

KOSIT

CODE OF CONDUCT

Our Purpose,
Guiding Behaviour and Values



Version 2024





Management Summary

Dear Colleagues,

Our achievements are a direct result of your dedication and hard work. Each day, you contribute meaningful services and solutions that benefit our customers, communities, and the environment. Personally, I am deeply committed to making our company an exceptional place to work for every employee. I want it to be a place where you can grow your career while feeling appreciated, supported and empowered.

We must cultivate in everyday life a People First culture, empowering employees to take the right actions at right time. This philosophy sets the standard for our core values and commitments, guiding our decisions and behaviours. Our vibrant and unique culture allows us to operate under a shared standard – one that unites us and defines our identity as a company. Our Code of Conduct offers essential guidance on how to uphold these standards, ensuring that we act with integrity and comply with both internal policies and external regulations. Our success and reputation depend on this.

While the Code cannot cover every scenario you may encounter, it serves as a valuable resource for understanding the rules relevant to your role. We want you to feel confident in Speaking Up if you have questions, concerns, or issues. Your supervisor or Human Resources is often a great place to start, but you can also reach out to the appropriate department, any member of management, or email the Helpline. Rest assured, when you SPEAK UP, we are here to listen and take action. We will not tolerate any form of retaliation for concerns raised in good faith.

I deeply appreciate everything you do and want to personally thank you for your commitment to upholding the Code of Conduct, as well as our shared promise to continually strive for a sustainable future.

Sincerely,

Marián Christenko

Marián Christenko
Chief Executive Officer

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Core Principles

Core Principles

Our Commitments and Values



- **Safety is Our Priority** – We work safely and ensure the well-being of others.
- **Unity and Respect** – We are one team, treating each other with respect and embracing diversity.
- **Adaptability** – We remain dynamic and open to change.
- **Shared Responsibility** – We take ownership of our actions and hold each other accountable.
- **Professionalism and Integrity** – Everything we do is carried out with the highest level of professionalism and honesty.

These principles set the benchmark for our Fundamental Commitments and Core Values, shaping our actions and decisions each day.



- **Entrepreneurial Spirit** – We approach challenges with innovation and initiative.
- **Purpose-driven Technology** – We apply technology that suits sustainable future.
- **Simplicity** – We strive to keep things straightforward and efficient.
- **Positivity and Enjoyment** – We stay positive and take pride in what we do, ensuring we enjoy the process.

Our Fundamental Commitments

People First

We are committed to taking care of each other, our customers, our communities and the environment. We are also dedicated to creating a workplace where open and honest communication is not just encouraged but expected. If you encounter any situations that you believe may involve a violation of policies or ethical standards, we want you to feel confident in reaching out to your supervisor or management. Your voice is valued, and we are committed to addressing concerns in a transparent and supportive manner.

Success with Integrity

Our success is defined not only by the outcomes we achieve but by how we achieve them. We pledge to be accountable, honest, trustworthy, ethical, and compliant in everything we do.

Our Core Values

- **Diversity and Inclusion**

We foster a culture of respect, trust, open communication, and embrace the diversity of thought and people.

- **Customers**

Our customers are at the heart of everything we do, and we strive to exceed their expectations every day.

- **Safety**

Health and safety are the foundations of our work, and we never compromise when it comes to protecting our team and those we serve.

- **Environment**

We are committed to being responsible to the environment, advocating for sustainability in all that we do.



Our Code's Purpose



About Our Code

The Code of Conduct serves as a roadmap, helping us align our daily actions with our Fundamental Commitments and Core Values. It outlines how we should treat one another and conduct our business, with our reputation resting on the choices we make every day. While the Code doesn't address every possible scenario, it provides guidance on handling various situations, and relevant departments for further assistance.

Operating in highly specific industry, KOSIT must comply with all applicable laws and regulations. Every employee is responsible for adhering to the Code, internal policies, and these laws. Additionally, all actions must always align with our Fundamental Commitments and Core Values. Failure to fully comply may result in disciplinary action, up to and including termination.

Code Application

This Code applies to KOSIT a.s, its subsidiaries and operating divisions, collectively referred to as "KOSIT" or the "Company." It is applicable to all KOSIT employees and our Board of Directors. We also expect consultants, contractors, vendors, and other third parties conducting business on our behalf to follow this Code. In cases where a collective bargaining agreement conflicts with any part of the Code, the collective bargaining agreement will take precedence.

Understanding Our Code

It's important to be familiar with the entire Code, even if some sections may not apply to your everyday tasks.

Right Action

To make the Code easier to understand, the Table of Contents is organized around our Fundamental Commitments.

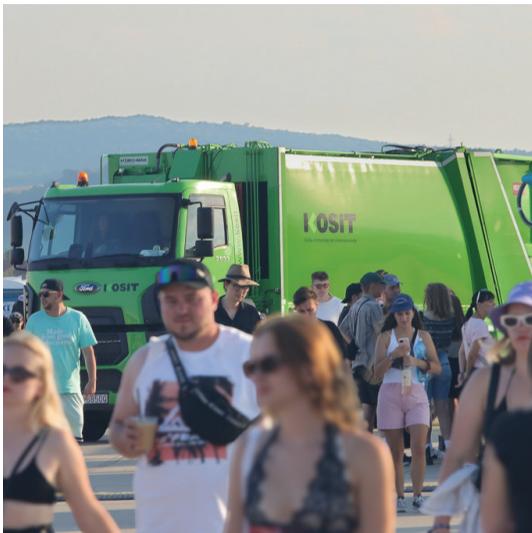
For any questions related to the Code of Conduct, you can email the Helpline nas.kodex@kosit.sk

Expectations

Below is a summary of key expectations for adhering to the Code and upholding our Commitments and Values. These apply to all employees, with additional expectations for our leaders.

Expectations For Our Employees

- Demonstrate our commitments and values in your daily words and actions.
- Be actively engaged in upholding compliance and ethics.
- Understand and consistently follow the Code and Company policies.
- Take personal responsibility for safeguarding and enhancing the Company's culture and reputation.
- Use your Stop Work Authority if you encounter a safety risk.



