



# Ethic Code of OSTROJ a.s. Company

OSTROJ a.s. is purely Czech company active in the field of mechanical engineering and producing mining equipment. While pursuing the Company mission and vision and respecting its values, all its employees are bound to follow the Company Ethic Code.

Complex of basic ethical standards as approved by the Administrative Board, the Ethic Code is applied when dealing with Company employees, customers, suppliers as well as general public. OSTROJ a.s. Ethic Code contains the following ethical standards:

## **Compliance with effective laws**

- standards as set out by Czech laws in force have to be complied with.

## **Respecting human rights and employees' freedom**

- equal opportunities for and treatment of employees shall be enforced, regardless of their gender, age, colour, language, race, nationality, social status, property, country or social origin, sexual orientation, political belief, religion and belief;
- each person's personal dignity, privacy and rights must be respected;
- zero tolerance to any unacceptable treatment with employees, such as mental strain, sexual abuse or discrimination, and/or any harm to personal dignity and reputation;
- zero tolerance to any behaviour including gestures, verbal and physical contact with sexual, compulsive, menacing, offensive or exploitative character;
- attention shall be paid to any complaint or question raised by an employee regarding their work and/or employment rights and duties.

## **Employment, reasonable work and working hours**

- working hours shall comply with national laws, collective agreement provisions, internal regulations and stipulations set out in employment agreement;
- conditions for working hours, overtime work and holiday shall be set;
- employees shall be duly and fairly remunerated for their work, legal minimum wage shall be guaranteed, remuneration system, benefit system and extraordinary bonuses system shall be set;
- employees healthcare and safety shall be provided in the scope extending regulatory framework;
- employees right for free gathering shall be reasonably recognized and members of employees' organization and/or trade union shall not be put to unreasonable disadvantage or discrimination, right to enter trade union and right to collective bargaining shall be respected.

## **Zero tolerance to child labour and forced labour**

- employment policy shall neither exploit nor support child labour, no employment of people under 15 years of age;
- forced labour shall be neither exploited nor supported.

## **Ensuring fire safety and occupational health and safety**

- responsibility for fire safety and employees' occupational health and safety;
- occupational hazards shall be proactively searched for and managed;
- optimal preventive measures against occupational accidents and diseases shall be adopted and enforced;
- employees training and courses on occupational health and safety issues and fire protection shall be provided for and organized;
- process including reporting, investigation and measures adoption for incidents and accidents determination and management shall be set up, implemented and maintained. Corrective measures shall reasonably correspond to impacts and/or potential impacts of incidents and accidents sustained;



- employees, customers and visitors shall be provided with safe and sound workplace at all company premises. Compliance with occupational health and safety standards shall be ensured including work hygiene and workplace ergonomics and arrangement;
- system of dangerous chemical substances and mixtures identification and procedure for their treatment, storage, safe use and manipulation shall be set and employees shall be duly trained in this respect;
- reasonable measures shall be adopted to prevent accidents, fire and injuries, diseases resulting from, in connection with and suffered during employment by minimizing reasons of risks connected to particular workplace;
- Occupational health and safety management system – ISO 45001, or equivalent, shall be adopted and applied.

### **Environmental protection**

- environment pollution shall be reduced to minimum and continuous environmental protection improvements shall be implemented;
- efforts must be made to systematically reduce energy efficiency and improve the environment, energy management legal requirements must be complied with;
- environmental aspects and their impact for present, foreseen, updated or modified activities and products shall be identified;
- company operation must comply with identified legal and other requirements to minimize waste, emissions, feedstock and energy consumption and other potential negative impacts (such as noise emissions, vibrations, treatment of dangerous chemical substances, accidents, etc.);
- waste treatment systems, chemical substances and energy management shall be set up and enforced;
- Environmental management system – ISO 14001, or equivalent, shall be adopted and applied.

### **Products quality**

- products quality and the system of inspections shall be implemented to ensure compliance with internal standards as well as relevant laws and each employee shall contribute to the standards by his high-quality work;
- attendance of development programmes and trainings offered by the company;
- efforts shall be made to prevent procedures with potential negative impact on product quality, safety and legal compliance – in any respect whatsoever;
- Quality management system based on ISO 9001 and/or VDA 6.1, or equivalent, shall be adopted and applied.

### **Protection of company reputation and assets**

- tangible and intangible assets of the company must not be misused;
- economical, business, technical and any other information of the company (including trade secret and confidential information) must not be misused for one's own or third party benefits;
- company reputation and own professional integrity shall be supported.

### **Conflicts of interests**

- situations with potential or suspect conflict of interest with the company shall be avoided. Any personal or family interests that might be in conflict with company's interest shall be without undue delay reported to your supervisor, including, among others, long-term employment outside the company, own business activities and any other activities and financial participations, manipulation and sharing of internal information, business opportunities belonging to the company, as well as conflicts of interest involving family members and any other personal relations.

### **Zero tolerance to corruption practices**

- no tolerance to and no participation in any form of unlawful corruption practices;

“Corruption practice” shall mean requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or a prospect thereof, which distorts the proper performance of any duty or behaviour required of the recipient of the bribe, the undue advantage or the prospect thereof.

- gifts and immaterial donations of a nominal value may be considered as part of ordinary business procedure only if in compliance with Income Tax Act (advertising and promotion items) and with Value Added Tax Act (gift in the framework of economic activity);

“Nominal value” shall concern the gift value and/or the frequency of such gift, i.e. high frequency of gifts – though of minimum nominal value – is not acceptable.

“Immaterial gift” shall include – among others – charitable and sports events, catering, social events, theatre plays and concerts.

### **Zero discrimination supply chain**

- every effort shall be made to ensure the Ethic Code is complied with also by your business partners;

- zero discrimination principles shall be observed as regards suppliers selection and treatment.

### **Proper relations with business partners and general public**

- fair and proper approach to all business partners and general public and creation of sustainable relations;

- discreet, polite approach towards confidential information and maintenance of confidentiality.

### **How to ask for help or report a violation of the Ethic Code**

Should you suspect the Ethic Code has been violated or should you have any questions concerning proper behaviour in a particular situation, ask your supervisor, manager or internal auditor (person responsible for anticorruption management) for advice.

All reporting shall be treated as strictly confidential, including the reporting person’s identity (if relevant).

Should you suspect you have been asked to behave in an illegal, unethical, or otherwise undue manner or should you suspect other people are behaving this way, it has to be reported without undue delay following the procedure as described above. In no way will you be punished for reporting a violation or suspected violation of the Ethic Code if done in good faith – even though it will be later proved that the Ethic Code has not been violated.

If the complaint is justified, proper remedy shall be ensured and measures adopted to prevent any reoccurrence in future.

Done in Opava on 15 June 2021

Ing. Vladimír Trochta  
Chair of the Administrative Board