



# **BUSINESS ETHICS POLICY**

**Our company accepts corporate responsibility for adhering to the business ethics policy in the following areas**

## **1. FREE COMPETITION (ANTICOMPETITIVE PRACTICES, INCLUDING CARTELS, ABUSE OF DOMINANT POSITIONS, ILLEGAL MERGERS AND ACQUISITIONS)**

We have always condemned and condemn any anticompetitive practices and we fully comply with Act No. 143/2001 Coll., on the Protection of Competition, as well as EU legislation on competition. We always proceed in accordance with these laws and respect the rules of the free market based on free competition of competitors within the framework of applicable legislation. We act as a responsible market participant and demand the same from our business partners.

## **2. CONFLICT OF INTEREST**

We make sure that our internal mechanisms are always set up in such a way as to eliminate risks arising from conflicts of interest of employees in which their personal and financial interests clash with the interests of our company, and thus prevent their personal interests from influencing their decision-making within our company or could lead to risks of corruption.

## **3. CORRUPTION, INCLUDING BRIBERY**

We have zero tolerance for offering or accepting bribes. We always encourage our employees to refrain from any corrupt conduct. No one may solicit or accept any performance in exchange for the provision or promise or provision of any benefit in connection with the performance of work for us, on our behalf or by reference to us. When dealing with our business partners, transparency and openness are essential for us to ensure trust and credibility.

## **4. COUNTERFEIT PRODUCTS**

The quality of our products, the satisfaction of our customers and our reputation is a fundamental priority for us, which is why we have a sophisticated system of quality control and subsequent marking of our products, which prevents counterfeiting.

## **5. FRAUDULENT CONDUCT**

We do not tolerate any fraudulent conduct or attempts at it, and we are able to detect any fraudulent conduct in time and thus prevent any fraudulent conduct thanks to a sophisticated system of corporate control and internal audit.

## **6. IMPORT AND EXPORT CONTROL**

We respect and comply with domestic and international legislation regarding the import and export of goods, services and information, including applicable embargoes and sanctions.

## **7. MONEY LAUNDERING**

We comply with the laws of the Czech Republic and the EU preventing money laundering and we take such measures to prevent this money laundering and the financing of terrorism.

## **8. CONFIDENTIALITY AND INTELLECTUAL PROPERTY**

We treat intellectual property with respect, we value it very much and we respect its protection, including copyright protection. We approach the personal data of our employees, our business partners and customers with due respect and caution, so that these data are processed lawfully and transparently towards the data subjects concerned, which is fully in accordance with applicable legislation – in particular Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and Act No. 110/2019 Coll., on the processing of personal data. Our internal legislation corresponds to this legislation and is continuously updated and adapted to current legislative developments and interpretation trends, especially those of courts and the European Data Protection Board, in order to always ensure the adequacy and transparency of personal data processing and its full protection.



## **9. DATA PROTECTION AND SECURITY**

Data protection and security is a priority for us, which we ensure with due care, we have a sophisticated security system for all IT systems, including cybersecurity, so that data is always protected as much as possible.

## **10. FINANCIAL RESPONSIBILITY / ACCURATE RECORDS**

We have a sophisticated accounting system using SAP software and detailed internal legislation based on valid legal regulations and corresponding to Czech and international accounting standards.

## **11. DISCLOSURE OF INFORMATION**

We comply with the obligations to publish information and data, which we are obliged to do to the extent and in the manner stipulated by applicable law, the articles of association of our business company and our internal legislation. Our trading company is the publisher of the printed weekly Třinecký/Trzyniecki hutník, and its electronic equivalent on the [www.ehutnik.cz](http://www.ehutnik.cz) website. We are aware of the important role of our business company in the region and the related importance of the possibility of informing our employees and the wider public through these media about current events in our company. We run the „WerkZona“ app for our employees, where they can find up-to-date and necessary information about our company.

## **12. WHISTLEBLOWING (POSSIBILITY TO SUBMIT SUGGESTIONS FROM THE OUTSIDE)**

We allow our employees and others to report harmful phenomena, submit questions and complaints. We consistently address, address and use all alerts, questions and complaints to further improve our relationships and our activities.

## **13. PROHIBITION OF RETALIATION**

We guarantee protection against any sanctions due to warnings, questions or complaints about harmful phenomena submitted by our company.

**THIS BUSINESS ETHICS POLICY IS FURTHER ELABORATED INTO THE OBJECTIVES OF THE IMS IN TŽ-MS.**