Expectations For Our Leaders

- Foster a SPEAK UP environment based on trust, free from fear of retaliation.
- Help your employees understand their responsibilities regarding compliance.
- Lead by example, holding yourself and your team accountable for the Right Actions and Right Approach.
- Evaluate employees not only on the results they achieve but also on how they achieve them.



Speak Up. Listen Up.

- Everyone is expected to speak up immediately if they have a question, issue, or concern.
- See something, say something: Start by talking to your supervisor or Human Resources. You can also contact any relevant department or any member of management.
- When you speak up, the Company will listen up and follow up.
- The Company strictly prohibits retaliation against anyone who speaks up in good faith.

Guiding Behaviour

Use the following series of questions to help ensure you take the right action:

1

Is it legal?

2

Does it comply with our Code, policies, and procedures?

3

Does it align with our Fundamental Commitments and Core Values?

4

Would your team member, supervisor and the Company approve?

5

Would you feel proud if your action appeared on the front page of the local newspaper?



If you can confidently answer **"yes"** to all these questions, you can proceed.
However, if you answer "no" or are uncertain about any of them, speak up and seek guidance.



Speak Up. Listen Up.

We cultivate a culture of open and honest communication. Every employee should feel empowered to seek guidance and raise concerns. If you witness or suspect any misconduct, speak up - even if it's uncomfortable. When you speak up, you won't be ignored.



Speak Up

Company values your voice and expects you to SPEAK UP if you have a compliance or ethics question, issue, or concern. This includes matters such as harassment, discrimination, fraud, safety, environmental concerns, accounting irregularities, or theft.

If you're aware of any potential violation of the Code of Conduct, Company policies, or external laws and regulations, blow the whistle immediately to help prevent further issues.

Reference: Directive on the procedure for reporting anti-social activity.

When reporting, provide as many relevant details as possible to ensure a thorough investigation. Reports must be made in good faith. False reports, threats, or malicious damage to someone's reputation may result in disciplinary action, including termination.

Listen Up

KOSIT is committed to fostering a SPEAK UP culture where concerns are met with a promise to LISTEN UP and FOLLOW UP. Regardless of how a concern is reported, it will be reviewed and properly investigated. Confidentiality will be maintained as much as possible while we follow up and investigate.

We respond quickly to reports of illegal activity, security issues, accounting or auditing irregularities, policy violations, and health and safety concerns, coordinating with the relevant teams. If violations are found, we act promptly and implement changes to prevent recurrence.



Q. What does it mean to make a report in good faith?

A. Making a report in good faith means you believe your report is true and complete at the time. It doesn't require having all the facts or a perfect understanding of the situation.

Employees may be asked to participate in internal or third-party investigations. When asked, you must fully cooperate, which includes:

- Providing complete and honest information.
- Not discussing the investigation with anyone outside the process.
- Avoiding interference or providing misleading information.
- Failure to cooperate fully may result in disciplinary action, including termination.

When you speak up, your supervisor or Human Resources is often a good place to start. However, you can also reach out to:

- An employee from another department.
- Any member of management.

Q: I suspect the Company is not accurately reporting its expenses, but my supervisor disagrees. What should I do?

A: Speak up. If you have a good faith reason to believe misconduct is occurring, report it. Since you've already approached your supervisor, reach out to another manager or the relevant KOSIT department.

Zero Tolerance for Retaliation

KOSIT has a strict zero tolerance policy for retaliation against anyone who SPEAKS UP in good faith. Retaliation of any kind will result in disciplinary action, including termination.

We recognize the courage it takes to voice concerns, and we will not retaliate, nor allow retaliation, against anyone for:

- Raising questions, issues, or concerns in good faith.
- Reporting potential misconduct or legal violations to us or a government authority.
- Assisting in an investigation of misconduct.
- We take allegations of retaliation seriously and will investigate them, ensuring appropriate measures are taken.



Our People First

Our People First

Our success starts with us. The Company's success is driven by the actions of its dedicated, engaged, and resilient team members. It begins with us fostering a culture of trust, respect, and mutual civility. To achieve this, we must:

- Collaborate effectively as a team.
- Respect the dignity of every individual.
- Listen openly to concerns and suggestions.
- Take accountability for our actions.
- Comply with all relevant policies, laws, and regulations.
- SPEAK UP immediately when we have any questions, issues, or concerns.



Employment Practices

We never base employment decisions or engage in harassment due to:

- Race
- Colour
- Sex
- Pregnancy
- Sexual orientation
- Gender identity expression
- Religion
- Marital status
- Age
- National or ethnic origin
- Disability
- Genetic information
- Citizenship status
- Support for or against a Union
- Any other characteristic protected by laws

Diversity & Inclusion

We are dedicated to promoting a diverse and inclusive work environment. We foster respect, trust, open communication, and diversity of thought and background. Our goal is to attract, develop, and retain a workforce that reflects the diverse communities we serve. This ensures an inclusive workplace that values differences and empowers employees to reach their full potential.

Your commitment to care and respect plays a vital role in creating a workplace where honesty, dignity, and courtesy are the norm, fostering an atmosphere of trust, openness, and belonging.

Q: I applied for a position on another team, but it was given to someone less qualified. I suspect this decision was made because of my age. What should I do?

A: Employment decisions at our Company must always be based on objective criteria. If you suspect discrimination, **SPEAK UP**. Start by discussing the issue with your supervisor or Human Resources. You can also contact any member of management or email the Helpline: nas.kodex@kosit.sk.



Anti - harassment

Company is committed to maintaining a harassment-free work environment. Harassment of any kind, including sexual harassment, is strictly prohibited. Employees are expected to treat coworkers, clients, partners, vendors, and suppliers with respect, professionalism, and courtesy in all interactions, whether at work or during work-related activities.

We will not tolerate any abusive, threatening, offensive, or intimidating behaviours, whether verbal or physical, that interfere with someone's ability to perform their job or impact their employment conditions. If you experience or witness harassment, discrimination, or any inappropriate conduct, we urge you to speak up immediately.

Workplace Violence

We enforce a zero-tolerance stance on workplace violence. Any behaviour that could make someone feel unsafe or threatened is strictly forbidden. This includes, but is not limited to:

- Verbal threats or intimidation.
- Physical aggression or harm.
- Property damage or sabotage.
- Hazing or any form of intimidation.

