

## Compliance with the Energy Group Code of Conduct

The provisions of this Code of Conduct are binding on the Group's employees and every employee is obliged to become familiar with it and follow it in full compliance. The Group shall make the Code of Conduct freely available to employees in an accessible and visible place in the Company and shall ensure that they are notified regularly every twelve months.

Employees shall report violations of the Code of Conduct to their immediate supervisor, to the next higher supervisor according to the organizational structure or anonymously through the employee suggestion box. The report shall be made orally or in writing. Violations of the Code of Conduct shall be judged in accordance with internal and legal regulations, this does not affect the actions of law enforcement authorities.

All those to whom a violation of the Code of Conduct is reported are obliged to guarantee the anonymity of the whistleblower. Anonymity may only be revealed with the consent of the whistleblower. Anyone to whom a violation of the Code of Conduct has been reported is obliged to deal with the report and take action in accordance with his or her responsibilities or to refer the matter to the Group's Human Resources Manager. The Company is committed to providing protection to any employee who reports anti-social activity or criminality of which he/she becomes aware in connection with the performance of his/her job or function.

This Code of Conduct has become a key internal document of each company belonging to the Energy Group following its ratification by all stakeholders.

1. 1. 2020 Myjava  
SLOVARM, a.s.:

Radovan Pobočík  
Chairman

Darek Stöhr  
Member of the Board

# CODE OF CONDUCT



# Energy Group Code of Conduct

**Energy Group (hereinafter referred to as “the Group”) is a group of companies operating in regions with a strong history in the industry. The Energy Group Code of Conduct sets out principles of conduct in accordance with applicable law, recognised values and determines relations with the external environment. It thus obliges every employee of a company that is part of the Group to comply with moral standards of conduct and to accept responsibility for their actions.**

## 1. Protection of the Energy Group’s Reputation and Assets

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It is the duty of all Group employees to conduct themselves at all times in a manner that preserves and promotes the reputation of their company and the Energy Group as a whole. It is also the duty of employees to protect the tangible and intangible assets of the Group, using them responsibly, for legitimate business purposes. Assets created by employees in the performance of their duties are the sole property of the Group.

## 2. Energy Group and Employees

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Energy Group condemns discrimination in hiring, training, evaluation and dismissal of employees, does not use forced labour, child labour, rejects illegal employment. The Group does not tolerate any form of harassment, whether in the form of psychological, physical violence or sexual harassment.

Relationships with employees and between supervisors and subordinates are based on respect and dignity of each person and on respect for fundamental human rights and generally binding legal regulations applicable to the activities of employees. Everyone has the right to the preservation of personal honour, good reputation and the protection of his or her name, the right to freedom, association and the right to engage in collective bargaining within the framework of the regulations. The Group does not interfere in the private and family life of employees, providing equal opportunities to all regardless of race, colour, sex, nationality, religion, age, ethnicity or other distinguishing characteristic.

It also applies the principle of fair remuneration according to the quality, competence and quantity of work performed. It provides employees with training and education opportunities that support their professional development; it ensures occupational health

protection and the creation of suitable and safe working conditions for the employee. The Group encourages cultivated communication not only between individual employees but also between departments, including between departments of individual Group companies. Deliberate concealment of information that could contribute to the improvement of the Group’s work and results is considered unacceptable.

The Employee undertakes not to use, make copies of, disclose or allow access to any confidential information belonging to the Group or any third party during the duration of his/her relationship with the Company and for a period of ten (10) years thereafter.

## 3. Compliance with Occupational Health and Safety Regulations

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The Group cares about the safe working environment for its employees. The general principles of prevention and the basic conditions for ensuring occupational health and safety and for eliminating the risks and factors contributing to the occurrence of occupational accidents, occupational diseases and other health impairments are reflected in the related internal regulations. The Group ensures employee awareness, including training on occupational health and safety requirements, while striving for continuous improvement of the working environment.

## 4. Relationship with Business Partners, Acceptance of Gifts and Corruption

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All employees must conduct themselves fairly when dealing with business partners, avoiding any illegal actions, conflicts of interest or any collusion. All information about relationships within the Group and its suppliers and business partners is treated as confidential. Employees of the Group shall not solicit or accept services, gifts or benefits from customers or suppliers that influence the employee’s actions in representing the Group or that would cause the employee to lose his or her independent judgment. When dealing with business partners, Group employees undertake to apply an honest approach that is consistent with ethical, legal and anti-corruption behaviour.

Gifts and benefits may be exchanged at a level that does not exceed the usual widespread local courtesies in accordance with ethical business practice and applicable laws. When in doubt, employees must consult with their immediate supervisor.

## 5. Energy Group and Its Responsibility Towards the Environment

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The Group strives to behave responsibly towards the surrounding community and tries to contribute to the development of the region – supporting charitable, educational, cultural and sporting activities with respect for local customs and traditions. It is committed to improving its environmental performance, including influencing the environmental behaviour of its employees and increasing resource efficiency.