



## **CODE OF CONDUCT**

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## Why do we need a Code of Conduct?

The Code of ethics is a document that regulates general and specific rules of work and conduct in society.

Our company is purely Czech and customer-oriented from the very beginning. Our employees are no less important to us, as each of them is an integral part of a prosperous society.

The code of ethics is intended to help resolve various situations and describes the basic rules of conduct that should be followed in all workplaces.

It is divided into 4 basic categories:

1. Conduct of ACL Automotive
2. Conduct of ACL Automotive towards employees
3. Conduct of employees
4. Quick guide to making the right decision

If you have any questions or concerns, do not hesitate to contact your immediate superior.

## Conduct of ACL Automotive

1. We comply with applicable national and international laws and regulations.
2. We always treat our business partners honestly and provide them with true and verified information.
3. We consider the information entrusted to us and all sensitive data from all entities, and especially from our customers, to be strictly confidential and as such we protect it. We ensure the protection of personal data and intellectual property rights.

We do not disclose any confidential information of our business partners.

4. We perceive our customers and suppliers as our partners. We respect their opinions and welcome ideas regarding the provision of our services.
5. We carefully select suppliers and service providers according to objective criteria and pay attention to the origin of the goods. No counterfeits are used.
6. Corruption:

We consistently reject and prohibit any corrupt practices, extortion and forms of retaliation from our business partners. Any conduct that endangers the applicable competition laws and regulations is also excluded. We undertake to comply with all applicable anti-corruption legislation, and in particular provisions prohibiting corruption, bribery and other unethical business practices.

Furthermore, we never, under any circumstances, provide or agree with illegal payment to any person.

7. In its decision-making processes, the Company relies on the accuracy and precision of its accounting records. All business transactions must be recorded in our records in accordance with specified procedures.

8. Revenge / retribution

We do not tolerate any form of revenge or retaliation against an employee who, in good faith, has reported a suspicion of misconduct or knowledge about it (whistleblowing). We also do not tolerate retribution to anyone else. You must not take revenge or tolerate retaliation against someone who has reported suspicions or insights about misconduct in good faith.

9. ACL Automotive is committed to providing accurate and comprehensible, correct and complete information in a timely manner through its means of communication.

10. ACL Automotive does not employ children under the age of 15 and does not employ anyone against their will.

11. We comply with all applicable laws, regulations and agreements, including in the area of trade and imports, exports control, including economics sanctions.

12. Ecological sustainability

We avoid environmental pollution. We are committed to minimizing waste and emissions and reducing the use of hazardous substances. On the contrary, we focus on the use of environmentally friendly technologies and processes. We expect suppliers to comply with all applicable laws and regulations, as well as internationally recognized environmental standards.

*Environmental area:*

We ensure that all necessary approvals and permits relating to the environment are obtained, shall ensure that they are updated and shall follow them so that its activities are always in accordance with the applicable regulations.

*Resource consumption, pollution prevention and waste minimization:*

We undertake to optimize the consumption of natural resources, including energy and water. It will take thorough measures to prevent pollution and minimize the generation of waste, waste water and gas emissions.

Wastewater and waste will be before discharge, respectively liquidation, marked in accordance with applicable laws and regulations and will be treated in accordance with these laws and regulations.

*Hazardous substances and product safety:*

We undertake to label dangerous substances, chemicals and substances and to ensure their safe handling, safe movement, storage, recycling, reuse and disposal. All applicable laws and regulations concerning hazardous substances, chemicals and substances must be strictly observed. Restrictions on the use of substances and product safety requirements, which are set by applicable laws and regulations, must be observed.

13. Responsible sourcing of raw materials:

We should use natural resources economically, respectfully and keep the consumption of resources as low as possible. This can be achieved directly at the point of origin, or by processes and measures such as an improved production and maintenance process, the use of alternative resources, the efficient use of resources, recycling and reuse of resources.

We shall implement measures to ensure and improve the transparency and traceability of the raw materials used in the product throughout the supply chain. The aim is responsible obtaining and using of raw materials. Particular emphasis is placed on ores, concentrates and metals, which contain tantalum,

tin, tungsten, cassiterite, coltan and gold and come from conflict-affected and high-risk areas. These areas include, inter alia, mining regions which have been the scene of armed conflict, are in a fragile post-conflict situation or whose government and national security must be considered weak or non-existent and which are characterized by systematic violations of international law and human rights.

