

SLUŽBA NITRA, s.r.o.	Code of Conduct SLUŽBA NITRA, s.r.o.	CSR 02-01 Issue No: 1 Sheet 1 / 26
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**CODE OF CONDUCT**  
**SLUŽBA NITRA, s.r.o.**  
**CSR 02-01**

Elaborated by: Ing. Ján Humený Date: 18.09.2023	Checked by: Mgr. Martina Štefanková Dňa: 20.09.2023	Approved by: Ing. Miroslav Lillák Date: 01.10.2023
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## PREFACE

The company SLUŽBA NITRA, s.r.o. (hereinafter referred to as SLU) operates in the field of development and production of automotive electronics, installed printed circuit boards, interior and exterior lighting.

SLU is a Tier 1 and 2 supplier to the most important manufacturers in the automotive industry.

In all activities, we respect the ethical principles of doing business with compliance with legal and other regulations.

We always review the risks incurred to minimize the losses of all parties involved.

We focus our actions on building long-term, fair and economically advantageous relations towards partner parties.

SLU expects all current and potential suppliers to have the same level of fairness, integrity and accountability in all areas of their business. Based on this, this Supplier Code of Ethics defines requirements and recommendations for all existing and potential suppliers.

The Supplier Code of Ethics applies to all suppliers of materials, products and services to SLU.

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## A. COMPANY MANAGEMENT

### Etický kódex SLU

SLU has developed this Code of Conduct as its commitment to "Sustainability". The Code is published on the company's intranet website.

### Social responsibility

We comply with applicable law to the extent specified in our Corporate Charter.

We provide objective accounting information to national and local institutions, as well as information to the media and the public about the company's activities and intentions.

Our financial transactions are transparent.

Our processes evolve to provide premium quality products that are safe and perform flawlessly in the long run in line with customer standards.

We expect managers to understand the company's business strategy and customer expectations and solve obstacles without losing professional perspective.

Managers are committed to understanding and fulfilling organizational tasks, creating pride in the "corporate brand". In the framework of their duties and powers, they prepare the foundations for the performance of the assigned tasks. They promote positive dialogue between co-workers, take initiatives and at the same time explain corporate goals supported by business-oriented considerations.

### Requirements to combat terrorism

Contractors are responsible for ensuring that none of them has a direct or indirect connection to terrorist activities to any level, such as:

- Direct or indirect terrorist activities
- Measures against common and social rights
- National or international terrorism
- Political Terrorist Activities

### SLU engages in sustainability programs

declared by the EU Commission and subsequently accepted by our customers. We see sustainability at SLA as a practical ability to meet today's basic needs without compromising the ability of future generations to meet their basic needs and maintain their standard of living. We develop SLU's

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processes in such a way that corporate culture and entrepreneurship do not conflict with the natural ability to environmental sustainability. The organizing principle of sustainability in SLOU is sustainable development, which encompasses four interconnected areas: ecology, economy, politics and culture. The SLU assesses the state of sustainability achieved (documentation, evidence) in the evaluation report SQA 5 Sustainability assessment.

### Mobility concept

As a long-term manufacturer of automotive components, we are vitally dependent on regular deliveries from subcontractors and, on the other hand, our customers require timely deliveries from us. We are actively aware of the growing congestion of transport routes. We are looking for every way to reduce fuel consumption and emissions.

### Written policy and objectives for the participation of sustainability programmes

The SLU develops a Corporate Policy for the participation of sustainability programs. The Policy is a publicly available document on the company's intranet that, once developed, presents the company's basic goals, objectives and strategy for meeting expectations on "Sustainability"

### Zhoda

SLU develops and manufactures automotive electronics, printed circuit boards and both indoor and outdoor lighting. We are aware of our responsibility towards our customers, employees and owners, which is why we present our Code of Conduct, which is binding for all our activities. In all activities, we respect ethical business principles, comply with legal and other regulations. We always assess any risks that arise to minimize losses for all parties involved. Our activities are focused on building long-term, fair and economically advantageous relationships with all our partners. Actions taken by anyone working in the company are governed by the principles outlined in this Code of Conduct. The behaviour of all employees in SLU must not undermine trust, the aim is to protect corporate interests and create a fair play environment in business and business contacts of the company with respect and decisiveness towards all interested parties. Adherence to the principles described in the Code can only be the result of good teamwork.

### External compliance review of processes and activities

External independent review of the requirements for quality management systems of the SLU company by certified audit companies is ensured by the following procedures:

1. Confirmation of the Conformity of the Organization by external entities in the direction of ensuring Sustainability requirements is ensured by formal verification of the conformity of processes and activities against selected issues of articles of ISO standards IATF 16949, ISO 14001, ISO 45001, TISAX, examination of the SLU Annual Report by external entities - accounting auditors, examination of the expediency of projects by banking entities, General Assembly and energy management by an energy auditor.

