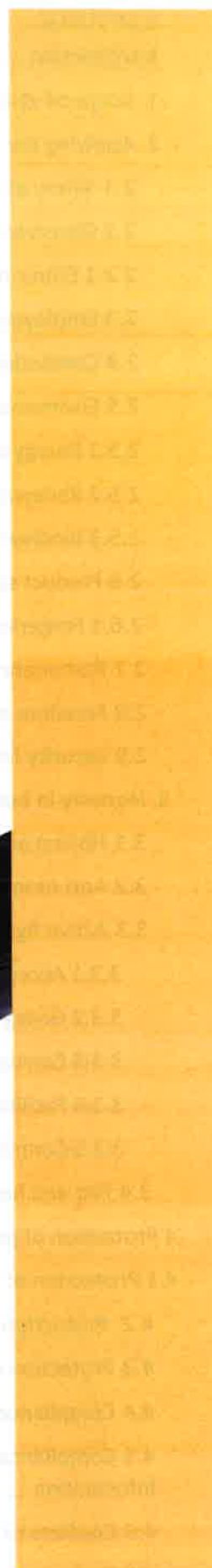




Code of Professional Conduct and ethics for suppliers



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Ing. Lukáš Thomas

CEO

Introduction

At ATEK s.r.o. we demand a high ethical standard both from ourselves and from our suppliers.

Suppliers, vendors, consultants, independent suppliers or representatives of ATEK s.r.o. or any other third party hired to carry out any activity on our behalf (hereinafter referred to as "suppliers") must always act with integrity and in every business situation respect the letter and spirit of the relevant laws, regulations and standards (collectively "laws") and principles of ATEK s.r.o. They should also require their suppliers to follow the requirements of this Code of Professional Conduct and Ethics (hereinafter referred to as the Code).

The requirements of this Code apply in addition to the requirements set forth in any contract or otherwise set contractual terms and conditions that relate to your relationship with ATEK s.r.o.

Our suppliers are subject to a number of laws that vary from jurisdiction to jurisdiction, however some important principles must be followed at all times.

1. Scope of the Code

The Code is binding for all employees of suppliers of ATEK s.r.o., regardless of their job title, status or function. It is the specific responsibility of suppliers and their corporate managers to participate in creating a positive and ethical work environment and to require their associates to comply with this Code and related regulations. All employees, regardless of whether they act as rank-and-file workers, in managerial or leadership positions, are obliged to comply with this Code and may not enter into any agreement or contract or take any other action that would be contrary to this Code or legal regulations.

2. Applying the principles of integrity towards employees and the work environment

Every employee of ATEK s.r.o. must have the opportunity to work in a peaceful work environment where no form of harassment or discrimination is tolerated. The company ATEK s.r.o. subscribes to the Global initiative The United Nations Compact is committed to respecting and enforcing the rights of every individual as defined in the Universal Declaration of Human Rights. Therefore, ATEK s.r.o. recognizes and protects the true value of each individual, strictly observes the legal regulations governing wages and remuneration for work, the minimum age of employees, equal rights of men and women, and employee privacy.

Employee safety and satisfaction at work are key aspects of the company's commitment to sustainable development. ATEK s.r.o. considers employees to be the most important part of its activities, and therefore implements all measures to ensure that the working environment allows respect for the needs of employees and their integration.

Every employee of ATEK s.r.o. must have the opportunity to work in a work environment where no form of harassment or discrimination is tolerated.

2.1 Workplace Safety

A safe and healthy working environment contributes to the improvement of the quality of products and services, as well as to the improvement of work morale. The most important priority of occupational safety is ensuring the safety of employees at the workplace.

To this end, we observe all the safety measures required by law to ensure a safe and protected workplace. We are responsible for providing a safe and healthy work environment. We use all available safety measures, detect and report unsafe conditions, and follow all accepted safety procedures.

Every employee, without exception, must understand the rules of ATEK s.r.o. regarding safety and health protection at work, which apply to their job title. Employees are required to immediately report any dangerous or disturbing situation in order to prevent occupational accidents or injuries.

Safety is a key priority and therefore the distribution, sale, purchase, exchange, possession and use of drugs and illicit substances is prohibited. The use of alcohol in the workplace is also prohibited.