Acts that compromise safety or create a hostile work environment will not be allowed. In the case of imminent danger, contact local emergency services immediately.

Our company is dedicated to providing a safe, harassment-free workplace. Everyone must be vigilant in recognizing violent or illegal behaviours. If you feel unsafe or witness misconduct, do not hesitate to report it.



Q: My supervisor often yells at me. Is this considered harassment?

A: It could be. Regardless, such behaviour creates a negative atmosphere and violates our respectful workplace policy. You should report your concerns through the appropriate channels.

Q: My coworker frequently makes offensive jokes. I don't want to cause trouble, but it makes me uncomfortable. Should I ignore it?

A: No. You should not remain silent. If you feel uncomfortable, ask your coworker to stop or seek help from your supervisor. If neither of these options works, or the behaviour continues, **SPEAK UP** by contacting HR, management, or email the Helpline: **nas.kodex@kosit.sk.**

Alcohol and Drugs

We are committed to protecting the safety of our employees, customers, and the communities we serve. Our company takes a zero-tolerance approach to drugs and alcohol in the workplace. Employees are prohibited from using, possessing, selling, transferring, consuming, inhaling, purchasing, or handling alcohol or illegal drugs while on company property, customer property, or when operating company vehicles. We also forbid working under the influence of alcohol, cannabis/marijuana, or any illegal substances.

In rare cases, alcohol consumption may be permitted during company-sponsored events, but only if these events are pre-approved by management and scheduled outside of working hours.

Prescription and over-the-counter medications can also impact job performance and safety. If you are taking any medication that could impair your ability to perform your duties, it is your responsibility to inform your supervisor or HR.



Q: I think a coworker may be drinking while on the job, and I'm concerned about his safety. What should I do?

A: Safety must never be compromised. You should **SPEAK UP** and report the situation so the company can address it and offer support if needed. You can report your concern to your supervisor, HR, or email the Helpline: nas.kodex@kosit.sk.

Q: My doctor prescribed medication that may cause drowsiness, and my job involves driving a company vehicle. Should I inform someone about this?

A: Yes, you must inform your supervisor before driving. It may be necessary to temporarily restrict your duties or work until we can assess the impact of the medication. You are not required to provide a diagnosis but may need to share the name of the medication.

Safety Commitment

At our Company health and safety are at the core of everything we do. We strive to ensure that each of our team members return home safely every day. Our commitment to safety extends to our employees, customers, and the communities in which we operate. No matter your role, location, or business unit, you are expected to:

- Always prioritize safety.
- Take personal responsibility for safety.
- Promote safe practices through your words and actions.
- Follow all established safety protocols.
- Identify and address safety risks proactively.
- There is no justification for compromising safety standards.

Every employee has the right to exercise Stop Work Authority. Regardless of your position, you are empowered to take immediate action if you believe safety is at risk. You should always speak up if:

- You are asked to perform a task you believe is unsafe.
- You are asked to disregard a rule, regulation, or law.
- You are asked to perform a task for which you are not adequately trained.
- You see someone engaging in unsafe practices or doing a task without proper training.
- You suspect that equipment or vehicles are unsafe or malfunctioning.
- You notice or become aware of any hazardous condition or potential danger to yourself or others.

Your right to a safe working environment is our priority. We are dedicated to ensuring safety in our facilities, on the road, and throughout the communities we serve. At KOSIT, safety is everyone's responsibility, and we keep each other safe by:

- Following all applicable safety standards for our jobs.
- Ensuring everyone is properly trained for their role.
- Recognizing and reporting potential workplace risks.
- Giving and receiving feedback when safety standards are not being followed.
- Committing to the safety of our coworkers, customers, and communities as we would for our own families.
- Proactively seeking ways to make our workplace safer.



Taking Care of Communities

At KOSIT we are dedicated to promoting health and safeguarding the environment. We help the communities where we work by fostering safety, resilience, and sustainability. We conduct ourselves with integrity, focusing on responsible and respectful actions while building stronger communities, protecting natural resources, and ensuring we do what is right.

One of our key sustainability goals is to see “thriving communities,” which drives our commitment to social impact initiatives. Through our initiatives, we empower individuals to live sustainably, prioritizing the following areas: sustainability education, environmental care, community vitality, workforce development, and supplier diversity.

Charitable Contributions and Donations

Vibrant communities are built on the involvement of engaged citizens, organizations, and corporate partners. We aim to assist communities in overcoming their unique challenges by being part of the solution. Our support extends to initiatives that promote social and economic growth.

Giving Guidelines

The Company focuses on supporting programs that enhance environmental well-being, promote environmental education, and improve community resilience and quality of life. Our pledge is to always work for a sustainable future.

Our Charitable Contributions

The policy outlines which organizations and causes we support. It also details the types of donations we make and the approval process.

Environmental Stewardship

- We prioritize the needs of the communities we serve, contributing to causes that matter locally.
- We work to keep our communities clean and safe while protecting the environment.
- We provide environmental education and support initiatives that enhance the health of our planet.
- By using environmental justice tools, we identify and address priority needs in communities impacted by environmental challenges.



Environment and Our Commitment

KOSIT is committed to being responsible stewards of the environment and champions of sustainability. We comply with a range of regulations, ensuring that environmental responsibility is at the core of our business through our Environmental Management System (EMS). This system integrates environmental considerations into our operations, helping us improve environmental performance and efficiency.

Our daily actions reflect this commitment through efforts to:

- Minimize resource consumption.
- Reduce environmental impacts.
- Foster a culture of environmental responsibility in all business decisions.
- Implement proactive practices that distinguish us from competitors.
- Operate sustainability-focused business lines, such as recycling and renewable energy initiatives.

Transparent discussions about the importance of environmental protection are vital to promoting a strong compliance culture. Our annual report highlights the efforts we make alongside employees, customers, and communities to foster safety, resilience, and sustainability.