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2. TÜV SÜD SLOVAKIA examines the competence and certifies the Quality Management System according to ISO IATF 16949. A registered certificate is available.
3. TÜV SÜD SLOVAKIA reviews the competence and certifies the Environmental Management System according to ISO 14001. A registered certificate is available.
4. TÜV SÜD SLOVAKIA examines the competence and certifies the Occupational Health and Safety Management System according to ISO 45001 Occupational Health and Safety System. As an additional means of independent verification are the Occupational Health Service Audit Reports
5. KPMG GERMANY. TISAX (Trusted Informations Security Assessment Exchange) examines the effectiveness of management procedures in implementing measures to protect cybersecurity and confidentiality of managed data / cyber risks. Proof of capability is the issuance of a formal compliance report.
6. The competence of suppliers is reviewed by an SLU auditor during audits of type VDA 6.3.
7. Confirmation that the SLU procures raw materials accordingly. We submit CMRT, EMRT, Cobalt report, IMDS report, REACH protocols to our customers according to their requirements

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7. Confirmation that the SLU procures raw materials accordingly. We submit CMRT, EMRT, Cobalt report, IMDS report, REACH protocols to our customers according to their requirements

### Interests of stakeholders

SLU employees are aware of their obligations to government authorities, our customers, suppliers, employees, organizations and private individuals in the neighborhood and owners. That is why we present our Code of Conduct as a binding ethical document for all our activities. In our activities, we respect ethical business principles, comply with the legal and other regulations of the parties involved.

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We always assess all risks we identify to minimize losses for all parties involved. Our activities are focused on building long-term, fair and economically advantageous relationships with all our partners. Anyone working in the company must abide by the principles outlined in this Code of Conduct. The behavior of all employees in the SLU company must not undermine trust, the aim is to protect corporate interests and create an environment in the company's business and work contacts. We create prerequisites for respecting the expectations of all stakeholders.

### Social performance

SLU management continuously monitors its social performance as a result of its engagement, activities and commitments of the company that affect stakeholders or affect the quality of its relationships with them. How well the company delivers on its commitments, interactions and activities that relate to local communities is crucial. Broader societal aspects include transparency of earnings and contracts, management of natural resources and cooperation with partners on social risks, suitability of working conditions, interestingness of pay conditions.

### Collective agreement

The management of the SLU publishes the principles of remuneration and the provision of social benefits to legal representatives. Statements are written in the document Material stimulation. The document enters into force by mutual agreement with the Staff Welfare Commission

### Environmental sustainability

The requirements for ensuring environmental sustainability are applied within the framework of environmental management according to ISO 14001: in the latest version. On the corporate website/or intranet, the Quality Manual, Quality Policy and Objectives, Guidelines, and the appointed Quality Officer are publicly published.

### Senior Management Representative for Environmental, Social, Ethical and Human Rights

The SLU appoints a senior management representative for environmental, social, ethical and human rights. His duties include: - manage and control the work of employees, - create favourable working conditions and ensure safety and health at work (hereinafter referred to as OSH), - identify immediately, - investigate and eliminate the causes of accidents at work or occupational diseases, - ensure the remuneration of employees in accordance with the applicable rules, - create favourable conditions for raising the professional level of employees and satisfying their social needs, - ensuring compliance with the company's legal regulations and regulations, - ensure that there is no violation of professional discipline, - ensure that timely and effective measures are taken to protect the employer's assets, - handle suggestions and legitimate comments or complaints from employees concerning the inspected workplace, - possibly in conjunction with the OSH, - continuously inform employees about legal and other provisions to ensure OSH, - regularly verify employees' knowledge of these regulations, - require and monitor compliance with them on an ongoing basis, - protection of employees' personal data in SLU information systems, - the confidentiality of information coming to

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their knowledge in the course of their duties, how to protect the information system with regard to security risks, - prevent security incidents.

### **Company Compliance/Business Ethics Representative**

SLU formally appoints a representative from senior management who is responsible for meeting compliance/business ethics expectations. His duties include: - protect employees' personal records and allow access only to those with a legitimate need to know, - respecting its customers is prioritising their needs, even at the expense of society; - apologize and provide compensation if the customer's expectations have not been met, - providing equal employment opportunities for people from different ethnic, gender and social groups; - encourage employees, in order to report unethical practices, employees must not fear job loss or disciplinary action for drawing the company's attention to unethical behavior, - ensuring transparency, - clear procedures for communicating with both employees and customers, - assist employee volunteering programmes, - reduce waste, protect local soil, water and air, - respect for the principle of fairness and respect, - compliance with fair pay requirements for work based on their experience, education and professional responsibilities, - periodic review of the remuneration arrangements.

