

Supplier Code, change 0

WE ARE RESEARCHERS,
MANUFACTURERS AND VISIONARIES



MEGA GROUP SUPPLIER CODE OF CONDUCT

1 SUPPLIER'S DECLARATION

We hereby confirm:

the adoption of the "MEGA Group Supplier Code" and, in addition to the obligations arising from we undertake to comply with the principles and requirements of the Supplier Code of Conduct in our supply contracts of the MEGA group of companies.

Signature

Functions

Company

Place, date

The document must be signed by an authorised representative of the company and returned within 20 working days of receipt.

2 INTRODUCTORY WORD

Only companies and firms that have clear rules of the game for their appearance and behaviour both externally and internally are able to further develop and maintain high standards in their activities. In other words - not only economic results are the criteria of a quality and promising company. For this reason, we have jointly developed the basic rules of conduct, behaviour, internal and external communication, etc., which are contained in the so-called Code of Ethics for companies in the MEGA Group. It should be emphasised that this Code of Conduct is binding for all companies within the MEGA Group and I believe that compliance with this Code of Conduct will take us a step further.

Ing. Luboš Novák, CSc.

3 VALUES OF THE MEGA GROUP OF COMPANIES

- The customer comes first and all activities are aimed at his satisfaction,
- experienced and qualified employees are the basis for the high quality of our products and services,
- we apply equal treatment and recognition of the work of others,
- The cornerstone of a respected business is meeting the legislative requirements and needs of the cooperating partners.

"We will only be a financially strong and growing company that will be able to withstand unexpected situations if each of us actively performs our tasks and contributes to the development of the MEGA Group companies, while at the same time trying to get along with each other as well as possible. Such a team has enormous strength and is almost unbeatable. Through our daily efforts, we are building and securing a common perspective and future for many years to come." Ing. Luboš Novák, CSc.

Table of Contents

1	SUPPLIER'S DECLARATION	2
2	Introductory word.....	3
3	Values of the MEGA Group	4
4	Respect for human rights	6
4.1	Foreword	6
4.2	Human Rights	6
4.3	Equality.....	7
4.4	Employee representation.....	7
5	Ethics in a business relationship.....	8
5.1	Professionalism.....	8
5.1.1	Conflicts of interest	8
5.1.2	Political and public activity.....	8
5.1.3	Refreshments, invitations and gifts.....	8
5.2	Respect	8
5.2.1	Unfair competition	9
5.2.2	Shopping.....	9
5.3	Transparency	9
5.3.1	Accounting and disclosure of financial statements.....	9
5.3.2	Social responsibility.....	9
6	Ethics in the workplace	10
6.1	Sustainability.....	10
6.2	Health and safety at work	10
6.3	Environment	10
6.4	Compliance with legislative requirements	10
6.4.1	Silence	11
6.4.2	Protection of information	11
7	Bindingness of the document	12

4 RESPECT FOR HUMAN RIGHTS

4.1 WRITE

Together, we are a group of technology companies with a global footprint and over 30 years of experience. We offer companies in the automotive, food, energy, chemical, pharmaceutical and other industries industrial technologies that save resources and the environment. The technologies and products we manufacture and offer are based on our know-how, the results of our own research and development and many years of experience.

MEGA's mission is to improve the quality of the environment and human life through research, development and implementation of our technologies with optimal use of material and human resources. Every employee of our Group must also be aware of his or her social responsibility, especially in relation to everyone's ability to strive for human well-being and in relation to the protection of the environment.

The MEGA Group of Companies is aware of its responsibility to comply with and respect the laws and regulations under which we operate. The basis of our social responsibility is due care for human rights as enshrined in international conventions:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Rights of Women
- International Labour Organisation (ILO) core labour standards
- OECD Guidelines for Multinational Enterprises
- Ten principles of the UN Global Compact
- European Convention on Human Rights

4.2 HUMAN RIGHTS

We respect, protect and promote applicable human rights laws ("human rights") as fundamental and universally applicable requirements. We condemn any use of child, forced and compulsory labour as well as any form of modern slavery and human trafficking. This applies not only to cooperation within our group of companies, but also to the conduct of our business partners and our behaviour towards them.

Every employee contributes to the protection of human rights by his or her example, by not remaining indifferent to the rights violations that take place in his or her environment. He is aware of rights and freedom without any distinction.

In particular, we follow the following principles for adjusting working conditions in the group:

- Compliance with the prohibition of child and forced labour.
- Equal treatment of all employees and no tolerance for discrimination.
- Ensuring health and safety at work.
- Providing remuneration of at least the statutory minimum wage for working hours in compliance with applicable standards.
- Privacy Policy.
- Recognition of the right of all workers to establish bodies representing workers and to bargain to adjust working conditions.

These principles are enshrined in the respective organisational guidelines of all MEGA Group companies and are an integral part of our contractual arrangements with our business partners.

4.3 ROVNOST

Everyone in the MEGA group of companies has the same opportunities. We promote the principle of equal treatment and remuneration for employees in the same job. We are committed to education and the improvement of knowledge and skills, which leads to the development of the human personality and the strengthening of respect for human rights and fundamental freedoms. No one shall be discriminated against on the grounds of nationality, sexual orientation, political opinion, religion, gender, age, colour or social origin.

