

BUSINESS ETHICS POLICY OF JC-Metal s.r.o.

To fulfil social responsibility and achieve success on the market, the Company and its employees and representatives strive to adhere to the highest standards of ethical behaviour in business, following these principles:

Creating a Positive Business Environment and Fair Business (Fair Competition and Anti-Trust)

- Act freely in competition within internationally recognised rules of fair trade; follow the standards of fair trade, advertising and competition.
- Create an atmosphere of trust and correctness by the attitude and conduct in business relations.
- The Company respect a free competition and follows the anti-trust legislation.
- The Company denounces illegal agreements on prices or market sharing and other cartel activities that limit the possibility of free and legal competition.

Corruption, Extortion and Bribery

- The Company and its employees dissociate from any provision of advantages or rewards to potential customers, public authorities or other representatives of such authorities that are not in compliance with the law or with good business.
- Practice zero tolerance policy in all business contacts, forbidding all and any forms of extortion, corruption, blackmail or embezzlement.

Respecting Privacy and Personal Data Protection

- All our employees and third parties the Company deals with within business relations are entitled to privacy. JC-Metal s.r.o. undertakes to protect their personal data.
- Personal data protection provides the persons whose data are save with the right to manage the collection, processing, use, publishing and saving their data.
- All personal data must be used in a polite way and for specific, clear and legitimate purposes and they may only be saved for a period necessary with regard to the purpose they are processed for.
- The Company and its employees pledge to adequately protect personal data of all the persons they do business with, including their suppliers, customers, consumers, and employees. The parties must follow legal regulations and directives in the area of personal data and information protection in those cases when personal data is gathered, stored, processed, forwarded, and shared.

Financial Responsibility

- The Company employees shall never engage in any fraudulent or other illegal activities. This especially applies to conduct concerning ownership, property, financial reporting and accounting in the Company.
- The reports that the Company prepares and publishes must comply with all relevant international standards and legal regulations; in particular, accounting must accurately reflect the financial situation of the Company. Employees make sure that all business processes are documented in a diligent, timely and complete manner. The expenses of the Company must be reported diligently and without delays.
- Responsible persons bear liability for the corresponding processes, for their due and detailed documentation, and for their supervision.

Disclosure of Information

- All business meetings shall be managed in a transparent manner and shall be reflected in the business ledgers and records of the Company. Information regarding the workforce of the Company, their health and safety, environmental practices, business activities, structure, financial situation, and performance is disclosed in accordance with applicable laws and regulations and established industry practices.
- Falsification of records or misrepresentation of conditions or procedures against third parties is inadmissible.

Conflict of Interest

- To prevent any conflict of interest, the employees of the Company must avoid situations where the objectivity of their business decisions could be infringed.
- Although the employees may take part in non-profit activities in their own name, they should make sure that this does not create a conflict of interest against the Company.
- We respect the political opinions and personal obligations of our employees; however, any expressions of such opinions and obligations must remain at the personal level (i.e., outside the working hours and at the employee's own cost). The employees are formally prohibited from binding the Company to any political activism or demonstrations based on the use of the Company's name, its resources or means.
- In situations when the employee's personal interests are identified and there is a doubt regarding the objectivity of the decisions made on behalf of the Company, the employee must inform their superior of such a relation prior to making any decisions and must not play any role in the decision-making process in question.
- The employees should not accept any valuable objects and gifts from third parties when performing their jobs (except for souvenirs) when such a gift could elicit a feeling of indebtedness in the receiving party, which could potentially infringe the objectivity of their decision.

Intellectual Property

- Intellectual property rights must be respected. Technology and know-how shall be transferred in a manner that protects intellectual property rights. Information on customers and suppliers must be protected as well.

Counterfeit Parts

- The Company undertakes not to develop, manufacture and use any counterfeit parts or imitations. If the Company finds any such parts, they shall inform the original manufacturer, or take other measures in compliance with the law.

Export Controls and Economic Sanctions

- The Company adheres to the valid law and regulations in the area of import and export that restrict the movement, export and sale of goods. The Company also follows the laws and restricting regulations (sanctions) against some third countries, such as arms embargo or economic and financial restrictions.

Whistleblowing

- No employee or any other person that reports a potential or ongoing violation of valid legal standards or internal standards of the Company shall be the subject to recourse, discrimination or revenge from the Company or its employees.
- The identification data of employees and other persons reporting any ascertained or possible violation shall be maintained as confidential and shall only be provided to investigating authorities, if necessary.