

# METAL TRADE COMAX, a.s.

## CODE OF ETHICAL CONDUCT FOR SUPPLIERS OF METAL TRADE COMAX, a.s.

**METAL TRADE COMAX, a.s.** carries out surface treatment of steel and aluminum strips by coating, as well as their forming and cutting. METAL TRADE COMAX, a.s., aims to contribute to positive development, improvement of the environment and quality of life. It is committed to continuously increasing customer satisfaction, employee satisfaction and improving living standards, applying the principles of Corporate Social Responsibility (CSR) – which encompasses social, environmental and economic principles – under the motto: “Kindness towards people and the environment pays off.”

We are aware of our position in society and of the trust placed in us by our customers, employees, and business partners. In connection with the UN Global Compact and its ten fundamental principles, we have established our own internal rules for supplier conduct.

The Code of Ethical Conduct for our company’s suppliers sets out the basic requirements for suppliers regarding respect for human rights, compliance with laws and regulations, social and working conditions, environmental protection, and anti-corruption behavior. We expect suppliers and their subcontractors to ensure compliance with this Code of Ethics.

### 1. Human Rights

METAL TRADE COMAX, a.s. promotes the values enshrined in the Universal Declaration of Human Rights and the core conventions of the International Labor Organization. Suppliers should support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. The basic requirements are as follows:

#### 1.1. Respect for Human Rights

- Support equal opportunities and equal treatment of employees regardless of skin color, ethnic origin, nationality, social background, disability, sexual orientation, worldview, religion, gender, or age;
- Respect the personal dignity, privacy, and personal rights of every individual;
- Not tolerate unacceptable treatment of employees, such as mental cruelty, sexual and personal harassment, or discrimination;
- Not tolerate conduct (including gestures, speech, and physical contact) that sexually harasses, coerces, threatens, insults, or exploits others.

#### 1.2. Absence of Conflict Minerals

- Ensure that no materials are used in production that directly or indirectly finance armed groups that violate human rights.

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## 2. Working Conditions

In the area of compliance with employees' working conditions, METAL TRADE COMAX, a.s., places respect and trust in each employee as a top priority. It promotes freedom of association, the recognition of the right to collective bargaining, elimination of all forms of forced and compulsory labor, abolition of child labor, and elimination of discrimination in employment and occupation. METAL TRADE COMAX, a.s. expects suppliers to respect and comply with the following requirements:

### 2.1. Employee Rights

- Provide fair remuneration and guarantee at least the statutory minimum wage in the respective country;
- Comply with the legally stipulated maximum working hours in each country;
- Recognize the right to freedom of association and not disadvantage or discriminate against members of employee organizations or trade unions;
- Not tolerate any form of forced labor.

### 2.2. Employee Health and Safety

- Take responsibility for the health and safety of their employees;
- Minimize risks and take the best possible preventive measures against workplace injuries and occupational diseases;
- Provide training and ensure that all employees receive occupational health and safety, fire protection, and other safety training.

### 2.3. Prohibition of Child Labor

- Not employ children younger than the legal minimum age. The minimum age is defined as the age at which compulsory education is completed, but in any case, no less than 15 years. Children above the minimum age must not be employed in hazardous work that is harmful to their personal development.

## 3. Environment

METAL TRADE COMAX, a.s. effectively maintains an Environmental Management System (EMS), thereby minimizing environmental impact, carefully managing environmental protection, and complying with environmental and other applicable legislation related to its activities. Suppliers should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and dissemination of environmentally friendly technologies. METAL TRADE COMAX, a.s. outlines the following basic requirements for suppliers in the field of environmental care:

### 3.1. Environmental and Climate Protection

- Act in compliance with legal and international standards related to environmental protection;

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- Minimize environmental burdens and continually focus on improving environmental protection;
- Reduce emissions of air pollutants and greenhouse gases (especially CO<sub>2</sub>), limit soil and water contamination, and reduce harmful noise emissions as much as possible.

## 3.2. Environmental Management System

- Establish or use an appropriate environmental management system;
- Manage, monitor, assess, and address substances that have negative environmental impacts.

## 4. Anti-Corruption Conduct

Bribery, corruption, conflicts of interest, and unfair competition can cause significant damage to a company's reputation and individuals, resulting in substantial civil and criminal penalties, loss of important market opportunities, disruption of the market, maintenance of inappropriate business practices, costly and stressful litigation, and broader harmful impacts on society and communities. Suppliers should ensure anti-corruption conduct in all forms, including extortion and bribery. The requirements of the METAL TRADE COMAX, a.s. Supplier Code of Ethics also address anti-corruption behavior:

### 4.1. Corruption and Bribery

- Not tolerate any form of corruption or bribery and not be directly or indirectly involved in any form of corruption or bribery, including offering or promising anything of value to public officials or private sector counterparts to influence official action or gain improper advantage.

### 4.2. Fair Competition

- Protect competition and contribute to fair competition, avoiding any conduct that could be considered anti-competitive under competition law (such as prohibited agreements, bid rigging, abuse of dominant position, etc.).

### 4.3. Conflict of Interest

- Avoid any conflicts of interest that could adversely affect business relationships.

### 4.4 Money Laundering and Terrorism Financing

- Not permit money laundering or the financing of terrorism.

### 4.5. Intellectual Property

- Respect and protect the intellectual property rights of METAL TRADE COMAX, a.s. and all third parties.

### 4.6. Counterfeit Parts

- Not develop, produce, or use counterfeit parts. If such parts are discovered, notify the original manufacturer and/or initiate law enforcement action.

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The requirements are set out in the METAL TRADE COMAX, a.s. Supplier Code of Ethics form part of contracts and purchase orders issued from 1 January 2021. Compliance with them influences supplier evaluation. METAL TRADE COMAX, a.s. expects that, in the event of a breach of the Supplier Code of Ethics, you will contact METAL TRADE COMAX, a.s. at: **info@mtcomax.cz**.

All reports are strictly confidential. METAL TRADE COMAX, a.s., declares that it will not take any retaliatory action against anyone who reports in good faith. All reports will be thoroughly and independently investigated.

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