalties.

No MILIPOL Corporation business may agree to a contract, document or oral request containing language that could be interpreted as an attempt by any country to enforce a boycott. This requirement includes not only specific agreements, but also declining, for boycott reasons, to consider a financial or commercial opportunity in a boycotted country.

Even providing information on business relationships with the country being boycotted may constitute a violation of Hungarian law.

MILIPOL Corporation must immediately report boycott requests even when we do not respond. You must immediately report any request for boycott-related information or receipt of boycott-related documents to your lawyer of the company. Refer to MILIPOL Corporation Corporate Policy for specific guidance.

## Political Activities

„An employee cannot act as a representative of MILIPOL Corporation or any of its businesses regarding political issues without specific approval from the MILIPOL Corporation CEO.”

Good corporate citizens do not unfairly or illegally influence the political process in the countries or communities in which they do business. MILIPOL Corporation is firmly committed to following all national, state, provincial and/or local laws that govern elections and campaign contributions.

MILIPOL Corporation encourages you to participate in the political process in ways that reflect your individual beliefs and commitments. However, political activity must take place on employees' own time unless you are participating in a Company-managed grassroots initiative involving issues of importance to MILIPOL Corporation. The resources and reputation of MILIPOL Corporation cannot be used for any political activities unless specifically permitted by law and approved by the MILIPOL Corporation CEO.

No assets of MILIPOL Corporation, its subsidiaries or companies, may be used directly or indirectly, for political purposes. This includes the support of any candidate or party, even in countries where it may be traditional, customary, and legal to do so. MILIPOL Corporation is not to become involved in the internal political affairs of the countries in which we operate. However, MILIPOL Corporation may express its opinion on issues that could affect us economically, after consultation with CEO.

### Specific Guidelines

- Do not allow your status as an employee to be used in support of a particular candidate or issue.
- Employees must not pressure, either directly or indirectly, other employees to make political contributions or to participate in support of a political party, issue, or candidate.
- Corporate funds or assets cannot be used to support a political party, an elected official, or the campaign of any candidate for local, state, or federal elected office. Also, you should advise the MILIPOL Corporation CEO any planned visits to an MILIPOL Corporation facility by an elected official, political party member, or candidate for elected office.

If you have questions or need guidance, contact your lawyer of the company the MILIPOL Corporation CEO.

## Public Statements

It is important that MILIPOL Corporation provide the public with accurate and consistent information regarding our operations. Generally, employees must not

make public statements regarding issues or matters about which they are not authorized spokespersons. If the media contacts you about a MILIPOL Corporation matter, refer them to the MILIPOL Corporation CEO

### Sales Agents/Marketing Representatives

We must carefully consider who we retain to conduct business on behalf of MILIPOL Corporation. You must contact your lawyer of the company before retaining any sales agents, consultants, or marketing representatives. There are extensive rules, and MILIPOL Corporation procedures regarding the retention of sales agents or marketing representatives, particularly those operating outside the Hungary. MILIPOL Corporation will retain such sales agents or marketing representatives only after we complete a written agreement that fully describes all services to be performed and all consideration to be paid.

### Securities

Our directors, officers, and employees may have the opportunity to learn or gain access to information about MILIPOL Corporation or companies with whom we do business that is unavailable to the public. Such information may be "insider information" within the meaning of Hungarian securities law. Consultants and other persons we hire to perform services for MILIPOL Corporation may also learn or gain access to "inside information."

Our directors, officers, employees, consultants and other persons we hire may not use any such inside information when they make personal investment decisions or investment decisions for others regarding our stock or the stock of companies with whom we do business. In addition, no one may inform persons outside MILIPOL Corporation of such information. This includes communications with family and friends. (See MILIPOL Corporation Corporate Policies for specific guidelines.) If you have any questions regarding compliance with these laws and principles, please contact an MILIPOL Corporation lawyer immediately.

### Security

MILIPOL Corporation intends to provide a secure working environment for all employees and visitors. We are committed to compliance with all national, rules and regulations, executive orders and laws that pertain to security.

You must be alert to the presence of unknown individuals or unusual activities which could lead to theft or harm to MILIPOL Corporation property or personnel. You must immediately report concerns regarding security issues to your supervisor.

They will then report the following incidents to your Company's senior management and the MILIPOL Corporation Security expert:

- 1) Any security incident which results in theft or damage to MILIPOL Corporation or customer property, or
- 2) Any security violations with the potential to cause serious harm to MILIPOL Corporation property or employees.

## Duty to Cooperate in Internal Investigations

From time to time, MILIPOL Corporation conducts internal investigations of employee conduct. All employees are required to cooperate in these internal investigations. Employees who fail to cooperate or who obstruct these investigations are subject to appropriate discipline, up to and including discharge.

