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1. Purpose

In order to successfully fulfil the vision of ECS Slovensko, s. r. o., odštepny závod Vlkanová company and its approach to achieving goals focused on customer through this Code, we internally commit our employees to compliance with the rules for sustainability of development and socially responsible behaviour. On the other hand, we expect and encourage our suppliers to adopt the same rules and principles.

The Code of Conduct is an important step for all parties interested to establish long-term and sustainable relationships in order to promote the integrity of entrepreneurship. It follows on from Directive No. 1-18 on sustainability for the Küster Group.

The requirements of the market, business partners, customers, investors, NGOs, regulatory agencies, as well as transparency requirements are becoming increasingly strict, leading the top management of ECS Slovensko, s. r. o., odštepny závod Vlkanová to adopt supply chain rules, and follow-up measures.

For the ECS Slovensko, s. r. o., odštepny závod Vlkanová company, it is crucial to provide quality products, thus giving customers priority to the sustainability of the business partnership, safety and environmental protection. Senior management has made a commitment to continuously improve performance in the areas covered by this Code of Ethics and to focus on performance, compliance with legal and other requirements and continuous improvement when selecting suppliers. This principle of development is defined within the implemented, maintained and improved management system quality, environmental management system and corporate social responsibility system.

2. Scope of the Code

The Code of Ethics is one of the basic documents of the corporate culture forming. The Code contains principles of conduct that are binding on management, all employees, as well as selected suppliers of the ECS Slovensko, s. r. o., odštepny závod Vlkanová company.



















3. Liability

The CSR Manager is responsible for drawing up this Directive and he/she is also responsible for drawing up a separate document – the Code of Ethics for the suppliers of

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ECS Slovensko, s. r. o., odštepny závod Vlkanová which is annexed to this Directive and is available on the website www.ecs-slovensko.sk.

All materials containing confidential information and are in paper form must not be thrown into trash cans when disposed and all employees are obliged to shred them.

	Senior management	SCSR Manager	Purchasing Manager
<p>  Main responsibility  Co-responsibility  Duty of information </p>			
Promoting the principles of the Code in practice			
Requiring compliance with the Code internally			
Requiring suppliers to comply with the Code			
Preparation of the Report on the evaluation of the CSR system			
Supervision for corrective measures in case of non-compliance with the Code			

4. Code of Ethics

The management of ECS Slovensko, s. r. o., odštepny závod Vlkanová firmly believes that human rights are the rights and freedoms to which all human beings are entitled. It also believes that the acceptance and principles observance of protection of internationally recognized human rights is an integral part of all fair trade relations. The company does not employ children and persons under the age of 18 and recognizes international standards regarding the minimum age at which children can work. In the case of part-time jobs or professional experience of young employees (juveniles), all principles of the Labour Code and regulations for occupational safety and health apply. In these cases, they work outside classroom learning, taking into account that the work, school and transport of young employees do not exceed 10 hours per day and the actual performance of the work does not take more than 8 hours per day. Young employees never work at night. We refuse any form of forced or slave labour and we do not accept or tolerate any form of physical punishment as a result of a disciplinary measure. We respect the principle of a free will of a work place. Our company refuses any form of child labour.

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Other internal principles and rules for managing suppliers to achieve social performance are listed below.

4.1 Internal principles of the Code

Confidentiality of information

Employees have access to important information about companies, their owners, customers, suppliers and other third parties. This information is confidential and under no circumstances may it be disclosed to persons outside the company.

During the employment relationship (performance of the agreement or contract), the employee is obliged to maintain confidentiality towards third parties regarding all information about the company and its owners and customers, regardless of how they learned about them. This information may not be misused in any way for its own benefit or for the benefit of third parties. The duty of confidentiality applies in particular, but not exclusively, to information relating to customers, forthcoming orders and offers, business partners, products and prices, accounting and tax data, and information relating to financial, commercial and technical data. An employee may only provide third parties with information that is officially intended for the public or that is commonly available and known.

