

Contents

PREAMBLE.....	1
Regulatory Compliance	4
OUR DUTIES AND COMMITMENTS IN THE WORKPLACE	4
1) Occupational safety and health at work, prevention of accidents	4
2) Working conditions and human rights.....	4
3) Professional growth and career development	5
4) Protection of personal data, business information, confidential data and know-how	5
5) Protection of business and intellectual property	5
OUR COMMITMENTS TO THE MARKET	6
1) Business relationships with interest groups and stakeholders.....	6
2) Conflict of interests	6
3) Commitment to quality	6
OUR COMMITMENTS TO THE SOCIETY	7
1) Environmental policy	7
2) Business ethics - Anti-corruption and anti-bribery	7
3) Privacy.....	8
SUPPLY CHAIN.....	8

PREAMBLE

Our company MB TOOL s.r.o. was founded in 2002. During the past years, our company consolidated its firm position and became a traditional supplier of products for the automotive industry at the Czech market. MB TOOL is a reliable and complex partner for its customers in the area of development and production of sophisticated car interior parts. Whenever you sit in your car, you are in permanent contact with products from our company.

Our goal is to cultivate the trust vested in us by our customers and to solidify the good name of MB TOOL recognized as an important supplier in the car industry domain. We intend to be the company whose employees are proud to work for us and give the best results to the benefit of our customers, business partners, suppliers and the company. The strong sense of responsibility for the actions of each individual is an essential part of our corporate culture. Decent and respectful conduct towards colleagues and business partners is regarded as standard among employees. The natural course of development, continuous innovations introduced in processes and technologies, an experienced team of professionals; those are the tasks that we constantly work on and thanks to our progress we are able to keep pace with our competitors, but most importantly, we are able to meet growing requirements from our customers.

Completed by : O. Příkryl – managing director	Date, signature : 1.3.2022	Approved by : Jiří Marák - executive	Date, signature : 1.3.2022
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MB TOOL s.r.o. exerts high effort to abate every kind of nonethical or illegal conduct. The company professes full concern for the society's interest in crime prevention and detection of incidents, along with aversion of potential crime consequences. Our company also understands its role of social responsibility in environmental protection, adherence to occupational safety standards and protection of health in the workplace, and ensures the best conditions available in the mentioned areas.

We are aware that the company's reputation is based not only on the quality of our products, but it also depends on our respectful approach in communication with all of our business partners and colleagues within the company. To confirm these values in our daily work, we created this Code of Conduct which is based on generally accepted principles of ethical conduct and morality; the Code lays down clear rules and standards to be followed in the workplace in all areas across the company. Being in the position of an employer, MB TOOL s.r.o. is liable for the acts of its employees within scope and course of employment. The company understands its responsibility to exert the maximum effort to educate all of its employees in the area of compliance with legal regulations and ethical standards.

We develop our business activities transparently and fairly, in good faith and with due observance of the requirements governed by law applicable to our activities.

We feel committed to improve everything that we do. We are developing a welcoming and open culture which is based on mutual respect and trust, where each person can have confidence in other team members. We develop a workplace environment where every single person can freely declare his/her opinion.

The principles and requirements stated in this Code shall be followed by all employees at MB TOOL, despite of their respective status or job title assignment. The principles and requirements are applicable also to part-time employees or contractors.