If a staff member observes a violation of the principles of equal treatment (disadvantage, harassment, bullying, etc.), he/she shall alert the persons concerned to the improper behaviour. If he/she is unable to influence the behaviour directly, he/she will report the incident to the Human Resources Department.

4.4 EMPLOYEE REPRESENTATION

We recognise the fundamental right of all employees to form bodies for employee representation. We are committed to open and trusting cooperation with the employee representative body, to constructive dialogue and to striving for a fair balance of interests. Our culture includes professional dealings with the employee representative that allow neither favouritism nor disadvantage. Securing the future of the MEGA Group and its employees is done in a spirit of cooperative conflict management and social commitment on the basis of and with the goal of economic and technological competitiveness. Cost-effectiveness and employment security are equal corporate objectives.

5 ETHICS IN BUSINESS RELATIONSHIPS

We always work with the vision that the customer comes first and all activities are aimed at his satisfaction. We are committed to continuously improving the quality of our products and services. We do not conduct ourselves in a manner that creates or could create a real or apparent conflict between our personal interests and our loyalty to the company. We follow the rules in our business dealings:

- **Professionalism**
- **Respect**
- **Transparency**

5.1 PROFESSIONALISM

The employee shall act impartially and independently, objectively, honestly, without undue display of emotion and without pursuing personal gain so as not to jeopardise the reputation, respectability and credibility of the company. There shall be no conflict of interest in the employee's decision-making.

The staff member shall present himself/herself in a cultured manner, express him/herself in a written manner and ensure appropriate verbal and non-verbal communication.

5.1.1 Conflicts of interest

The MEGA group of companies can be harmed by the interests of an individual if he or she puts personal interests above those of groups.

We respect the personal interests of employees and their private lives, but we carefully consider potential conflicts of interest between private interests and the interests of the MEGA Group of Companies. An employee's business activities or facilitation of activities where there is a conflict of interest with the employer's business are detrimental to the MEGA Group of Companies.

5.1.2 Political and public activity

Employees shall not engage in political or public activities that could undermine public confidence in the MEGA Group, in its ability to perform its tasks impartially, or that could jeopardize the rights and freedoms of others.

5.1.3 Refreshments, invitations and gifts

The MEGA Group of Companies perceives that gifts, treats and invitations are common and expected in business relationships, provided that they are done in accordance with the law and good manners. At the same time, there is a risk of corrupt behaviour in relation to gift giving (receiving and giving gifts). When making a donation, the persons concerned are obliged to act in such a way as to avoid any suspicion of corrupt or other criminal conduct.

Each employee is personally responsible for his or her own conduct and for preventing criminal conduct with knowledge of the OS 114 Criminal Prevention Program, a binding organizational directive that describes inappropriate conduct and the specific risks in this area.

5.2 RESPECT

The MEGA Group maintains relationships with its suppliers and customers based on mutual respect and understanding. We act fairly, respecting their knowledge and experience. We maintain a co-operative and collegial environment, ensure the positive development of relationships and promote mutual openness and friendliness.

5.2.1 Unfair competition

Corruption is a serious problem in business competition. It leads to decision-making for non-objective reasons, often hinders development and innovation, distorts competition and harms the MEGA group of companies.

The employee shall prevent risks of corruption and fraud and undesirable external influences that could jeopardise the proper performance of the job. He shall also avoid relationships and situations in which he would or might feel obliged.

5.2.2 Shopping

Suppliers of goods and services are carefully selected and evaluated according to the criteria set out in the organisational directive. When selecting suppliers of goods and services, the capabilities of MEGA Group companies are always considered together with alternative suppliers.

We do not unilaterally favour any supplier or service provider without objective reasons and avoid any conflict of interest. Any possible advantage for employees, close persons and natural or legal persons with whom the company has personal, business, professional or political relations is also considered a conflict of interest.

5.3 TRANSPARENCY

The MEGA Group of companies honours its legislative obligations towards all stakeholders, the state, suppliers, customers and employees. MEGA Group companies have clear owners, annual reports including financial statements are regularly published. We support culture and sport in our regions of operation.

5.3.1 Accounting and disclosure of financial statements

We properly maintain accurate and complete financial records and report complete, fair, accurate, timely and understandable financial results and other information. We strictly comply with statutory accounting and financial reporting requirements.

We ensure that the books, records and accounts accurately reflect transactions and comply with the required accounting policies and processes within the MEGA Group of companies. There must never be falsification of documents or misinterpretation of the true nature of any transaction.

5.3.2 Social responsibility

The MEGA Group of companies is a stable and strong group that has long supported cultural and/or sporting events in the regions where it operates. It contributes to projects to eliminate the consequences of natural or war disasters.

5.3.3 Whistleblower protection

MEGA Group companies strictly comply with the obligations arising from EU regulations on the protection of whistleblowers, the requirements of which are transposed into the Czech legal system by Act No. 171/2023 Coll., on the protection of whistleblowers. MEGA Group companies have an internal whistleblowing system, details of which can be found here: <https://www.mega.cz/cs/ochrana-whistleblower/>.

