

Code of Ethics KOVOSTROJ a.s. Dobšiná

Introduction

The Code of Ethics arises from fundamental objectives and visions of the company KOVOSTROJ. It represents a summary of rules of actions and behaviour expected from any and all employees and business partners of the company KOVOSTROJ. Therefore, any and all employees and business partners are obliged to act in compliance with this Code of Ethics. In case the specified rules are violated, the labour relation or the cooperation with the business partner may be terminated.

The objective of this Code of Ethics is to provide directions to identify and resolve ethical problems. The Code of Ethics is part of a system supporting ethical managing manners, actions and behaviour; personality and exemplary behaviour of managers, workers and business partners of the company KOVOSTROJ play its essential roles.

In case of any uncertainties, questions or remarks regarding the Code of Ethics of the company KOVOSTROJ by the employees, business partners or other persons of the company KOVOSTROJ please contact us at kovostroj@kovostroj.sk.

Rules and principles

1. Goodwill and protection of company property

Goodwill is an essential, precious business value of the company KOVOSTROJ and all employees and business partner account for it. It is their task to take care of the Goodwill of the company and protect its interests.

All employees of the company KOVOSTROJ are obliged to act in compliance with this Code of Ethics and maintain high moral standard in the business and work efforts. With their behaviour, actions and expressions, the employees represent both themselves and the company KOVOSTROJ. Therefore, they must make sure to comply with the applicable law and order, principles of just conduct and this Code of Ethics in their personal lives, at work and during off-time.

Every and each employee of the company KOVOSTROJ accounts for the correct use of the property and resources of the company KOVOSTROJ. At the same time they are obliged to take any and all measures to prevent their damage, theft or unauthorized use by third parties. By taking necessary measures they are obliged to protect the company KOVOSTROJ from the risks of property deception or fraud. No employee of the company KOVOSTROJ shall use their position or authority to obtain particular rights or benefits.

2. Safe work environment

Occupational safety and fire protection of the employees are first priority of the company KOVOSTROJ. The company cares for the level of medical and social care of its employees and establishes conditions for a safe work environment. General principles of prevention, essential conditions of occupational safety and elimination of hazards and factors creating conditions for occurrence of occupational accidents, diseases and other damages to health are transferred into particular internal provisions on occupational safety and fire protection. The company KOVOSTROJ establishes conditions to keep every employee informed and trained on provisions regarding occupational safety. The care for occupational safety and improvement of work conditions is a component of the work tasks of the company KOVOSTROJ.

3. Atmosphere of mutual respect and trust

Employees of the company KOVOSTROJ are obliged to observe the ban of any discrimination based on gender, race, age, sexual orientation, religion and health state, as well as the ban of abasement and harassment. Every employee of the company KOVOSTROJ is expected to establish at workplace the atmosphere of mutual respect and trust, otherwise it is not possible to cooperate and achieve good work results. Management of the company KOVOSTROJ shall not accept any form of bad treatment or harassment by anyone at any workplace of the company KOVOSTROJ.

For its employees company KOVOSTROJ shall establish conditions for personal and vocational growth by development of their abilities, skills and knowledge.

Company KOVOSTROJ expects its employees to deliver high level of work performance, employee relationships and observance of occupational safety. Relationships with the employees and relationships between the employees at all levels are based on respect and honor of every human being and respect of the essential human rights.

Employees are obliged to establish in the company KOVOSTROJ work and partner relationships constituting respect, cooperation, trust and tolerance. The superiors shall access the subordinates with respect and honor and evaluate their performance without prejudice. The employees shall show respect to their superiors and fulfill the assigned tasks efficiently and consistently. In case of conflicts, every and each employee of the company KOVOSTROJ is obliged to make maximum efforts to resolve conflict situations.

The employees are obliged to report violation of the work discipline, work or social ethics by an employee or of the ethical standards of the company KOVOSTROJ specified in this Code of Ethics to their direct superior. The competent superior is obliged to settle the respective report and draw conclusions to protect the work discipline or the work or social ethics of the company KOVOSTROJ and its goodwill.