2.2 Respect for human rights and the rights of women and ethnic minorities

We stand for the freedom and equality of all people regardless of race, color, sex, language, religion, political or other beliefs, national or social origin, birth or other status. We underline our initiative by supporting the UN Universal Declaration of Human Rights and the European Convention on Human Rights.

We expect all our employees to always respect the dignity, privacy and personal rights of every person and the rights of ethnic minorities. Under no circumstances will we tolerate discrimination, mobbing or insults.

ATEK s.r.o. fights against forced child labor. The company does not employ children and young people under the age of 16 and complies with the International Labor Organization conventions on the work of young people between the ages of 15 and 18. It also requires compliance with the same rules from its suppliers and partners.

Forced labor is also prohibited in the company. Employees are treated equally and fairly. Women's rights and gender equality are respected. They are remunerated based on relevant wage regulations (including regulations governing the guaranteed minimum wage, overtime pay and statutory employee benefits).

Employees have the right to freedom of expression in accordance with local laws. ATEK s.r.o. also supports and uses proactive social dialogue based on mutual trust.

ATEK s.r.o. respects the right of all employees to establish and join unions and representative bodies and to engage in collective bargaining in accordance with applicable legislation.

Any person who discovers or fears a violation of these rights is entitled to report this fact immediately without fear of retaliation.

2.2.1 Ethnic recruitment

Atek s.r.o. is committed to honoring ethical recruitment initiatives that protect against forced labor and exploitative labor recruitment practices.

2.3 Employee development and diversity

Employee involvement is an integral part of ATEK s.r.o.'s strategy and contributes to its overall corporate culture.

ATEK s.r.o. regularly invests in professional training and upgrading the qualifications of its employees so that they can acquire new professional competences and knowledge, improve their performance and gain a greater degree of autonomy or a higher degree of responsibility.

Employees have a number of opportunities for career growth and development, which is reflected in the proposed salary.

The company's employees come from different backgrounds, and ATEK s. ro considers diversity to be one of its greatest strengths. We support and promote diversity, with special attention paid to women, older age groups and people with disabilities. Members of the youngest generations are welcome in our ranks, with whom we cooperate as part of professional internships and practical teaching of apprenticeships.

2.4 Combating discrimination and harassment

The company ATEK s.r.o. does not tolerate any form of discrimination and strictly complies with the legal regulations that oppose it. When making decisions in matters of employment, hiring new employees, professional training, remuneration, employee benefits, assignment of tasks and career progression, we objectively base our decisions on professional qualifications, job classification, experience and performance of employees.

When making employment decisions, ATEK s.r.o. does not take into account place of birth, origin, gender, sexual orientation, age, marital status, genetic traits, nationality, ethnic origin, political opinions, trade union activity, physical appearance, health status, disability, potential pregnancy or other protected person status.

ATEK s.r.o. fights against harassment so that the work environment is a place where safety and respect are the main values. Psychological or sexual harassment and any form of intimidation or inappropriate behavior that could create a hostile or threatening atmosphere in the workplace is prohibited.

Any report of discrimination, harassment or any form of intimidation is treated as confidential and will be investigated as quickly as possible without any risk of retaliation.

2.5 Environmental protection

Environmental protection is an integral part of the identity of ATEK s.r.o. Sustainable development and the development of innovative technologies are one of the company's priorities and enable it to participate in the overall development of human society and especially in the protection of nature. Consistent compliance with local environmental legislation and internal regulations contributes to the long-term growth of ATEK s.r.o. and the trust it enjoys.

The environmental management system, which was introduced in order to protect the environment, stipulates the optimization of the management of natural resources, the reduction of the discharge of industrial waste and the optimal use of all the company's products. In addition, the production and sale of products that pose an unacceptable risk and are harmful to human health and the environment are prohibited.

When using materials such as leather, Atek s.r.o. takes into account the ethical breeding and treatment of animals when selecting suppliers. He rejects any unethical behavior towards animals.

Biodiversity and efficient use of land are among the basic priorities of Atek. Atek supports the planting of new forest stands.

When choosing technologies, the noise emission factor is taken into account not only for the sake of protecting the health of employees, but also for the sake of eliminating noise emissions for all interested parties.

The company undertakes to respect, observe and set internal rules for reducing greenhouse gas emissions, set goals and monitor them. In this area, the company sets targets for N₂O, CO₂ and the gradual reduction of the energy demand of buildings and the use of renewable energy sources.

