

General Director's Instruction No. 33/2023 on the Code of Ethics

1. Acting in accordance with my internal regulatory powers as defined in Section 32 of the Rules of Organization and Operation of the Hungarian State Opera (hereinafter referred to as “**OPERA**”), and for the purpose of complying with the requirements of Article 6 (1) of *Government Decree 370/2011 (XII. 31.) on the Internal Control System and Internal Audit of Budgetary Bodies*, I hereby set forth the **Code of Ethics** of the OPERA as set out in this Instruction:
2. The purpose of the Code of Ethics is to set **ethical standards** at all levels of the organisation and to **ensure that ethical values and integrity are upheld**. The Code of Ethics provides guidance and assistance to the OPERA employees and contractual partners on the behaviour expected of them.
3. The scope of the Code of Ethics extends to all **employees** in any employment relationship with the OPERA and beyond, as well as to **contractual partners** who have a contractual relationship with the OPERA. The OPERA will make the Code of Ethics known and available to its employees and contractual partners and expects them to comply with the requirements set out.
4. To ensure that it **carries out its activities in a lawful and ethical manner**, the OPERA undertakes:
 - a) to fully respect the rights relating the personality, human dignity, and privacy,
 - b) to always respect the requirements of equal treatment and non-discrimination,
 - c) to make every effort to create and maintain an orderly, safe, and healthy working environment,
 - d) to establish a fair and equitable remuneration system.

Ethical standards

5. Respect for the Rights Relating to Personality

The OPERA expects its employees and contractual partners to **respect the human and personality rights of others** and to refrain from conduct that violates the rights of personality, in particular reputation and integrity, or otherwise offends human dignity. To this end, the parties concerned shall communicate with each other in a careful, courteous, polite, and appropriate manner. Employees will behave, communicate, and present themselves in a manner consistent with the OPERA'S prominent cultural role and in a manner that does not reflect negatively on the OPERA'S image.

Employees and contractual partners are expected to behave in private and in public in a manner that **does not endanger or damage** the OPERA'S reputation.

6. Requirement of fairness

The requirement of fairness establishes **confidence in the activities** of the persons concerned and contributes to respect for their person and profession. On the basis of the **principle of integrity**, employees and contractual partners shall comply with the law and the rules governing their activities and shall avoid any situation which could give rise to the appearance of unlawful or unethical conduct, in particular by refraining from behaviour which does not comply with the requirements of the Code of Ethics or by acting in a manner which could influence them to do so.

Employees and contractual partners shall perform their duties within the framework of their contracts **in the interest of the OPERA** and in the interest of the OPERA'S organisational goals. Based on the **principle of commitment**, they shall keep in mind the proper functioning and objectives of the OPERA and shall contribute to their fulfilment according to their possibilities and contractual obligations.

7. Expertise and efficiency

The OPERA'S fundamental purpose is to provide a service that meets the cultural and entertainment needs of its audiences and maintains and enhances the recognition and prestige of the OPERA'S artists and employees. To this end, employees and contractual partners shall carry out the tasks entrusted to or undertaken by them with the **appropriate knowledge, expertise and experience**.

On this basis, the persons concerned shall carry out the task entrusted to them with the utmost professionalism, creativity or artistic skill, making full use of their training, knowledge and experience, observing the written and unwritten rules applicable to their duties, and shall continuously improve their skills and strive at all times **to achieve the highest quality**.

Employees and contractual partners shall carry out their duties **objectively, transparently and with the utmost care and diligence**, within the limits of the law applicable to their legal relationship, putting the interests of the OPERA first. Based on the **principle of objectivity**, the stakeholders are expected to provide credible, objective, and professional information on their day-to-day activities and to act free from outside influence. The **transparency principle** requires that, depending on the task in hand, appropriate documentation of the activity in question is required for easy transparency, traceability, and verifiability.

Employees and contractual partners are expected to be **non-prejudiced**, i.e., to base their behaviour and decisions towards others on the actions of the person concerned, free from impressions of the person or group concerned and from pre-existing views.

