

CODE OF ETHICS - KOH-I-NOOR PONAS s.r.o.

KOH-I-NOOR Ponas s.r.o. Polička (hereinafter referred to as "the Company") adopts this code of ethics addressing the behavior and conduct of the Company and all its employees towards the public, customers and other business partners.

Ethical behavior in all our relationships is the base of our long-term success and maintaining company good name. Code of ethics is our commitment to fair treatment in every situation and respecting human rights of every individual. This attitude is expected from every employee and also from all our business partners.

1. Conduct in accordance with law

The basic principle of the company ethical standard is compliance with the constitution, law, legal regulations, international agreements, human rights and other legislation. The Company abides law and rules at all times.

2. Work relations

Functional working relationships and the atmosphere of co-operation is the basis of successful company's development. Employees in their employment activities and when dealing with their colleagues, must not:

- Disrespect their colleagues
- Favor their own personal or other party's interests above the company's interest
- Refuse co-operation with their colleagues when fulfilling working tasks, for no reason

3. The role of Management

Management & Senior Executive staff serve as a moral and ethical role model for other employees

4. Employee relations

Good relationship with all its employees based on respect and dignity is of key importance for the Company. Created working conditions are in compliance with law and legal regulations and international law agreements.

The Employer commits to:

- provide safe and healthy working environment with continuous improvement
- provide equal opportunities regardless of race, color, gender, nationality, religion, ethnicity and other differences.
- not allowing discrimination or harassment of any kind
- provide continual training & education to support current and future plans of personal growth
- employ only people at 15 years of age and older
- no use of forced labor or other forms of not-voluntary employment at its workplace
- never pay their employees below legal minimum wage

5. Business competition

The company respects and follows principles of open and fair business competition. Each company representative in all his actions follows fair business practice and avoid situations that could lead to potential breach of good practice.

Employee shall never engage in an activity as dealings with competition or other business entities in order of putting and setting up pricing and such, or other illegal actions that set up an obstacle for fair and free business.

6. Corruption

Employees (for themselves or other parties) shall not receive or demand gifts, payments, services or any other benefits from customers, suppliers and other business partners and in no other way influencing fair business negotiation.

Especially negotiations between suppliers and customers regarding selection of products and services have to be based only on the principles of competitive conditions of quality, pricing and services with result that is favorable for the company.

7. Politics relations

The company does not support, neither provides contributions nor payments in the benefit of political parties, political commissions or individual politicians, directly nor indirectly. Employees shall not provide any political contributions in the name of the Company.

8. Conflict of interest

Employees shall avoid potential conflict of their personal and company's interests. When dealing with current and potential costumers, suppliers, public officials, investors and competition, employees shall represent the interest of the company, regardless of their own benefit.

9. Sensitive information

Employees shall keep company's sensitive information confidential. All information that are not public and could harm the company & its employees, their customers & suppliers or give benefits to their competition, are considered sensitive.

These especially are: business secret, patents, brands, financial data, business plans, proposals, data databases, wages and employees' personal information.

With the exception when the employee was given waiver of confidentiality by the company management or the law.

10. Property protection

Employees shall treat company's property with respect and ensure its effective use. They shall handle it with care and protect it against loss, theft or misuse. Company property can not be used for private activities.

11. Environment

The company follows all environmental regulations. The company protects environment in all their activities, incl. design, planning, production, sale and product handling. The company is certified by ČSN EN ISO 14001 which ensures implementation and continual improvement of its environmental management system.

Every person that witnesses a breach of this code of ethics or has a suspicion of breach, shall inform their Senior Executive or Management.

If the person for any reason prefers not to inform Senior Executives or Management, it is possible to refer to the company personal department, trade union or send the information anonymously through the letterbox for improvement proposals.

Signature of Company Managment

In Polička, 3.8.2018