Our goal is the responsible optimization of the effects of our actions on the environment by understanding the impacts of our activities and those of our customers and continuously improving our contribution to the sustainable sustainability of natural resources.

2.5.1 Energy efficiency

Atek s.r.o. actively supports the improvement of energy efficiency as an opportunity to reduce greenhouse gas emissions, pay attention to savings in final energy consumption, reduce production costs and overall reduction of the negative human impact on the environment.

2.5.2 Renewable energy sources

Atek s.r.o. supports and favors the use of renewable energy sources, such as non-fossil natural energy sources, i.e. water, wind, solar energy, solid biomass and biogas, environmental energy, geothermal energy and liquid biofuel energy.

2.5.3 Biodiversity

Water is a vital common resource for us and for the people around us. We consider sustainable access to water as a key natural resource,

Access to water resources and sanitation facilities and the proper management of freshwater ecosystems are essential for human health, environmental sustainability and economic prosperity. Regular monitoring is the basis of efficient use of water resources and reduces their wastage in our society.

ATEK complies with NO_x and CO emission limits. Regular monitoring and follow-up of the evolution of emissions is essential for the fight against pollution and is a permanent part of the solution for the improvement and sustainability of air quality with the aim of implementing national and international decarbonization policies.

When using materials such as leather, Atek s.r.o. takes into account the ethical breeding and treatment of animals when selecting suppliers. He rejects any unethical behavior towards animals.

Biodiversity and efficient use of land are among the basic priorities of Atek. Atek supports the planting of new forest stands.

2.6 Product safety ,

Our top priority is to ensure the best quality products that are safe and meet legal requirements. ATEK s.r.o. products are evaluated by strict quality control systems. They are subject to a safety monitoring process during production, including post-marketing processes. We are responsible for identifying, reporting and resolving suspected security issues. If necessary, we report deficiencies to relevant business partners and supervisory authorities and take the necessary measures to ensure the safety of our products.

2.6.1 Counterfeits

Counterfeiting grows exponentially with respect to the type of production. If this threat is not adequately addressed, counterfeit items can seriously compromise the safety and operational effectiveness of our products.

Counterfeit parts can cause:

- personal injury,
- reduced reliability and product recall,
- potential loss of contracts,
- shutdown of production lines at our customers,
- negative impacts on the costs and schedule of compliance with new projects,
- penalties for companies and individuals,
- damage to our company image.

The high level of our quality management system must protect our business partners and end users without fail, anytime, anywhere.

The company ATEK s.r.o. and the responsible employees undertake to procure input materials only from authorized suppliers who are able to demonstrate an unbroken chain from the original source of production provided by the manufacturer either directly or indirectly as a component included in the assemblies. The quality management and supplier management system is binding for all responsible employees who are in any way included in the purchasing process and decision-making about the selection of suppliers and purchased items. If necessary, it is the duty of each employee to report any discovery or suspicion of the occurrence of counterfeit items to a superior employee, who will take an immediate decision to ensure the elimination of a high risk.

2.7 Compensation and wages, working hours

Atek s.r.o. declares fair remuneration (wages and benefits) of employees, ensuring equal treatment and paying employees equal wages for equal work. Compensation paid to workers must comply with all applicable wage laws, including laws relating to minimum wages, hours of work, overtime and statutory employee benefits. Any disciplinary deductions from wages are not allowed. Workers must be informed in a timely and clear manner by means of a pay slip, email or similar document, on what basis they are remunerated.

2.8 Freedom of Bargaining and Association

Employees have the right to freedom of expression in accordance with local laws. ATEK s.r.o. also supports and uses proactive social dialogue based on mutual trust.

ATEK s.r.o. respects the right of all employees to establish and join unions and representative bodies and to engage in collective bargaining in accordance with applicable legislation.

Atek s.r.o. respects the rights of workers to freedom of association, joining trade unions, electing representatives and joining employee councils in accordance with local laws. By law, employees who become representatives should not be discriminated against and should have access to management and co-workers to exercise their representative role. Workers must be allowed to communicate with management about working conditions openly, without fear of retaliation, intimidation or harassment. Any person who discovers or fears a violation of these rights is entitled to report this fact immediately without fear of retaliation.