14. Labour law:

We comply with all applicable working time laws, regulations and agreements, ensure timely and reasonable payment of wages to employees, and observance of reasonable working hours in accordance with standards and applicable laws. We support diversity and equal employment opportunities without signs of any discrimination. We do not approve the using of forced labour or slave labour, nor trafficking with people - is not tolerated at any level supply chains (for more information on this area, see ACL Automotive's conduct towards employees).

15. Conflict of interest:

We respect the personal interests and private lives of our employees. But we do emphasis on preventing conflicts between private and corporate interests. We make decisions solely on the basis of objective criteria and do not allow ourselves to be influenced by personal interests and relationships.

16. Compliance and honesty: we comply with all applicable laws and regulations regarding corruption, bribery, fraud and prohibited business practices.

Fight against bribery:

We ensure that employees and subcontractors do not offer, promise or

provide advantages that would enable them to obtain a contract or other advantage in the course of trade.

Fair competition:

We behave fairly in terms of competition and comply with applicable antitrust laws. We will not participate in agreements with competitors that would be contrary to antitrust law, nor will it abuse any dominant market position.

Money laundering:

We shall not engage in money laundering activities and shall comply with applicable legal obligations to prevent money laundering.

Intellectual property:

We will treat business correspondence as confidential information.

Confidential information, proprietary data of any kind, as well as the intellectual property rights will be adequately protected in accordance with applicable law.

**We expect our business partners to comply with the above points.**

## Conduct of ACL Automotive towards employees

1. We treat our employees with respect, dignity, honesty and courtesy. We respect human rights.
2. We respect good interpersonal relationships, relationships between subordinates and superiors, and relationships within the entire team of employees.
3. We provide our employees with safe and healthy jobs that meet the requirements of all applicable laws, regulations and standards in force in the relevant industry. Harassment in the workplace is not allowed. We do not allow any form of coercion or discrimination.
4. We must provide our employees with reasonable working conditions. It must provide at least access to drinking water and sanitation, as well as fire safety, first aid, adequate lighting and ventilation.
5. We care about improving the abilities and skills of our employees.
6. We pay attention to a safe environment.
7. We are loyal to our employees and take care to promote the good name of our company.
8. We value the diversity of our employees and consider it a competitive advantage that needs to be supported and expanded.
9. We avoid conduct that could damage relationships with our employees and we respect agreed decisions.
10. We respect the opinions of employees and their personalities. We help them achieve their professional goals.
11. We comply with all our obligations and duties towards employees arising from contracts and by law.

12. We observe timely, adequate and fair payment of wages. We observe reasonable working hours in accordance with standards and applicable laws.

13. We welcome the ideas that our employees come up with and try to implement them.

14. We respect the rights of minorities.

15. Freedom of association and the right to collective bargaining are respected.

**Working conditions are created by the employer in full compliance with the Labor Code and related regulations, which covers all rights and obligations of both the employee and the employer.**

We expect that our suppliers will also treat their employees in accordance with the above.

## Conduct of employees

Each employee should follow these rules:

1. Be loyal to company.
2. Not share personal data to other employees, especially the amount of bonuses and wages.
3. Follow the rules of work safety.
4. Maintain order in public areas such as the kitchen, locker rooms and other areas of the company.
5. Follow the instructions of the immediate superior.
6. Do not discriminate, harass or sexually harass other colleagues.
7. Do not appropriate other people's ideas as your own.
8. Act honestly, be tolerant.
9. Take care of the good name of the company.
10. Do not spread slander and false accusations not only on social networks.
11. Do not accept bribes.
12. Maintain the company's loyalty and reputation after termination of employment.

## A quick guide to making the right decision

If you're in a situation where you don't know if your decision is right, try answering the following questions:

1. Is your behaviour in accordance with the set principles and guidelines?
2. Do you feel that your behaviour is correct towards the company and towards your colleagues?
3. Is your conduct in accordance with the law?
4. Can your decision have negative consequences for your reputation or the reputation of ACL Automotive?
5. Would you feel uncomfortable if others knew how you decided to act?
6. Is there a solution that is not ethically questionable?
7. What would people you respect and think about your behaviour that you care about?
8. Have you consulted with other colleagues?
9. Have you tried to solve the problem with your line manager? Did he help you?
10. Have you contacted ACL Automotive management if you are unsure of your decision?