



PRINCIPLES OF CONDUCT OF MORAVIA STEEL A. S. (THE CODE OF ETHICS)

Our company, MORAVIA STEEL a.s., was established in 1996 and is closely connected with the region in which it operates and the people who live there. We recognise that our company has an impact on this region and we feel a responsibility towards it.

These principles of conduct set out the fundamental rules governing the behaviour of members of MORAVIA STEEL's corporate bodies, its employees, associates and other persons involved in its activities.

MORAVIA STEEL is committed to the principles of conduct set out below. By adopting these principles, we are taking a significant step towards fulfilling our responsibilities as a business partner, employer and member of the community. MORAVIA STEEL is committed to conducting its business lawfully and with a high degree of respect for ethical standards, rights, freedoms and the legitimate interests of our employees, business partners, customers, clients and the general public. Under no circumstances will we participate in criminal activity.

These principles of conduct relate to ethical matters and are integrated with MORAVIA STEEL's other internal policies and procedures, which also establish standards and rules governing the conduct of the company and its members. These principles are consistent with all other internal policies and procedures of MORAVIA STEEL, to which they relate and refer where appropriate, and which they supplement.

We uphold ethical principles and comply with the law

- We are a company established and operating under Czech law. We continuously monitor, understand, respect and strictly comply with Czech law and any other applicable law governing our relationships.
- Our company is committed to maintaining the highest ethical standards and complying with all applicable laws and regulations. We conduct ourselves as a responsible and trustworthy market participant and we expect the same from our business partners.
- We fulfil all contractual obligations properly and transparently, always in accordance with decisions made by the company's governing bodies. We act fairly, uphold the principles of honest business conduct and reject any behaviour that could undermine trust or damage our reputation.
- We are committed to openness and accountability in all our activities and strive to ensure that our relationships are always founded on mutual respect and trust in honest dealing.
- Ethical principles and respect for the law are fundamental to our conduct and corporate culture..



We value our employees.

- Respect for human rights is fundamental to our operations. We do not tolerate discrimination, forced labour or child labour, and we employ only persons who meet the legal requirements. We expect the same standards from our business partners.
- We do not tolerate any form of illegal working arrangements, either within our own company or amongst our business partners.
- We provide our employees with fair remuneration, including benefits and allowances in excess of the statutory requirements. We comply with all legal standards relating to working hours, rest periods, remuneration and the termination of employment.
- We encourage open communication and provide channels for raising concerns, including anonymously, all of which we address responsibly. We respect employees' rights to freedom of association and collective bargaining.
- We fulfil all our statutory information obligations towards our employees and public authorities.
- We maintain regular communication with our employees through meetings and briefings with senior management and other line managers, and by keeping employees informed of current matters through the LOTUS NOTES systém, the works radio and the Třinecký hutník weekly newsletter.
- We regularly appraise and train our employees and support their professional development. We are committed to creating a working environment based on trust, respect and accountability.

We are committed to safety and health protection.

- The safety and health of our employees are amongst our highest priorities and form an integral part of all our activities. We maintain safe and favourable working conditions and operate an accident prevention programme. All activities are carried out in accordance with safe working procedures.
- We prioritise prevention over cure. We provide our employees with continuous training in occupational health and safety and encourage responsible behaviour. We rigorously ensure that occupational health assessments are carried out and we do not permit employees to work where this would be inconsistent with their medical fitness.



- In the event that an accident does occur despite all precautions, we operate a rapid response system covering everything from the provision of first aid and proper reporting through to the investigation of causes and the implementation of corrective measures to prevent similar incidents in future.
- In the event that an accident does occur despite our best efforts, we have a system in place that includes the provision of first aid, the reporting and investigation of injuries or other adverse events, and the implementation of measures to prevent recurrence and to provide compensation for any damage.

We value our business partners.

- MORAVIA STEEL builds relationships with suppliers, customers and other business partners (hereinafter „business partners“), as well as with the general public, that are founded on trust and honest dealing. We approach all business partners and the general public transparently, we respect the principles of honest business conduct, and we maintain the confidentiality of information, trade secrets and business know-how. MORAVIA STEEL therefore expects its business partners to approach the company with the same respect.
- We apply the principle of continuous improvement of products and services whilst acting responsibly towards the environment. We agree quality standards with our customers and monitor their achievement. We implement a zero-defects strategy.
- We select suppliers on the basis of their expertise, quality and alignment with our values. We expect compliance with employment law and technology standards, as well as a willingness to cooperate during audits and inspections.
- We regularly assess the satisfaction of our partners and consider every suggestion so that our cooperation leads to mutual benefit.
- We want our business partners to work with us on a continuing basis or to return to us. Our business partners' success is our success.
- We believe in unity of word and deed, we deliver on our promises. We promote an ethical business culture and fulfil our obligations carefully, honestly and honourably.