Conflict of interest

A conflict of interests of the company and an employee is considered to be the performance of a competitive activity or other conduct that is contrary to the interests of the company. The following conduct is considered to be the conflict of interest in particular, but not exclusively:

- adversely affecting negotiations or transactions with third parties,
- misuse of the company's assets for its own benefit or for the benefit of another person, acting as a member of the board of directors, statutory body, manager or any other position for any company that has a competitive character with the business of ECS Slovensko, s. r. o., odštepny závod Vlkanová. This activity may be performed by the employee only with the prior written consent of the manager,
- providing advice or other assistance to a competing company,
- acting as a board member, officer or in a direct employment relationship with any contractor. This activity may only be performed with the prior written consent of the company managing director,

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- accepting and offering bribes to influence business contracts and transactions,
- accepting and offering personal gifts, financial rewards or other inducements to influence business contracts and transactions in excess of EUR 100/year,
- using own job position to influence or compel another employee to do something that would result in the personal gain of the employee or another person.

Fraudulent and unfair practices

The employee must not engage in any fraudulent or unfair activities, including those related to the company, its customers, suppliers and other partners. The following, in particular, but not exclusively, are considered fraudulent and unfair practices:

- theft, fraud, embezzlement,
- false or excessive invoicing,
- illegal or unauthorized offering and receipt of money, goods or services,
- a request for reimbursement of expenditure documents for higher amounts than they actually were.

Protection of property and intellectual property

Every employee is obliged to protect the company's intellectual and tangible assets. Telephones, e-mail, the Internet, as well as all computer equipment, hardware and software, are in principle used only for work purposes, except when absolutely necessary.

It is forbidden to use the Internet for other than business purposes. It is forbidden to download programmes, videos, pictures, music, and other large files that are not necessary for work or educational purposes. It is also forbidden to browse the Internet and transmit information with inappropriate content (erotic sites, offensive sites, information that violates the law, information in violation of the Code of Ethics, information that harms the interests of the company, etc.). Mobile phones and landlines are used in accordance with information security and privacy directives.

It is forbidden to use company cars for private purposes which are not allowed in the standard way.

Data in electronic form, recorded in writing or otherwise, may not be used, copied or transmitted by employees for purposes other than work.

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The employee does not appropriate, borrow or lend the company's property without permission. The unlawful appropriation of corporate property or its use for personal purposes or other persons' use without expressed permission is considered as serious as direct theft and may lead to termination of employment. The employee is obliged to use the working time exclusively for work for the company.

Employee's paid working time is also considered company property that should not be used for personal purposes.

Alcohol and drugs in the workplace

Consumption of alcohol, drug intake or other narcotics is prohibited on company premises. There is an exception for a reasonable amount of alcohol on important anniversaries, i.e. celebrations outside the premises and operations, which is permitted by the manager of the company.

Discrimination and Protection of Human Rights

The company pursues a policy that:

- effectively prohibits discrimination or harassment based on sex, marital or parental status, ethnic or national origin, sexual orientation, religion, political affiliation, age, skin colour, language, national or social origin, property, gender, disability, trade union membership or employee organizations or other status,
- includes a ban on forced or involuntary work and the requirement for special deposits on taking up employment,
- excludes payments of fees and employment costs from employees,
- excludes procedures for withholding wages, benefits, property or documents of employees in order to continue working for the company,
- supports the right to leave the workplace after the end of fixed working hours, and the freedom to terminate the employment relationship if the employee so notifies,
- condemns trafficking in human beings,
- supports the exercise of employees' rights to respect principles or practices, or to meet needs relating to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, trade union membership, political opinions, or any other rights;
- provides a framework for the exclusion of threats, abuse, exploitation, or sexual coercion, including gestures and physical contact.

Other conditions of work performance are stipulated in the Company Collective Agreement and in the instructions of the management No.