### **Company Representative for Environmental Sustainability**

The SLU formally appoints a representative from senior management who is responsible for environmental sustainability. Her duties include: - regular control of the system and work in accordance with the requirements of legal and legal regulations, - application of legal and other regulations in processes, - submission of proposals for quality objectives, quality policy and, after approval, review of the implementation of tasks and objectives, definition of the activities and tasks of the EMS quality management system, - design and application of various elements of the quality management system; - providing audits by a second or third party, - designation of EMS task forces; - methodical management of the activities of internal auditors in the field of the ESM, proposal of corrective and preventive measures to ensure correction; - ensuring and controlling the activities of certification bodies; - issuing, distributing, revising, downloading and marking invalid documentation.

### **Human Rights Representative**

The staff of the SLU elects the head of the Staff Welfare Commission as the employee representative for human rights. His duties include: - control of working conditions and protection of safety and health at work, - identification, analysis and elimination of causes of occupational accidents or diseases, - participation in the elaboration of conditions for employee remuneration, - creation of conditions for raising the professional level of employees and satisfying social needs; - verification of compliance, - participation in ensuring professional discipline, - handling suggestions and legitimate comments or complaints

### **Sustainability report**

At SLU, we annually publish the SQA 5 SSLU Sustainability Report, as a formal proof of meeting our "Sustainability" expectations. In the report, we assess the extent to which the requirements are met

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as set out in the scope requirements of the "SQA 5 Sustainability Report" and in the GRI methodologies.

### Content of the SQA 5 Sustainability Report

SQA 5 Report hodnotí všetky popísané aspekty aktivít SLU tak ako sú popísané v tomto Etickom kóde SLU. Súčasťou preskúmania je aj dodržiavanie ľudských práv.

### Externé preskúmanie SQA 5 Reportu

The SQA 5 Report is annexed to the review of the SLU Annual Report for the year. The annual report is reviewed independently by external third parties such as the Accounting Audit Firm, Banking Supervision, the General Meeting of the Company. The report is publicly published on the website.

### Risk assessment

The risk assessment matrices for processes and individual activities are based on best practices. Evaluations shall respect the standards set for such evaluations. Classification, preventive and risk mitigation measures are assessed by independent certified auditors for ISO 14001 EMS, ISO 45001 OSH systems, ISO IATF 16949.

### Due diligence

The SLU annually conducts an inspection of the exercise of reasonable care regarding the company's activities within its business. The due diligence review shall include an examination of the economic, legal, fiscal and financial circumstances of the undertaking or employees, sales data, stakeholder expectations and examinations of whether negative activities, corruption and tax evasion have been prevented.

### Employee training

Training and education are firmly planned and monitored on a monthly and annual basis. Each employee receives training according to the achieved qualification, is assigned an alternate training date, we monitor the benefits of training and evaluate the benefits of education. The topics of the training are: - Information on the accessibility of documentation on the corporate intranet, - requirements for certified systems ISO IATF 16949, ISO 14001, ISO 45001, ISO 50001, SA 8000, TISAX, - requirements for "Sustainability" programmes, - SSLU Code of Conduct, - protection of human rights and working conditions, - Establishment plan, - Working rules, - Policies and objectives of ISO IATF 16949, ISO 14001, ISO 45001, TISAX certified systems, - Information on compliance with the policies and objectives of certified systems, - Trauma plan, Emergency plans, - Work Environment Improvement Programmes, Workers' Health and Safety Programmes, Carbon Footprint Reduction Programmes, - a complaints mechanism, - the provision of LAW No. 54 Protection of whistleblowers, - requirements for a Supplier Code of Conduct

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## B. HUMAN RIGHTS AND WORKING CONDITIONS

### Requirements of SA 8000

The SLU has described and externally independently verified procedures and/or formally implemented management systems to meet the requirements for respect for human rights and adequacy of working conditions.

### Responsibilities of managers

In particular, managers are obliged to: a) manage and control the work of employees b) create favorable working conditions and ensure occupational safety and health (OSH), immediately identify, investigate and eliminate the causes of occupational accidents or diseases; (c) ensure that employees are remunerated as applicable (d) create favourable conditions for raising the professional level of employees and meeting their social needs; e) ensure compliance with laws and regulations adopted by the employer, ensure that professional discipline is not violated (f) ensure that timely and effective measures are taken to protect the employer's assets; (g) handle suggestions and legitimate comments or complaints from employees relating to: the site inspected or, where appropriate, in conjunction with the employee commission.

### Violation of professional discipline

Work discipline is based on a conscious attitude of employees to respect human rights.

