

CODE OF CONDUCT OF TŘINECKÉ ŽELEZÁRNY, A. S.

The Policy of Social Responsibility

Our company TŘINECKÉ ŽELEZÁRNY, a. s. has a long tradition of steel-making; its basic values have been shaped and kept since its founding in 1839. Further development is associated with responsibility towards our employees, business partners, society, the regions in which our company operates, and the people who live there.

The code of conduct reflects the principles that are the foundation of our business, our activities, and the use of management tools.

We follow ethical principles and adhere to legal rules and regulations

- Ethical principles and respect for the law are the fundamental principles of our Code of Conduct and corporate culture.
- Our company is established and exists under the laws applicable in the Czech Republic; the laws governing our activities and relations are systematically followed, recognized, respected and adhered to unconditionally and consistently.
- We act and make our decisions in accordance with the principles of corporate culture, social responsibility, employee collegiality and fair-trade, and also in accordance with the laws and obligations ensuing from legal regulations, decisions of public authorities and the contractual relations in which we participate.
- Business partners' conduct in accordance with the law and ethical principles is considered an unavoidable condition for our cooperation.
- The compliance program, including management of business and procedural risks according to International Organization for Standardization (ISO) standards, international standards for Quality Management Systems (QMS) including IATF 16949 standard, principles of Corporate Social Responsibility (CSR) international standard SA8000 Social responsibility, is consistently enforced, its effectiveness is continuously evaluated and measures are taken to improve it.

We are a socially responsible company

- We fulfil our corporate mission "Together for the next generations."
- Our vision is to be a progressive and socially responsible steel producer. We recognize the risk of climate change and its consequences. We actively contribute to protecting our planet. Our goal is to produce sustainable steel.
- Through our actions, we pursue a strategy of continuous development of products and services while applying socially responsible principles.
- In our visions, plans and decisions, we always take into account the interests of our business partners and employees, the impact on the regions in which we operate, and the impact on their inhabitants and on the environment,
- We strive to make our relations with our business partners, public authorities, our employees, trade unions and the public long-established, stable and based on mutual respect and rightful trust in honest

conduct,

- We support the regions in which we operate and we strive to contribute to further improving the quality of life of their inhabitants,
- Every year we issue a Corporate social responsibility report, which is published on our website www.trz.cz.

We respect our corporate culture

- We are proud of our history which we build on through further development of our company as a place with lasting values, traditions and customs.
- The basic principles of our corporate culture are:
 - focus on the customers, forthcoming and complete satisfaction of their needs with the highest quality products and services,
 - consistent fulfillment of the obligations,
 - good interpersonal relations based on cooperation and mutual respect,
 - satisfaction and motivation of employees,
 - development and use of knowledge, abilities, skills and experience of employees,
 - teamwork,
 - a high level of work ethics,
 - entrepreneurial spirit of good economists – technological advancement based on systematic innovation,
 - continuous improvement of everything and everyone.

We respect our employees

- Respect for human rights is a given in our company.
- We have implemented a Human and Labour Rights Policy that sets out principles for respecting human rights, ensuring decent working conditions, and promoting equal treatment.
- We neither encourage nor tolerate any form of discrimination. We respect employees' rights to privacy and condemn all forms of forced or compulsory labor.
- We condemn the abuse of child labour. We only employ persons who meet the conditions provided by legal regulations.
- We provide specialized training for pupils of secondary vocational schools and university students at our workplaces; we do so under the contracts with these schools under special circumstances meeting the requirements of pupils and students' age, knowledge and experience.
- We do not tolerate any form of illegal work, not even with our business partners.
- Procedures and conditions provided by legal regulations have always been the minimum standard in our relations with employees. This also applies to the conclusion and content of employment contracts or other labour-law contracts and agreements, length of working hours, work rest periods including

breaks, setting overtime, remuneration, making wage deductions, and termination of labour-law relations.

- Our employees are properly remunerated for their work, including providing extra pay for work in the afternoons, at night, on weekends and public holidays, overtime, and other bonuses. Beyond the law we provide our employees with social and other benefits.
- In relation to our employees, but also in relation to public authorities, we fulfil all our statutory disclosure obligations.
- We respect our employees' rights, including the right to form unions and negotiate collectively. We respect the position of trade unions as representatives of our employees and consider them our partners in social dialogue.
- We consistently communicate with our employees, including having meetings and consultations with TOP management and other senior supervisors, and informing our employees about current issues via effective means of communication.
- We regularly conduct surveys of employee satisfaction and motivation.
- We regularly evaluate our employees every year.

We apply a whistle-blowing policy / Grievance mechanism

- Through our established external reporting system(whistleblowing) and internal complaint and grievance mechanism, we enable our employees as well as external stakeholders to report harmful practices and submit inquiries and complaints.
- We consistently address all reports, inquiries, and complaints, resolve them, and use them as basis for further improvement.
- We guarantee protection for everyone against any form of retaliation for reporting harmful practices submitting inquiries, or filing complaints in good faith.

We consistently comply with occupational health and safety

- The safety and health protection of our employees is an integral part of all our activities and is our highest priority
- We have implemented and Occupational Health and Safety Policy that sets out principles for ensuring a safe and healthy working environment.
- We strive to create the most favorable working conditions possible. We adhere to a safety accident prevention program and ensure that every work activity is carried out using safe working procedures.
- We have developed and continuously assess and update a system for identifying and evaluating risks of potential health harm at work, including measures to eliminate such risks.
- We are committed to prevention. We continuously educate and train our employees in safe working practices and health protection.
- We provide our employees with personal protective equipment in accordance with lists prepared for each job position. Employees working in positions with increased thermal or physical strain are provided with protective beverages.

