

CODE OF ETHICS

SMALT BRNO s. r. o.

CODE OF ETHICS of SMALT BRNO s. r. o. states our basic values in relation to our employees, among the employees, to suppliers and third parties. It is also a foundation of our company culture and focuses on ethical principles and following the law.

Our Code is defined by three basic pillars:

RESPONSIBILITY FOR BASIC SOCIAL RIGHTS
COLLABORATION WITH SUPPLIERS
ENVIRONMENTAL PROTECTION

We act professionally and with respect in order to keep our company's and our clients' good reputation. We always cooperate with our colleagues and discuss the best ways to achieve our goals. We are mindful of keeping ethical and moral principles during all the steps we take during collaboration with our clients, suppliers and our own colleagues in the company.

RESPONSIBILITY FOR BASIC SOCIAL RIGHTS

SMALT BRNO s. r. o. fully respects and protects human rights and laws. In order to make sure that all the rules and principles are followed, we created an internal document called *Code of Ethics for Employees*. It is made sure that every employee has access to it and has been properly trained. Every employee is given support if he/she has any questions or in following the principles.

We respect human rights and we protect them according to valid legal norms. We refuse any intentional employee rights violation or intentional forced labor. Child labor is forbidden. Employees' wage is not lower than legal minimum. Working hours and days off are respected in agreement with legal norms.

Our employees are hired in proper open competition and are fully encouraged to use their skills and keep growing professionally.

Our employees are always guaranteed equality of opportunity and treatment regardless of ethnicity, skin color, sex, disability, world view, religion, nationality, sexual orientation, social background or political view, if it is based on democratic principles and tolerance for people with different opinions.

Every employee is obliged to steer clear from any discrimination and fully cooperate on developing a friendly environment as well as to treat his/her colleagues with respect. Good collaboration is always built on mutual trust, open awareness and support. We always treat our colleagues, clients and business partners with respect, fairly and politely.

We regularly hold training courses according to valid legislation that are attended by all the employees. We cooperate on keeping industrial injuries and sicknesses from happening. We create a healthy and nice environment where

we feel well and our health doesn't suffer. Every workplace is properly equipped with good job aids. Enough light, right temperature, ventilation, sanitary facilities, hygiene, personal protective equipment and drinking regime is guaranteed. Workplaces and buildings where employees work are in agreement with standards, valid laws and regulations.

None of our employees is allowed to use company's business contacts for his/her own/someone else's benefit or to harm the company. Our employees neither give nor receive forbidden private benefits under business contact (e.g. money, favors, things) that would affect independent and fair business except for low-value corporate gifts with logo. We refuse corruption behavior.

COLLABORATION WITH SUPPLIERS

SMALT BRNO s. r. o. expects the Supplier to follow all the valid laws and regulations, especially responsibility for basic social rights, environmental protection and checking his/her suppliers under following our three basic pillars.

Supplier

- can in no case use forced labor, physical punishment, threats of harm, keep employees' identification cards and passports.
- hires only workers entitled to work in his/her institution and is responsible for checking the employees' authorization to work.
- meets legal condition that his/her employees work from free will and they have an option to leave the job or quit as long as they announce it properly. Work needs to take place based on an employment contract following the country's laws and regulation to the highest extent. All the commitments to the employees based on laws and regulations need to be met.
- must meet the required minimum age of his/her employees and must guarantee fair and equal treatment. No form of mental, physical, sexual or verbal abuse or intimidation, threats or harassment can be tolerated.
- respects privacy of his/her employees and doesn't misuse any of the private information to follow the workers.
- is fully responsible for following established working schedules, overtime, breaks, time off, vacations, maternity and paternity leave. Wages are paid and benefits are given in agreement with the law.
- pays attention to health and safety of the employees. Guarantees healthy environment with equipped workplace, proper lighting and ventilation, drinking water and sanity facilities.
- guarantees that all the delivered products meet the quality and safety standards required by valid laws.
- follows all the legal requirements concerning environment, verifiably keeps trying to improve his/her performance regarding the environment.
- undertakes to follow legal regulations regarding corruption prevention and to have effective internal management policy including proper bookkeeping according to relevant regulations and standards.

ENVIRONMENTAL PROTECTION

We bear responsibility for instant improvement and following these principles:

- We undertake to do our job and run the business responsibly and in harmony with sustainable development.
- We support development of technologies that limit negative effect on the environment.
- We act in agreement with relevant international and local environment standards.
- We look for ways to limit our own impact on the environment.
- We meet requirements concerning limitation of material and safety of products set by valid laws and regulations.
- We optimize our consumption of natural resources including energy and water.

Responsibility for following

Each and every one of us is obliged to properly and fully follow the CODE OF ETHICS and be supportive of everyone else in the company. If we find out about a violation or have a suspicion, we will investigate the case and take necessary steps to deal with the situation.

Every employee is supposed to contact an authorized person if he/she has a suspicion or doubts and he/she should act bona fide, fairly and with respect. SMALT BRNO s. r. o. will protect the employees or people coming with such a message from possible negative consequences of the report.

Authorized persons are obliged to take care of such reports, check them properly and remedy the situation.

Reporting violations and making comments

Every employee can use the following to report a violation or make a comment:

e-mail: compliance@smalt.cz

box: placed in office and production space with perfect privacy for sending a message.

Suppliers and our partners can turn to the following, if needed:

e-mail: compliance@smalt.cz

Supplier Acknowledgement

We, by signing below, hereby confirm that:

- we obtained and are aware of the content of the CODE OF ETHICS of SMALT BRNO s. r. o.,
- we are aware of all the relevant laws and regulations in the countries where the company operates,
- we will report to SMALT BRNO s. r. o. any case of probable violation of the CODE OF ETHICS,
- we will follow the requirements of the CODE OF ETHICS of SMALT BRNO s. r. o. as our customer.
- we will inform all our employees/sub-suppliers about the content of CODE OF ETHICS of SMALT BRNO s. r. o. so that they can also work in agreement with arrangements stated here.

Name of the company:

Seal and signature:

Name and position:

Date and place: