

CODE OF ETHICS (CODE OF ETHICAL CONDUCT)

AGENDA

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1. INTRODUCTION

We, the statutory representatives and employees of **MORAVIA Stamping, a.s.** (hereinafter referred to as the Company), being aware of the importance of social responsibility and the Company's position as one of Czech business entities operating in the automotive industry on the Czech and foreign markets, are determined to support and require all of the following ethical practices in business and technical activities, not to commit or tolerate any violations of competition rules, corrupt behaviour and discrimination of any form.

We have expressed our decision in this Code of Ethical Conduct (hereinafter referred to as the "Code") at Moravia Stamping, a.s., which sets out a set of rules beyond the basic and binding obligations imposed by laws and other legislation.

The Company's employees and statutory representatives have voluntarily undertaken to comply with the rules in order to achieve a higher level of business and prestige for the Company. The Code contains the principles of mutual conduct of the Company and business partners, public entities and their authorities, conduct towards the general and professional public and the required principles of mutual conduct of the Company's employees.

2. GENERAL PRINCIPLES

- We care for the professional reputation of our Company with respect for all the requirements of morality, ethics and legal standards;

- We maintain our professional skills at the highest level, and keep abreast of the latest trends, so that we are able to offer our customers the highest possible quality and the most advanced procedures with the maximum economy of expenditure, as well as to develop and maintain an economically viable business;
- We emphasise that our mission is to build long-term and mutually beneficial relationships with our customers, to whom we always strive to offer the optimal solution to their needs;
- We only use the results of our own activities for self-promotion;
- We ensure that the interests of our Company and other partners are not intentionally or negligently harmed;
- We do not seek to obtain contracts by any unethical means;
- We place great emphasis on occupational safety, however, our objective is to develop procedures and measures that not only ensure the maximum protection of occupational health and safety for our employees, but also for other persons who come into contact with our activities in the course of their tasks;
- We strictly reject any activity in the nature of corruption, bribery or unfair competition, or any activity aimed at such;
- All of our activities are transparent, and we will always allow authorised bodies to inspect our management and financial system;
- If any employee, business partner or any third party has any doubt as to whether a particular matter is in accordance with the Company's Code of Ethical Conduct, they will report this to the locally appropriate executive of the Company;

3. RELATIONSHIP WITH BUSINESS PARTNERS AND CUSTOMERS

- We are customer-oriented because we believe that our future depends on listening to our customers and helping them contribute to their success;
- We offer expertise and practical solutions;
- We do not seek to take over a contract that has been properly awarded to another tenderer who has no performance issues;
- We respect the right of the trade secrets of our business partners;
- We distance ourselves from any purposeful criticism of another business or its specific work, the sole or main purpose of which is to obtain a contract;
- We endeavour, within the limits of our abilities and competences, to make the principles of this Code of Ethics the principles of our business partners;
- We always comply with the applicable legal standards and require the same from our business partners;
- We secure an IT system that ensures controls and security features to ensure the highest level of data protection for our customers and business partners;

4. COMPANY'S RELATIONSHIPS TO ITS EMPLOYEES

- We believe in democratic values, protection and respect for human rights according to the Charter of Fundamental Rights and Freedoms;
- We provide equal opportunities to people regardless of race, colour, gender, nationality, ethnicity, origin, mother tongue, age, marital status, health, sexual orientation, economic situation, religion, political or social status;
- We ensure compliance with all the legal standards governing the working and wage conditions of employees and do not tolerate any violation of our employees' labour or human rights;
- Acting always in the interests of our Company and actively pursuing its strategy;
- We develop a corporate culture that encourages initiative, responsibility and excellent performance;
- We emphasise teamwork, fair employee relations and personal employee development;
- We always wish to be actively involved in processes and be part of a successful team, giving our employees the opportunity for their self-fulfilment;

5. EMPLOYEE RELATIONS WITH THE COMPANY

Company's employees:

- They shall at all times comply with applicable legal standards, the guidelines of the Work Rules and other internal regulations;
- Protect the Company's property and do not use it contrarily to the scope of any authorisation, given regulations, and instructions or approval of any supervisor;
- Observe the rules of loyalty to their employer, do not abuse their position, knowledge, confidential information, personal contacts acquired in the course of employment to the detriment of the Company or to the benefit of themselves or any third parties;
- They are aware of their responsibilities within the scope of their position and act as a reliable partner;
- Prioritise their professional responsibilities over their private interests;
- Perform their work honestly, decently, conscientiously, objectively, without undue delay, correctly, responsibly, with due care, rationally, in cooperation with other employees, meaningfully, and with initiative with respect to the adopted goals and plans of their employer;
- Maintain the principle of confidentiality, taking care to protect the information used and processed in any form within the Company so that it cannot be misused for the benefit of others;
- Only disclose information in any form to designated persons in accordance with their authorisation for the activity and in a manner specified for that purpose;
- Represent the Company externally via its achievements;
- Make public appearances in such a way that the Company's reputation is not damaged by improper activities, conduct and actions;
- Avoid conflicts of interest in their work, or notify their supervisor without undue delay of any conflict of interest that may arise;
- If any employee becomes aware of suspicious circumstances indicating that there is a possibility of financial, commercial, technical, safety, moral or social damage to the Company or environmental damage, they shall contact their supervisor;
- Strictly act in such a way that they do not commit acts of corruption, bribery, unfair competition or other offences, whether or not such acts may result in (unjustified) benefit to the Company and, in the event that they are encouraged to do so by their supervisor, they shall refuse to do so and shall immediately notify the Company's top management.

6. SUPPLIERS

- Must have a Code of Conduct;
- Must have an internal directive on working conditions and human rights, covering at least the thematic areas of child labor and young workers, pay and social benefits, working hours, forced labor and trafficking in human beings, freedom of association and collective bargaining, as well as harassment and prohibition discrimination;
- Must have an internal directive on safety and health at work, which covers at least the thematic areas of emergency preparedness, accident and accident management as well as fire protection;
- Must have an internal directive on business ethics, which covers at least the thematic areas of corruption, extortion, bribery and conflicts of interest;
- Must have an internal directive on environmental protection, covering at least the thematic areas of greenhouse gas emissions, energy efficiency and renewables, as well as the management of natural resources and waste prevention.

7. ENVIRONMENT

- Everything we do is done with the environment in mind;
- We are an environmentally responsible Company, for which sustainable development is an important part of its business;
- We minimise the negative impact of the Company's activities on the environment;
- Prevent environmental accidents and incidents;

- Promote the introduction and use of more environmentally friendly products, processes and technologies;
- The Company involves all of its employees and business partners in responsible environmental management, with an emphasis on good communication and the implementation of effective technical solutions and measures;

8. CODE VIOLATIONS

Any potential violations of the principles of the Code are dealt by the HR Manager, Operations Manager and a lawyer.

They have the right to take appropriate disciplinary action to protect the Company's interests. Following the applicable law, disciplinary action will be taken against those responsible for violations.

9. FINAL PROVISIONS

The provisions of previously issued by-laws, to the extent that they conflict with this standard, shall cease to be effective on the effective date of this standard.

10. SCOPE OF VALIDITY

The rules, procedures and employee responsibilities set out in this document apply throughout the entire scope of Moravia Stamping, a.s.'s activities.

This Code has been approved by a decision of the management meeting of Moravia Stamping, a.s. and can only be amended by a new decision of the Company's management.

It shall take effect on 1 June 2022