

THE CODE OF ETHICS FOR METAL TRADE COMAX, a.s. SUPPLIERS

METAL TRADE COMAX, a.s. is engaged in the business of environmentally friendly recycling of waste containing aluminium, production of alloys from such waste, and the coating, shaping and cutting of steel and aluminium strips. METAL TRADE COMAX seeks to contribute to positive development, support the environment and quality of life, continuously increase customer and employee satisfaction, improve the living standards and apply the social, environmental and economic principles of corporate social responsibility (CSR) in line with the motto “Being good to people and to the environment pays off”.

We are aware of our position in society and of the trust that our customers, employees and trading partners place in us

. Based on the UN Global Compact and its ten fundamental principles we have defined our own internal rules of supplier conduct.

This Code of Ethics for Suppliers sets out our essential requirements for **suppliers** in terms of human rights, compliance with laws and regulations, social and working conditions, environmental protection and anti-corruption conduct. We expect our **suppliers** and their **subcontractors** to ensure compliance with this Code of Ethics.

1. Human rights

METAL TRADE COMAX advocates the values enshrined in the Universal Declaration of Human Rights and in the fundamental conventions of the International Labour Organization. Suppliers should support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses. Our key requirements are as follows:

1.1. Respect for human rights

- Promote equal opportunities for and treatment of employees irrespective of their skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
- Respect the personal dignity, privacy and rights of each individual;
- Do not tolerate any unacceptable treatment of employees, such as mental cruelty, sexual and personal harassment or discrimination;
- Do not tolerate any behaviour (including gestures, language and physical contact) that is sexual, coercive, threatening, abusive or exploitative.

1.2. Absence of conflict minerals

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

2. Working conditions

In the field of compliance with employee working conditions, METAL TRADE COMAX puts respect for and trust in each employee first. The company promotes the freedom to associate and recognises the right to collective bargaining, employee rights, and the elimination of all forms of forced and compulsory labour, child labour and discrimination in the workplace. METAL TRADE COMAX expects its suppliers to respect and observe the following requirements:

2.1. Employee rights

- Provide fair remuneration for work and guarantee the applicable national statutory minimum wage;
- Comply with the maximum number of working hours laid down in the national laws;
- Recognise the right of free association and refrain from favouring or discriminating against members of employee organisations or trade unions;
- Do not tolerate any form of forced labour.

2.2. Employee health and safety

- Take responsibility for the health and safety of employees;
- Mitigate risks and take the best possible precautionary measures against accidents and occupational diseases;
- Provide training and ensure that all employees are educated in occupational health and safety, fire prevention, and other health and safety rules.

2.3. Prohibition of child labour

- Do not employ any persons under the minimum legal age for employment. The minimum age is the age at which the child completes elementary education but not less than 15 years. Children over the minimum age shall not be employed for any hazardous work that is inconsistent with the child's personal development.

3. Environment

METAL TRADE COMAX minimises its environmental impact by strictly observing its EMS, takes proper care of the environment, and acts in accordance with the environmental and other laws covering its operations. Suppliers should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies. The fundamental environment-related requirements placed by METAL TRADE COMAX on suppliers are as follows:

3.1. Environmental protection

- Act in accordance with the statutory and international standards regarding environmental protection;
- Minimise environmental pollution and make continuous improvements in environmental protection.

3.2. Environmental management system

- Build or use a reasonable environmental management system;
- Manage, control, evaluate and address substances with a negative impact on the environment.

4. Anti-corruption conduct

Bribes, corruption, conflicts of interest and unfair competition may damage the reputation of the company and people, result in severe civil and criminal sanctions, cause the loss of significant market opportunities, cause market disruption and the continuation of inappropriate business practices, lead to costly and stressful litigation for businesses and individuals, cause harm to society and municipalities, and have many other impacts. Suppliers should promote all forms of anti-corruption behaviour, including against extortion and bribery. The requirements

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of the Code of Ethics for METAL TRADE COMAX Suppliers also apply to anti-corruption behaviour:

4.1. Corruption and bribery

- Do not tolerate any form of corruption or bribery and do not participate, whether directly or indirectly, in any form of corruption or bribery, including any offer or promise of anything of value to a public official or private sector counterparty to influence official conduct or gain undue advantage.

4.2. Fair competition

- Protect competition and contribute towards fair competition, avoid any conduct that might be considered contrary to competition law (prohibited agreements, bid rigging - prohibited agreements between tenderers, abuse of a dominant position, etc.).

4.3. Conflicts of interest

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

4.4. Intellectual property

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

The requirements set out in the Code of Ethics for METAL TRADE COMAX Suppliers form part of contracts and orders entered into with effect from 1 January 2021. The evaluation of suppliers is influenced by compliance with these requirements. METAL TRADE COMAX expects you to report any violation of the Code of Ethics for METAL TRADE COMAX Suppliers to the company by sending an email to info@mtcomax.cz. All such reports are strictly confidential. METAL TRADE COMAX will not take any retaliatory action against anyone who makes a report in good faith. All reports will be thoroughly and independently investigated.

Velvary, 1 January 2021