2.9 Security Forces and Security Forces

Atek s.r.o. rejects the use of security forces or security forces, as no critical elements have been identified, such as in countries with weak governance or in countries affected by conflict. In the event of an international armed conflict, the needs and risks will be taken into account to apply the requirements for the protection of property and persons of Atek s.r.o.

3. Honesty in business relationships

ATEK s.r.o. considers ethical conduct in business relations to be one of the fundamental pillars of its current and future success. For this reason, it fully identifies with policies and legal regulations that promote fair competition in the market environment and that protect businesses from anti-competitive practices, bribery and corruption. The penalties for breaching these statutory regulations are severe, regardless of whether the breach is committed by a business or an individual. It requires the same principles from its suppliers.

3.1 Honest and lasting relationships with customers

The trust shown to us by our customers is of fundamental importance and we are aware that we have to fight for it day in and day out. We also realize that in order to satisfy our customers, we must constantly innovate, produce products of very high quality and adhere to the maximum extent of the principles of business ethics.

Our endeavor is to provide added value to our customers, and therefore we require our suppliers to properly fulfill their obligations and keep their promises. We respect the intellectual property rights and confidential information of our customers. We reject any unethical way to obtain this type of information. We require the same approach from our suppliers.

We are also convinced and insist on the requirements for our suppliers that loyalty, mutual respect and honest dealings with business partners, customers and other stakeholders are the basis of long-term, quality and mutually beneficial relationships. We can win new customers thanks to the quality and value of our products. We don't have to resort to unfair and illegal methods to win in the market.

3.2 Antitrust and Competition Laws

We compete with our competitors actively and with determination, but we always respect the rules of free and fair competition. We expect the same from our suppliers.

The antitrust program of our suppliers must be based on simple and clear principles: respect for market integrity and principles against any illegal conduct aimed at eliminating a competitor or forcing business partners to accept unfair business terms. We absolutely do not agree with any anti-competitive practices.

This specifically means that there are no cartel agreements, pricing and market sharing agreements with competitors, and no cheating in the submission of bids. Any attitude that could indicate that conduct that is contrary to the principles of equal economic competition could be adopted is rejected. Care is also taken to ensure that sensitive business information is not exchanged with competitors.

ATEK s.r.o. expects its partners to understand the principles of this Code and to comply with ethical standards governing antitrust policy.

Suppliers of ATEK s.r.o. must comply with all applicable antitrust and competition laws and must in no case act in a manner that would in any way unduly restrict competition. Examples of prohibited conduct include agreements with competitors on prices, discounts or conditions of sale, limiting production, dividing markets, allocating customers, agreements to submit bids to competitions or boycott specific customers or suppliers, agreements on employee rewards or to refrain from hiring each other. employees. In some jurisdictions, even the mere exchange of sensitive business information is considered illegal.

Contractors must know the laws that apply to them and respect their letter and spirit. Suppliers may not enter into collusive agreements with competitors designed to restrict competition. Suppliers are strictly prohibited from offering bribes to officials. Suppliers must not violate sanctions or export control laws. If a specific source of used minerals needs to be identified, suppliers must cooperate with ATEK s.r.o.

3.3 Active fight against corruption

The required principles for suppliers of ATEK s.r.o. are clear: the prohibition of bribery and corruption applies.

Corruption leads to wrongful decision-making, hinders progress and innovation, distorts competition and harms businesses. Corruption is therefore a criminal offense and can lead to financial penalties against the company and criminal prosecution of the affected employees, managers and members of the company's management.

Any behavior that could be interpreted as an attempt by our suppliers to inappropriately influence the decision-making of customers, the government or any authority, as well as any attitude that would indicate that the supplier is open to any form of active or passive corruption, is strictly prohibited.

Our suppliers must comply with all applicable laws that prohibit the transfer of anything of value to any person or entity for the purpose of obtaining an improper business advantage, including laws that require accurate accounting and record keeping. Suppliers must comply with anti-corruption laws at all times, and they must be especially careful when dealing with officials. Regardless of what specific laws apply in a particular jurisdiction where we or our suppliers operate, or what business practices are in place there, ATEK s.r.o. prohibits all "facilitation" or "noticeable" payments (i.e. payments involving smaller amounts intended for official persons at a low level of the hierarchy for ordinary actions, the performance of which the bribing person is entitled anyway).