8. Cooperation

Employees and contractual partners are expected to carry out their duties in cooperation with all stakeholders acting in good faith, i.e., to cooperate as closely as possible with each other within the limits of the law in order to ensure the effective performance of the OPERA'S public tasks. When the nature of the task does not preclude it, cooperation, and meaningful dialogue with those directly concerned should always be built upon.

Employees and contractual partners are expected to **communicate openly**, to justify their decisions and actions to the extent necessary, unless confidentiality precludes this, and to resolve professional and personal conflicts constructively.

Employees and contractual partners are expected **to use human, social, economic, or environmental resources efficiently** in the course of their work. To this end, efforts should be made to make the best use of the resources used and to safeguard and use the OPERA'S assets for their intended purpose.

9. Protection of confidential information

Employees and contractual partners are obliged to keep confidential and protect confidential (internal) information that comes to their knowledge, and therefore must not use confidential information unlawfully, disclose or share confidential information with unauthorised persons. Confidential information" means any information which is not publicly available and the disclosure of which could create a harmful situation.

Employees and contractual partners are **aware of the value and confidentiality of the information they hold, in particular personal data**. Accordingly, personal data will only be processed in accordance with the data management notices published by the OPERA and in accordance with the relevant authorisation. In all other cases, they will contact the OPERA'S Data Protection Officer via dpo@opera.hu.

10. Responsibility

Employees and contractual partners shall carry out their duties responsibly, being aware of the seriousness of their decisions, statements and actions, and shall take into account the foreseeable consequences of their actions.

11. Anti-corruption

The OPERA condemns and rejects all forms of corruption and bribery and will not tolerate any activity that leads to the unjust gain of advantage at the expense of others and will avoid any such conduct that may create the appearance of such and expects its contractors to do the same. The OPERA prohibits any person acting in its name, on its behalf or in any way on its behalf from offering, giving, soliciting, accepting, or receiving any undue advantage.

The OPERA will only approve minor token gifts and reasonable, necessary hospitality, subject to the following limitation. The OPERA has set the maximum amount of gifts to be declared at HUF 50,000 per person per occasion, and gifts more than this amount may be accepted after approval by the Director General, provided that it is not possible to refuse or donate the gift to charity.

Ethical standards for the managers of the OPERA

12. Leading by example

In the course of their work, managers encourage behaviour in line with legal and ethical requirements by setting a personal example and fulfil the specific duties of their position in such a

way that they set an example of responsibility, duty, and humanity to those who do not have the same obligations.

13.Support

The managers provide their co-workers and contractual partners with the information they need to work effectively, set clear and achievable goals for them, recognise their performance, encourage them to improve their performance, skills and expertise, and provide the necessary conditions to do so, and protect them from any unlawful or unethical attacks on them as a result of their work. The senior managers shall establish an open working environment in which ethical behaviour can be demonstrated and discussed and shall refrain from abusing any perceived or real position of authority.

14.Accountability

The managers shall make clear to their co-workers, both orally and in writing, the conduct expected of them in relation to their legal and ethical duties, shall regularly monitor their compliance with their legal and ethical requirements using the legal and ethical means at their disposal, and shall impose justified and proportionate sanctions on those who breach their legal and ethical obligations in a principled and consistent manner, without bias.

Reporting ethical misconduct

15. If employees or contractual partners experience an act or omission that violates ethical standards, they can report it to the OPERA'S **internal whistleblowing system**. Information on the internal whistleblowing system is available on the OPERA'S website and in the internal IT system. The OPERA will investigate the reports made in accordance with the relevant procedures and will take appropriate action if the report is substantiated.

Closing provisions

16. This instruction will be published by circular and posted on the OPERA'S IT system and website.

17. This instruction shall enter into force on **1 January 2024** and the **General Director's Instruction No. 10/2019 shall be repealed**.

Budapest, "*according to timestamp*"

**Hungarian State Opera
On behalf of General Director
Dr. ÓKOVÁCS Szilveszter**

**Dr. FŐZŐ Virág
Deputy General Director**