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TENZA cast, a.s., with its registered office Brno, Svatopetrská, House No. 35, Or. No. 7, 617 00 Brno; ID No. 29370931

## I.

### PREAMBLE

- 1.1 TENZA cast, a.s., (hereinafter the "**Company**") is engaged in the production of castings from zinc alloys using technology of pressure casting.
- 1.2 This Code of Ethics (hereinafter the "**Code of Ethics**") establishes and describes the fundamental values of the Company and the related desired standards of behaviour and conduct of the Company's employees. Among others, The Code of Ethics constitutes the basic ethical standard of employees' behaviour towards the employer (i.e. the Company), the other employees, state authorities and local governments, customers/business partners and third parties.
- 1.3 The Code of Ethics is a binding set of rules, which, among other things, build on employees' basic rights and obligations as specified by the Act No. 262/2006 Sb., the Labour Code, as amended, for general ethical standards of behaviour and conduct that govern their daily working activities.

## II.

### The fundamental values of TENZA cast, a.s.

- 2.1. In particular, the Company's core value is a responsibility towards our clients (customers), our employees, our shareholders, government authorities, and the public as well as towards the environment, where the Company operates. Considering this responsibility, the Company's aim is to develop and maintain an economically sound and prosperous business.
- 2.2. The Company operates on the basis of high morality and ethics standards and legal compliance.
- 2.3. The Company does not tolerate corruption, bribery and unfair competition because these activities disrupt the market and constitute a barrier to economic, social and democratic development.
- 2.4. The Company does not use any restrictive trade practices nor abuse its dominant position in the market in any form.
- 2.5. The Company provides a safe working environment, while striving for continuous improvement. The Company also provides equal opportunities for people regardless of race, skin colour, sex, national origin, religion, ethnicity or other distinctive characteristics. The Company refuses the forms of behaviour such as discrimination or harassment. The Company does not employ an individual less than 15 years of age.
- 2.6. In relation to the Company's asset, our employees are required not to act in conflict with the legitimate interests of the Company, to manage the entrusted funds properly and to protect its assets.
- 2.7. The corporate culture ensures that the behaviour of the Company and its employees in business and ethical issues is based on the following values:

- Compliance with laws, integrity and fair play
- Focus on a customer
- Work professionalism
- Work quality
- Mutual respect between employees
- Initiative and willingness of employees
- Team cooperation and mutual trust
- Protecting sensitive data of the Company, employees, customers and third parties
- Environmental protection

2.8. The Company aims to keep and maintain a good reputation and a good name.

2.9. The company does not tolerate any behaviour that violates the law or this Code of Ethics, and any effort to make a profit does not justify these actions.

2.10. To produce its products, the Company does not use any prohibited substances and compounds. Substances and compounds are managed in accordance with legislative requirements of the Czech Republic and the EU and with regard to the legislative requirements of the countries outside the EU, where the Company exports its products, as well as in accordance with the relevant subordinate technical and safety regulations.

### **III.**

#### **Obligations of Company's employee in relation to the Code of Ethics**

3.1. Company's employee shall carry its work in accordance with the Constitution of the Czech Republic, laws and other legislation and in accordance with the provisions of the Code of Ethics. Within his/her behaviour and conduct, the employee is particularly obliged to respect the fundamental values of the Company described in the previous article of the Code of Ethics.

3.2. When carrying their working duties, the Company's employees shall not proceed in breach of the applicable rules on economic relations and the legislation governing public procurement, especially Act No. 137/2006 Sb, on public procurement, as amended.

3.3. The Company's employees are obliged to comply with the laws, regulations and rules of the countries where the Company operates or where they are on a business trip. In cases where the Code of Ethics and local laws stipulate different rules, the stricter rule will be applied.

3.4. If any employee is asked to act contrary to the legal norms or to this Code of Ethics, he/she is obliged to immediately notify his/her senior manager. Likewise, the employee is obliged to notify his/her senior manager when he/she finds that there is a procedure within the Company being a contrary to legal norms, this Code of Ethics and to the core values expressed herein.

3.5. The Company's employees are required to avoid the conduct, which might result in injury to Company's reputation and good name. Within each transaction and each decision, the employee must always take into account the potential risk of injury to Company's reputation.

3.6. The employees are required to respect all of the contractual negotiations and to ensure that they are comply with.

3.7. The Company's employees shall not, directly or indirectly, offer or provide any payment or any other compensation to other persons or entities to make such person or entity to act contrary to prescribed duties in order to obtain, maintain or control a business opportunity or to secure any other improper advantage in carrying out business activities of the Company.

3.8. The Company's employees shall not, directly or indirectly, ask for or accept any improper payments or any other compensation, which would be provided with the aim to act in conflict with the stated obligations. The employee shall not, directly or indirectly, engage in any activity that could be interpreted as asking for or accepting bribes or favours for his/her own benefit.