3.3.1 Acceptance of gifts and invitations

The policy of ATEK s.r.o. prohibits the acceptance of any gifts and rewards in cash, in kind, in the form of services, entertainment events, travel, entertainment and other benefits of the same nature, with the exception of gifts and entertainment of low value. An unreasonable or inappropriate gift must be refused or returned, except when refusing or returning the gift would offend the donor. We require identical values and procedures from our suppliers.

3.3.2 Giving or promising gifts and invitations

We require our suppliers to accept the prohibition of providing, offering or promising gifts, invitations and payment of travel or accommodation expenses to their customers, suppliers or other third parties for the purpose of obtaining an undue advantage, either directly or indirectly.

Employees of our suppliers may only be authorized to offer or provide gifts or invitations that are reasonable and in accordance with the ethical rules of business conduct and cannot be considered corrupt practices and violations of criminal law. Benefits may therefore only be given or received when they are in accordance with applicable local laws (appropriate in value and having regard to the recipient's position and circumstances, in accordance with normal and reasonable business practices). Giving or receiving promotional items and occasional gifts (courtesy) that are not of high value, as well as inviting or accepting lunch/dinner invitations as part of a business meeting is acceptable.

It is always necessary to note that although bribes are generally associated with money, they can also take a non-financial form.

3.3.3 Corruption of public officials

Our suppliers' strict anti-corruption policies also apply to relationships with the state, government, officials, public officials, administrative bodies, state-owned companies and their employees.

The persons or entities concerned (hereinafter collectively referred to as "Public Officials") are, for example, members of governments and ministries, elected representatives, election candidates, customs officials and any other person employed or appointed by the government, any office or state-owned enterprise. Identifying a public official is difficult in some cases, so it is necessary that you consult when in doubt.

It is strictly prohibited to provide or promise to provide, offer, pay or promise to provide payment in any direct or indirect manner of any valuable consideration to a public official in exchange for preferential treatment or the granting of an undue advantage.

Business partners and third parties who act on behalf of the supplier and whose activities involve relations with public officials are also required to comply with these anti-corruption rules of this Code.

3.3.4 Facilitation payments - "noticeable"

It is important that suppliers and their employees know the difference between an authorized payment requirement and a facilitation payment requirement. A facilitation payment is a payment made to speed up a normal administrative procedure.

ATEK s.r.o. considers facilitation payments to be bribes and prohibits them, except in situations where the employee would face a threat or danger and have no other choice but to engage in this type of practice. The law allows a limited exception to our policy against auxiliary payments in the event that an employee faces a life-threatening situation. If you find yourself in a similar problematic situation, make a payment to ensure your own safety as quickly as possible, and then report this fact immediately.

3.3. 5 Contributions to political parties and sponsorship

Our suppliers ensure transparency of donations and sponsorship activities.

Sponsorship activities are used to support certain objectives, such as cultural activities, education, natural sciences and sporting events. Financial donations are provided voluntarily, without expectation of compensation, and applicable laws and regulations are observed. Financial donations to political parties, political candidates, political officials or officials in the administrative or other field are excluded.

3.4 Fair and honest supplier selection process

As part of the implementation of the "Involvement of suppliers" policy, ATEK s.r.o. established a number of partnerships that are legal, ethical and mutually beneficial. We want our partnerships to be legal, ethical and mutually beneficial.

Business partners must be chosen based on quality, needs, performance and costs. We expect our partners to make the same commitments to human rights, fair business and marketing practices, protection of confidential information and personal data, intellectual property and anti-corruption that we have made. We want them to meet our high ethical standards.

ATEK s.r.o. selects its suppliers and service providers based on criteria of quality, performance, costs and ability to meet the company's needs. It expects its partners to make similar commitments in respect of human rights, fair marketing and sales practices, protection of confidential information and intellectual property rights, the fight against bribery and corruption, and that they will generally promote the principles of business ethics.

All suppliers of ATEK s.r.o. are obliged to select their partners based on objective criteria, without favoritism or discrimination, based on a consistently applied selection process. Holding shares in a partner entity and providing loans to suppliers is not allowed. It is also prohibited to accept bribes and any rewards.

We take conduct in violation of our Code and policies very seriously. Violations may result in the termination of the relationship or termination of the contract with the business partner.