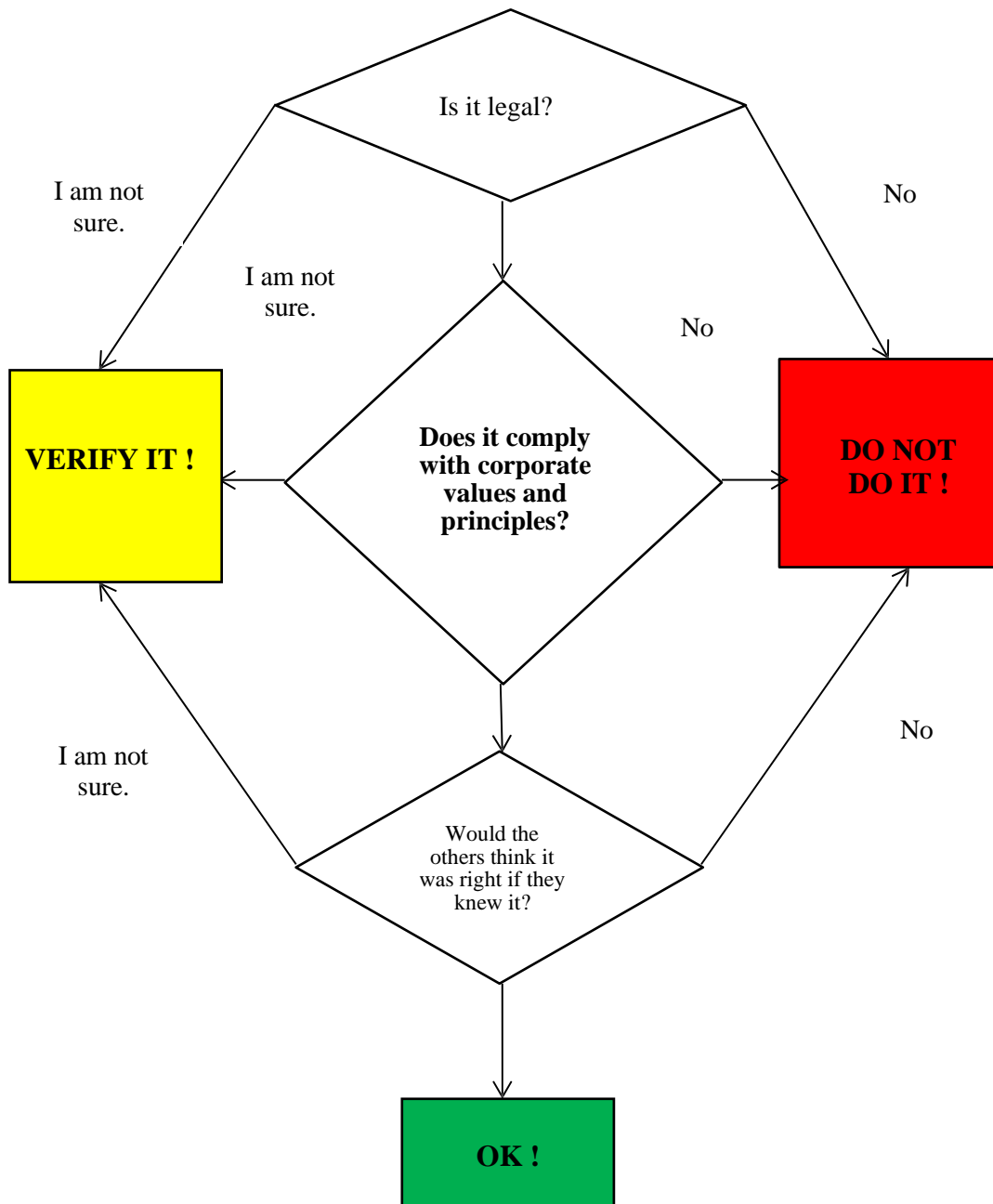
This Code of Conduct is also binding for external business partners - suppliers.

During the daily work process, our employees may encounter, inter alia, many situations without a clear notion of how to resolve the matter correctly. This Code of Conduct is intended to serve as a worthwhile guide, a manual giving recommendation how to proceed in critical or nonconventional situations and how to maintain decent conduct and respect towards our clients, customers, suppliers and also towards our colleagues.