We expect our employees to support our environmental objectives by:

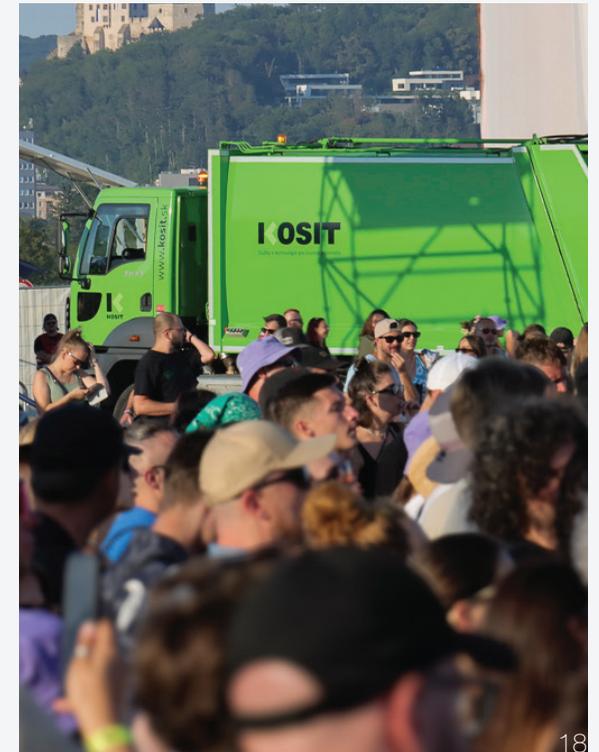
- Adhering to company policies and procedures.
- Complying with relevant laws and regulations.
- Operating in an environmentally safe and responsible manner.
- Identifying and mitigating risks to people and the environment.

Company Prepares for Emergencies by:

- Establish and maintain an emergency situations and evacuation plan policy outlining management's approach to emergency preparedness.
- Implement a crisis management plan that addresses technologies and site-specific risks, including reporting protocols and response requirements.

Q: Who is responsible for environmental compliance?

A: Environmental compliance is a shared responsibility across all employees. Even if your role does not directly involve environmental compliance, it is essential to **Speak Up** if you encounter an environmental issue. Start by reporting concerns to your supervisor or HR. Alternatively, you can contact the appropriate department, a manager, or email the Helpline: **nas.kodex@kosit.sk**.



Public Relations

We enhance our public image by engaging with stakeholders in a timely, professional manner. Employees play a critical role in fostering positive relationships between the company and the community, serving as daily ambassadors of our brand and reputation.



Media Relations

Designated spokespersons handle all media communications. If approached by the media, direct them to the Marketing and PR team. Our aim is to manage media interactions efficiently to minimize disruption while upholding our reputation.



Q: What should I do if the media arrives at an accident site or my facility?

A: Serious incidents should only be addressed by designated spokespersons. If approached by media personnel, refer them to the Marketing and PR team.

Q: How do I share good news about the company?

A: Share positive news with Marketing and PR team, who will assist in distributing it through the appropriate channels.

Q: How should I respond if someone requests to film at a company facility?

A: Refer any filming requests to Marketing and PR team. We ensure all filming is vetted for safety and compliance.

Social Media

Social media offers a platform to exchange ideas, whether through personal websites, blogs, videos, or messaging apps. However, your online actions may affect the Company's reputation, even if they seem personal. While the Company does not actively monitor employees' social media, we investigate any complaints related to online activity that may impact the organization.



Social Media Guidelines

- Avoid posting any content about the company, management, colleagues, customers, or suppliers that is vulgar, obscene or threatening.
- Do not disclose confidential or proprietary information about the company or third parties.
- Do not speak on behalf of the company unless authorized.
- Avoid discrediting the company's products or services.
- Do not access social media while driving or operating company vehicles or machinery.
- Personal social media use during work hours should be minimal and in line with company policies.

Recommendations for Social Media (if identified as an KOSIT employee):

- Recognize that your posts may become public.
- If your profile is public, include a disclaimer such as, "My views are my own and do not necessarily represent the views of the company."
- Avoid using offensive language, ethnic slurs, or personal insults.
- Steer clear of incendiary discussions on sensitive topics like politics or religion, as the company prohibits discrimination based on race, colour, religion, gender, or any other legally protected characteristic.

Q: What should I do if I notice a colleague's social media post contains confidential customer information?

A: Report the issue immediately. Confidential information should not be shared publicly. Contact your supervisor, HR, or email the Help-line: nas.kodex@kosit.sk

Government Affairs

We collaborate with government officials to support our business in compliance with all laws.

Political Activities

While the company encourages personal political involvement, the following guidelines apply:

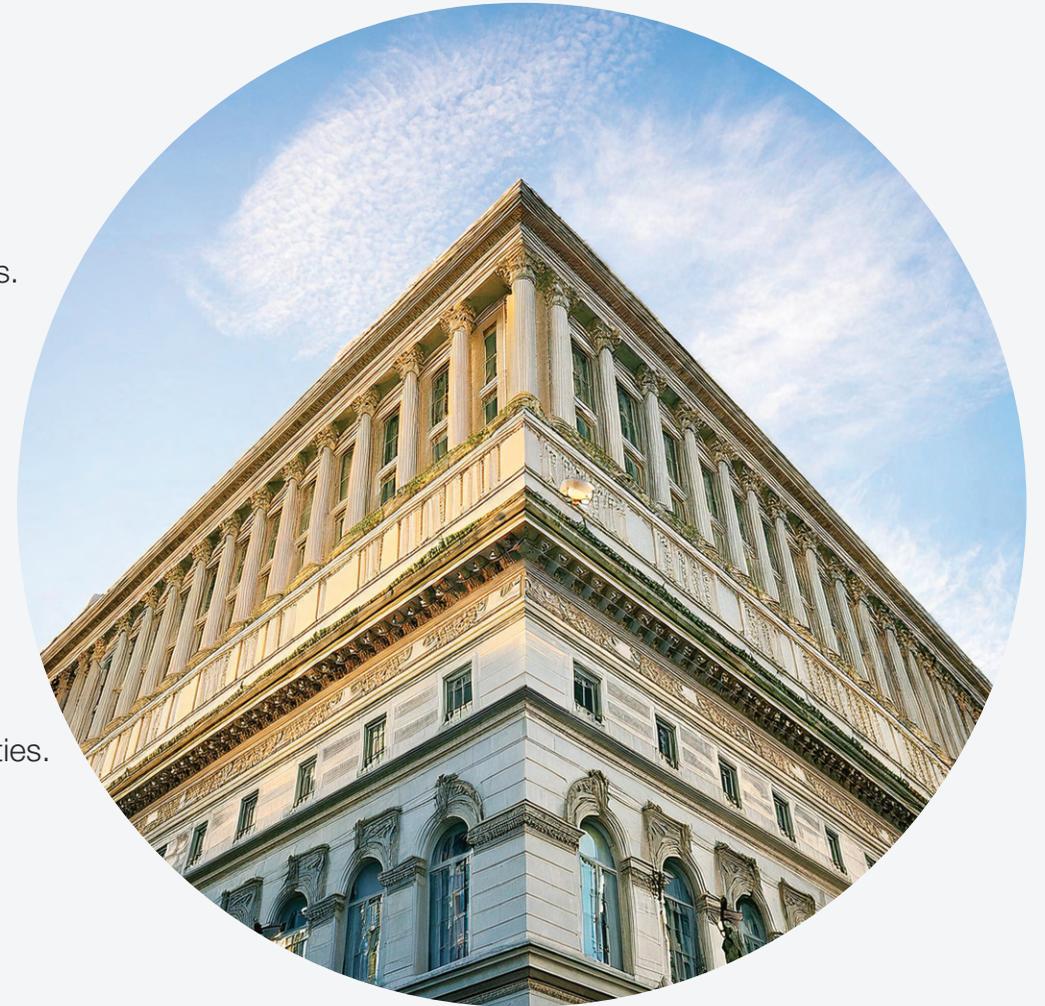
Company time, resources, and information should not be used for political activities.

Do not pressure coworkers to support your political causes.

Refrain from seeking reimbursement from the Company for personal political activities.

Ensure that your political views are clearly stated as your own, not the Company's.

You may also pursue public office, but this should not interfere with your job.





Taking Care of Our Business

Taking Care of Our Business

Privacy and Confidential Information

Protecting confidential information is the key to maintaining the trust and security of our business operations. As part of your role, you may access information about KOSIT, its customers, or other third parties that is confidential, non-public, or proprietary. This information should be treated as confidential unless it has been publicly released through approved channels.

Confidential information includes, but is not limited to:

- Personal information.
- Employee and applicant data.
- Pricing and cost data.
- Financial data.
- Trade secrets.
- Information related to mergers, acquisitions, or divestitures.
- Proprietary business processes and procedures.
- Marketing and sales strategies.
- Customer or third-party information.

You are required to take all necessary precautions to protect confidential information. Sharing such information should only occur on a need-to-know basis, even within the company. It is strictly prohibited to disclose confidential information to anyone outside of the Company, including family members, unless it has been explicitly authorized and approved by the Legal Department.

Retention and Disposal of Records

To protect data security and ensure compliance, KOSIT strictly prohibits the uploading or sharing of highly restricted data on online platforms. All confidential information must be stored only in authorized, secure, access-restricted locations within KOSIT's system. You may not transmit confidential information outside of KOSIT (such as sending it to personal email accounts or third-party platforms) without authorization and proper safeguards in place. Under no circumstances should confidential information be used for personal gain.

You have a responsibility to safeguard KOSIT's confidential data, and this obligation remains even after your employment or relationship with the Company ends.

Respecting Privacy

We value the privacy of our potential customers, customers, employees, and third parties. When handling personally identifiable information you must do so with care, following our internal privacy policies, contractual obligations, and all applicable privacy and data protection laws. These laws regulate how we collect, store, use, share, transfer, and dispose of personally identifiable information.

To ensure security and compliance, it is important that employees maintain up-to-date phone numbers in company records. This information may be needed for emergencies. Any use of this information must comply with our policies and applicable laws.

Q: I know I can talk about non-confidential information with my coworkers. Can I discuss my wages and benefits?

A: Yes, you are allowed to discuss your own wages and benefits with other employees. However, if you have access to information about other employees' wages and benefits (such as in roles like HR, Accounting), you must treat this information as confidential and use it only to perform your job duties. 23

Use of Company Information and Assets

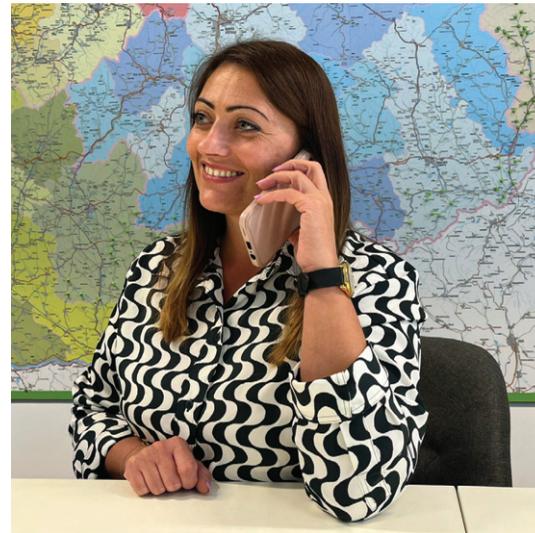
KOSIT's property is intended to be used for business purposes. We must protect these assets and use them wisely. This property includes, but is not limited to:

- E-mail, voicemail & Teams
- Computers, laptops & tablets
- Mobile devices (includes personal devices connected to Company network)
- Confidential & proprietary information
- Vehicles & equipment
- Lockers
- Facilities & other workplaces
- Company documents & data
- Computer networks & software
- Access to & use of the Internet
- Other technology resources



Personal use of Company computers, networks, printers, mobile devices, email, and the internet should be limited and must not negatively affect your productivity or the performance of the systems. Under no circumstances should Company property be used for illegal or inappropriate purposes. You are prohibited from using Company systems to send, receive, store, or forward messages containing content that is:

- Abusive.
- Threatening.
- Malicious.
- Unlawful.
- Sexually explicit.
- Harassing.
- Discriminatory.
- Hostile.



You must also avoid knowingly accessing websites that contain such material. Company's digital devices and systems must be used in accordance with applicable laws, policies, and software agreements.