4. Relationships between the employees of KOVOSTROJ a.s. Dobšiná and the business partners or other persons

Employees of the company KOVOSTROJ are obliged to act correctly, ethically, omit manipulative or dishonorable practices when dealing with business partners or other persons. The company KOVOSTROJ enforces principles of ethical behaviour and respect for the environment.

The company KOVOSTROJ acts honestly, correctly and responsibly against business partners and other persons and establishes bilaterally advantageous business relations based on discretion, politeness, omitting any preferences or discrimination.

Every and each employees of the company establishes transparent conditions for all business partners, uses legitimate business methods and considers information obtained from business partners be confidential.

The company KOVOSTROJ performs its business and official activities in an honest and ethical manner. Any corruption is inadmissible with zero tolerance level.

The company KOVOSTROJ observes business terms agreed with all business partners or other persons. In case extraordinary circumstances cause the company KOVOSTROJ not to be able to fulfill the agreed conditions, a negotiation with the business partners or with other persons shall be initiated in order to settle the situation arisen.

The company KOVOSTROJ does not tolerate any incorrect actions by the business partners or other persons. We consider direct addressing of our customers by our suppliers be reason for immediate termination of business cooperation.

5. Conflict of interests or presumable conflict of interests of an employee and prohibited behaviour.

Conflict of interests or presumable conflict of interests endangers the Goodwill of the company KOVOSTROJ. Therefore, the company expects its employees to avoid situations creating collision of their own interests, the interests of their family members, the interests of their close or otherwise affined persons with the interests of the company KOVOSTROJ. The conflict may occur in cases when an employee, family member of an employee or an affined person of an employee perform activities competing or seemingly competing with the interests of the company KOVOSTROJ. Another conflict may arise in a situation when an employee accepts some personal or financial advantage and has financial interests in providing services or work for the supplier, customer, competitor or a person seeking a business relation with the company KOVOSTROJ. Conflict of interests may also occur in case when the employee abuses property, information, resources and facilities of the company KOVOSTROJ for personal advantage or for the advantage of other persons. Last but not least, also if an employee has another employment negatively affecting his work performance or intervening with his competences as employee of the company KOVOSTROJ.

The ban to run their own business or work simultaneously in equal or similar branch as stated in the commercial register of the company KOVOSTROJ applies to all employees of the company KOVOSTROJ.

Every and each employees of the company KOVOSTROJ is obliged to report all circumstances that may lead to a conflict of interests. In case an employee discovers a conflict of interests they are obliged to immediately, provably inform their superior and the superior shall inform the management of the company KOVOSTROJ, which, with regard to the severity of the case, shall evaluate whether or not it is conflict of interests. If an employee does not report circumstances potentially leading to a conflict of interests, this act itself may represent the violation of the aforementioned rules. Reporting circumstances shall not be considered violation of rules. On the contrary, it shall be considered observance of the obligations by the employee of the company KOVOSTROJ.

Employees of the company KOVOSTROJ are prohibited to ask for or accept services, gifts or advantages from business partners or from other persons that influence or may influence actions of the employee when representing and acting on behalf of the company KOVOSTROJ. It is prohibited to offer or accept gifts offered against a counter-value in the form of a bribe.

Minor valued gifts such as souvenirs, flowers etc. contributing to maintaining good relations are considered symbolic gifts. If an employee afterwards discovers that a gift opposes the stated rules they shall report it to their superior and return the gift.

6. Rules for intellectual property of the company KOVOSTROJ, personal data, confidential information, business secrets.

Intellectual property of the company KOVOSTROJ represents property with the need of continuous protection.

The company KOVOSTROJ accentuates respecting of the rules on personal data protection and protects available personal data of all persons. Personal data is collected exclusively with the consent of the affected person, for specified and appointed purpose, and are only processed in necessary extent to achieve the purpose of their processing in the sense of generally binding legal regulations of the Slovak republic and internal procedures. Access to personal data of affected persons only have employees trained for such purpose who need to know them due to their work position. Employees are not allowed to act in a manner that may lead to illegal abuse of personal data and information regarding privacy of affected persons, including their use by any other unauthorized persons.