Working time creates the organisational framework for employment relationships and represents the obligation of employees to perform work within a set time frame. Requirements for the performance of work are regulated by the Working Regulations of the SLU. The Working Regulations shall be violated by those who do not respect the provisions of the Working Regulations

### Independent review of human rights and working conditions in the SSLU

The external certification company TÜV SUD Slovakia formally carries out reviews of certified systems such as ISO 14001 EMS, ISO 45001 OSH, ISO IATF 16949 and examines the formal fulfilment of environmental requirements, requirements for the protection of occupational safety and health, human rights, procedures for risk assessment of processes and activities, the state of adequate care for employees. During the audits, all requirements for "Company Sustainability" are checked in a controlled or selective manner.

### Child labour

The SLU does not tolerate child labour and complies with the requirements and recommendations of the International Labour Organization (ILO).

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### **Platy a benefity**

SLU respects and complies with the valid Labor Code and internal remuneration arrangements. It guarantees that the employees it employs are remunerated in accordance with the applicable legal requirements and agreed salary requirements.

### **Working time**

SLU respects working time requirements where it is defined that working time is:

- 40 hours per week in an establishment where the employee works evenly 5 days a week,
- 38 and 3/4 hours per week in a two-shift operation where the employee performs his work alternately in both shifts,
- 37 1/2 hours per week in three-shift or continuous operation where the employee performs his work alternately in all shifts.
- For adolescent employees under the age of 16, working hours shall be a maximum of 30 hours per week. This is true in total, even if he works for multiple employers. If the adolescent is over 16 years old, his working hours can be a maximum of 37 1/2 hours per week.

### **Prohibition of slavery and forced labour**

The SLU respects the provisions of the Declaration of the Charter of Fundamental Rights of the European Union in relation to the requirements of Article 5 - Prohibition of slavery and forced labour in duties, which states:

1. No one can be held in slavery or servitude.
2. No one shall be required to perform forced or compulsory labour.
3. Trafficking in human beings is prohibited.

### **Freedom of association**

SLU respects the rights it hires to carry out its activities and fully complies with applicable legal requirements. It allows workers to establish works councils, bargain collectively and define forms of employee representation.

### **Non-discrimination and harassment**

SLU does not tolerate physical, psychological, or sexual harassment. No form of abuse, humiliation, bullying, oppression of women, gender, minorities and discrimination is accepted

### **Human rights, special attention to women's rights**

The SLU ensures respect for human rights for all groups of workers, regardless of gender and sexual orientation, the creation of specific conditions for the protection of physical and mental health, the right to education, to have their own property, to vote and vote and earn equal pay, to be non-discriminated against at work, in relationships. SLU participates in creating adequate working

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conditions, legal and substantive conditions for women, creating conditions for a life free from violence and discrimination.

### **Diversity, equity and inclusion**

SLU creates policies and acceptable working conditions for diversity, equality and inclusion, promotes representation and participation of different groups of individuals in society and the community's surroundings. People of different ages, races, ethnicities, abilities, disabilities, genders, religions, cultures and sexual orientations must have equal chances of social inclusion.

### **Rights of minorities and indigenous peoples**

No one belonging to an ethnic, religious or linguistic minority is denied the right to enjoy their culture, report and practice their religion or use their language in the SLU.

### **Ethical recruitment**

SLU applies ethical values in its daily business practices and promotes them as company-wide values. Ethical values include trust, honesty, respect and responsibility. The proliferation of unethical recruitment practices leads to demotivation, disappointment and exploitation.

When recruiting, the SLU shares general principles such as: - does not publish misleading job advertisements, - maintain an open dialogue with candidates, - interviews are organised in such a way as to verify the correct assignment to the activity being carried out, - treats all candidates equally without bullying during interviews, - requires only the information that is necessary, - keep confidential the use and storage of candidate information, - if he considers that the candidate is also suitable for another post, as he reports, he will be offered another job, - after the end of the interview, notify the applicant within what time he informs him of the result of the interview and the selection decision.

### **Rights to land, forests, water rights and forced evictions**

The SLU is committed to respecting indigenous peoples' land rights under internal and international human rights law. The SLU will not engage in illegal activities to relocate indigenous peoples without their free, prior and informed consent and without providing adequate compensation if it conducts business in such territories.

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### Use of private security services or public security forces

The SLU contractually employs private security services to protect its property and personnel in cases where the government does not provide police protection in everyday life or where, under the provisions of the law, contracts for the provision of private security services can be concluded

It ensures that private security service providers establish clear procedures and conditions for the protection of workers' and property's health before taking any safety measures. The SLU controls and disables the illegal practices of private security services if the private security services violate operational measures or their involvement is contrary to legal and other regulations. The activity of the security services in the SLU must not be accompanied by inappropriate use of force, violence against the population.

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## C. HEALTH AND SAFETY AT WORK

### Occupational Health and Safety System Certification according to ISO 45001 Requirements

SLU has certified the Occupational Health and Safety (OSH) System according to the requirements of ISO 45001.

On the company's website / or intranet are publicly published OSH Handbook, OSH Policy and Objectives, Directives, appointed Commissioner of Quality.

#### External independent verification

The conformity of the OSH system is annually verified by certification auditors with appropriate competence.

A representative of workers for OSH issues is elected in the company, as determined by law. The representative communicates with management regarding issues of ensuring safe work or in case of suspicion of a risk to workers' health.

#### Written policy and OSH objectives

The SLU draws up a controlled and written Health and Safety Policy that complies with laws, decrees and customer requirements.

The document presents the company's philosophy in the field of work culture and employee protection.

An OSH policy is a publicly published document on a company's intranet that presents a company strategy for injury prevention, improving working conditions and the working environment. The SLU has set a program goal of zero injuries.

#### Personal protective equipment

Assessment of hazards arising from the work process and working environment in the SLU carried out in cooperation of a safety technician with heads of departments and workers' representatives in accordance with § 6 par. 1 letter c) of the Act of the National Council of the Slovak Republic no. 124/2006 Coll. on safety and health at work and on amendments to certain acts and regulations of the Government of the Slovak Republic no. 395/2006 Coll. on minimum requirements for the provision and use of personal protective equipment. Based on the identified threats and risk assessment in accordance with the provisions of § 6 par. 1 letter c) of the Act of the National Council of the Slovak Republic no. 124/2006 Coll. on safety and health at work and on amendments to certain acts, a list is prepared for the provision of personal protective equipment for SLU employees. Protective equipment is provided free of charge.

#### Safety at work on machinery and equipment

The safety officer assesses risks and develops risk matrices for activities, processes and for the machinery or work processes used. For each risk, managers ensure preventive measures are taken to minimize the possibility of accidents. The basic objective of all measures is to avoid injury or damage to health

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Heads of production centres acquaint employees with legal and other ongoing provisions to ensure OSH, - regularly verify employees' knowledge of the regulations, - require and check compliance with the regulations, - create conditions for raising the professional level of employees, - ensure that there is no violation of professional discipline, - provide employees free of charge with the necessary personal protective equipment and work equipment (PPE), - cleaning and disinfectants according to the elaboration of the list, - ensure that PPE of workers is maintained in good condition, - check their correct use and ensure that workers use it permanently.

### **Emergency preparedness plans**

Emergency preparedness plans in the SLU are drawn up for each workplace or activity and on the basis of verified information such as: - risk assessment, - setting up an emergency response team, - defining evacuation procedures, - procedures for training and exercises, - indicate significant communication telephone numbers, - principles for providing first aid and medical assistance, - ways to test and update the emergency preparedness plan. The basic types of plans are Plan of measures in case of reduced water quality and Emergency plans for individual workplaces or technologies. All types of plans have their own identification number and are included in documents of the Managed Documentation type.

On the basis of the prescribed measures, financial resources are allocated, the responsibilities of workers are determined, protective devices and premises are designed, procured and set up to protect against various types of disasters

### **Incident and accident management**

To ensure immediate response in case of incidents and accidents, the following are intended: - a step-by-step procedure for dealing with an emergency, - whom to call for help, - whom to inform from the top management of the company, - appointed and trained fire patrols, - assigned duties of managers on how to proceed in the event of a hazardous event, - how to organise workers in order to avoid risks to workers' life and health Once the damage has been repaired, it shall be re-evaluated, whether the measures in place are sufficient.

All types of documentation for incident and accident management have their own identification number and are included in documents of the type Controlled documentation

### **Ergonomics of the working environment**

The Technical Preparation of Production department is responsible for the regulation of working conditions. Working environment conditions are established in such a way that: - prevent unwanted lights and accidents, - create preventive measures to reduce risk factors such as noise, radiation, chemical factors, work with dangerous substances, physical stress, biological factors, mental stress, visually impairing work with display units.

The layout of accessories at the workplace is designed according to the principles of 5 S.

According to standards and decrees, ergonomic and administrative conditions for the performance of manual or administrative work are proposed and developed in writing.

All types of documentation for ergonomics management have their own identification number and are included in documents of the type of Managed documentation

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### **Treatment of chemical and/or biological agents**

SLU does not treat biological factors. Written instructions are elaborated in the SLU: - for Hazardous chemical substances and hazardous chemical preparations for humans, - identification of risk factors to which the work process and working environment are exposed, - use of protective equipment, - Organisational measures, -- description of the appropriate adjustment of work schedule and work organisation in order to exclude or limit the effects of harmful or adverse effects of work and the working environment, elaborated Trauma plan - procedure in the event of damage to health, including the provision of first aid and evacuation of injured persons.