- We consistently ensure the assessment of our employees' medical fitness through a system of occupational health examinations; we do not allow work that does not correspond to an employee's medical fitness.
- Should an accident occur despite our efforts, we apply our system, which includes providing first aid, reporting and investigating accidents or other adverse events, and implementing measures to prevent recurrence and to compensate for damages.

We appreciate our business partners.

- We deal with all of our business partners honestly and transparently, with respect and fairness; we expect such conduct from them.
- The ethical principles of business conduct are governed within the company by a separate Business Ethics Policy.
- We have also implemented a Sustainable Procurement Policy, which sets out principles for a responsible, ethical, and sustainable approach in purchasing and supplier selection.
- We respect the interests and needs of our business partners, unless it is contrary to legal regulations and does not cause excessive risk or harm.
- We are committed to create value for our business partners. With regard to our products, we implement the principle of constant improvement, increasing their added value, while reducing the burden on the environment. We practice the strategy of zero errors.
- We choose our suppliers with thorough care in order to maintain the quality of our products. We negotiate agreements with our suppliers regarding product quality and evaluate the fulfilment of their obligations.
- We ensure adequate supervision of compliance with labour and technological procedures and of solutions to potential complaints from business partners. We evaluate the satisfaction of our business partners.
- We want our business partners to work with us continuously or to come back to us for business. The success of our business partners is also our success.
- We recognize the unity of words and actions; we keep our promises. We support ethical business culture; we fulfil our duties thoroughly, fairly and honestly.
- We are ready to arrange an audit with our business partners in our company.

We condemn any manifestations of corruption.

- We adhere to zero tolerance towards offering or accepting bribes.
- We educate our employees and strictly guided them to refrain from any act of corruption; in connection with the performance of work for our company, acting on our behalf or with reference to us, no one may solicit or accept any services in exchange for granting or promising to grant any privileges, nor offer or provide such services.

**We respect fair competition and intellectual property,
we protect personal data, and we safeguard the company's assets**

- We advocate a free, honest and fair competition; we do not engage in any acts that would undermine such competition.



- We avoid any conflicts of interest and situations that may cause suspicion of such conflicts.
- We have implemented a Security Policy to protect individuals and property, to safeguard information systems and technologies, and to protect intellectual property and confidential information, including trade secrets.
- We respect intellectual property rights and interest to protect the confidentiality of trade secrets and other confidential information, and we protect these rights and such information within the scope of legal regulations, contracts with business partners, data subjects' consents and business ethics.
- Personal data of our employees, as well as any other persons whose personal data have been provided to us, are always processed only in accordance with legal regulations.
- All our employees, who in the course of their duties come into contact with personal data, information constituting a trade secret or any other confidential information, are obliged to maintain confidentiality of such data and information.
- Employees are required to protect company assets and use them responsibly, economically, and exclusively for work purposes or for purposes approved by the company.

We protect the environment

- Environmental protection is a fundamental part of our policy. The standard is no less than fulfilling all legislation and authorization requirements granted to us thereunder by public authorities.
- In the long term and conceptually, we strive to continually reduce the impact of our activity on the environment. Old environmental burdens are removed.
- To meet environmental protection principles, we have set up and implement waste management systems preferring recycling, closed water systems and industrial wastewater treatment plants, chemical treatment and energy management; The priority is to gradually reduce air pollutant emissions.

We recognize the risks of climate change

- We acknowledge the risks of climate change and its consequences.
- We are committed to systematically reducing our carbon footprint, using natural resources efficiently, and minimizing emissions, waste, and other negative impacts of our activities.
- We have launched a transformation project aimed at creating an environmentally friendly steel production process. Its goal is to further reduce greenhouse gas emissions released into the atmosphere.
- We consider the steel from which our products are made as a strategic raw material, which as a 100% recyclable resources, represents a cornerstone of sustainable production.

We are committed and sustainable business

- We are committed to responsible and sustainable business in accordance with ESG (Environment, Social, Governance) principles.
- In our operations, we minimize negative environmental impacts, promote safe and and fair working conditions, respect human rights, and apply ethical and transparent governance. We also expect our suppliers to adhere to these principles.
- We regularly monitor trends in this area and strive for continuous improvement.



We do not use conflict minerals

- We are committed to ensuring that the production of our products does not involve conflict minerals (tantalum, tin, tungsten, and gold) originating from conflict-affected areas.
- All materials used in production are sourced from suppliers who adhere to conflict-free sourcing principles and provide transparent information about the origin of the raw materials.

We place emphasis on cybersecurity

- We place emphasis on cybersecurity and the protection of information systems, data, and digital assets.
- We have implemented a Cybersecurity Policy that establishes rules for the protection of information systems and data.
- Employees are required to follow established information security rules, protect access credentials, handle electronic information responsibly, and prevent cyber threats, including unauthorized access, data misuse, or system breaches.

We apply the Code of Conduct to all activities

The Code of Conduct is the fundamental basis of our company's internal regulations, including:

- conditions of employment
- technical and organizational regulations (TOP)

and related internal standards that are specified in such a way as to ensure their consistent application.

The Code of Conduct is respected and its compliance in our company is monitored and enforced.