6 ETHICS IN THE WORKPLACE

The MEGA Group's priority is to ensure the safety and health of every employee, as well as equal treatment of employees without prejudice. We are aware of the importance of reliable environmental protection, the protection of employees' and customers' personal data, as well as the protection of our own know-how. Our behaviour and actions are based on the following principles:

- **Sustainability**
- **OHS**
- **Environmental protection**
- **Compliance with legislation**

6.1 SUSTAINABILITY

The MEGA Group is committed to sustainable business in Strategy 2024+ and expects the same commitment from its suppliers. Sustainability must be considered in all major decisions. We are responsible not only for our economic performance, but also for the impact of our business on the environment, our employees and the future of the region.

6.2 HEALTH AND SAFETY AT WORK

We know that our employees will help us achieve our goals through a positive working atmosphere, the courage to accept personal responsibility and accountability to our customers and society. By improving working conditions, openly promoting health and safety in the workplace for all professions, we support the performance and satisfaction of the MEGA Group's employees.

We comply with legislative requirements and internal regulations (PP, OS) in the field of OSH. Senior employees regularly inspect workplaces and, in cooperation with the OSH technician and the elected employee representative, regularly search for risks and take preventive measures to eliminate them.

6.3 ENVIRONMENT

The MEGA Group offers its customers industrial technologies that save resources and the environment. By implementing our own research, we offer solutions for the optimal use of material resources.

Within the Group, we comply with legal requirements for environmental protection. We adopt targets to reduce waste and maximise the use of packaging. Through our own processes, we contribute to maximising the use of resources and reducing energy consumption. We consider the use of environmentally friendly materials in our own new product design. We are involved in the CO₂ monitoring/reduction programme.

All employees are required to comply with internal environmental regulations.

6.4 COMPLIANCE WITH LEGISLATIVE REQUIREMENTS

In the MEGA Group of companies, we regularly monitor the impact of changes in legislative and regulatory requirements on our business, especially in the areas of labour and civil law, accounting and tax, the environment, and occupational safety and health. Non-compliance with legal and

Supplier Code, change 0

WE ARE RESEARCHERS,
MANUFACTURERS AND VISIONARIES



regulatory requirements for our products and processes is not accepted within the MEGA Group of companies.

Each employee respects the objectives, concepts and priorities of the company within the limits of the law. An employee shall act only within the scope and authority vested in him by the Company or by law and in accordance with its purpose and within the limits of his authority.

In the event that a staff member is asked or pressured to act contrary to the law or in a manner that constitutes a potential abuse of power, he/she shall refuse to do so and shall follow the organisational directive on criminal law.

6.4.1 Silence

Staff members shall maintain confidentiality of the facts they have learned in connection with the performance of their duties. Breach of confidentiality could damage or jeopardise the activities of the MEGA Group of companies. Employees are obliged to maintain confidentiality even after termination of employment. The duty of confidentiality does not apply to facts that give rise to suspicion of illegal or impermissible conduct.

Employees are obliged to maintain confidentiality of personal data or trade secrets to the extent provided for by law and internal regulations, unless they are exempted from this obligation in accordance with the law.

6.4.2 Protection of information

Every day, our employees work with information from different areas, activities and processes, which may include sensitive personal data of employees, customers and suppliers, trade secrets and, above all, our knowledge and know-how.

The MEGA Group of Companies collects, processes, uses and stores personal data only in accordance with legal requirements and in the manner described in the organizational guidelines. Information systems and access to stored data are managed in accordance with cybersecurity requirements. Electronic data has the same weight as paper-based data, is faster to exchange and easier to trace, and therefore the use of electronic communication is encouraged in the MEGA Group of companies. At the same time, electronic communication is more environmentally friendly in terms of efficient use of resources and protection of the environment.

Some examples of violations of the policy for the use of electronic devices:

- promotion of goods or services unrelated to the business of the companies in the MEGA Group,
- creating or forwarding chain emails,
- forgery,
- the use of electronic devices for illegal purposes,
- disclosure of confidential company information (e.g. drawings of new products or price lists) to unauthorized persons,
- Sharing or storing confidential company information (e.g., financial disclosures) on unauthorized media or websites,
- downloading or storing pornography on company media,
- installing unauthorized or unapproved software or unauthorized electronic media (audio or video files) on company media,
- plugging unauthorised hardware or devices into the corporate network or corporate email systems.

7 BINDING NATURE OF THE DOCUMENT

Just as we inform our business partners of the Supplier Code of Conduct, it is imperative that they the same standards to their business partners.

In the event of conflicts with the Supplier Code in business relations, the partner has the opportunity to inform the HR and Legal Department of MEGA a. s., Pod Vinicí 87, 471 27 Stráž pod Ralskem, PTPP@mega.cz.

At the same time, we reserve the right to monitor compliance with the Supplier Code through an audit, i n c l u d i n g by a third party.

Failure to comply with the MEGA Group Supplier Code of Conduct or failure to implement improvement measures after the supplier has been given a reasonable period of time will lead to the termination of cooperation. This Code is to be considered as a contractual obligation.