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01-04-VS: Job descriptions and activities

01-06-VS: Health protection in the company

18-01-VS: Trainings

18-02-VS: Training of new employees/reassignment

4.2 Business Integrity

Suppliers and all persons acting on their behalf must comply with national, supranational and antitrust laws and competition laws. They must not directly or indirectly enter into any illegal agreements, or exchange sensitive information, e.g. relating to markets, customers, strategies, prices and the like. All suppliers and all persons acting on their behalf participate in public tenders and private sector tenders in compliance with applicable laws and regulations.

The ECS Slovensko, s. r. o., odštepny závod Vlkánová company expects its Suppliers to conduct business in an ethical and lawful manner, and to comply with the following specific rules in the areas of the fight against corruption, competition and conflicts of interest:

A - 1 Bribery

The Company does not tolerate any form of bribery and expects its Suppliers not to accept or offer bribes of any kind. The bribery ban applies to all countries in which suppliers do business.

The prohibition of bribery applies without exception, i.e. also in cases where the company's competitors or their suppliers resort to bribery, as well as in countries where bribery as such is not illegal, or where bribery is a common part of business practice.

Payments for expedited arrangements are also considered bribery. No supplier will be penalized for refusing to pay a bribe, even if the company loses a business opportunity.

Bribery means any offer or acceptance of a gift, loan, fee, compensation or anything of value from another person or entity, whether private or public, for the purpose of influencing or encouraging a course of action or inaction that would not ordinarily be considered in the absence of bribery. In this sense, bribery includes any transfer of assets and is not limited to monetary transfers.

The prohibition of bribery applies to all countries in which suppliers do business with ECS Slovensko, s. r. o., odštepny závod Vlkánová.

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A - 2 Gifts, Travel Costs, Entertainment, and likewise

The company is aware that entertainment, hospitality and the exchange of business gifts are considered common practice, and part of building and maintaining business relationships. It is a policy to accept such practices provided that the value provided does not exceed a reasonable value and that the gift, entertainment or hospitality is not provided with the intention of influencing the recipient's behaviour or decisions. Under no circumstances is it allowed to accept or offer any monetary donations over 100 EUR / year.

A - 3 Competitive Fight

In accordance with national and regional legislation, the Code of Conduct and Company Rules prohibit all illegal pricing agreements and other unfair agreements on key requirements, rates, deductions, fees and conditions between competitors (cartels) that could exclude, prevent, limit or distort fair competition.

Therefore, suppliers are required to make the same effort and are encouraged to implement a compliance programme to ensure that their employees do not receive or provide competitors, business partners, customers or suppliers, either orally or in writing with agreements or other conditions relating to an unrelated third party either orally or in writing.

The Company may disclose certain confidential information to suppliers in the course of its business in which case, the confidential information shall be disclosed solely in support of the supplier's obligations. Suppliers may never make this confidential information available to third parties or use it for any purpose other than the supply of goods or services.

A - 4 General Behaviour

The Company expects its suppliers to make efforts to use appropriately qualified and trained employees. Furthermore, suppliers are expected to ensure that appropriate measures are taken to prevent the use and abuse of alcohol, drugs, etc. by its employees in the performance of assembly / service work or other services on behalf of the company.

The company expects that its suppliers will be able to adequately communicate internally with employees and customers of the ECS Slovensko, s. r. o., odštepny závod Vlkanová company in all situations.

We make sure our communications are clear and consistent with aim to maintain the trust of customers, investors and other stakeholders. The company's statutory bodies coordinate the planned communication and marketing rules and make decisions based on objective criteria that

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do not conflict with the interests of stakeholders. Responsible managers control bans, restrictions, approvals by authorities or other measures imposed on international business relations.

Suppliers are also obliged to comply with the specific requirements, rules, and regulations set by the ECS Slovensko, s. r. o., odštepny závod Vlkanová or its customers in the field of general behaviour, handling and performance of work for customers. However, suppliers are not obliged to comply with specific requirements that would be in conflict with the regulations for general safety or for safety and health at work, transport safety or similar regulations applicable in the areas to or from which the transport route leads.