## Frauds and Thefts

Employees of MILIPOL Corporation work hard to produce our assets. Assets include products, money, information, equipment, and our reputation. These are all highly valuable and are to be safeguarded and used only to promote our business interests. We must ensure that our assets are protected against theft, loss or abuse. Protection of MILIPOL Corporation property is the responsibility of each employee. We will promptly investigate, and where appropriate, prosecute reported incidents of fraud or theft. You should report any suspected incident as indicated in the preceding Security section.

„Classified information should only be made available to individuals who have a need to know and who hold the proper security clearance.“

## Government Classified Information

Security regulations that pertain to the protection of government classified information in MILIPOL Corporation's possession are complex and vary by government agency. It is the responsibility of each employee, visitor, consultant, and subcontractor to familiarize themselves with all government relevant security regulations prior to gaining access to classified information. Security assistance and information can be obtained from Security expert or your Company's CEO.

## MILIPOL Corporation Confidential Information

Confidential MILIPOL Corporation information and trade secrets are important corporate assets. They are as valuable as our physical assets and merit equal protection. (The term confidential with regard to this policy pertains to MILIPOL Corporation sensitive proprietary information. Control of Hungarian Government information that is classified Confidential is subject to the rules and regulations governing the handling of Hungarian government classified information. See your Security department for more information.)

“MILIPOL Corporation Confidential” information refers to information that is not already in the public domain that a company would normally expect to be non-public and that might affect the company's competitive position. It includes information sometimes referred to as trade secrets.

„Confidential MILIPOL Corporation information and trade secrets are important corporate assets which must be protected and not be disclosed to unauthorized persons.“

Some examples of confidential information are:

- Technical information about current services/or processes.
- Procurement plans, vendor lists, or purchase prices.
- Cost, pricing, marketing, or service strategies.
- Non-public earnings reports and other financial reports.
- Information related to divestitures, mergers and acquisitions.

All Directors, employees, agents, consultants and representatives must avoid disclosing MILIPOL Corporation's trade secrets and confidential information to unauthorized persons, either within or outside MILIPOL Corporation, and must exercise care in protecting the trade secrets and confidential information received from another party.

#### Specific Guidelines

1) Employees, consultants, agents and representatives must not discuss confidential

MILIPOL Corporation matters where unauthorized persons could hear it. Use care, since even family and friends may inadvertently convey such confidential information to others.

2) You must consult the lawyer of the company before disclosing any confidential information to a third party to arrange an appropriate agreement for safeguarding that information.

3) No MILIPOL Corporation employee, consultant, agent, or representative may disclose or use any confidential information gained during employment, or in any other relationship with MILIPOL Corporation, for personal benefit or for the benefit of others.

4) Obtaining confidential information from a third party without adequate legal safeguards is improper and may expose MILIPOL Corporation to legal risks. Accordingly, no employee may accept such information without the advice of the lawyer of the company and until an agreement in writing has been reached with the offerer. After such information is obtained, its confidentiality must be protected as provided in the agreement.

5) We may not hire an employee in order to obtain that person's knowledge of a former employer's confidential information. Nor may a new employee be placed in a position that would require disclosing or using a former employer's confidential information. If you are thinking of offering a job to an executive of a direct competitor, the approval of the Human Resources expert, Legal expert, and the CEO of the MILIPOL Corporation is required before any active negotiations are undertaken.

„For more information regarding confidential information please review the preceding Securities section as well as the MILIPOL Corporation Corporate Policy.“

## Workplace Violence

Employees should have a safe place in which to work. We will not tolerate workplace violence, including threats, threatening behavior, harassment, intimidation, assaults, and similar conduct. You must immediately report any threats or concerns about your safety or the safety of others to your supervisor.

You may not carry firearms or other weapons on any MILIPOL Corporation facility without prior written approval from your Company Human Resources and Legal Departments.

## Waivers

If any employee, officer or director believes a waiver of this Code of Corporate Conduct is necessary or appropriate, you must state your reasons in a written request and send it to the CEO.

## Code of Corporate Conduct Contacts

### Your Lawyer:

Name: Zoltan Beres Dr.

Phone: +36-30-989-8263

### Your Human Resources Expert:

Name: Zsoltne Kelemen

Phone: +36-70-949-2020

### Your Controller expert:

Name: Erika Szabo Gerencserne

Phone: +36-30-969-0009

### Your CEO:

Name: Jozsef Keresztes

Phone: +36-1-4770080

### Your President of BD:

Name: Herbert Szekely

Phone: +36-1-4770080