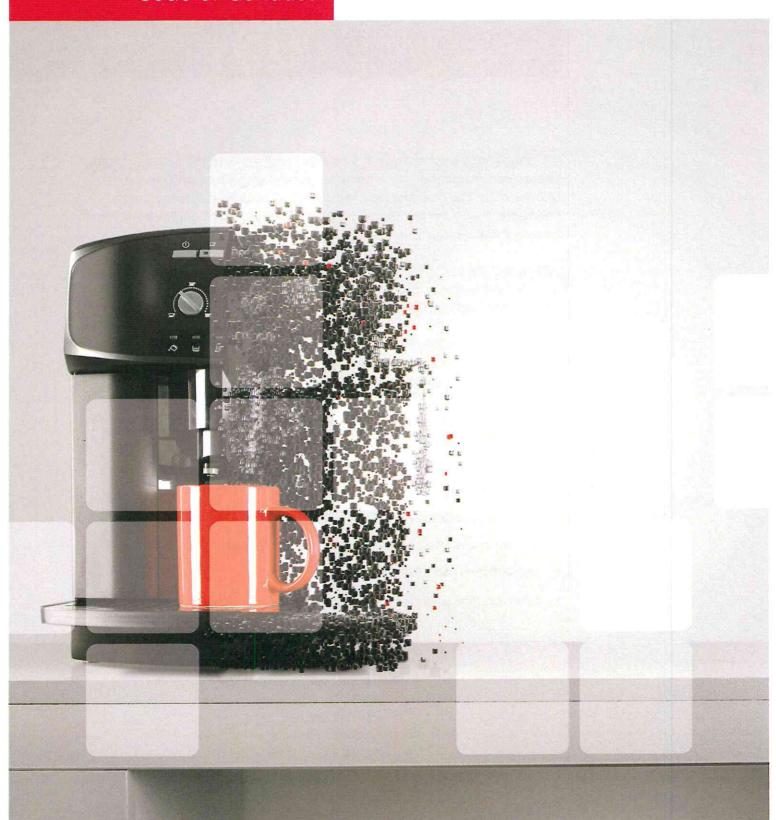


# Code of Conduct





## Code of Conduct SAX Polymers

We are a family business which trusts its employees do their jobs correctly. We are convinced, that our employees act independently and we want to offer them the greatest possible creative freedom in their activities. Therefore, the Hromatka Group defined guidelines which apply as the basis for every task we perform.

With this Code of Conduct, we are committed to ethical business practices and to comply with applicable laws, make our employees familiar with our expectations and explain our five guiding rules for business life.

Internalizing this code of conduct and complying with its principles are prerequisites for the personal success of our employees. Compliance with these rules contributes to success and image of our company as well as to the success and satisfaction of every colleague and their families and consequently to the success of our customers, suppliers and neighbours in the locations where we live and work.

- We comply with the law
- We respect human rights
- We act in the interests of our group of companies
- We behave responsible
- We stand for a modern quality and environmental management system



## Our commitment as a group of companies

### **INCREASE IN VALUE**

We are committed to a success-oriented and sustainable development of our group of companies. This is a requirement for long-term competitiveness, securing the future and increasing corporate values of our own group as well as of our customers and suppliers.

### **EXCELLENCE**

Our goal is to continuously improve our products, services and processes. Excellence is an essential requirement for that we are and will remain the preferred supplier, customer, employer and partner.

### TRUST AND RESPECT

We are committed to dealing honestly, directly and fairly with our employees, suppliers, customers, partners and everyone at the locations where we operate. Mutual trust and respect are also prerequisites for a successful relationship and long-term cooperation.



## Our expectations

- Every employee contributes to the good reputation of the company, for which he/she works.
- All employees and business partners respect our Rules of conduct for business life.
- The entire management is actively working towards the realization of the Code of Conduct and recognizes employees who set an example in this regard
- Every employee is encouraged to question behaviour which is not compatible with the guiding rules of the Code of Conduct. If he/she feels unsure, he/she immediately draws his/her direct supervisors, as the person responsible for the fulfilment of the guidelines or management for advice. He/She can also make an anonymous report to the management of the group.
- Employees who violate this Code of Conduct and/or are involved in criminal acts must be associated with appropriate calculate disciplinary action.

## We obey the law

We comply with all laws, directives and regulations, in every country, in which we operate. We respect the rules of fair competition, antitrust law, export and import restrictions, industrial property rights and copyrights and reject any form of bribery.

### RULES OF FAIR COMPETITION AND ANTITRUST LAW

We respect the rules of fair competition and antitrust law and refrain from behaviour that leads to a violation of these rules could, such as:

- Conclusion of inadmissible agreements with competitors or market partners about prices, areas, customers or production volumes.
- Entering into inadmissible agreements that completely or partially exclude competition with a competitor.
- Bid rigging or the submission of unfair bids.

