



CODE of ETHICS OSTROJ a.s.

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Headquarters: Těšínská 1586/66, Předměstí, 746 01 Opava

ID: 45193681

Registration in the Commercial Register: Regional Court in Ostrava, Section B, Insert 349

Preamble

OSTROJ a.s. is a purely Czech engineering company with a long tradition and a strong commitment to ethical and responsible business. We value these traditional values on which our company is built and therefore we place great emphasis on compliance with legal regulations, ethical principles and our social responsibility.

We believe that ethical behavior is not only the key to long-term success, but also the basis for building trust with our business partners, employee satisfaction and respect for our company in the eyes of the public. As a socially responsible company, we strive to create an environment in which any unlawful conduct is completely rejected and the principles of fair dealing and the highest standards of ethics are upheld.

In order to fulfill these principles, we have adopted the **Compliance code of OSTROJ a.s.** and the **Anti-Corruption Code of OSTROJ a.s.**, which, together with this **Code of Ethics** set out the minimum standards of conduct that we follow. We also require the same behavior from our business partners throughout the supply chain.

The Code of Ethics represents our commitment to act with integrity and respect, transparently, legally, responsibly and in accordance with the highest standards of ethics in all areas of our business.

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1. Introduction

The Code of Ethics sets out the basic values of OSTROJ a.s. (hereinafter referred to as the "Company"), which are binding not only on the Company as a whole, but also on the actions and decisions of the Board of Directors, members of the Company's management and all employees and cooperating persons at all organizational levels (hereinafter collectively referred to as "employees").

These core values are **Empathy, Transparency, Integrity, Quality and Application of Responsibility** → **ETHICS is the basic rule of our conduct:**

- **E**mpathy – to respect others and protect their rights
- **T**ransparency – to act openly and honestly at all times
- **I**ntegrity – to uphold the law and moral values
- **Q**uality – to emphasize excellence in all areas of activity
- **A**pplication of responsibility – to take responsibility for behavior and decision making and maintain consistency in all areas of work.

1.1. Basic areas of the rules

The Code of Ethics is divided into four main areas of rules, which clearly define the basic rules of conduct (bold text) for each area. Each rule is complemented, not exclusively, by specific obligations or explanations to better understand the context and background.

Detailed procedures and assignment of responsibilities for the performance of duties are set out in the Company's internal regulations or set out in company policies and established good practice, which employees are required to know and follow.

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| <ul style="list-style-type: none">▪ Attitude towards employees
It enshrines the principles of fair, dignified and respectful treatment of all employees, a safe working environment and the protection of employees' rights.▪ How we do business
This section focuses on acting responsibly, honestly and ethically in the conduct of our business. | <ul style="list-style-type: none">▪ Attitude towards business partners
Here we emphasize the principles of transparency, honesty and trust in business relationships.▪ Attitude towards society
We are an integral part of society and therefore the last area defines our commitment as a socially responsible company. |
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1.2. What we expect from employees

All employees must know and act in accordance with the values and rules set out in this Code of Ethics that apply to them and act in accordance with them. Unethical or illegal conduct is not tolerated, regardless of its extent or consequences. Employees are expected to:

1. comply with the law and ethical standards in all matters relating to the Company.
2. act with respect and dignity towards their colleagues, co-workers, business partners and all those with whom they will come into contact in the course of their duties.
3. act responsibly and avoid any conduct that could bring the Company into disrepute.
4. report violations or suspected violations of the Code of Ethics through available reporting channels.

1.3. What ethical decision-making looks like

This Code of Ethics is the basic guideline by which employees are expected to act. However, an ethically questionable situation may arise where an employee is unsure how he or she should behave. When this happens, it is helpful to follow these steps:

Ask yourself basic questions:

- Is the conduct in accordance with the law?
- Is the conduct in accordance with the Company's Code of Ethics, internal regulations and corporate policies and good practice?
- Could such conduct harm the Company or its reputation?

Apply the rule of "common sense":

- How would you feel if your actions were publicly exposed?
- How would you feel if someone treated you the same way?
- How would such behavior look from the perspective of another person (colleague, customer, public)?

Contact the person responsible:

- Seek advice from your line manager.
- If the issue goes beyond the scope of a normal situation, seek advice from a member of the Company's management, a lawyer or other professional staff member whose job responsibilities include the situation.
- You may also contact the *Helpline* for advice at: **linkaduverý@ostroj.cz**.

2. Provisions of the Code of Ethics

2.1. ATTITUDE TOWARDS EMPLOYEES

✓ **We comply with labor law regulations**

We comply always with national labor and related legislation, the Collective Agreement, the Company's internal regulations and the provisions of employment contracts.

We do not employ minors under the age of fifteen or minors in violation of the conditions set forth in the Labor Code.

We do not use or support child labor or forced labor.

We respect the right of employees to freedom of association, the right to form and join trade unions and to bargain collectively, and we do not favor or discriminate against members of an employee organization or trade union.

We do not support any form of discrimination in the recruitment and selection of new employees.

✓ **We respect and protect the human rights and freedoms of employees**

We always treat employees fairly, equally and without discrimination.