The ECS Slovensko, s. r. o., odštepny závod Vlkanová expects its suppliers to ensure that their equipment used in the provision of services is reliable and capable of meeting general and statutory maintenance standards and that they comply with all safety regulations and measures in all circumstances.

The ECS Slovensko, s. r. o., odštepny závod Vlkanová policy complies with the Whistleblowing and protection against retaliation applies to all those (staff or others) who report, in good faith, suspected wrongdoing and may be subject to retaliatory action as a result.

The ECS Slovensko, s. r. o., odštepny závod Vlkanová is committed to complying with all customs, trade and export control regulations, taking into consideration potential conflicting regulations among the countries in which we operate.

A - 5 Human and Labour Rights

Suppliers are expected to respect internationally proclaimed human rights, to provide their employees with equal opportunities and not to discriminate against them on the basis of race or gender, marital status, ethnic or national origin, religion, sexual orientation, or other status, or they will not use forced or involuntary work, and shall comply with international child labour law. Suppliers are required to create a safe and healthy work environment for their employees that meets or exceeds all ever-changing legal requirements. The ECS Slovensko, s. r. o., odštepny závod Vlkanová company calls on its suppliers to respect the rights of its employees to freely associate, join trade unions or works councils and engage in collective bargaining in accordance with national laws and international conventions. Finally, suppliers are expected to comply with applicable laws, regulations and industry standards regarding working hours and minimum wages.

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A - 6 Environmental Friendliness

Environmental protection is a key part of the commitment to sustainability. The company supports the business model, including a strategy for growth and value creation which means working with resource efficiency, including improving the environmental profile in the supply chain.

The Company manages all known risks, harmful effects, threats to safety, health and the environment and to the property of customers or third parties that are associated with its products. Senior management promotes compliance with legal and other regulations and takes measures to minimize negative impacts on all components of the environment, in particular the production of greenhouse gases and climate change.

Suppliers, on a larger scale, are expected to be able to comply with all relevant national and international environmental laws and regulations, and are motivated to constantly monitor and apply methods and technologies that minimize negative environmental impacts.

A - 7 Financial Responsibility

ECS Slovensko, s. r. o., odštepny závod Vlkanová builds the trust of the general public, its shareholders and business partners through sound accounting and reporting. Any irregularities can have serious consequences, which is why we strictly adhere to the legal provisions regarding proper bookkeeping and financial reporting. Transparency and fairness are our top priorities. We publish regular financial statements in a timely manner in accordance with national and international accounting regulations.

We thoroughly verify the identity of business partners and other third parties with whom we wish to do business. Our stated goal is to do business only with business partners who operate in compliance with the law and use legally obtained resources. We promptly allocate incoming payments to the relevant deliveries and account for them accordingly. We ensure transparent cash flows.

A - 8 Conflicting Items

Suppliers must comply with all relevant legislation and requirements regarding the prohibition or restriction of the use of specific substances - hazardous substances and chemicals, in particular those that appear on the list of substances of very high concern in the context of REACH Regulations. These need to be identified and managed to ensure their safe use, recycling or reuse

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and disposal. We require all our suppliers to supply electrical and electronic equipment in accordance with the relevant European Union regulation.

Suppliers are obliged to track sources of conflict minerals and promote transparency within their supply chain, take appropriate measures to this end and ultimately exclude the use of scarce resources or resources from high-risk areas of the world.

A - 9 Whistleblowing System

This Code of Conduct brings together our core ethical values. Together, we protect our company by speaking up when something is wrong. If anyone has questions or is unsure about something, or if any of us suspects a violation of internal or external regulations, they can contact a senior manager and seek advice from the appropriate authority. The Human Resources Department and employee representatives are there to provide support.

