

## SYSTÉM ŘÍZENÍ

### 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 behaviour 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.

When establishing foreign business relations and carrying out exports, it respects government regulations, laws and global export control standards to eliminate the risk of violating legal regulations in the field of export controls and international economic sanctions. It verifies its business partners, whether business dealings with them are not restricted or outright prohibited.

#### 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
- Misrepresent or conceal information necessary to complete the task
- 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

When a labor dispute arises between employees, the parties to the dispute are obliged to actively, constructively and responsibly seek a solution to such a dispute, taking into account the interests of the company, and in the event of failure to reach an agreement, to inform their superiors

#### 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:

- respect the personality, human dignity and privacy of its employees;
- 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

Between trade union and company KIN Ponas is signed collective agreement according to which are managed and set: working time, wage conditions and bonuses, social benefits, rights in labour relations and collective negotiation.

#### 5. Safety and health protection at work

- Safety and health protection at work together with fire safety is managed by valid legislation, which defines local operational safety regulations for individual workplaces or the whole company.
- Employees are equipped with personal protective equipment according to internal regulation
- Machine safety is ensured by checks, maintenance and regular auditing
- Workplaces are adjusted in accordance with employee needs
- Usage of dangerous chemical substances is managed by valid legislation and SD no. 9.602 and 9.607 – Registry of chemical substances and compounds, which is available to all employees
- Emergency preparedness should ensure that plans are in place to respond to events that may occur in an emergency
- Incident and accident management should ensure the safe operation of the workplace
- Emergency preparedness is trained at onboarding, periodic and emergency training of employees and ensures that emergency events they will be dealt with in accordance with the employer's instructions and this will ensure the safe operation of the workplace

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### 6. 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. The company holds the ISO 9001 and IATF 16949 certificates through which it guarantees the quality of its production. It protects production against counterfeiting of its parts by means of batch labeling, laser marking and unique codes

### 7. 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.

### 8. 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.

### 9. 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.

### 10. 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.

Employees also protect the intellectual property rights of the employer, including the intellectual property of third parties. With the exception when the employee was given waiver of confidentiality by the company management or the law.

### 11. 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.

To protect the organization's property, it is necessary to use all legal means, including the application of the right to compensation for damage against those who are responsible for it and against those who caused, or participated in causing, damage intentionally or through negligence, or failed to fulfill obligations to prevent it, or turning away. The financial responsibility of employees is dealt with in the company by Directive No. 1 from 2008 "Damage and compensation proceedings".

### 12. 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.

### 13. Disclosure of Information

The company properly and timely publishes information, its publication is required by legal regulations or the current situation in the company. Information is always accurate and true. Employees must not disclose any information about the company that could have the nature of a trade secret, sensitive or confidential information.

### 14. Information security

The company has an information security management system in place, which ensures that information is protected at the necessary level in terms of confidentiality, integrity and availability.

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### 15. Code of Ethics Violations and Whistleblower Protection

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 pe

Personal department, trade union or send the information anonymously through the letterbox for improvement proposals. The company will not take any retaliatory action against an employee who reports a possible violation of the code of ethics

  
Signature of Company Management

In Polička, 7.10.2022