The company KOVOSTROJ accentuates the protection and safety of confidential information, business secrets, and intellectual property. Likewise, it accentuates any confidential information obtained in relation with the business activities be kept in strict secrecy and not be used incorrectly, abused or disclosed to third parties. Publication of confidential information may seriously jeopardize or damage the interests of the company KOVOSTROJ. In such case, the person accountable for such action may be exposed to a labour remedy, including labour relation termination.

The company KOVOSTROJ respects confidential information belonging to business partners, potential clients and other involved parties and uses them in accordance with the applicable legal regulations. It maintains the confidentiality of data obtained in business relations, does not disclose it to third parties and impedes their abuse. The obligation to protect confidential information, business secrets and intellectual properties persists also after labour relation termination with the company.

7. Observance of the Code of Ethics of the company KOVOSTROJ a.s. Dobšiná and reporting its violations

The Code of Ethics of the company KOVOSTROJ applies equally to any and all employees of the company. Any and all employees are obliged to get familiar with this Code of Ethics and follow the principles stated in it when performing their daily work. The Code of Ethics of the company KOVOSTROJ is issued in the form of an internal directive and every employee of the company KOVOSTROJ is directed to study it.

Every employee confirms with their signature to have understood any and all parts of this Code and commits to its observance. Managers are accountable for all their subordinate employees be informed about the contents of the Code of Ethics and act according to its principles. In case principles stated in this Code are violated, the labour relation with the employee may be terminated.

The employees of the company KOVOSTROJ are obliged to report discovered violation of the Code of Ethics. They may do so personally by reporting it to the superior of the employee, who violated the Code, or in writing by means of the internal form or via e-mail to kovostroj@kovostroj.sk. All superiors who had been reported violation of the Code of Ethics are obliged to ensure anonymity of the reporting person. Revealing anonymity of the reporting person is only allowed with their consent. There must not be any sanctions applied to the employee reporting violation of the Code of Ethics. An exception is a deliberate, false reporting of a violation of the Code of Ethics with the intention to cause damage to a certain person. The specified act is considered violation of the Code of Ethics. Every superior who had been reported a violation of the Code of Ethics is obliged to settle that report and set a solution pursuant to their competences. Other subjects, such as business partners, other persons, etc. are entitled to report a violation of the Code of Ethics by sending an e-mail to kovostroj@kovostroj.sk.

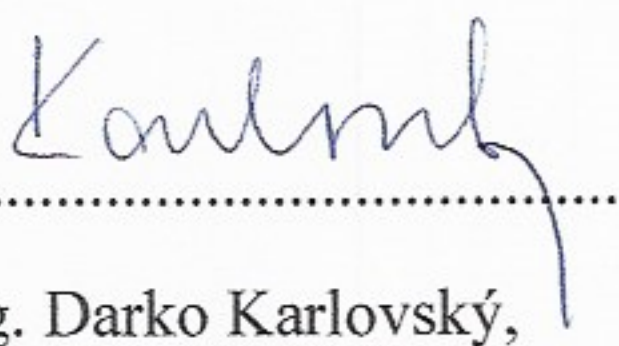
Violation of work discipline is also considered violation of the Code of Ethics and shall be judged and sanctioned pursuant to the general binding applicable regulations and internal provisions of the company KOVOSTROJ.

8. Business partners and other persons

The rules specified in this Code of Ethics define acts expected and required by the company KOVOSTROJ from its business partners and other persons of cooperation. When signing a business contract with business partners or other persons of cooperation, this Code of Ethics is signed as part of the relevant contract too. Disobedience or infringement against these rules of the company KOVOSTROJ by the business partners or other persons of cooperation may lead to an immediate cooperation termination.

The company KOVOSTROJ expects its business partners and other persons to observe this Code of Ethics and publishes it on the web-page of the company KOVOSTROJ www.kovostroj.sk.

In Dobšiná, on February 01, 2021



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Ing. Darko Karlovský,

Chairman of the Board of Directors KOVOSTROJ a.s. Dobšiná