Ondřej Přikryl
managing director

Jiří Marák
executive

How can you properly assess whether your behaviour is ethical? This is a simple method which helps:



Regulatory Compliance

MB TOOL s.r.o. does not tolerate any violation of law, the same as it does not tolerate any breach of rules and orders. Any violation of legal regulations or internal guidelines and directives set forward by the company may, among other, result in disciplinary proceedings – legal consequences (including termination of employment or other labour relation). Each employee is bound to observe governing laws and internal rules and orders.

In the case that an employee (any company's employee) feels mistrust about a certain course of conduct – even potential, or suspects unethical activity which appears to be in conflict with legal regulations or internal corporate directives, the employee must refer the suspicion about non-compliance to his/her supervisor. Controversial conduct shall be analyzed and qualified either as alleged breach or non-breach of compliance with rules and regulations.

In the case of an actual breach of law the employee must report the case to his/her supervisor. Each such notice shall be duly examined and treated as confidential material. The notice can be submitted anonymously and made out in writing.

OUR DUTIES AND COMMITMENTS IN THE WORKPLACE

1) Occupational safety and health at work, prevention of accidents

Our priority is to prevent occurrence of accidents in the workplace and maintain a safe and healthful work environment for our employees. All of our company employees and business associates are liable to act in the manner to eliminate, to the maximum extent possible, any potential risks connected with their activities and to prevent occupational health risks which may be posed to their own person or to any other persons.

If a safety incident or hazardous situation occurs at the workplace or a person is injured, we take care of provable and verifiable documentation and we determine subsequent prevention measures to avoid any similar occupational hazard situation in the future.

- Each and every employee has the right to a safe and secure workplace.
- Each and every employee is personally responsible for helping to secure a healthy and safe work environment.
- We highly regard personal health and therefore we cooperate with the workplace safety and prevention technician in order to properly identify and eliminate all possible risks and safety hazards which might endanger personal health.
- Personal protective equipment is required for each work position according to the specific workplace and the use is mandatory for all employees.
- Consumption of alcohol, drugs and other illegal substances in the workplace during working hours is strictly prohibited.

2) Working conditions and human rights

- We highly respect human rights and freedoms, we pay careful attention to human rights in the workplace, and we immediately resolve any negative indication of a breach which may appear in the workplace.
- We do not tolerate compulsory labour in any form, including such practices like illegal withholding of wages or unlawful deduction of wages.
- Child labour is prohibited.

- Legally young workers that are under 18 years of age can not work at night or overtime and they are protected against conditions of work which are harmful for their health, safety or development.
- We allow working hours, wages and bonuses only in compliance with the law.
- All employees have the right to have a salary, paid sick days, family and medical leave, paid overtime etc.
- Working hour should not exceed 48 hours, including overtime. All overtime shall be voluntary.
- All forms of modern slavery (i.e. slavery, servitude and forced or compulsory labour and human trafficking, forced overtime, retention of identity documents, as well as human trafficking) are prohibited.
- All employees have the right to be treated with dignity, respect and fairness. Employees in turn understand they have to respect privacy and rights of all other persons.
- An important interpersonal skill which is part of the professional conduct of each employee is the ability to be on good terms with colleagues, namely the ability to avert any tension which may appear in workplace relationships. The necessary prerequisite for building good work relationships is mutual respect and amicable behaviour. Employees are required to be honest and decent when they communicate with colleagues; employees are expected to abide by generally acknowledged ethical and cultural principles; employees shall avoid using any forms of abusive language or reproachful behaviour. Any controversies which may appear among colleagues shall be settled by conciliation. We do not tolerate any form of disrespectful behaviour, intimidation, discrimination, bullying or unwanted conduct of a sexual nature.
- Any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers are prohibited.
- Discrimination is prohibited. We treat all of our employees fairly and we provide equal opportunities in the workplace without any prejudice to their particular characteristics, including sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation.
- Freedom of association relates to the right to freedom of peaceful assembly and to freedom of association at all levels. In particular in political, trade union and civic matters, which implies the right of everyone to form and to join trade unions for the protection of his or her interests. This includes also collective bargaining.