We place emphasis always on equal opportunities, including the rights of women and other groups.

We promote inclusion and inclusion for all.

We provide fair remuneration for work, without any discrimination, at least the lowest legally permissible wage (minimum wage).

We comply with all legal requirements regarding working hours, wages, benefits, statutory pay and holiday pay.

We do not tolerate any form of modern slavery.

We do not tolerate any unacceptable treatment of employees, such as psychological pressure, sexual harassment or discrimination, damage to personal honor and reputation.

We do not tolerate behavior that includes displays, verbal or physical contact that is

sexual, coercive, threatening, abusive or exploitative in nature.

We respect the privacy of our employees, their personal rights and protect their personal data.

We support employee professional development and education.

We place emphasis on work-life balance.

✓ **We create a safe and healthy working environment**

We ensure and are responsible for the health and safety of employees at work, for fire protection, for the safety of machinery and for emergency preparedness in the Company.

We respect and use good practice within the Occupational Health and Safety Management System according to ISO 45001.

We provide education for employees in matters of health, safety and fire protection.

We provide personal protective equipment.

We keep records of hazardous chemicals and mixtures, and manage the procedure for handling, storage, safe use and manipulation of these substances.

We provide incident and accident management.

We take and apply preventive measures to eliminate safety risks at work, in the working environment and to prevent accidents, fires, occupational accidents and occupational diseases.

We ensure that any injury or accident, workplace defect or workplace safety failure is reported promptly.

We follow a process for investigating and taking action to identify and manage work-related injuries, occupational diseases and accidents.

We take corrective action commensurate with the effects or potential effects of the problems and deficiencies that arise.

We pay attention to the ergonomic arrangement of workplaces.

We create a pleasant working environment.

2.2. BEHAVIOUR TOWARDS BUSINESS PARTNERS

✓ **We always act as we would want others to act towards us and in accordance with the rules of business ethics**

We always act with honesty, integrity and respect for others.

We behave always courteously and correctly.

We provide accurate and truthful information.

We do not conceal or distort key information.

We conduct all negotiations with business partners in accordance with the principles of fair business.

We treat all business partners fairly and without discrimination, regardless of size, nationality, culture or other differences.

We always maintain objective and independent judgment.

We strive to do a better job than what is expected of us.

✓ **We respect contractual obligations and the rights of business partners**

We conclude business contracts on the basis of transparent and fair negotiations.

We comply with contractual obligations and all agreed terms and conditions.

✓ **We follow the rules for accepting and giving donations**

We strictly follow the rules set out in the *Anti-Corruption Code of OSTROJ a.s.*

✓ **We make decisions and act in the best interests of the Company without conflict of interest**

We strictly follow the rules set out in the *Anti-Corruption Code of OSTROJ a.s.*

We avoid situations where personal interests could influence our professional decisions.

✓ **We also require our business partners to comply with ethical and legal standards**

We support and promote an ethical approach throughout the supply chain to create an anti-discriminatory supply chain.

We do not engage in business relationships with partners who violate human rights or engage in illegal activities and violate the law.

✓ **We protect information and assets**

We support and protect the good name of the Company.

We respect copyright and intellectual property.

We protect Company and business partner property from damage, theft, loss and misuse.

We do not accept the use of Company and business partners' assets for personal gain, e.g. for employees' own business activities.

We do not use Company and business partner information for our own benefit or the benefit of 3rd parties.

We maintain the confidentiality of all non-public information, including personal information, whether it belongs to the Company or a business partner.

We do not participate in the dissemination of false or misleading information or manipulate information in any way.

We adhere to cyber security rules, including rigorous data protection and security, and remain vigilant against all forms of cyber threats.

We do not accept violations of human rights and ethical principles in the use of security forces.

✓ **We accept responsibility for our actions**

Every employee is responsible for what he or she says and does, with all possible consequences and implications.

2.3. HOW WE DO BUSINESS

✓ **We comply with the law, the highest ethical standards and cultural differences in all countries in which the Company operates**

In cases where a country's laws impose less stringent requirements than those required by this Code of Ethics, we will always adhere to the more stringent standards of the Code of Ethics. Where a country's legislation conflicts with the principles of the Code of Ethics, we respect the applicable laws and seek a solution that is consistent with the Company's values.

✓ **We comply with contractual obligations**

All contractual obligations and agreements must be fulfilled on time and in accordance with their terms. The business partner must be informed of possible delays in a timely manner and all relevant steps must be taken to minimize negative consequences.

✓ **We reject any form of corruption, bribery or fraud**

We strictly follow the rules set out in the *Anti-Corruption Code of OSTROJ a.s.*

✓ **We support fair and equitable competition**

We approach competition fairly, honestly and openly.

We do not tolerate behavior that could distort competition rules (e.g. unfair competition, cartel and antitrust agreements, monopolistic practices).

We respect the rights of our competitors.

We do not tolerate violations of competition and antitrust laws.

We only do business with trusted business partners who are engaged in legitimate business activities and use funds from legitimate sources.

We comply with international sanctions and have implemented control measures relating to trade in sanctioned entities and commodities.

