

# CODE OF CONDUCT



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GRAFOBAL, joint-stock company (hereinafter referred to as, the Company“) with this code commits itself to ethical behavior and to honesty in their business aims. This code of behavior is binding, and is derived from documents pertaining to our company values and applies to all employees of the Company. It lays down the principles of mutual behavior in the Company, with employees, and with external subjects.

### **1. Protecting the good name and property of the Company**

Employees are required to conduct themselves in a way that spreads the good name of the joint-stock company GRAFOBAL and protects it's interests. Every employee is obligated to protect the intellectual property as well as the material wealth of the Company. Using the property of the Company, including work equipment, supplies, buildings or other property for personal benefit, barring explicit permission by agreement between employee and employer, is prohibited. Intellectual property is a valuable asset and must be protected from unauthorized usage or disclosure. This type of property comprises trade secrets, confidential information, copyrights, protected trademarks, logos, also lists of customers, business opportunities, and product specifications, which are owned by our company or business partners.

### **2. Protection of personal data**

The company respects the privacy of employees, customers and suppliers and undertakes to protect their personal data. Personal data are processed in accordance with the European Parliament and European Council Regulation (GDPR), the Personal Data Protection Act and related internal directives. Access to these data is only available to employees of the company who are authorized to do so and who process this information to meet the company's obligations. Taking into account the privacy and protection of personal data, the company reserves the right to access and monitor computers and to monitor the company's premises in order to maintain the information technology in which the personal data are being processed and in order to fulfill its commercial obligations or obligations arising from the general Binding legislation and internal directives.

### **3. Internal company relations and the working conditions**

Internal company relations are founded upon transparency, open communication, and mutual trust and respect. Relations with employees and between superiors and subordinates are founded upon respect for individual dignity and upon respecting fundamental human rights.

Everyone is entitled to preserving their human dignity, personal honor, good reputation and to protecting their name. The Company management does not meddle in the private or family life of employees, doesn't tolerate any mental or physical violence and motivates it's employees to expressing their opinions and to speak openly. The Company management is obliged to maintain cordial relations with union representatives with the goal of creating conditions for dignified work. The working conditions of employees are satisfactory in the terms of safety and social conditions. Child labor is prohibited in the Company.



#### **4. Discrimination practices**

GRAFOBAL, joint-stock company, does not discriminate on the basis of gender, race, religious affiliation, age, medical fitness, sexual orientation, nationality or any other reason protected by law. The Company requires that all employees contribute to the improvement of the work environment by respecting all rules and principles and by abstaining from any type of discrimination.

#### **5. Sexual harassment**

Sexual harassment at the work place is prohibited. Sexual harassment is defined as unwanted sexual advances, or any request for sexual favors, or any other unwanted verbal or physical behavior of a sexual nature at the workplace.

#### **6. Health and Safety**

The Company sees to a high level of health and social care for its employees and creates the conditions for a safe work environment. General rules of prevention and fundamental conditions for ensuring safety and protecting health during work and for eliminating risks and factors which cause work injuries, job-related illness and other health problems are rejected in the relevant internal documents. The Company ensures awareness of these regulations by employees and also provides training related to safety requirements and protecting health during work. Attention to safety and safe work practices at work and improving work conditions are a part of fulfilling work tasks. Managers in the Company, at all levels of management are, to a determined extent, responsible for ensuring that tasks are fulfilled.

#### **7. Accepting gifts, Corruption**

Employees mustn't ask for or accept services, gifts or other advantages from customers or suppliers which influence, or can seem to influence the actions of an employee while representing the Company. Gifts and advantages can be exchanged on a level which doesn't exceed the usual local extension of courtesy in accordance with ethical business practices and related laws. In case of any doubt, employees are required to consult with their superiors or a manager of the Personnel department. During negotiations with our business partners, we enforce an honest approach, which is in accordance with anti-corruptive behavior.

#### **8. Relationship with shareholders**

Our obligation is to protect the investments of the shareholders and ensure their long-term return on investment. In terms of legal regulations we provide shareholders with information and we take into account their interests. We abide by legal regulations ensuring the transparent publication of information. All shareholders have the right to influence the actions of the Company particularly by means of voting at general meetings and through their functions in the Company authority, which are elected by means of a general meeting. The Company has established transparent voting rules respecting the rights of all shareholders.

Auditing companies, which prepare independent audits in accordance with legal regulations, are approved by a general meeting.

## **9. Environmental protection**

The Company is committed to minimize the environmental impact of its business by reducing waste, emissions and using environmentally friendly technology.

All employees are required to work in accordance with laws and ordinances relating to environmental protection which applies to their workplace.

The possible environmental incentives are systematically identified and evaluated through environmental audits and risk management.

By taking preventive measures, the Company is still working to improve its environmental behavior.

## **10. Relationship with business partners**

We support the transparency and fairness of the competitive environment. We reject any illegal and unethical practices towards business partners and competitors.

All employees must behave in a correct manner when dealing with business partners, and must steer clear of manipulative practices, of concealing relevant information, of abusing confidential information, or of any other dishonest behavior. We provide customers with current, adequate, exact, and understandable information about our products and services. Every employee of the Company performs their duties in a way which increases the value of the provided product or service for customers. We share the principles of ethical conduct, social commitment and respect for the environment with our suppliers, subcontractors, and mediators. We present these principles with our business partners and motivate them to abide by the same norms by which we abide.

## **11. Conflict of interests**

A conflict of interests arises when personal interests interfere with the duties of an employee and his loyalty to the Company and when the employee could damage the Company or put the Company at a disadvantage through their activities. Managers mustn't carry out activities as a statutory body or member of a statutory or other body of another legal person with a similar subject of business, with the exception of companies in which the Company participates in business. Entrepreneurial or other earning activities of which the subject of the business activities can be congruent with those of the Company can only be carried out by an employee with previous agreement by the employer. Nobody is permitted to take advantage of their official position in the Company for private purposes, and everyone must avoid relationships which carry the risk of corruption and which call into question the objectivity and independence during the performance of the duties.



## 12. Illegal practices

The Company abides by valid laws and legal regulations during the carrying-out of their activities and also requires the same from its business partners. The Company doesn't participate in any illegal business. The Company maintains the confidentiality of information gained through business relationships and doesn't provide them to third parties and impedes the abuse of this information.

## 13. Reporting unethical behavior

Employees of the Company are obligated to report any breach or potential breach of Code of Conduct which they come into knowledge of. Violations of Code of Conduct are to be reported by employees to their direct superior, other higher-level superiors according to the organizational structure, the manager of the Personnel department, or anonymously by means of a box located at the reception. Employees also have the possibility of handing in a notification of violation through an employee representative or through the union. Notifications are given verbally, by telephone, or in writing. All, to whom notifications of Code of Conduct violations are announced, are obliged to guarantee the anonymity of the notifier. Revealing of the identity of the notifier is only possible with the consent of the notifier. Anyone to whom a violation of Code of Conduct is notified, is obliged to report and pursue a solution in accordance with their competency. GRAFOBAL will not tolerate any sanctions against people who report problems with observing the Code of Conduct in good faith.

In Skalica, on January 3, 2022

**Ing. Richard Kohút**

Chairman of the Board and Managing director  
GRAFOBAL, akciová spoločnosť