3) Professional growth and career development

- We support our employees in their professional growth and career development.
- We organize training programs and education opportunities for our employees to help improve their professional skills and knowledge.
- We follow the equal employment opportunity policy which also promotes equal access to motivation programs at our company.

4) Protection of personal data, business information, confidential data and know-how

- We take great care to ensure safe procedures for personal data processing including collection, registration, classification and deletion of data in strict compliance with relevant laws and legal regulations. All of the collected personal data are stored no longer than absolutely necessary, which represents storage time limited to the strict minimum. The data must be carefully deleted and documents shredded after this period.
- Each employee is required to exert the maximum effort to ensure that all data and information are secured against unauthorized access by third persons.

- Employees are prohibited to allow unauthorized persons access to the company premises or disclose access to the company information systems and computer network.
- We respect the right of each person to his/her personal data protection. It is necessary to keep in mind that sensitive data also include information pertaining to wages of other employees and this information shall not become the subject of unauthorized use or disclosure in any way.
- Employees have the obligation to respect the confidentiality of trade secrets and the company's know-how; all information which comes to their knowledge during work, including information about the company or its business partners (i.e. manufacturing processes, business plans, technical details from running projects launched by the company, price information, financial or accounting data) must be treated by employees as confidential information which must not be disclosed to any third party without permission granted by the company management. Information about production, know-how, project details, financial and accounting data, etc., is the company's property and this value must be protected against misuse and disclosure.

5) Protection of business and intellectual property

- We use assets owned by the company in our daily work and it is likely that we protect them from damage, theft, loss or misuse, because everything what belongs under the company's property is vital for our business. The same principle applies to the customer's property which we also protect from damage, theft, loss or misuse.
- We do not allow the use of computers and electronic communication systems for inappropriate communication; this includes unlawful actions and conduct which can be assessed as discriminating, insulting or bullying.
- Uncertified or illegally copied software is not allowed within the company. Copying, reselling, or distribution and use of information, software or other data is strictly prohibited.
- We do not allow to use the company's assets to generate our own personal profit, i.e. to run a secondary business.
- We do not allow any inappropriate use of the company's assets for undesired purposes, i.e. misleading or deceptive conduct, breach of data safety, bullying, or for the purpose of offensive or obscene content on the basis of sexual or ethnic nature.

OUR COMMITMENTS TO THE MARKET

1) Business relationships with interest groups and stakeholders

- We believe that the best business relations are based on mutual respect and benefit. That is the reason why we try to understand the needs of all interest groups and associates.
- Entities who belong among interest groups or stakeholders are the company owner, customers, suppliers, company employees, and also state administration bodies (Tax Office, Customs Administration, Czech Metrology Institute, etc.).
- As regards suppliers, the company acts fairly and honestly with the vision of discharging its contract-based business commitments at top level quality.
- Subcontractors are always given space to negotiate conditions of cooperation whenever they enter into a business relationship. We at MB TOOL s.r.o. never deal with our subcontractors from the position of a strong entity, but we always try to find compromises acceptable for both parties.
- Employees are required to refrain from any negative statements about the involved parties, as it might be perceived or interpreted as defamation.

2) Conflict of interests

- We do not enter into activities which might eventuate in conflict of interests. If an employee finds himself/herself or a colleague in the situation where private interests may possibly collide with the company's interests, the employee is liable to report this situation to the supervisor without delay. The potential conflict of interests shall be strictly assessed and further procedures arranged.
- Employees must also be aware of the fact that conflict of interests may arise when internal information is shared as good practice, for example, with counterparts from another party, typically on the basis of close relations or other kinds of contact with the company's competitors (labour market).

