



CODE OF CONDUCT OF MORAVIA STEEL a.s.

Our company MORAVIA STEEL a.s. was established in 1995 and from the beginning is closely connected with the region where it is located and the people who live there. We realize how much influence we exert over the region and therefore, we are fully aware of the responsibility that we bear.

We follow ethical principles and adhere to legal rules and regulations.

1. Ethical principles and respect for the law are the fundamental principles of our Code of Conduct and corporate culture.
2. Our enterprise is a trading company established and existing under the laws applicable in the Czech Republic. This law or any other law governing our relations is systematically monitored, recognized, respected and adhered to unconditionally and consistently.
3. We strive to keep our relations with our business partners, public authorities, our employees and the public long-established, stable and based on mutual respect and trust in just and honest conduct.
4. We act and make our decisions in accordance with the principles of employee collegiality and fair trade and also in accordance with the laws and obligations ensuing from legal rules and regulations, decisions of public authorities and the contractual relations in which we participate.

We appreciate our employees.

5. Respect for human rights is commonplace in our company. We do not incite nor tolerate any acts of discrimination. We condemn any form of forced, involuntary or otherwise illegal work.
6. We condemn the abuse of child labour. We employ only persons meeting the statutory requirements established by law.
7. We do not tolerate any illegal work, even among our business partners.
8. Procedures and conditions established by law have always been a standard practice in our relations with employees. This also applies to entering into and the content of employment contracts or other labour-law contracts and agreements, working hours, granting time off, working breaks, setting overtime, remuneration, making wage deductions, and termination of labour-law relations.
9. Our employees are properly remunerated for their work performance. Beyond the law we provide our employees with other benefits.
10. In relation to our employees, but also in relation to public authorities, we fulfil all our statutory disclosure obligations.
11. We consistently communicate with our employees by means of meetings and consultations with top management and other senior supervisors, including informing our employees about current affairs via LOTUS NOTES.
12. All our employees are regularly evaluated.



13. We are open to complaints from our employees or other persons. They are allowed to file complaints, including anonymous ones, and such complaints are addressed responsibly.
14. We respect the rights of employees, including the right to associate and bargain collectively.

We consistently comply with occupational health and safety.

15. Occupational health and safety are an organic part of all our activities and has the highest priority. We create the best possible working conditions in our company. We make sure that every working activity is conducted according to safe working practices.
16. We adhere to prevention. Our employees are consistently educated and informed about occupational health and safety.
17. We consistently provide assessment of our employees' medical fitness for work by means of occupational medical examinations. We do not allow any work performance that does not meet employees' requirements for medical fitness.
18. If an accident occurs despite our best efforts, we employ our system comprising of providing first aid, reporting and investigating accidents or other unfortunate events, and taking measures to prevent their occurrence and compensate for damages.

We appreciate our business partners.

19. We treat our business partners as equals and deal with them honestly, openly, fairly and with respect.
20. We assume that our business partners follow the same principles as we do. If we discover that it is not the case, we respect their decisions as long as they are not in conflict with legal rules and regulations and do not cause excessive risk or harm.
21. We are committed to create value for our business partners. With regard to our products we trade, we implement the principle of constant improvement, increasing their value added, while diminishing the environmental burden. We exercise a strategy of committing no errors.
22. We select our suppliers with proper care in order to maintain the quality of our traded products. We negotiate agreements with our suppliers regarding product quality and assess fulfilment of their obligations.
23. We evaluate the satisfaction of our business partners and possibly we solve their complaint.
24. We would like our business partners to cooperate with us continuously or to restore previous business with us. The success of our business partners is our success as well.
25. We adhere to the unity of words and practices; we keep our promises. We promote ethical business culture and comply with our obligations properly, fairly and honestly.
26. We are ready to arrange audit with our business partners in our company.



We apply a whistle-blowing policy.

27. We enable our employees and other persons to practice whistle-blowing, make queries and complaints.
28. All whistle-blowing reports, queries and complaints are consistently addressed, solved and used for further improvement.
29. We guarantee all employees protection against any disciplinary action on account of bona fide practicing whistle-blowing, making queries and complaints.

We condemn any manifestations of corruption.

30. We adhere to zero tolerance towards offering or accepting bribes.
31. We strictly encourage our employees to refrain from any act of corruption. In connection with the performance of work for our company, acting on our behalf or referring to our company, nobody is permitted to solicit or accept any services in exchange for granting or promising to grant any privileges, nor to offer or provide such services.

We respect economic competition and intellectual property.

32. We advocate a free, honest and fair competition. We do not engage in any acts that would undermine such competition.
33. We respect the legislation applicable to monopolies.
34. We avoid any conflict of interests and situations that may raise the suspicion of such a conflict. Any business dealings in conflict of interests are possible only if permitted by law.
35. We respect the intellectual property rights and interest to protect the confidentiality of trade secrets and other confidential information. We protect these rights and such information within the scope of the legislation, contracts with business partners, consent of data subjects, and business ethics.
36. We protect the personal information of our employees and all other persons whose personal information has been provided to us.
37. All of our employees, who in the performance of their duties come into contact with personal data, information constituting a trade secret or other confidential information, are bound to maintain confidentiality of such data and information.

We are a financially responsible company.

38. We strictly adhere to the general legal conditions for accountancy and financial reporting. Transparency and accuracy are our top priorities.
39. We do not tolerate any fraud.



Export and import legislation.

40. We comply with all applicable laws governing the control of imports and exports, including sanctions, embargoes and other laws, government regulations and methodologies governing the control of the transfer or transportation of goods and technology.

We are a socially responsible company.

41. We fulfil our corporate mission "Together for the Generations to Come."

42. We support the region and strive to contribute to further improving the quality of life of its inhabitants.

We protect the environment

43. Protecting the environment is a fundamental part of our policy. The standard is no less than fulfilling all the requirements of legal regulations and permission granted to us thereunder by the state authorities.

44. We use natural resources (e.g., water, energy sources) thriftily and sensibly in order to mitigate the impact of these processes on our planet's resources.

45. We take a proactive approach to reducing the impact of our activities on the environment.


These principles are the basic foundation of our company's internal regulations, including Technical and Organizational Regulations (TOP).

These principles are observed and their compliance in our company is monitored and enforced.

In Třinec, 15th June 2021



Ing. Petr Popelář, MBA
Chairman of the Board
Financial Director



Mgr. Krzysztof Roch Ruciński
Vice-Chairman of the Board
Sales Director