3.9. Computers and any other property of the Company shall not be used by the employee for illegal or unethical conduct.

3.10. The Company's employees are required to avoid conflicts of interest, especially the conflict between their personal interests and the Company's interests or their involvement in activities of the Company. If the employee finds he/she has the power to influence Company's decisions concerning the entity to which his/her personal interest relates, he/she is obliged to notify their immediate supervisor about it and he/she shall not participate in such transactions without the prior consent of the senior manager.

3.11. Information about the Company, its activities, its business relations, and customers that the employees get acquainted with within their work may not be used for personal gain and for any other purpose than that for which they have been intended. The employees may not disclose this information to any third party, unless it is necessary for the performance of the job. Employees are required to maintain the confidentiality. The obligation of confidentiality also applies after the end of the employment relationship.

3.12. Employees or other persons working for the Company do not pay any facilitation payments (small amounts given to representatives of public authorities in order to obtain or accelerate services to which a person has the right).

3.13. The exchange of gifts or invitations can be reasonably socially acceptable part of successful business relationships. However, receiving and giving the gifts or invitations may have unsuitable influence on the business relationship. The employee is always obliged to assess in advance whether a gift or invitation will correspond to a reasonable extent. Receiving or providing cash is prohibited.

3.14. The contributions in the form of expenses, donations, charitable contributions and sponsorships should not be used by the employees as a way to bypass the rules on receiving and giving gifts, bribes, facilitation payments, and benefits given to political parties and politically active persons.

3.15. The employees faithfully records all financial transactions and provide the documents for the accounting department staff, who keep records and accounts on those transactions in accordance with the legal norms and generally used accounting practices. In its decision-making processes, the Company relies on the correctness and accuracy of its accounting records.

3.16. The employees are required to ensure the Company's relations with relevant supervisory state authorities are open, transparent and synergetic.

3.17. The employee performs his/her working duties at an appropriate level of expertise and he/she is required to continually enhance and supplement his/her expertness by studying. He/she is also obliged to make any possible effort in maximum effective and economic managing and utilization of human

resources, financial resources, facilities, and services assigned to him/her. If he/she finds any loss or damage to the Company's property, improper or corruption conduct, he/she is obliged to notify immediately his/her superior about this fact.

3.18. The employees are obliged to devote the working time only to performance of his/her working duties and responsibilities with full investment of their abilities. They are required to approach to the performance of their work creatively and proactively, with all its inventiveness. The employee is responsible for the reliability and accuracy of documents and any other outputs he/she creates.

3.19. The Company's employee always acts towards the other employees, Company's customers and third parties politely and with the respect regardless of gender, ethnic or social origin, sexual orientation, ethnicity, wealth, health, age, marital and family status, creed and religion, membership or activity in political parties, trade unions and other associations.

3.20. Within their working teams, the employees are required to create an atmosphere of cooperation and trust using joint efforts. Any labour disputes must be resolved with direct superiors objectively, in a refined manner and openly; the employees are obliged to respect their decisions. The senior managers are obliged to apply equal access to subordinate employees, with emphasis on evaluation according to work done.

3.21. When acquiring, processing and storing information (financial and technical data, operational information, customer information, etc.), the employees are obliged to act carefully, prudently and so that the sensitive data of the Company, employees, customers, and third parties are protected. The information obtained during the employment is confidential and the employee is obliged to protect them in respect of the relevant legislation. In this regard, the employees are also obliged to comply with established standards and security data procedures to prevent access, alteration or destruction of such information.

3.22. The employees are not authorized to provide information to media on behalf of the Company, unless they are so authorized by the Company.

3.23. When carrying out their working duties for the Company, the employees are obliged to strive to mitigate the impacts of their activities on the environment not only by adhering the generally binding regulations relating to the environment, but also by professional approach to the environmental sustainability within their activities.

#### **IV.**

#### **Final Provisions**

4.1. This Code of Ethics is an integral part of the Company's Working Rules.

4.2. The Code of Ethics is mandatory for all of the employees. For the purpose of the Code of Ethics, the employee is meant an individual in labour-law relation with the Company (not only the persons employed under a contract of employment, but also under an agreement on work performed outside the employment relationship). Adherence to the principles set out by the Code of Ethics will affect the employee's evaluation and his/her professional growth, while essential violation of these standards may then be regarded as a breach of discipline with all the ensuing consequences.

4.3. The employees and people outside the Company may express their opinion about the behaviour of the Company or its employees or about decisions, which they consider unethical. Feedback and information from other persons are accepted by the Company's HR.

4.4. The Company's HR shall ensure that the employees are demonstrable familiarized with the Code of Ethics and allow them to look at it at any time. For this purpose, the Code of Ethics is also available on the Intranet.

Adamov, February 19th, 2019