4 Protection of property values and assets

ATEK s.r.o. is a development partner in the true sense of the word, and therefore invests significantly in development and modern technologies. However, the activity of ATEK s.r.o. until development and related projects and investments must remain confidential. The company's success depends on its ability to define optimal business strategies and implement related investments. In order to ensure the growth and efficient functioning of the company, assets and confidential information need to be protected and secured. An identical understanding and implementation of these values is also required from our suppliers.

Therefore, it is imperative to protect all information and assets and it is the duty of every individual to handle them with care. In particular, it concerns the protection of:

- intellectual property,
- confidential information,
- technological data,

- hardware and software,
- media used to store data,
- real estate,
- equipment, machinery and tools,
- raw materials,
- cash resources.

Third party property, especially intellectual property, may only be used subject to the third party's approval. Private use of third party property is prohibited.

Protecting these assets and maintaining confidentiality requires discipline and vigilance, both in and out of the workplace.

4.1 Protection of information and intellectual property

Ensuring the confidential nature of information is a task of strategic importance. Confidential information, which employees should actively protect in the course of their work during their employment with the company, as well as after termination of their affiliation with the company, means, for example:

- drafts and final texts of commercial contracts,
- financial data, prices and costs,
- business, investment and development strategies,
- customers and suppliers,
- intellectual property rights, copyrights and also plans,
- personal information about our employees or customers,
- technological information as well as any other sensitive data, especially those related to the profitability of our production units, research and development projects and patents,
- other documents and information that are not intended for the general public.

Maintaining confidentiality is the duty of all employees, even if they leave the company.

The protection of confidential information also involves the secrecy of passwords and access codes. Subject to applicable regulations, the resources, resources and templates that our suppliers make available to their employees are intended solely for work use, in accordance with the rules for the use of information technology.

ATEK s.r.o. also requires that the intellectual property rights of business partners, as well as manufacturing secrets and copyrights, especially regarding software, images and publications, be respected.

4.2. Protection of personal data

ATEK s.r.o. requires its suppliers to respect the privacy of their employees and business partners and realize that full-fledged relationships are based on trust. For this reason, they protected an individual's right to privacy.

As a company operating in the global automotive industry, ATEK s.r.o. constantly develops and maintains relationships with customers, employees, applicants, students, suppliers, potential customers and many other stakeholders. ATEK s.r.o. needs to collect, store and use some of their personal data exclusively for business purposes.

ATEK s.r.o. asks suppliers to accept the commitment to process personal data in accordance with the legal regulations for the protection of personal data, including the European General Data Protection Regulation

(GDPR) and to respect the rights of data subjects, whether they are employees, customers, business partners, or about stakeholders.

Personal data includes, but is not limited to:

- name, email address, fingerprint,
- identification numbers assigned by the state,
- financial, medical and remuneration information,
- information about performance appraisals, promotions and other employment-related matters;
- biometric data .

Suppliers must therefore, in accordance with their policies, collect personal data in a fair, lawful and transparent manner, use it only for legitimate purposes, take measures to protect its integrity, not keep it longer than necessary and fully support the exercise of the rights of data subjects.

Suppliers must have a process in place that allows their employees to contact the Data Protection Officer if they have questions, problems or concerns. Anyone who has reason to believe that compliance with the protection of personal data is not observed, or who wants to report possible violations of this right, must be able to contact an authorized person.

4.3 Protection of personal data of employees

Suppliers undertake to protect the personal data of their employees. It can be:

- identification numbers issued by government authorities,
- contact details and date of birth,
- bank connection,
- data on religious belief,
- financial, health and salary information,
- performance evaluations, career progression and other employment-related information.

Access to this type of data is limited to authorized persons and all processing, use, storage and deletion of data takes place in accordance with applicable regulations.

Every individual has the right to decide on the disclosure of personal data and how it should be processed. Our use of personal data is transparent.

Each employee must protect their personal data as well as the personal data of other persons. It is strictly prohibited to search for data related to fellow employees, except when such search is expressly permitted and is carried out exclusively for work purposes. Apart from the workers who are authorized to perform the above actions, employees only have access to information that relates to their person.

ATEK s.r.o. is very interested in the protection of personal data against their unauthorized processing, unauthorized changes, transfer to third parties, or deletion. The same rules and principles are also required of our company's suppliers.

4.4 Compliance with export and import restrictions and economic sanctions

Suppliers undertake to comply with applicable legal regulations governing the import and export of goods, services, technology and information, including re-export and parallel trade.