We have a whistleblowing policy

- We enable our employees and other persons to report harmful conduct, to submit enquiries and to raise concerns, including anonymously.
- All reports are rigorously investigated, properly assessed and used to implement measures to improve our processes and corporate culture.
- We guarantee protection against any sanctions, retaliation or disadvantage arising from the submission of report.



- We protect the identity of the whistleblower and ensure that the entire process is conducted in accordance with legal requirements and internal policies.
- Reports can be submitted through a designated independent channel which is separate from the company's day-to-day management.
- The company's management guarantees a fair and safe environment for submitting reports and fosters a culture of openness and trust.
- We have developed and „Internal Whistleblowing System MS“, which is published on our company's website.

We condemn all forms of corruption.

- We have zero tolerance towards the offering or acceptance of bribes.
- We rigorously instruct our employees to refrain from any conduct that could be considered corrupt. No person may, in connection with the performance of work for our company, in our name or with reference to us, demand or accept any benefit in Exchange for preferential treatment or the promise of an advantage, nor may they offer or provide any such benefit. All corrupt conduct is strictly sanctioned.
- We respect fair competition and intellectual property rights, and we protect personal data.
- We avoid conflicts of interest and situations that might give rise to suspicion of such a conflict.
- If an employee becomes aware of any corrupt or unethical conduct, or suspects such conduct, they must report it to the designated person in accordance with the procedure set out in the Internal Whistleblowing System MS.

We respect fair competition and intellectual property rights

- We are committed to fair and honest competition and we strictly comply with the laws protecting it. We avoid conflicts of interest and we require transparent and fair dealing from our employees and partners.
- We respect intellectual property rights and protect trade secrets and confidential information entrusted to us. Every employee is bound by obligations of confidentiality and is responsible for handling such information securely.
- We process personal data exclusively in accordance with applicable laws and regulations and we implement the necessary organisational and technical measures to protect it. The responsible handling of information is an integral part of our corporate culture and ethical principles.



We are a financially responsible enterprise

- We strictly comply with the legal requirements for accounting and financial reporting. Our records are always accurate, complete and transparent.
- We use internal control mechanisms and regularly assess risks in order to prevent errors and misuse. We manage the company's resources responsibly and ensure that all business transactions are properly documented.

Compliance with anti-money laundering counter-terrorism financing rules

- We are committed to combating money laundering and financing of terrorism and undertake to comply with the strictest standards and legal regulations against money laundering.

We comply with import and export regulations

- We comply with all applicable laws and regulations governing import and export controls, including sanctions, embargoes and other orders issued by public authorities.
- We respect international obligations and trade restrictions and we ensure that our activities are always in accordance with applicable legislation. Our employees are kept informed of their obligations in this area in order to prevent any breach of the rules and associated risks.

We are a socially responsible enterprise

- We fulfil our corporate mission „Together for future generations“ and all our activities are directed towards this goal. We support the region in which we operate and we strive to improve the quality of life of its inhabitants.
- We actively cooperate with local institutions, schools and communities, we contribute to the development of education and culture, and we support the voluntary initiatives of our employees.
- In our business operations we apply the principles of sustainability, fairness and longterm responsibility towards society and the environment.

We protect the environment

- One of our objectives is to contribute to environmental protection and to limit the direct and indirect impact of our activities on the environment. MORAVIA STEEL promotes a culture of sustainability in all areas of its operations.
- We are familiar with ESG (Environmental, Social, Governance) concept, we regularly monitor trends in this area and we are progressively implementing an ESG strategy in the



administrative buildings, sites, steelworks, warehouses and regulations in the field of ESG, both at national and European level.

- We support the international commitment to limit global warming and we are committed to decarbonization.

Final provisions

- These principles form the fundamental basis for our internal company regulations, including technical and organisational regulations (TOP) and related internal standards, and are set out in detail therein.
- We comply with these principles and we monitor and enforce their compliance within our enterprise.