

Code of Ethics of the Integrity Authority

Conscientia mille testes

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We believe that a peaceful and uplifting future can only be built on honesty and mutual trust

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Chapter 1

Values of the Integrity Authority

Honour

Honour is an inner quality, a moral virtue and ideal that guides the behaviour of the individual or community in the spirit of justice, morality and mankind.

Moral confrontation is the ability of the individual to take responsibility for the consequences of their actions.

Our honour serves as a compass in our everyday lives and gives meaning to what we do.

Service

Service is the action of helping a community, an institution or cause, an activity that promotes the realisation and success of something.

The Integrity Authority serves exclusively the common good; it works to benefit and support the common good.

Economic crimes, especially corruption, pose a serious threat to society. It undermines people's trust in one another, the state, the institutions and has a negative impact on the lives of citizens. In the effective struggle against unethical deeds, all of our colleagues are committed to serving the public interest and create trust. Our service is building a society upon which future generations can build a liveable future.

Integrity

A member of the Integrity Authority is a person who, from an ethical point view, is uncorrupted and irreproachable.

It is necessary to be irreproachable not only on the inside but on the outside as well. Whoever fights corruption cannot be smeared. The work of the Integrity Authority, just as its employees, must meet the highest standards of integrity and impartiality. Perfect integrity is the least we can do to serve our country.

Determination

The complexity and scale of economic crimes and corruption present a challenge of such magnitude that requires relentless and steadfast determination to defeat. The Integrity Authority is facing the challenges. We are committed to revealing the truth, regardless of the circumstances. We are setting an example with our work while contributing to the creation of transparency, accountability, and a culture of trust in an effort to help completely eradicate corruption.

Professionalism

In the struggle against economic crimes and corruption, our professional preparedness is key to fight and serve the public interest effectively. To this end, the Integrity Authority collaborates with highly and continuously trained professionals and applies and develops the latest technological solutions in its work.

Teamwork

The key to the Integrity Authority's success is the teamwork carried out by its well-trained and highly committed colleagues for the sake of the common goal. This is what brings success to its efforts. In the context of this teamwork, we collaborate with government, civil society and private-sector actors, and international organisations as well. We especially count on the help of whistleblowers.

Teamwork inside and outside the organisation. This is the only way to be successful in the fight against economic crimes and corruption.

The Authority's principles of professional ethics are built upon these values.

Chapter 2

2. Objective of the Code of Ethics and Integrity

Section 1

(1) The objective of the Code of Ethics and Integrity (hereinafter referred to as "Code"), considering the long-term service of the public interest, is the formulation of a set of ethical rules relevant to all employees and cooperating partners of the Authority that provide adequate guidance and a point of reference in terms of rules on decent and expected conduct inside and outside the workplace if that may have a negative impact on the reputation of the Authority, judgement by external parties, including requirements concerning conflict of interest, independence, transparency, and responsible work.

(2) The Code sets out fundamental principles of conduct appropriate for work that provide an adequate basis for decent, correct, and uncompromised behavioural norms.

(3) The Code provides guidance to all employees and cooperating partners of the Authority (hereinafter collectively referred to as "colleagues") for identifying, assessing, and managing factors that risk compliance with the fundamental principles.

(4) The most important element of the Authority's operation is its commitment to ethical conduct. Any action of the Authority's colleagues shall reflect honour and compliance with ethical norms in their work, public and private life alike.

(5) The Authority requires that its colleagues comply with the ethical norms, familiarise with and apply the rules and fundamental principles defined by the Authority in their work, with their actions, in their judgement and spirit. In performing their official duties and professional relationships, the colleagues shall act in good faith while upholding the public interest in accordance with the fundamental norms of righteousness, integrity, honesty, discretion, reliability, respect, and decency.

(6) The examples set by the Authority's leaders is one of the pillars of ethical conduct. The work of the management must be characterised by a strong emphasis on ethical conduct, high standards of professionalism, responsibility, and transparency.

(7) It is the personal responsibility of each of our colleagues to uphold, cultivate, and prioritise the culture of integrity and professionalism over personal interests.

3 Scope of the Code

Section 2

(1) The present Code applies to all bodies, organisations, board members, employees, advisors, and business partners of the Authority.

(2) The Authority expects that all colleagues, board members, advisors, and business partners of the Authority familiarise with the contents of the Code and that the persons and organisations in contact with the Authority recognise the rules of conduct as authoritative and expected in the context of their cooperation with the Authority.

