

# CODE OF ETHICS

## AL INVEST Břidličná, a.s.

### Introduction

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- Company AL INVEST Břidličná, a.s. wants to ensure that its business activities are conducted in compliance with all applicable legal regulations and in compliance with sustainable growth. This is also the requirement we place on our employees, customers, suppliers and all stakeholders who are involved in the activities of our company.
- Code of Ethics lays down **basic rules and principles relating to the Company's relationships with its employees and its environment** as well as the resulting behaviour of the Company employees'.
- Code of Ethics is **binding for all Company employees**.
- **All supervisors and members of the Company management** are responsible for the compliance with the Code of Ethics on their corresponding level in their respective areas. This activity is coordinated and inspected by the Human Resources department across the entire Company in cooperation with the Quality Attainment Manager who is a competent person responsible for activities in compliance with the Social Responsibility Requirements within the SEDEX system.

### Employment conditions, employee minimum age, bonus scheme

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- The Company employs workers, who comply with requirements given for the performance of each position stipulated by legal regulations. Work done based on Employment Contract is preferred. Other forms of employment (Contract for Work, Job Agency) shall be used only exceptionally, usually for short-term jobs. The Company does not use so called "Svarc system" (approximately: "large scale engagement of outsourced contractors").
- In compliance with ILO Convention No. 29 on forced labour and ILO Convention No. 105 on abolition of forced labour, forced labour or any proceeds therefrom are not used. The work for the Company is voluntary and any employee is entitled to terminate his or her work relationship by way stipulated in the Labour Code. In compliance with ILO Convention No. 138 on minimum age and Convention No. 182 on elimination of the worst forms of child labour, the Company does not employ children under 15 years of age and, beyond the scope of the Convention, neither adolescents under 18 years of age.
- Under the stipulated conditions, employees are entitled to a bonus upon retirement, loyalty bonus on work anniversary and, beyond the scope of law, they are also entitled to severance pay in case of job termination due to incapacity to work not caused by a work accident or occupational disease.

## Employee associations, fair and equitable treatment

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- We create conditions for operation of Company Labour Union, no employee may be disciplined or disadvantaged due to his or her participation in Labour Union. Company management discusses all crucial decisions relating to the Company with the Labour Union management.
- In compliance with ILO Convention No. 111 on discrimination, the Company does not discriminate job applicants or workers due to their race, colour of skin, religion, gender, age, physical abilities, national origin, sexual orientation, membership in political parties, membership in Unions, medical tests or family status.
- The Company entered into Collective Agreement regulating employee rights regardless of whether they are members of Labour Union or not. Employees are entitled to nominate their representative for the Supervisory Board.

## Work environment, health and safety at workplaces

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- The Company ensures safe and healthy working environment in line with respective legal regulations. We provide personal protective equipment free of charge, we perform risk assessment and safety supervision of individual workplaces. Technical and organizational measures are taken to prevent work accidents and occupational diseases. The Company employs its own Safety Officer.
- Each employee must have access to drinking water, sanitary facilities (changing rooms, showers, washing rooms, toilets), workplaces have adequate lighting, ventilation and adequate temperature.
- The Company has introduced a system of regular employee training in respect to work safety and the Company has on-site company doctor providing job-related medical care (examinations, medical evaluations, health surveillance over work places). Employees working in dangerous areas have opportunity to participate at recovery stays fully covered by the Company with wage compensation.

## Working and wage conditions

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- The Company ensures that its employees work in compliance with valid legislation relating to regular working hours, overtime work, breaks, time to rest, holiday and maternity and parent leave. All employees are provided with one extra week of holiday beyond the minimum required by the Labour Code. Detailed working conditions are regulated by the Code of Practice, whose publishing is conditioned by the previous agreement with the Labour Unions.
- Employees must receive wage, which, as a minimum, is in compliance with respective wage and legal regulations; monetary performance is provided to employees based on internal rules (wage rules, bonus scheme), it is discussed with the Labour Union prior to becoming effective. Beyond legislation scope, the Company provides all employees with an allowance for the pension scheme, regardless of the

pension scheme provider. Wage development is regularly discussed with the Labour Union.

- The Company provides and financially supports meals for employees (lunches, dinners) on the Company premises and there are snack shops and vending machines available (water, coffee, refreshments). A system of benefits is available for employees (swimming pool, sports and cultural activities).

## Product quality and safety, dangerous materials, the environment

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- Products supplied by the Company comply with quality and safety standards according to corresponding legal regulations and technical standards. Manufacturing processes are described in the in-house documentation (detailed process routing) and the properties of raw materials are defined on so called material cards.
- The Company complies with conditions relating to handling dangerous materials, chemicals, and ensures their safe handling, storage and disposal.
- Environmental protection is ensured through the Integrated Pollution Prevention and Control (IPPC), under which it is regularly inspected by the respective government bodies; any change or introduction of new process or manufacturing equipment is subject to the approval by the above bodies. The Company employs environmental engineer.

## Anti-bribery provisions, intellectual property, continuous improvement, suppliers

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- No employee may, directly or through intermediaries, offer or promise any personal, financial or unusual advantage with the aim to gain or keep financial, business or other advantage, either for him or herself or for the Company (accepting and offering bribes is prohibited).
- The Company may not provide or accept bribes, negotiate or accept illegal commission and must not require such conduct which would breach or force to breach valid legislation or which would lead to a corruption act. No agreements that breach rules of economic competition may be entered into.
- We respect protection of intellectual property, we ensure adequate protection of confidential information relating to our business partners and we only use such information for purposes for which we received it. The Company has a continuous improvement system which enables employees to file innovation proposals and it stipulates rules for remuneration.
- Suppliers of services and works are acquainted with the AL INVEST Břidličná, a.s. Code of Ethics and they are required to provide a written confirmation that their production and business activities are not in breach with this Code (see the Code of Ethics for Suppliers).

## Positive presentation of the Company in the region

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- The Company works with the public sector and community organizations in all its locations, it is aware of its position of an important employer in the region and it supports its employees in an active way of spending free time, including financial support of local associations and clubs and voluntary donor activity.

## Breaching the Code of Ethics

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- Each employee has a right to inform his or her superior, the HR department employees or the Vice-Chairman of the Board of the Board who is in charge of the Company management, of any breach of the Code of Ethics. They are responsible to discuss the information, inform the respective employee of the result and take a corrective measure if such breach is confirmed. The same process is applied in case the information is passed by the Labour Union. The breach of the Code of Ethics may also be communicated by an employee by posting it in the Employees' Questions and Comments Box.

Ing. Jan Marinov, MBA  
Vice-Chairman of the Board of Directors