Q: Can I use personal devices to store Company data?

A: No, you must not use personal devices like flash drives or external hard drives to store Company data. If you access Company data through a personal device such as a smartphone, tablet, or laptop, you must follow the approved security protocols and never attempt to bypass or undermine those procedures.



Employees are responsible for ensuring that Company mobile devices, as well as personal devices used for Company business, are physically secure and updated regularly with security patches. You must remain vigilant about cybersecurity risks and report any questions or concerns to the IT department.

If you use personal or Company issued devices to conduct business, those devices may be subject to legal hold and data preservation in the event of litigation or investigations. This requirement extends to the use of third-party messaging apps (e.g., WhatsApp, Facebook Messenger) if they are used for Company-related activities. Should you be notified of a legal hold, you must take immediate steps to preserve any relevant information.

Employees are prohibited from duplicating, installing, or using software in violation of copyright laws or licensing terms. No software should be installed on a KOSIT - issued device without prior approval from both your manager and the IT Department. All software must be purchased or authorized by KOSIT, and electronic data should only be copied with permission from the copyright owner.

Other personal uses of Company property require approval from a supervisor or Human Resources. Scavenging or taking materials intended for disposal or recycling is strictly prohibited.

When accessing Company systems, you will be provided with a unique login and a confidential password. It is your responsibility to protect your account and keep your password confidential. Sharing your password or allowing others to use your account is against Company policy.

Q: I use my personal phone for Company related text messages. If there's an investigation or litigation, do I need to provide my phone for data collection?

A: Yes. If you use your personal phone for Company business, it may be subject to legal hold and data preservation requirements in the event of an investigation. You may be required to provide your phone to the Company for data extraction. Failure to comply with these requirements can result in disciplinary actions.

Legal Holds & Other Special Situations

If you become aware, or the Legal Department informs you, that certain records are relevant to potential or ongoing litigation, audits, or other events, you must immediately preserve those records. This means you cannot delete, alter, or destroy those records until the Legal Department confirms that they are no longer needed. This applies to all forms of records, including electronic files like emails and text messages stored on Company or personal devices. A Legal hold overrides any previously established record destruction schedules.

Q: Everything I do is electronic. Does the Records and Information Management Policy still apply to me?

A: Yes. The policy covers both paper and electronic records.

Q: What are some examples of things I do not need to save?

A: You do not need to save:

- Duplicates of originals (regardless of format).
- Information that can be regenerated from a Company system.
- Notes or drafts with temporary use that don't reflect major decisions or steps in record preparation.
- Any records older than the retention period in the Records List, unless there's a Legal Hold, Tax Hold, or another valid reason to keep them.

Intellectual Property

Company's intellectual property is an important asset. Examples include:

- Trade secrets
- Trademarks

You cannot use Company's intellectual property without prior written consent. In some cases, Company may have ownership rights to intellectual property you create while employed. You must promptly notify the Legal Department of any intellectual property you develop that relates to Company's business. Unauthorized copying or distribution of copyrighted material is prohibited.



The KOSIT Brand

As KOSIT has grown beyond just a waste services provider and into a leader of sustainability, the brand has evolved. It's essential to protect the brand by ensuring consistency across all communications.

Key guidelines include:

- Our brand name is KOSIT
- Green and black are KOSIT's primary colors, and the correct KOSIT logo should be used in all communications.
- Approval from the KOSIT marketing department is required to share the KOSIT logo or grant permission for others to use it.
- Ensure your Company email signature complies with the current guidelines.

Q: My relative asked for samples of contract proposals I've created so she can create a proposal template. Can I send them to her?

A: No. The contract proposals are considered confidential and proprietary to Company, and you do not have the authority to share them.

Principled in Our Conduct

Conflict of Interest

When conducting KOSIT business, you must always act in the Company's best interest and avoid any actual or perceived conflicts of interest.

A "conflict of interest" can arise when your personal interests or relationships, or those of a known family member, interfere with your loyalty to the Company. An example of a conflict of interest is when your own personal interests (or those of a known family member) affect your ability to do what's best for the Company. A potential conflict can also exist when interacting with someone with whom you have a close relationship (e.g., someone that could influence, or appear to influence, your decisions).

Your obligations related to conflicts of interest can be found in the Code. If applicable, you should:

- Identify situations that create a potential or actual conflict of interest or even the appearance of one.
- Disclose any potential conflicts of interest immediately to your supervisor and Human Resources.

Once your conflict is disclosed, your supervisor and Human Resources will view and determine:

- Whether an actual conflict of interest exists.
- Whether steps can be taken to avoid a conflict moving forward.

Conflicts can often be easily avoided or addressed if they are promptly disclosed and properly managed.

While it is not possible to identify every potential situation that could present a conflict, the following are some of the more common conflicts of interest situations. If you are presented with one of these situations or something similar, you should immediately contact your supervisor and Human Resources for guidance on how to proceed.

Personal Relationships in the Workplace

You should not have a close family member or someone you're romantically involved with directly report to you. These relationships may cause real or perceived bias in decisions regarding tasks, evaluations, compensation, recognition, expense approval, or hiring.

It's important to avoid situations where you could influence employment matters like hiring, promotions, evaluations, or terminations.

Always review and comply with the company's policies before accepting outside employment or participating in activities involving family member or someone you're romantically involved with. Approval from your supervisor and HR is required in these cases.

Financial Interests

A conflict of interest may arise if you, a close family member, or someone with whom you have a close relationship has a financial interest or stands to gain personally from a transaction or business relationship with the Company.

Business Opportunities

You are not allowed to personally benefit from external business opportunities that come to your attention through your role at the Company.

Investments with Vendors, Suppliers, Customers, or Competitors

A conflict may occur if you, a family member, or someone with whom you have a close relationship holds a significant investment (1% or more) or exercises control over one of Company's vendors, suppliers, customers, or competitors. Disclose such ownership to the Company.

Gifts and Business Entertainment

While the exchange of gifts or entertainment can help strengthen professional relationships, they must never be used to influence business decisions or create conflicts of interest. KOSIT maintains its competitive edge through the quality of its services.