### **Management of dangerous substances**

The SLU has established an internal management system in internal processes to ensure compliance with national and international legislative and other regulations for environmental and food safety. This system includes:-a comprehensive and up-to-date list of stored chemicals; System of layout and updating of safety data sheets (MSDS - Material Safety Data Sheet), - process of approval of procured chemicals and their own application in internal main and auxiliary processes, - training of workers in the use of hazardous substances, - disposal of waste from hazardous substances. All types of documentation for the management of hazardous substances have their identification number and are included in documents of the type of Controlled documentation

### **Fire protection**

The management of the SLU company, on behalf of the managing director of the company, assigns tasks in the field of fire protection management to employees. When fighting a fire, each employee is obliged to: - rescue endangered persons, - if possible, extinguish the fire or prevent its spread, - report a detected fire to the fire brigade or ensure that it is reported, - provide personal assistance to the fire brigade at the request of the intervention commander.

Managerial employees are obliged to:- ensure compliance with the regulations on fire protection, fulfill the resulting orders, prohibitions and instructions and carry out regular inspection of their fulfillment,- ensure that regular inspection of the condition of technical and technological equipment from the point of view of fire safety is carried out, - ensure protection against fires during non-working hours,- procure and install appropriate types of fire-fighting equipment, - eliminate identified deficiencies.

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## D. BUSINESS ETHICS

### Policy covering the field of business ethics

SLU formally publishes the Business Ethics Policy, where the company's statements or commitments are declared, such as: promoting fair play in communication with stakeholders, - prevent illegal practices in business, - respect customer expectations, - take into account their needs, - apologize if defective products have been provided to the customer, - warn employees to report and report unethical practices, - protection of employees against loss of employment, or draw attention to illegal or unethical behaviour in disciplinary proceedings, - ensuring transparency in communication with customers, suppliers, - employees, -adherence to the principles of mutual respect and respect, - guaranteeing a fair wage for the work they do, based on their experience, education and job responsibilities.

The Business Ethics policy and objectives are publicly published on the company's website and intranet. A trustee for business ethics is appointed in the SLU.

### Data protection and data security

The SLU has regulated in a controlled manner the release or disclosure of confidential information regarding employees of the GDPR (General Data Protection Regulation) as general principles for the protection of personal data within the meaning of European Union regulations that govern the protection of individuals in connection with the processing of personal data. The procedure for publishing facts or information regarding confidential data about products or processes is determined within the certified TISAX system.

It requires the same level of protection of confidentiality of data regarding supplied components or materials from its suppliers.

### Financial responsibility. Adequacy and accuracy of accounting records

The SLU maintains sound internal accounts in accordance with national and internationally recognized requirements. The records provide information about business and evidence of financial movements according to specified charts of accounts. Financial transactions shall be transparent. The method of bookkeeping is authorized by an external accounting audit organization.

### Disclosure

SLU respects formal procedures for making information available, a way of communicating with stakeholders according to customer requirements. Procedures for protecting cybersecurity are described in the guidelines of the TISAX certified system.

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## Competition fairness and anti-dumping (anti-discrimination) policy

### Customer Relations

We develop our processes to provide premium quality products that are safe and function flawlessly in accordance with customer standards for a long time. An open and fair approach to customers and meeting their expectations are a prerequisite for maintaining a successful and long-term business relationship. We act politely towards our customers without prejudice and discrimination in business relations, respect the confidentiality of transmitted information and communicate on the principle of mutual respect. We provide truthful information about how products should be used and respect agreed guarantees. We communicate the identified risks with customers.

### Supplier relations

SLU also respects suppliers. We develop relationships based on mutual respect and trust, maintaining the confidentiality of the data provided to us. We communicate on the principle of mutual respect. We do not abuse our business position. We require our suppliers to supply premium quality products that are safe and function flawlessly in accordance with customer standards for a long time. We oblige suppliers to respect the Supplier's Code of Ethics, requirements for properly provided information and compliance with guarantees, and we check them in connection with this commitment

### Relations with creditors

SLU provides its creditors with truthful information about its financial situation and undertakes to effectively evaluate the funds it receives.

### Company employees

They may not accept any gifts or commissions from business partners with a view to obtaining undue benefits. For its employees and nominees, consultants and agency workers who work for it, business partners, SLU creates a Policy and practical measures to ensure fair competition.

### Relations with competitors

SLU respects legal norms that regulate the principle of competitive relations. It operates lawfully in accordance with the rules of fair competition.

Relations with public authorities, region and society We comply with the payments of applicable legislation to the extent set out in our corporate charter. We provide unbiased accounting information to national and local government authorities

## Conflict of interest

The SLU defines measures for eliminating conflicts of interest. Conflict of interest refers to any case where an employee's personal interest could conflict with the interests of the company for which they work. It also imposes duties on employees so that there is no conflict with the interests of the SLU

## Fake (imitated) products

The SLU shall establish such measures as to prevent harm to customers in the event of the use of such products where counterfeit products are offered as genuine products or where the origin or quality of the products offered is incorrectly stated. It requires the same procedure from its suppliers

## Intellectual property

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SLU enters into a written commitment with customers or suppliers to "Maintain Data Confidentiality" marked as a "Non Disclosure Agreement". The supplier is obliged to ensure the protection of the intellectual property of the SLU for any provided documentation for the product and trademarks.