(3) Those who fall within the scope of the Code shall familiarise, comply with, and provide a written declaration on the acceptance of and compliance with the provisions of the Code.

Chapter 3

4 Principles of professional ethics built upon the values of the Authority

4.1. Honour

4.1.1. Honesty

Section 3

(1) The colleagues of the Authority shall act in an honest manner that is true to their profession and display in their conduct determination, openness, sincerity, and trustworthiness with regard to professional engagements, work relationships, and personal affairs.

(2) Honesty reflects a trustworthy way of conduct and authenticity.

(3) The Authority unequivocally condemns and fights all forms of fraud, intentional and malevolent misrepresentations.

(4) In respect of internal ethical norms of conduct and its business relations, the Authority considers fraud, along with the definitions in criminal law, the intentional misrepresentation of circumstances and facts or suppression thereof with the intention of allowing persons or parties to convince others to act or refrain from acting in order to obtain unlawful benefits by circumventing rules, procedures and creating a false appearance of business activity or transaction.

4.1.2. Justice

Section 4

The colleagues of the Authority shall fulfil their duties while adhering to the law, morality and justice and ensuring at all times that the application of law complies with the original objectives of the laws and is also acceptable from a moral point of view.

4.2. Integrity

4.2.1. Integrity

Section 5

The Authority is committed to employing a workforce characterised by moral integrity and consistent compliance with professional and ethical rules. Colleagues shall display a behaviour that reaffirms public confidence in the Authority and its colleagues and strengthens the moral influence of the Authority.

4.2.2. Independence, conflict of interest

Section 6

(1) The colleagues of the Authority shall perform their duties independently while carrying out an accurate and detailed analysis, understanding, and application of conflict of interest rules.

(2) It is incompatible with the interests and integrity of the Authority if the personal relations, participation in external activities, participation and other interests in business enterprises of the colleague have an actual or apparent influence on their decisions in the performance of their duties.

(3) The colleagues of the Authority shall refrain from all activities and situations that may effectively or apparently question the objectivity of their decisions and freedom from predilection.

(4) In respect of independence and conflict of interest, the Authority operates an internal system of control that allows for the constant control of independence regulations, identification and constant monitoring of risks to independence in the performance of the activities in order to ensure the colleagues avoid all situations that may risk independence.

(5) In respect of independence, the colleagues of the Authority shall consider the following circumstances:

- a person whose close relative is a senior employee, official, supervisory board member, owner or member with ownership interest, auditor, or advisor of a person or organisation affected by an investigation procedure may not be the head of the investigation or a member of the investigation task force,
- a person who within the 2 years prior to their employment at the Authority was a senior employee, official, supervisory board member, owner or member with interests in funds or ownership interest, auditor, or advisor of a person or organisation affected by an investigation procedure may not be the head of an investigation or a member of the investigation task force,
- a person or a close relative of a person is involved in lending, leasing business or guarantor contract with the person or organisation affected by an investigation procedure, except for loans granted by credit institutions under general terms and conditions of contract, may not be the head of the investigation or a member of the investigation task force,
- a person who within the 2 years prior to their employment at the Authority worked at the budgetary body affected by an investigation procedure in the field concerned by the subject of the investigation may not be the head of the investigation or a member of the investigation task force
- the head of the investigation or a member of the investigation task force may not partake in an investigation procedure that affects a procedure in the arrangement of which it participated within the 2 years prior to their employment at the Authority,
- the head of the investigation or a member of the investigation task force may not partake in an investigation procedure that involves a case on which it possesses substantive information for other reasons, or in which there are interested persons with whom the investigator or the head

of the investigation is in such a contact that may influence or question its impartial and objective value judgement or decision-making.

(6) To avoid situations of conflict of interest, the above-mentioned conditions apply to persons, business organisations, or company groups thereof that have a direct influence on the subjects under investigation.

(7) The colleague of the Authority shall disclose without delay if they are participating in an investigation procedure that, based on the above or other criteria, may bring into question their independence. The colleague of the Authority shall be liable to disciplinary action if they fail to disclose the ground for exclusion of independence in a timely manner (at the latest on the working day following the discovery).

(8) In respect of conflict of interest, the colleague of the Authority may not engage in activities of management, control, supervision or accounting with their relatives or close associates in connection with their employment at the Authority.