Employees have the right to complain to the employer about violations of the principle of equal treatment and non-compliance with the terms of the Labour Code; the employer is obliged to respond to the complaint without undue delay, to remedy, to refrain from such conduct and to remedy its consequences.

Employees can file a complaint via e-mail: poradna@kuester.sk.

The purpose of the whistleblower system is to protect our company, whistleblowers, and all persons who contribute to the violations investigation. The whistleblower system also protects the interests of the persons concerned. For them, there is a presumption of innocence until a violation is proven. As a result, investigations are only initiated if there are reasonable grounds to suspect a serious infringement. Any deliberate use of the information system will not be tolerated.

Business partners can file their complaints via following email address: oznameniam@kuester.sk.

5. Inspection and Corrective Action

Based on the results of control activities or internal and external audits, the MCSR is responsible for taking effective corrective action. The purchasing manager is responsible for requesting corrective actions from suppliers in the event of non-compliance with the Code of Ethics by suppliers. For the management and evaluation of suppliers, we proceed according to the instruction of the management no. 06-04-VS, point 5. Violation of the provisions of the Code of Conduct will be considered a breach of work discipline and, if repeated, may lead to termination of employment by the employer.

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6. Archiving

The records resulting from this Directive shall be archived as follows:

Record type	Retention period in the filing department	Place of origin	Record form	Retention period in the central archive
Report on compliance with CSR system requirements	5 years	MCSR	Paper	10 years
Evaluation of suppliers	2 years	Purchase department	Paper electronic	5 years
Internal audit report	2 years	IMS manager	Paper electronic	5 years
Supplier audit report	2 years	Purchase department	Electronic	5 years

7. Abbreviations and Terms Used

Company	ECS Slovensko, s. r. o., odštepny závod Vlkanová company
Employment relationship	employment in an employment relationship, work on an agreement on work performed outside the employment relationship
Employee	a person listed in the organizational structure, regardless of whether he/she is employed or working on an agreement on work performed outside the employment relationship or another contract
Child	any person under the age of 15, unless the minimum age for work or compulsory schooling is higher under local law, in that case a specified higher age applies in this locality
Young employee	a person under the age of 18 but older than a child

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Payment for expedited equipment	refers to the habit of paying a small sum of money to a civil servant for illegally expediting a normal act of a state administration body. It is an offer to the responsible person in a certain amount of money to grant the permit without meeting the set deadline.
Bribe	<p>is an offer, promise, solicitation, giving or acceptance of any objects (e.g. money, jewellery, real estate), property substantial performance (e.g. repair of a house), or non-property substantial performance (e.g. provision of a service, benefit) aimed to influence a particular behaviour or decision.</p> <p>A bribe must be distinguished from a gift or attention (e.g. an advertising item, an invitation to an event, etc.) which cannot give the impression that it is consideration for the expected particular behaviour or decision.</p>
Bribery	any offer or acceptance of a bribe from another person or entity, whether private or public, in order to influence or encourage a particular act or omission or decision which would not normally be achieved without bribery.
Forced or involuntary labour	any work or service which a person does not offer voluntarily and is forced to do under threat of punishment or retribution, or which is required as a means of repaying a debt
Trafficking in human beings	Attracting, transporting, concealing, transferring, detaining or receiving persons through the use of threats of force, fraud or other forms of coercion with a view to their misuse for various purposes.



ABBREVIATIONS:

MCSR	Manager of corporate responsibility system
IMS	Integrated management system
SM	Directive
BOZP (OSH)	Occupational safety and health protection
EU	European Union

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8. Attachments

Appendix No. 1 - Code of Ethics applicable to suppliers

	Function:	Name:	Date:	Signature:
Issued by:	CSR System Manager / Head of HR Department	Anna Turčanová	21.02.2023	
Certified by:	IMS Manager / Head of Quality Department	Ing. Cyril Pecha	23.02.2023	
Approved by:	Chief Executive Officer	Ing. Michal Marák	27.02.2023	