

# METAL TRADE COMAX, a.s.

## THE CODE OF ETHICS

METAL TRADE COMAX, a.s. (“MTC”) adopts this Code of Ethics as a set of fundamental business values and attitudes which MTC adheres to in its operations.

Maintaining the company’s reputation and the trust placed by all stakeholders in MTC ranks among the company’s most important tasks.

The company’s compliance with the Code of Ethics is its moral obligation that governs the behaviour and conduct of all employees towards MTC, colleagues, customers, other trading partners, government agencies and the public.

MTC carries out all activities in an ethical manner, in good faith and in strict compliance with all laws and regulations applicable in that geographical area.

### Customer relations

MTC considers honesty and fairness towards customers to be the bedrock of a successful business relationship. MTC makes sure that its products conform to the declared quality parameters and requirements set out in national and international standards.

MTC understands the importance of always delivering on time.

In selling its products, MTC shall not use any means other than generally recognised business practices.

MTC deems all forms of corruption unacceptable.

MTC considers customer information to be confidential.

### Supplier relations

Our suppliers are selected based on their merits.

In purchasing products, services, etc., MTC uses no means other than generally recognised business practices, and never abuses its market position.

MTC deems all forms of corruption unacceptable.

MTC honours all contractual and payment terms.

MTC considers all information on relations with its suppliers to be confidential.

### Employee relations

The company’s relations with employees are based on the respect for the dignity of each individual.

MTC recruits and promotes employees based on their qualifications for the job, without any political, racial, religious or national discrimination, and regardless of their sex, age, status or incapacity not related to their job responsibilities.

MTC strives to create a safe working environment with high sanitary standards, pleasant working climate, and conditions that encourage employees to enhance their professional qualifications.

MTC makes sure its employees are regularly paid for their work and receive their salaries on the agreed pay day.

MTC does not tolerate any sexual, physical or psychological harassment of employees.

MTC requires its employees to follow occupational safety rules, and observe and use their hours of work.

With respect to the company’s assets, MTC requires its employees not to act contrary to the employer’s legitimate interests, to take due care of items assigned to them, and to protect the employer’s assets.

Information obtained by employees about MTC as part of their work must not be used for personal profit or any purpose other than the purpose the information was intended for.

The core strategy pursued by the company is competition in the market based on the product, quality of services and price competitiveness.

Therefore, it is strictly prohibited to provide/receive disproportionate entertainment or gifts to/from suppliers or customers.

MTC strives to resolve any labour disputes between the company and its employees through negotiations.

### Relations with state administration bodies, municipalities and the region

In the course of its business activities, MTC also takes into consideration the interests of a wider community, including national and regional interests.

The company's communication with state administration bodies is based on truthful information about MTC. MTC makes sure that its books of account are kept properly and that its financial obligations towards state administration bodies are fulfilled in a timely manner. MTC actively supports charitable causes.

### **Environment**

MTC is committed to improve the quality of the environment. MTC is actively involved in eliminating the consequences of its business operations and aims to minimise the environmental impact of its production operations by upgrading its technological processes. MTC keeps the stakeholders informed of its environmental programme. In the course of its business activities, MTC observes the standards regarding waste, emissions, etc.

### **Relations with competitors**

MTC competes vigorously and with integrity. MTC does not damage the reputation of its competitors. MTC makes sure that its employees maintain the confidentiality of business or otherwise confidential information when dealing with competitors. MTC does not obtain information about competitors dishonestly. MTC does not engage in restrictive business practices.

### **Relations of employees towards the company**

Employees are obliged to safeguard the company's assets and make effective use thereof. Unauthorised personal use of any of the company's assets is strictly prohibited. Employees are obliged to maintain the confidentiality of information received from MTC or its clients; this obligation continues to apply beyond the termination of their employment. Employees are obliged to provide accurate and complete information to the company's managers, internal and external auditors, and all other persons authorised to obtain information.

### **Compliance with standards and verification thereof**

Each manager is responsible for communicating this Code of Ethics to their subordinates. MTC has a system in place (governed by an internal policy) that allows employees to raise their concerns over the ethicality of the company's or its employees' behaviour. The company's management investigates all concerns and information related to the violations of this Code of Ethics and, if necessary, makes sure that appropriate measures are adopted.

This model of conduct is applied to all managers and employees of MTC.

Velvary, 1 January 2021

Ing. Marián Manda, CSc.  
Managing Director