✓ **We provide quality products and services that meet customer specifications and expectations**

We strive to meet the highest quality requirements of our business partners.

We comply with all legislation and relevant certifications relating to product safety.

We use a quality management system according to ISO 9001 or IATF 16949.

We implement internal quality controls and conduct regular process audits.

We prevent practices that could adversely affect the quality of products and services, their safety or compliance with legal requirements.

We respond efficiently to any complaints or grievances from business partners.

We provide clear, truthful and complete information about the characteristics, use and safety of products.

We do not conceal any defects or risks associated with the product or service supplied.

We ensure responsible sourcing of raw materials, including within the supply chain.

We reject the use of counterfeit parts and materials.

We participate in development programmes and quality training.

✓ **We keep proper and transparent business records**

We conduct all business activities honestly, without deception or concealment of key information.

We subscribe to financial responsibility.

We record business information, including financial transactions, completely, accurately and truthfully and in accordance with legislation.

We disclose financial and non-financial information in accordance with legislation, including verification and audit where appropriate.

We comply with all applicable laws that prohibit money laundering.

2.4. ATTITUDE TOWARDS SOCIETY

✓ **We place emphasis on social responsibility**

We support training programs focused on technical disciplines related to the Company's industrial production and innovation.

We cooperate with local educational institutions to improve qualifications in the area in which the Company operates.

We support employees, educational institutions and local communities through sponsorship and various donations and assistance in line with the Company's values.

We respect the rights of minorities and local residents.

We ensure that the Company's external communications to the public, media and business partners are truthful, fair and understandable.

✓ **We protect the environment**

We strive to continuously reduce the negative impact of the Company's activities on the environment and implement continuous improvements.

We carry out the Company's business activities in accordance with identified aspects, legal and other requirements regarding minimizing waste generation, emissions, consumption of raw materials and energy and the occurrence of any other negative impacts (e.g. noise emissions, vibrations, handling of hazardous chemicals, accidents, water use and air quality).

We meet legal requirements in the field of energy management.

We strive to increase energy efficiency, reduce energy consumption and improve the environment.

We implement systems for waste management, chemical management (responsible chemical management) and energy management.

We use the Environmental Management System according to ISO 14001.

We promote decarbonization, environmentally friendly technologies and responsible practices

in production and logistics and sustainable resource management.

We promote sustainable resources and use renewable energies.

We use reuse and recycle.

We respect the right to land, forests, water and biodiversity and act in a way that does not compromise their conservation or the conservation of local communities.

We comply with requirements to preserve soil quality and promote responsible land use and minimize deforestation.

We respect animal welfare.

✓ **We respect compliance obligations, including commitments to sustainability and environmental responsibility**

We ensure compliance with the Company's ethical, legal and contractual obligations as defined in the *Compliance Code of OSTROJ a.s.*

We integrate sustainability principles into all aspects of the Company's business, including materials sourcing, manufacturing and logistics.

We report regularly in accordance with the relevant legislation.

We support innovations that lead to sustainability, environmental improvement, long-term conservation of natural resources and energy efficiency.

✓ **We proceed transparently**

All activities related to the support of the Company, including sponsorship, must be transparent and supported by clear rules. We do not support activities that may be contrary to ethical principles or could damage the Company's reputation.

✓ **We promote commitment to responsible supply chain management**

We require business partners to adhere to the *OSTROJ a.s. Supplier Code* and meet basic standards of ethics, legal compliance, environmental protection and sustainability.

3. Helpline

The company has established *an Ethics Helpline (the "Helpline")*, to which unfair, unethical or other conduct in violation of this Code of Ethics, or suspected conduct, may be reported at the following email address: **linkaduverý@ostroj.cz**. Ethical issues and dilemmas can also be consulted on this channel.

The administration and operation of the Helpline is under the auspices of the Director of Human Resources and the Company's lawyer.

The Company guarantees that adequate attention will be paid to the notifications received. However, the Company will not deal with bullying (malicious) communications or communications containing defamatory language. The information communicated and the identity of the whistleblower will be treated as strictly confidential. Anonymous notifications are also permissible. Whistleblowers will be protected from retaliation, and no one will be penalized or otherwise disadvantaged for making a report in good faith. Adequate consequences will be drawn from the results of the investigation and corrective measures implemented as appropriate.

The Company has *an Internal Whistleblowing System* in place for reporting suspected or actual wrongdoing. For more information, please refer to the Company's Internal Regulation V 125 - Internal Whistleblowing and Whistleblower Protection and the website www.ostroj.cz.

4. Final provisions

4.1. Employees are obliged to read the Code of Ethics, respect the Company's values, follow the rules of the Code of Ethics in their daily activities and participate in regular training on this issue.

4.2. The Code of Ethics is available to all employees on the Company's internal portal. It is also available to the public on the Company's website at www.ostroj.cz.

4.3. The Code of Ethics of OSTROJ a.s. was approved by the Board of Directors of the Company on 18.2.2025 and becomes valid and effective on the date of this approval.

Ing. Vladimír Trochta
Chairman of the Board of Directors
OSTROJ a.s.