### **Export control and compliance with economic sanctions**

The SLU monitors decrees publishing rules to prevent prohibited trades, economic sanctions and import or export restrictions based on international conventions. Conventions may prohibit trade with specific individuals, entities or countries, or restrict or prohibit exports or imports of certain goods or services.

SLU reserves the right not to accept from the supplier goods or services whose import or export falls under formalized restrictions.

### **Complaints mechanism**

The SLU has procedures in place regarding the Protection of Whistleblowers and Protection from Retaliation Act for employees or other persons who report suspicions of wrongdoing in good faith. The whistleblower has conditions created for discreet or public submission of a report in case of suspicion that anti-social activity is taking place.

### **Whistleblower reporting and protection**

The SLU has developed a guided document on the procedure for formalising the submission of complaints, describing the complaints procedure, - whistleblower protection, - how to examine the validity of the complaint, - independence of the Data Protection Officer for the review, - confidentiality, handling of complaints lodged and protection of the identity of the complaint (anonymity), - an undertaking not to retaliate against complainants, - submission and processing of environmental complaints, - submission and processing of complaints about dangerous, or harmful to health, - complaints about unethical business practices, - time to examine and reply to the complainant.

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## E. ENVIRONMENT

### The ISO 14001 environmental management system certification

SLU has a formally certified Environmental Management System (EMS) according to the requirements of ISO 14001: as amended. The EMS Manual, EMS Policy and Objectives, Guidelines, Appointed EMS Commissioner are publicly published on the corporate website and/or intranet

### External independent verification of EMS

be verified annually by independent external certification auditors with appropriate competence

### Decarbonisation

SLU is positive about global efforts to reduce CO2. SLU is actively looking for opportunities to transition to sustainable energy sources, ways to save energy and increase the efficiency of means of production without increasing energy consumption. We purchase energy from so-called "Green sources".

### External review of the level of carbon footprint achieved

The SLU regularly undergoes external reviews to quantify and confirm its efforts to reduce its carbon footprint in a formalised manner.

### Greenhouse gas emissions

The increase in the global average temperature is mostly due to emissions from the combustion of fossil fuels (coal, oil and natural gas).

SLU chápe celosvetové úsilie a dobrovoľne sa pripája k úsiliu o znižovanie emisií a uhlíkovej stopy riadeným prechodom na udržateľné zdroje energie, šetrením energie a zvýšením účinnosti výrobných prostriedkov. Podľa jej možností priamo vytvára, alebo participuje na tvorbe zelených plôch a využívaní iných prírodných a technických procesov na znižovaní emisií.

### Energy efficiency according to ISO 50001 Energy Management requirements

SLU develops the requirements of ISO 50001

The SLU develops an Energy Policy, measures the level of energy consumption, evaluates trends, sets goals and objectives to meet Energy Management Policies and Programs.

### Targeting energy saving programmes

Reduction of eliminated emissions through newly acquired funds: - we prefer low-emission means of transport, - we have acquired a vehicle with a hybrid drive, we will install a stand for plug-in charging of electricity in the parking lot, - with the support of the operational programs "Quality of the environment" we install clean energy sources - solar collectors, in order to prepare hot water and support heating.

External independent verification of energy management practices

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### Conformity of management practices

is regularly verified by an external verifier – an energy auditor with the required competence. The auditor prepares Energy Audit in SLU reports on the result of the verification. SLU monitors unwanted heat leaks in forms such as examining the building envelope with a thermal imaging camera, performing a repeated energy audit of the building, detecting and eliminating unwanted heat leaks.

### Renewable energy

SLU, with the support of the state operational programs "Quality of the Environment", installs clean energy sources - solar collectors in combination with each other from already established devices in order to produce hot water and support heating. Photovoltaic panels are intended as a source for the supply of workplace lighting and non-technological operating equipment.

### Water quality, consumption and management

The SLU creates conditions and manages the operation of its own optimal use of water resources in order to minimize the consumption of sanitary and drinking water and subsequent measures with minimizing the risks of reduced water quality. If it depends on drinking and service water supplies from external suppliers, it has internal control processes in place to immediately alert and request remediation in cases of violations in accordance with applicable legislative and other regulations (laws, decrees, customer requirements) for water protection.

### Air quality

The SLU creates conditions and directs activities with the aim of minimizing the risks to air quality by discharging exhalations beyond the level permitted by decrees. It permanently monitors the discharge of exhalations from the gas boiler room. The SLU has internal control processes in place to monitor compliance with air quality protection requirements.