(9) The colleague of the Authority

- may not engage in an activity or display a behaviour that is inappropriate for their position or may risk impartial way of conduct free of any influence,

- may not engage in party political activity, hold office in a party, or engage in appearances in public life on behalf or in the interest of a political party,

- may not hold office in or engage in appearances in public life on behalf or in the interest of advocacy groups or lobbying organisations, except for employment advocacy groups and mandatory public body membership.

(10) The colleague of the Authority may take on other employment only with the approval of the President. The colleague shall disclose any scientific, educational, artistic, reviser, editorial, legally protected intellectual, and voluntary activity of public interest prior to the start of employment.

(11) The colleague of the Authority may not be a senior official or a supervisory board member at a company.

(12) The colleague of the Authority shall disclose without delay if faced by conflict of interest situations in the course of its employment in order to allow the President of the Authority to decide on the neutralisation of the reason giving rise to the conflict of interest.

4.2.3. Free of external influence

Section 7

(1) The Authority shows zero tolerance against all forms of active and passive bribery and corruption. Suppressing active and passive bribery and corruption is one of the most important duties of the Authority.

(2) The Authority considers active and passive bribery and corruption to include all kinds of benefits, fees, advantages, direct or indirect unlawful favours violating general social expectations, ethical norms and capable of manipulation which are given or received as offers or promises for business, financial benefits, and payments.

(3) The colleague of the Authority shall report any discovered instances of active and passive bribery and corruption or situation risking the danger thereof to the integrity advisor.

(4) The colleagues shall without exception avoid all transactions and circumstances that may give rise to the fact of active and passive bribery and appearance of corruption.

(5) The colleague may not use their official position and influence deriving therefrom to instigate others to provide or promise financial or other advantages or unlawful benefits to them or, on their behalf, to others.

(6) The colleague may not, by virtue of their official position or influence deriving therefrom, create the impression that their activities outside the Authority are supported by the Authority or public bodies in general. Therefore, they may not use their official position, in particular, over the course of their scientific, educational, artistic, reviser, editorial or legally protected intellectual activities outside their official position, or in appearances in public life not related to their official position. Their public appearance is subject to presidential approval.

4.2.4 Business gifts, catering, offered services

Section 8

(1) Business gifts and catering, offered services are objects or services of exclusively symbolic and ordinary value intended as acts of recognition, which are offered or given to the colleague or their close relatives.

(2) Received and given gifts, offered services may not be used as a means to influence decision-makers, as compensation, and may not exceed the extent of ordinary business gifts, catering, and offered services. This extent may not exceed HUF 10,000 individually and per person, and HUF 50,000 per person on an annual basis. In certain cases, if the acceptance of the received gift or offered service by its nature cannot be used to exert influence or is acceptable in diplomatic circumstances, it may be deemed acceptable by an individual presidential decision.

(3) It is forbidden to accept or offer any gift, service or catering that may give rise even to the appearance of demand for active and passive bribery, external influence, bribe or compensation, or that are given to exert a lawful or unlawful influence on the Authority's obligations.

(4) The colleague may not ask for or accept any gift from a person or organisation that are or want to be in client, other procedural or business relationship with the Authority, and whose fundamental interests may be influenced by the actions of or failure to act by the colleague.

4.3 Determination

4.3.1. Commitment to the common good

Section 9

The Authority's leaders and colleagues shall display, in the performance of their duties, commitment to the common good, social responsibility and solidarity, and strive to promote the common good to achieve the Authority's goals, fully taking into account the conviction and objectives of the Authority.

4.3.2. Commitment to revealing financial risks

Section 10

(1) The Authority is fully committed to the struggle against money laundering.

(2) The colleagues of the Authority shall fulfil their reporting obligation provided for by law in relation to the prevention and obstruction of money laundering and financing of terrorism, and the fight against insider trading, market manipulation and terrorism it becomes aware of. The detailed regulation concerning the judgement of money-laundering activities and monetary and other assets obtained by forbidden, illegal activities concealed by apparently legal business activities, and the adaption of

adequate measures is included in the anti-money laundering and anti-terrorism regulation of the Authority.

4.4 Service

4.4.1. National interest

Section 11

The real common good is always beneficial to all individuals. The Authority performs its duties in the interest of the common good, identifying the common good with national interests. The colleagues of the Authority always prioritise the common good over individual and group interests.

4.4.2. Protection of public property

Section 12

(1) The Authority has at its disposal material and immaterial assets, financial and non-financial funds of value. Its colleagues shall protect and adequately and reasonably use public property in the performance of their duties.