3) Commitment to quality

- Everything we do and whatever we do – we endeavour to discharge perfect work and we concentrate on continuous improvement.
- We work with all participants, stakeholders and associated parties, to produce outputs that will meet their expectations.
- The concept of quality is perceived at our company as the essential key to success, as the access way to new projects. The quality assurance system is deeply rooted across all processes within our company and we do everything to consolidate growth in quality which is reflected to the maximum extent in the final product.

OUR COMMITMENTS TO THE SOCIETY

1) Environmental policy

One of the highly important goals for us at MB TOOL s.r.o. is active environmental protection. The basis for systematic environmental management is adherence to applicable legal regulations.

All employees are required to strictly comply with legal regulations pertaining to protection of the environment. To minimize the negative impact of our activities on the environment must be an integral part of our daily decision processes as well as our long-term planning – waste management, introduction of new technologies which are more friendly to the environment.

- We treat the environment responsibly. All of our operations are fitted with containers for depositing classified waste and we use waste management service companies specializing in ecological waste disposal.
- We profess strict adherence to requirements for use, storage, labelling and disposal of chemicals and hazardous materials.
- Employees are required to exert their maximum effort to avoid incidents or emergency situations which may possibly impact the environment. Employees in the work process prove high responsibility in adherence to proper classification and recycling of waste materials, rational use of energy and water resources and clean workplace maintenance with a permanent vision to reduce environmental impacts.
- In the field of air protection, the company has developed an Operating rules for the listed sources of air pollution and meets the requirements of act No. 500/2004 Coll., The Administrative Procedure Code and the air pursuant to Section In the field of air protection, the company has developed an Operating Rules for the listed sources of air pollution and meets the requirements of Act No. 500/2004 Coll., The Administrative Procedure Code and the air pursuant to Section 67 of Act No. 129/200 Coll. And Act No. 201/2012 Coll. on air protection. It thus meets all legislative requirements of the Czech Republic.
- We joint the Czech Republic's commitments under Kyoto Protocol and strive to gradually reduce GHG emissions.

- In accordance with Act No. 406/200 Coll. On energy management, adopted in 2012, we increase energy efficiency in the company's newly built and existing company buildings.
- We support the use of renewable energy sources, which will help us meet emissions limits and prevent further increases in energy prices.

2) Business ethics - Anti-corruption and anti-bribery

- We do not tolerate corruption, extortion or bribery.
- We do not try to impact the results of selection procedures or decisions carried out by state administration bodies. The success of our work is based on objective criteria – supreme quality, reliability and respect to deadlines. Any form of bribery is prohibited.

3) Privacy

- No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation.
- Everyone has the right to the protection of the law such interference or attacks.

MB TOOL s.r.o. consistently provides for the continuous education of employees in order to prevent any breach of legal regulations or obligatory internal rules in the process of discharging work duties.

If the Code or some rule connected with the Code is breached by an employee, he/she shall be confronted with disciplinary measures which may result in termination of work contract or other sanctions.

This Code of Conduct describes critical moments which an employee might face most frequently. It is beyond capacity of this Code of Conduct to analyze in detail all types of possible situations which may arise and the employee might feel uncertain how to resolve the challenge, whether it is in compliance with law or with this Code of Conduct – and that is the key moment where each employee is responsible for reporting the breach of Code or a suspected breach of Code to his/her supervisor.

Reported issues will be handled in strict confidentiality, which means that the identity of the reporting person will not be disclosed or publicized in any manner. Issues reported anonymously to the company management, either in writing or reported over the phone, will be carefully verified.

SUPPLY CHAIN

The provisions contained in this Code of Conduct are binding on all suppliers throughout the supply chain. MB TOOL requires compliance with all requirements in the area of:

- working conditions and human rights
- health and safety
- business ethics
- environment

Each supplier is obliged to set a requirement for his own suppliers.

Compliance with the Code of Conduct within the company is regularly checked by the company's management, independent auditors and state and local authorities.

Compliance with the Code of Conduct by suppliers in the supply chain is checked during audits at suppliers (potential analysis, process audit, etc.)