### Responsible management of chemicals

Management of chemical substances respects the requirements of laws, decrees, standards. Issues of chemical management and hazardous waste management within EMS processes.

### Sustainable resource management

SLU understands resource sustainability requirements, monitors resource sustainability expectations. It spreads awareness among workers and collaborators that resources need to be actively managed so that they are not depleted in context to such an extent that future generations will be affected.

### Waste reduction

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SLU creates a sustainable waste management system in such a way that materials can be kept in use for as long as possible and the amount of solid waste that is disposed of in landfills or incinerated can be reduced.

SLU uses materials that, once incorporated into a product at the end of its life cycle, will be recyclable to the maximum extent possible.

SLU respects the requirements and maintains proper and up-to-date records and reporting on waste management in accordance with applicable legislative and other regulations for waste management.

### **Reuse and recycling**

SLU understands the desire to maximize the reuse of resources, machinery and equipment in order to maximize service life until they lose their intended efficiency and effectiveness. It uses raw materials and substances that have the potential to regenerate internally generated wastes either directly or vigorously recyclable.

### **Creating conditions for animal welfare**

The SLU monitors the conservation status of domestic or wild animals in its surroundings within its reach and develops active measures in accordance with applicable legal and other animal protection regulations.

### **Biodiversity, land use and deforestation**

SLU monitors the state of land use and deforestation in its surroundings and creates compliant measures to regulate biodiversity, protect soil from degradation and land loss.

### **Soil quality**

The SLU monitors the state of the soil ecosystem quality on which it has a localized production site, the direct vicinity of the production site within its reach, and creates active measures in accordance with soil quality protection regulations.

### **Noise emissions**

The noise level of equipment is regularly measured and reassessed by an independent Health Work Service. SLU creates suitable conditions for noise reduction in accordance with current regulations for the protection of human health and life. It also creates conditions so that neighbouring companies or private individuals are not disturbed by noise.

### **Risk factors for health**

The level of exposure to risk health factors is regularly measured and reassessed by an independent Health Occupational Service. The SLU creates suitable conditions for reducing the exposure of workers or stakeholders to risk factors in accordance with regulations for the protection of human health and life. It also creates conditions so that neighbouring companies or private individuals are not endangered by health risk factors.

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## F. RESPONSIBLE SUPPLY CHAIN MANAGEMENT

### Supplier certification

Only a supplier who is certified at least according to ISO 9001 requirements is released for delivery. A prerequisite for releasing a supplier is the fulfilment of the conditions of potential analysis according to the requirements of VDA 6.3.

### External independent verification of conformity of the applied system at suppliers

The conformity of the applied quality system with suppliers is annually verified according to the requirements of VDA 6.3. by an internal SLU auditor with appropriate competence. The auditor prepares VDA 6.3 Supplier Audit Reports on the outcome of the review.

Determining and implementing the same standards with suppliers in business relationships as required by customers from SLU.

### The supplier is released for delivery

only if he undertakes to respect the Supplier's Code of Ethics" as developed and submitted to the supplier for approval by SLU. The scope of requirements of the Supplier's Code of Ethics is specified in the provisions of SQA 5 Sustainability

### The Supplier is obliged to thoroughly acquaint himself with legal and other requirements

SLU transfers customer requirements to suppliers to the same extent as SLU committed customers. The transferred requirements of customers are bound to suppliers to the same extent as the SLU is bound. A deviating wording may only be agreed between SLU and the supplier in writing.

### Training at the supplier on requirements from the Supplier Code of Conduct

SLU requires written proof that suppliers officially notify their personnel of the requirements of the Supplier Code of Conduct.

Line of requirements from Tier 1 suppliers to meet customer expectations towards the entire Tier 2 supplier network.

The Supplier is also obliged to regularly acquaint himself and in his own interest with the specific requirements of customers provided by SLU.

The supplier is led to understand the expectations about the high demands of SLU on its goods and services, because SLU cannot in any way discount customer requirements or even accept products and services with reduced quality.

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## G. RESPONSIBLE SOURCING OF RAW MATERIALS

SLU respects legal requirements, national decrees and specific customer requirements regarding the method of procurement and chemical content of supplied components and materials.

### Confirmation of corresponding procurement of raw materials

We provide customers with CMRT, EMRT, CRT Cobalt report, IMDS report, REACH, or other evidence of chemical composition or proof of health safety.

### Customer expectations for submitting required reports

SLU requires suppliers to make the same material composition declarations as prescribed by customers

### Mapping of supply chain compliance and acceptability

SLU in protocols such as CMRT, EMRT, CRT Cobalt report, declares that only suppliers from the formalized "List of smelters" are released for supply

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