(2) Inadequate or negligent management of public property is incompatible with ethical conduct. The colleague may use the tools provided to them for the performance of their official duties only for the performance thereof. Furthermore, the colleague may use the equipment provided to them for the performance of their work for personal purposes that may arise during their daily work only to the extent necessary, in compliance with generally accepted practices.

4.4.3. Transparency

Section 13

(1) Transparency and accountability are in the centre of the mentality and activities of the Authority. The leaders and colleagues of the Authority shall perform their duties in a properly documented, transparent and verifiable manner.

(2) Information of public interest and public information in relation to the Authority's work shall be published in an articulate and simple manner that is accessible to the public on equal terms.

(3) If the Authority becomes aware or the suspicion may arise that its colleagues violate the fundamental values defined in the Code, the colleagues of the Authority shall disclose such acts, while the leaders shall decide on the initiation of ethical proceedings.

4.5 Professionalism

4.5.1. Taking responsibility

Section 14

In the performance of their duties, the colleagues of the Authority shall act faithfully and by displaying personal commitment to the values of the Authority, with care appropriate to their respective responsibilities, and in defense of the values of the Authority in all of their decisions and actions.

4.5.2. Objectivity

Section 15

The principle of objectivity requires that prejudice, conflict of interest, and unauthorised influence shall not risk professional work. The colleague of the Authority shall perform their duties impartially and objectively.

4.5.3. Professional competence

Section 16

(1) The colleague shall perform their duties with appropriate professional expertise and care. It is their duty to acquire and maintain professional knowledge and skills at such a level that is required to ensure they are able to perform expert and professional work based on current technical and professional regulations and standards. In this regard, they are supported by the Authority.

(2) The maintenance of professional competence requires the continuous monitoring of the changes in, adequate mastery and application of relevant technical and professional regulations and standards.

(3) The colleague shall at all times strive to develop their professional expertise, expand and maintain competent performance skills within the professional environment in order to achieve the Authority's objectives.

4.5.4. Confidentiality

Section 17

(1) The colleague of the Authority shall treat all information obtained in the course of their duties as confidential and use only for work in strict compliance with relevant regulations.

(2) The colleague of the Authority shall not disclose any information obtained in the course of their duties to third parties, use it to their own or third parties' advantage, and shall avoid even the appearance thereof.

4.5.5. Confidentiality and protection of trade secrets

Section 18

(1) Any information collected or created in the course of work is property of the Authority. The use and transfer of such information to external parties may take place only in the performance of the Authority's duties, in connection with and in the interest of work, and to the extent necessary. The use or transfer of the Authority's data and information for private or individual purposes is forbidden.

(2) The protection of the Authority's secrets and trade secrets, including the prevention of unauthorised and unlawful access to (inside) information collected and stored during certain procedures of the Authority, is a first priority task for the colleagues of the Authority.

(3) The colleagues and partners or organisations the Authority is in contact with shall not disclose any fact, data or information in relation to the Authority or the operation thereof, and act in a way that enables third parties to access such facts, data and information without prior written consent of the Authority. Confidentiality does not cover any obligation to supply data, reporting and information obligations provided for in law that concern the publicity of information of public interest and public information.

(4) Detailed rules concerning Confidentiality and the protection of trade secrets are contained in the regulations on confidentiality and the protection of trade secrets of the Authority.

4.5.6. Professional conduct

Section 19

(1) The colleagues of the Authority shall comply with relevant internal and external regulators and avoid all forms of conduct or acts that are known or supposed to be known to the employee as being detrimental or possibly detrimental to the Authority's reputation and authenticity.

(2) The colleagues of the Authority shall act in mutual cooperation with and in support of their co-workers. In their engagements with one another, the colleagues shall act by respecting their co-worker's personality, human dignity and age, and being objective in their comments on one another's work.

4.5.7. Protection of intellectual property

Section 20

Any intellectual property purchased by the Authority or prepared, developed by the employees is property of the Authority, which may not be used, copied or shared for personal purposes outside the scope of the Authority's work or other purposes.

4.5.8. Data security

Section 21

(1) The Authority is committed to the confidential management, maintaining the integrity of and the strict control of access to data stored for and made available to the Authority.

(2) In respect of electronically stored and processed data, the adequate and professional management, use and operation of information systems, including meeting information safety requirements, are obligations of the Authority.

(3) Access to the Authority's information systems and data processed and stored thereon may only be granted to authorised system administrators and users.

