

CODE OF CONDUCT

This document describes the basic ethical principles on which a company philosophy is based in relation to all parties involved.

In our company EGE, spol. s r.o. (EGE) we endeavour to create an environment for equal and fair competition. Our success depends on the good name of the company, on the sustained formation of good relationships with employees, suppliers, customers, governmental authorities and other third parties. At the same time we are aware of the fact that success might be only temporary unless a direct and honest approach at all levels is created. We wish to develop our success on the principles of reliability, respect, determination and sustainability.

A. EGE IS BOUND WITH REGARD TO THE PARTIES INVOLVED:

1. To provide high quality supplies of all products and services.
2. To establish customer trust, and the same with other parties involved.
3. To create a competitive environment on the basis of honest practices in business, transparency, innovation and intensive work.
4. To neither accept nor provide unauthorized illegal payments.
5. To protect its credibility and avoid unacceptable gifts and favours.
6. To provide equal opportunities for all our employees.
7. To protect confidential and privileged information.
8. To respect the intellectual property of others.
9. To avoid conflicts of interest.
10. To keep exact and complete accounting records.
11. To exercise equality while choosing suppliers.
12. To maintain open communications with all parties involved.
13. To establish a healthy work environment without relations leading to any sort of harassment.
14. To remember the importance of the environment and health and safety at work.
15. To respect all legislation relating to the subject of our enterprise.
16. Not to cooperate with parties that breach ethical principles.

B. THE EMPLOYEES OF EGE ARE ASKED TO:

1. Act in all situations in an honest and fair way.
2. If you make a mistake, do not be afraid to admit it. Do not transfer responsibility to others.
3. Tell the truth and distinguish facts from a presumption or even from feelings.
4. Report immediately any cheating, damage or theft.
5. Behave towards your colleagues as if you were in their position.
6. Not to be angry, vulgar, aggressive and arrogant. Be always correct, tolerant and optimistic.

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7. Listen to the opinions of others even if you do not agree. However, do not be afraid to express your opinion.
8. Before criticising the competition, look first at the matters you might be able to influence or even change.
9. Be fair in your judgement and acts.
10. Customer's requests are an opportunity for the company and also for you. Try hard with all your abilities and potential to satisfy a customer without letting them down.
11. Work for the company, not for yourself. Your effort will be redeemed and you will be duly rewarded.

Prevention and prohibition of passive corruption and conflicts of interest

EGE prohibits all its employees and third parties acting on behalf of EGE from engaging in any form of passive corruption, in particular soliciting or accepting an illegal or hidden advantage, regardless of its nature or value, in exchange for the provision of an advantage by EGE.

No decision taken on behalf of EGE shall be influenced by a conflict of interest. Such conflicts may arise where the personal interests (financial or family related) of an employee or third party acting on behalf of EGE may influence a matter dealt with by that person in the course of his or her duties.

Gifts and entertainment received

Employees (including directors and managers) and third parties acting on behalf of EGE may accept courtesy gifts or entertainment from business partners, subject to the rules set out below. In addition, gifts and entertainment may only be accepted if they have a value (or equivalent) of up to a maximum of CZK 1,000 / 1 partner / 1 year. In any case, they must be publicly acknowledged by both the offering and receiving party.

EGE prohibits:

- all forms of solicitation of gifts,
- the acceptance of any gifts or entertainment covertly or from persons whose identity is not precisely known,
- the acceptance of any gift or entertainment in the form of money or money equivalents (e.g. gift vouchers or promissory notes),
- any gift or entertainment contrary to good manners.

Any gift or entertainment that does not comply with the above principles must be refused and, where appropriate, returned.

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C. EGE ADHERES AND AT THE SAME TIME ASKS ITS SUPPLIERS THE FOLLOWING:

1. To obey the law
 - which means that all legal enactments of the applicable rule of law(s) will be obeyed.
2. Ban corruption and cheap bribes
 - which means that corruption and cheap bribery will not be tolerated in any form and that the subjects involved will not be engaged, not even indirectly or implicitly. The same is applicable for all illegal offers of bribes or similar advantages with regard to government employees in order to influence their decision.
3. To obey the essential rights of the employees
 - to ensure equal opportunities and the same treatment regardless of race, nationality, social origin, handicap, sexual orientation, political and religious conviction, sex or age;
 - to respect personal dignity, privacy and the rights of every individual;
 - not to employ anyone against his will and not to force him to work;
 - not to tolerate unacceptable treatment of employees, such as physical attacks, sexual or personal harassment or discrimination;
 - not to tolerate such behaviour (including gestures, offensive vocabulary, inappropriate contact) that would be aimed at sexual harassment, coercion, threat, violation or exploitation;
 - to ensure appropriate remuneration and to provide all its employees the minimum wages as stipulated by the law;
 - to adhere to maximum working hours specified in the given country;
 - that the company will – if it's admissible with regard to the law – recognize the liberty of employees to join employment organizations and not to give preferential or non-preferential treatment towards the members of such organizations or unions.
4. Ban on child labour
 - the company will not employ workers younger than 15 years. In the countries, which are related to the minimum age convention ILO 138, the exception for developing countries can be made. If this is the case, the age limit can be reduced to 14 years.
5. Health and safety of employees
 - the company is bound to take over responsibility for health and safety towards its employees;
 - it will not take risks and will execute the best possible preventative measures against injuries and work-related illnesses;
 - the company will offer and ensure for all its employees special training regarding health and safety at work;

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6. Environmental protection

- the company will take care of the environmental protection required by regulations and international standards;
- it will minimise the impact on the environment and it will progressively improve this protection;

7. Supply chains

- the company will require from its suppliers to the maximum extent possible the observance of the content of this code of ethics,
- the company will remain fair when choosing its suppliers and during cooperation with such suppliers.

D. REPORTING CORRUPTION AND CONDUCT INCONSISTENT WITH THE CODE OF CONDUCT

Anyone (employee, external worker, employee of another organization, natural or legal person) who witnesses or has a reasonable suspicion of corrupt, illegal or unethical conduct related to EGE's business activities has the right to notify such conduct.

The notification contains data on the name, surname and date of birth, or other data from which the identity of the notifier can be deduced. If the notification does not contain information about the name, surname and date of birth, or other information from which it is possible to deduce the identity of the notifier, the notifier is entitled to protection under the law from the moment his identity becomes known to those who may expose him to retaliatory measures. The notification can be made in the following ways:

- 1) electronically, by telephone to the dedicated person, who is the HR manager or the director of EGE: Tel. No. of the HR manager: +420 739 329 673, e-mail address: podrouzkova@ege.cz. Tel. No. of the director of EGE: +420 731 717 898, e-mail address: knittl@ege.cz.
- 2) notify such conduct or suspicion in writing by placing it in a locked mailbox provided for that purpose. The box is located outside the entrance to the canteen in the EGE Novohradská administration building and inside the entrance to the administration building in EGE SC U Pily and is continuously checked by the HR manager.

The notification should include the following information:

- 1) identification of the persons suspected of impermissible conduct and all persons involved or profiting from the impermissible conduct,
- 2) a detailed and coherent description of the impermissible conduct, including a timeline,
- 3) specific evidence of the impermissible conduct or other specific knowledge supporting the suspicion regarding the impermissible conduct.

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E. ACCESS AND INVESTIGATION OF NOTIFICATIONS

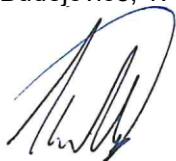
Only the dedicated person (HR manager or director of EGE) will have access to notices made under chapter D. The dedicated person assesses/evaluates their seriousness and, if she/he evaluates the notification as reasonable, she/he is obliged to propose measures to correct or prevent the illegal situation. At the same time, she/he notifies the notifier of the receipt of the notification within 7 days of receipt of the notification and notifies the notifier within 30 days of the assessment and handling of the notification.

F. PROTECTION OF WHISTLEBLOWERS

- 1) The whistleblower of a suspected corrupt, illegal or unethical act has the right to conceal his identity, unless the whistleblower gives written consent to its provision or the dedicated person is obliged to disclose the identity to the relevant public authorities in accordance with generally binding legal regulations.
- 2) Any notification made in accordance with Chapter D of the Code of Conduct will not be sanctioned, even indirectly. However, if the notification is found to contain knowingly false information and has therefore been made purposely with the intent to harm the person(s) involved, appropriate consequences will be imposed on the whistleblower.
- 3) Employees who are not found to have committed misconduct in the assessment are similarly protected.

Each employee is required to become acquainted with the company code of ethics and to pursue further its principles in contact with other parties involved. Should any of these principles be breached by any employee, the management of the company will investigate such cases and will take appropriate action.

In České Budějovice, 1. September 2023



Tomáš Knittl

Chief Executive Officer of EGE, spol. s r.o.