## We obey the law

### **EXPORT OR IMPORT RESTRICTIONS**

We comply with applicable export and import control regulations, which restrict the exchange of goods and commodities with certain countries, regions, companies or individuals or need an approval by state organs. This applies to permitted use, purchase or sale of technical information, products and services.

To comply with these regulations, all companies have established corresponding

Policies and procedures. They are to be observed by the employees without exception.

### INTELLECTUAL PROPERTY LAW

We respect the intellectual property rights of third parties (patents, utility models, trademarks, copyright) and do not violate them.

#### BRIBERY

Offering, soliciting, giving or receiving any inducement or bribes designed to undermine the actions of a person, a to influence a company, a civil servant or a state body, is strictly forbidden. Bribery can include giving money, goods, favours, or contain any promise or undertaking, that is suitable to influence a recommendation, the action or the decision of a person.

## We obey the law

- Gifts to business partners should be given carefully and with regards to applicable laws are selected to avoid any dishonest intent.
- Gifts to civil servants, other public servants or other officials are to be refrained from, except where applicable law allows.
- Employees must never accept unjustified benefits from third parties (e.g. customers, suppliers, service providers, consultants or agents).

Does an employee feel unsure about any of the above mentioned points, he/she should immediately contact his/her direct superior or consult the person in the group responsible for compliance with the guidelines.

## We respect human rights

We respect the personal dignity and privacy of everyone. The recruitment and selection as well as the advancement, promotion and compensation of our employees takes place exclusively according to individual and work-related criteria such as experience and efficiency.

- We do not allow any kind of human rights violations.
- We forbid child labour and allow none of any kind of forced labour.
- We take the necessary care to ensure a socially and ecologically responsible sourcing of raw materials in our supply chain.
- We do not tolerate discrimination, threats or harassment, resulting from race, skin colour, national origin, gender, religion, age, physical or mental impairment, sexual orientation or family relationships.

## We act in the interest of the group

Our actions only serve the interests of our business activities. We avoid situations in which private interests of an employee stand in contradiction with the interests of the company.

### CONFLICTS OF INTEREST MAY ARISE WHEN AN EMPLOYEE:

- owns shares in a company that is not part of the group, and doing business with it on behalf of the group.
- Employees close relatives or buys goods and services provided from businesses owned by relatives.
- Works privately in an organization, whose activities could negatively influence the interests of the company or employee.

## We behave responsibly

- We deal with our tangible and intangible assets carefully and responsibly. The same goes for handling electronic media.
- We store personal data of our employees and customers only if and as long as this is absolutely necessary
- We protect confidential information and intellectual property of our group of companies and of our business partners conscientious.

### CONFIDENTIAL INFORMATION INCLUDES:

- All non-public information about our company as well as our customers, which could be of interest to competitors or are suitable for harming the company, its customers or business partners, if published.
- Product and business plans, specifications, unpublished financial information, production methods and processes, customer and employee lists, and computer software.
- All information which is subject to commercial protection and copyright laws.



## We behave responsibly

To protect our tangible assets and our intangible assets every employee has to handle confidential information with care:

- Employees only have access to confidential information if they need it to do their job effectively.
- Employees are not allowed to keep written records, Database entries, audio/video recordings or other copies of confidential information, unless it's a direct part of their
- Tasks and/or they have the approval of their manager.
- All information from our customers and business partners are subject to strict confidentiality.

# EXCEPTION: DISCLOSURE OF THIS INFORMATION IS EXPRESSLY AUTHORIZED.

We respect the intellectual property of others. We do not copy or use this property without prior formal consent.

With regard to the preservation of confidential information, all employees follow the instructions of their supervisor.

All employees are aware of the risks arising from use from the Internet and other electronic media and act appropriately responsible.

## We ensure modern QSU management

We continuously monitor our needs and our performance in the areas of quality assurance, occupational safety and environmental protection. If necessary, we immediately introduce improved standards.

# OUR PRODUCTS AND SERVICES MEET THE REQUIREMENTS OUR CUSTOMERS.

- We are committed to developing, producing and to market products, which meet the requirements of our customers in the desired benefit and quality.
- We adhere to generally accepted QM system standards.
- Since our customers come from very different business areas, we certify our products according to the relevant industry standards.
- With the continuous further development of our quality management systems, we ensure that errors are reduced to a minimum and that we always meet customer requirements.

## We ensure modern QSU management

# WE ARE COMMITTED TO PROVIDE SECURE JOBS TO OUR EMPLOYEES.

- We respect and comply with applicable occupational safety laws.
- Our goal is to minimize all risks and hazards at each workplace, to ensure the health and well-being of all employees, suppliers and visitors.

# ENVIRONMENTAL PROTECTION IS SUBJECT TO A CONTINUOUS IMPROVEMENT PROCESS.

- We comply with all applicable environmental protection laws.
- We adhere to generally accepted standards of Environmental Management Systems.

On behalf of the management,

Hromatka Hans, 28.08.2023