(4) Where feasible, the Authority's information must be avoided from being stored on computer equipment not owned by the Authority. The Authority's information may be used or stored on computer equipment not owned by the Authority only in accordance with the Authority's regulation on file management and information security and the restrictions defined therein. Any information or data stored on computer equipment not owned by the Authority is property of the Authority, which are subject to the Authority's rules on data security and the protection of assets and intellectual property.

(5) Any computer equipment owned by the Authority may be used for private purposes only to an extent and in a way that do not risk the security of the Authority's data and systems.

4.5.9. Complaint management

Section 22

(1) Reporting any observations of ethical problems facilitates the effective identification and prevention of problems and illegalities.

(2) The Authority operates adequate and safe systems for the reporting of complaints concerning internal ethical problems defined in the Code in a way that facilitates the protection of the reporting person and the prevention of eventual atrocities arising from the act of reporting.

(3) Detailed rules on the management of ethical complaints to the Authority are set out in the Authority's code of ethics. In the event of observation of any illegality or irregularity concerning the Authority's

functions, notifications or complaints may be made in accordance with the provisions of the act on complaints and public interest disclosures.

4.5.10. Equity

Section 23

The Authority's decisions are made in accordance with the rules (laws, professional standards, internal rules) and on the basis of common sense and humanity, while taking into account the real circumstances considered according to the best expertise.

4.5.11. Freedom from prejudice

Section 24

The Authority treats every company or social organisation, church institution or private individual equally regardless of function, geographical location, social or other forms of appearance, personal traits, including race or ethnicity, skin colour, religious or world view, origin, gender, sexual orientation, age, gender identity or the expression thereof, nationality, marital status, or health condition.

4.5.12. Sustainability

Section 25

The Authority is committed to the sustainability of its day-to-day operation in both environmental and social, including corporate governance terms. In the context of sustainability, the Authority is fully committed to minimising its impact on the environment, protecting nature, and not endangering future generations in the performance of its duties. The Authority's core activity of fighting corruption also has a significant social impact in relation to sustainable development goals.

4.6 Teamwork

4.6.1. Management obligations

Section 26

(1) The Authority's leaders have a special responsibility to

- act as role models,
- familiarise the Authority's colleagues with the Code and the norms of conduct and other duties expected of them,
- monitor whether the actions of the colleagues reflect a high level of respect for and adherence to the provisions of the Code,
- support and encourage the colleagues to raise constructive, good faith issues,
- ensure that colleagues who ask questions or express opinions are not subject to attack or atrocity and, if they become aware of such an incident, to promptly initiate an investigation and propose to the President of the Authority the appropriate action to be taken in consultation with the integrity advisor,
- help directly and effectively clarify any misunderstanding amongst colleagues,
- promptly report to the integrity advisor any matter requiring investigation into suspected violations of the provisions of the Code,
- lead and evaluate colleagues according to the rules of ethical conduct, due consideration and analysis, without prejudice or discrimination.

4.6.2 Human rights

Healthy and safe work environment

Section 27

(1) The Authority is committed to creating and operating safe work circumstances.

(2) In the course of its operation, the Authority pays the utmost attention to the aspects of occupational safety and property protection. Every colleague of the Authority shall comply with occupational health and safety regulations and inform their manager as soon as possible if they observe any dangerous activity.

Equal treatment

Section 28

(1) The Authority is committed to human dignity and mutual respect.

(2) The Authority rejects all forms of discrimination.

(3) In respect of its colleagues, business or professional partners, cooperating and other organisations, authorities and private individual it comes into contact with, the Authority fully accepts and tolerates diversity, different faiths, religions, nationalities, convictions, cultural and social affiliations.

(4) The Authority always stands out against harassment, humiliation, insult, degradation, intimidation, and animosity toward its managers, employees, and partners and firmly rejects all forms of defamation or slander.

Protection of privacy

Section 29

The Authority is committed to the protection of privacy and personal information. The Authority takes preventive measures for the protection of personal information managed and stored in its data bases.

Fair employment practices

Section 30

(1) The Authority is convinced that the most important resource at its disposal is human resources, which is why it is committed to the maintenance, protection and development of its workforce.

(2) The Authority is committed to complying with relevant laws in respect of fair employment and payment.

4.6.3 Ethical proceedings

Section 31

The colleague of the Authority shall be subject to ethical proceedings for ethical misconduct or infraction of discipline in accordance with the provisions of the ethical regulations of the Authority if they violate the principles of professional ethics defined in this Code of Ethics, internal or external rules and, in doing so, cause damage to the Authority or others, or damage the Authority's reputation.