- Gifts: Anything of value given to or received from a third party.
- Business Entertainment: Activities with a business purpose, such as meals with clients or events with vendors.

Gifts or entertainment must never:

- Be a bribe or improper payment.
- Violate any applicable laws or company policies.
- Be unreasonable or inappropriate.
- Be solicited by you.
- Occur frequently.

Always comply with your supervisor and HR when giving or receiving anything of value.

Accuracy of Records and Fraud

Maintaining accurate and complete business and financial records is critical. Many stakeholders, including investors, government agencies, customers, vendors, and the public, rely on the integrity of our records. Each of us is responsible for ensuring that our records accurately reflect all business transactions. Company information must be complete, reliable, and protected. Financial records and accounts must be maintained with reasonable detail, accurately reflecting our assets, liabilities, revenues, expenses, and other financial transactions. These must comply with internal record-keeping policies. Internal controls help ensure compliance with policies, procedures, laws, and regulations.

Falsifying information or coercing others to provide false or misleading documentation is strictly prohibited. This includes any information stored electronically or in writing. We must never delay recording transactions or events in violation of policies, laws, or regulations, and we cannot maintain secret or unrecorded funds or assets for any reason.

Fraud is defined as knowingly providing false or misleading information, as well as concealing material facts. Fraudulent acts can have serious legal consequences, including criminal penalties, especially if they are intended to obstruct audits, investigations, lawsuits, or similar proceedings.

We must fully cooperate with government inspections and external audits. During these inquiries, it is important that we never:

- Conceal, destroy, or alter Company documents.
- Provide false or misleading information to investigators.
- Obstruct the collection of information, data, or records.
- Encourage others to provide inaccurate information.

The accuracy of our records is vital. If you have concerns, speak up immediately by contacting your supervisor, Human Resources, or the appropriate KOSIT department. You can also email the Help-line: nas.kodex@kosit.sk

Q: I don't work in finance or accounting. Is "accuracy of records" still my responsibility?

A: Yes. All employees are responsible for maintaining accurate records, whether it's expense reports, benefit forms, sales invoices, or contracts. Every transaction must be complete, reliable, and protected.

Q: What should I do if an outside party or regulatory agency requests records?

A: Immediately contact your supervisor or the Legal Department.

Q: Is it fraud only if I say something untrue?

A: No. Fraud also includes concealing important facts. It can also involve altering or signing documents without proper authority or making false accounting entries.

Ethical Practices in all Business Activities

At KOSIT, we are committed to the highest standards of professionalism, truthfulness, and honesty in all customer interactions, regardless of the medium or topic. We ensure that all information provided about our pricing and services, is clear and accurate. All claims are substantiated before being aired or published.

Our Customers

Our customers are at the centre of everything we do. We are committed to delivering high-quality services that meet or exceed their expectations. Transparent and honest communication is key in all of our business operations.

Municipal Customers

When working with municipal contracts, we strictly comply with detailed laws and regulations. This includes adhering to rules on gifts, gratuities, meals, record keeping, billing, and conflicts of interest, ensuring we maintain compliance throughout bidding and contract performance.

Commercial and Residential Customers

We negotiate in good faith and uphold fairness and ethics in all customer contracts. Discrimination, deception, or unfair practices are never tolerated. Our operations comply with all applicable laws, regulations, and the terms outlined in our contracts.

We never use deceptive language or visuals to mislead customers or to gain an unfair advantage over competitors. We do not exaggerate or falsify information in any communication.

Our Suppliers

We value strong, ethical relationships with our suppliers. When working with suppliers, we:

- Adhere to the procurement policy for all purchases.
- Select suppliers based on fairness and objectivity.
- Deal honestly in all contract negotiations.
- Use sound business judgment.
- Choosing suppliers.

The Company selects suppliers according to our procurement policy, prioritizing a combination of quality, cost, delivery, sustainability, technology, and service. We conduct fair and reasonable contract negotiations, always complying with relevant laws, regulations, and company policies.

Supplier Confidentiality

We treat supplier-provided information as confidential, including intellectual property like copyrights, patents, trade secrets, and trademarks. We do not share this information outside of Company without written consent from the supplier. Additionally, we will not reproduce or incorporate supplier software unless allowed by license agreements.

International Trade

We ensure that all international transactions comply with applicable laws, rules, and regulations. This includes compliance with trade sanctions and import/export restrictions.

Our Competition

At KOSIT, we believe in fair, open, and honest competition. We compete vigorously while adhering to all antitrust laws. It is important to gather information legally and act independently when making business decisions. We do not engage in unethical practices, such as collusion with competitors.

Fair Competition

KOSIT's pricing, bid, and output decisions must be made independently.

Customer Territories

Right action

Do: Make pricing, wage, and bid decisions independently and involve the Legal Department whenever agreements with competitors are considered.

Don't: Discuss or agree on prices, wages, or terms with competitors unless it's part of a legitimate business transaction, and always involve Legal in such discussions.

The Company stands for integrity and fairness in all our business practices. By following these guidelines, we maintain a competitive and ethical business environment.

Competition and Antitrust

Agreements with competitors - whether written, verbal, or implied from circumstances - must be carefully managed. Communications with competitors about sensitive topics require prior review and approval by the Legal Department. Any meetings or conversations with competitors should strictly adhere to an agenda approved by the Legal Department.

Violating antitrust laws could result in serious legal penalties for the Company and criminal charges for the individuals involved.

Gathering Competitive Information

We gather competitive information only through legal and ethical means. Sources can include public conferences and publicly available documents. We may also obtain market information from customers and suppliers in the normal course of business.

Improper means, such as hacking, illegal pretexting, burglary, spying, or wiretapping, are strictly prohibited. We must respect proprietary information and trade secrets. We never solicit or accept information that would violate a confidentiality or non-disclosure agreement, even if we are not a party to it. Additionally, we do not ask or encourage newly hired employees to share proprietary information about their former employers.

We are also prohibited from disclosing any customer or vendor proprietary information to third parties unless the owner properly authorizes its release.



Anti-Bribery & Anti-Corruption Policy

Anti-Bribery & Anti-Corruption Policy

What does the policy cover?

- This anti-bribery policy exists to set out the responsibilities of Company and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.
- It also exists to act as a source of information and guidance for those working for Company. It helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy statement

- The Company is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. KOSIT has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.
- The Company will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the Slovak Republic in regards to our conduct both at home and abroad.
- KOSIT recognizes that bribery and corruption are punishable. If our Company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Who is covered by the policy?

- This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located. The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.
- In the context of this policy, third-party refers to any individual or organization our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with.

Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Definition of bribery

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

What is and what is NOT acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and hospitality

KOSIT accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements.

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually 100 €).
- k. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.



Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

The Company recognizes that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

Facilitation Payments and Kickbacks

The Company does not accept and will not make any form of facilitation payments of any nature. We recognize that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognize that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

KOSIT does not allow kickbacks to be made or accepted. We recognize that kickbacks are typically made in exchange for a business favour or advantage.

KOSIT recognizes that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk.

Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to your line manager.

Political Contributions

The Company will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognize this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

KOSIT accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

Employee Responsibilities

As an employee of KOSIT, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. A Managing Director has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.



What happens if I need to raise a concern?

Facilitation Payments and Kickbacks

- a. How to raise a concern.
- b. What to do if you are a victim of bribery or corruption.
- c. Protection.

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to KOSIT, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director, or the Head of Legal.

The Company will familiarize all employees with its whistleblowing procedures so employees can vocalize their concerns swiftly and confidentially.

What to do if you are a victim of bribery or corruption? You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, KOSIT understands that you may feel worried about potential repercussions. The Company will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

Training and communication

KOSIT will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

KOSIT's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

KOSIT will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with antibribery training where there is a potential risk of facing bribery or corruption during work activities.

Record keeping

KOSIT will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and reviewing

The Company compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

This policy does not form part of an employee's contract of employment and The Company may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

Forced labour / Child labour Policy

The Company firmly opposes and does not tolerate the illegal employment or exploitation of children or the use of forced labour in any form. In compliance with national regulations, the Company restricts employment to individuals who are 18 years of age or older.

Additionally, the Company strictly forbids any form of forced labour, defined as work or services performed involuntarily and under threat of punishment.

The Company also expects its suppliers, subcontractors, and business partners to uphold these standards. They must not employ or engage any individual below the legal minimum working age as defined by national laws, nor should they permit any form of forced labour within their operations.



Human trafficking and Modern slavery

Human trafficking, also known as trafficking in persons, involves exploiting individuals for forced labour through deception, coercion, or threats. The Company is firmly committed to a zero-tolerance stance against modern slavery and human trafficking. We are devoted to establishing strong due diligence measures and implementing effective safeguards to ensure that modern slavery does not occur within our business operations or supply chain.

SUPPLIER AND CUSTOMER CODE OF ETHICS OF THE KOSIT GROUP

With the aim of strengthening mutual supplier-customer relationships within the KOSIT GROUP and supporting ethical business practices, we request our partners to adhere to the following principles:

- I.** Suppliers and customers must conduct their activities with integrity and compete fairly, meaning:
 - a)** They must comply with all applicable laws and regulations of the countries in which they operate.
 - b)** They must act fairly in all aspects of their operations, including dealings with business partners, competitors, and society as a whole.

- II.** Suppliers and customers must not offer or provide bribes or anything of value to government officials, private individuals, politicians, political parties, or their advisors to gain business advantages or favorable treatment. Such actions are strictly prohibited.

- III.** Suppliers and customers must not offer any hospitality or transfer any valuable gifts to KOSIT GROUP employees that exceed customary business practices in the country where they operate.

- IV.** Suppliers and customers must have a zero-tolerance policy prohibiting all forms of bribery, corruption, extortion, and embezzlement (including promising, offering, giving, or accepting any bribes).

- V.** Suppliers are expected to ensure that the procurement of supplied products or services does not finance or support armed groups.

- VI.** Any conflicts of interest affecting transactions between KOSIT GROUP and a supplier must be reported to the KOSIT GROUP management, and the supplier must eliminate such conflicts.

- VII.** Accurate accounting records and supporting documents must clearly describe and reflect the nature of relevant transactions. Expenses and payments must comply with all applicable legal and regulatory requirements and accepted accounting practices. No false, artificial, or misleading records are allowed.

VIII. Suppliers and customers must avoid any discrimination in human resources or daily work practices based on race, color, gender, religion, sexual orientation, political beliefs, age, health status, or disability. Procedures must be implemented to prevent such occurrences.

IX. Forced labor and employment of minors are unacceptable within supplier and customer organizations.

X. Suppliers and customers must respect employees' rights to freedom of association in accordance with local laws.

XI. Suppliers and customers commit to protecting the environment in compliance with international standards relevant to their business, as well as applicable laws and regulations.

XII. Suppliers and customers will meet generally accepted and contractually agreed quality requirements to provide goods and services that meet KOSIT GROUP's quality standards and are safe for their intended use.

XIII. The KOSIT GROUP expects suppliers and their supply chains to ensure a healthy and safe working environment for employees and neighbors. Suppliers must implement adequate controls and procedures to prevent and manage industry-specific hazards and risks. Suppliers must provide access to potable water, adequate sanitation facilities, appropriate emergency procedures, and first aid assistance.

XIV. Confidential business information about the KOSIT GROUP and its partners must not be disclosed to third parties. All business information related to companies, ownership, shareholders, business plans, organization, financial matters, and any other aspects of KOSIT GROUP companies is considered confidential. Suppliers and customers must ensure the confidentiality and privacy protection of employees and business partners, as well as intellectual property rights.

XV. Any behavior by suppliers or customers that violates these principles can be reported to the email address **etickykodex@kosit.sk**



Conclusion

This Code of Conduct outlines key policies and practices applicable to employees of KOSIT a.s. and its various direct and indirect subsidiaries. Throughout this Code, "KOSIT" or "the Company" refers to any such subsidiary of KOSIT a.s.

We expect every employee to read this Code carefully, as it serves as an important guide for understanding your job responsibilities and ethical obligations. If you have any questions or concerns about this Code or its application, please do not hesitate to reach out to your supervisor, a Human Resources representative.

KOSIT