Depending on the nature of goods, services and technologies, currencies or parties involved, EU and/or US legislation may be applied in particular in the following areas:

- Sanctions regimes restricting direct or indirect imports from or exports to a sanctioned territory (including but not limited to the sending and receiving of payments) that currently apply to Ukraine's Crimea, Cuba, Iran, North Korea, Sudan or Syria, or direct or indirect trade with by sanctioned persons (for example, those subject to EU and US restrictions), including imports and exports through third countries or third parties (for example, sellers or distributors).
- State control of the physical or electronic export of certain goods and technologies, for example where the products may be used for military purposes or for purposes of political oppression and require authorization.
- Correct customs classification and declaration of imported items.

Our business partners must act in accordance with these obligations, including compliance with US laws that have extraterritorial effect, and ATEK s.r.o. expects them to provide it with information about their international business dealings, the origin and export classification of products or materials that ATEK s.r.o. supply, or that they confirm in writing the end use or end user of ATEK s.r.o. products that they purchase from it or that they distribute on its behalf.

4.5 Compliance with the intellectual property rights of third parties and the confidential nature of their information

Suppliers respect the intellectual property rights of third parties and the confidential nature of their information. Using illegal or unethical tools to obtain confidential or business information of third parties is strictly prohibited.

Even after termination of the employment relationship, the employee is obliged to protect the company's confidential information and may not disclose it to other persons under any circumstances.

4.6 Conflicts of Interest

A conflict of interest is a situation in which there is a risk that the personal interests of an employee or a third party will have an impact on the interests of the company or our customers. It is important to us that our suppliers do not have conflicts of interest or loyalty.

Each employee must demonstrate the utmost loyalty to their company and refrain from any activity that could put them in a conflict of interest.

"Conflict of interest" occurs when the employee's private interests intersect with the interests of the company in which he is employed (or in another employment-legal relationship), such as in the case of:

- ownership of shares in a company that is a competitor of the company,
- the use of business opportunities that employees encounter as part of their work for the company,
- seeking to trade in products or services provided by the company, directly or indirectly,
- membership in the statutory bodies of other organizations that come into contact with the company or perform activities in the same industry,
- personally benefiting (or providing a personal benefit to a family member) from transactions in which the company participates.

The loyal attitude of the supplier's employees is as critical to success as their skills; for this reason, personal interests cannot be prioritized over the interests of one's own company within the scope of work.

Suppliers are committed to promoting a strategy that relationships with business partners are based on integrity and sound business judgment. Therefore, they require employees to immediately report situations where there is a conflict of interest. Similarly, we expect each supplier to inform us of any family or close personal relationship with an ATEK s.r.o. employee who is authorized to make a business decision that may benefit the supplier or that may influence that decision.

Reporting inappropriate behavior that workers witness or suspect helps protect the company and its employees. Those who report such behavior may not be subject to any retaliation.

4.7 Proper accounting

All assets, liabilities, expenses and various operations carried out by suppliers must be recorded in the accounting in a completely transparent manner. Accounting documents must faithfully and accurately reflect the transactions carried out and must be carried out in accordance with applicable standards and rules.

All company assets must be accounted for when they are acquired. Documents on business and financial transactions must accurately record these transactions. No payment, even partial, can be approved or made for a purpose other than that indicated on the documents attached to the request for payment.

No entries may be made in the accounting books that do not correspond to the facts or are inconclusive.

4.7.1 Principle of transparency of accounting records

Basic accounting principles include transparency: the accuracy and reliability of accounting books and records is an inevitable condition for preventing corruption and fraud. All expenditures, payments, accounting records and books must give a true and fair view of the use of funds and the nature of the transaction. Posting inaccurate, incomplete and false information is strictly prohibited.

4.7.2 Principle of reliability of accounting records

Great importance is placed on the quality and reliability of accounting. All financial statements and books must give an accurate and true picture of all assets, liabilities, expenses and other business transactions in strict accordance with applicable accounting principles and rules.

For this reason, it is strictly prohibited:

- make accounting records that do not correspond to reality,
- change or otherwise modify or cancel company accounting records without prior consent,
- provide financial information that is not based on the truth or that could mislead the client, supplier, or regulatory authorities.

Account books must be archived in accordance with applicable regulations and internal procedures. In the same way, the obligation to keep certain accounting documents for a certain number of years applies, others are always invalidated after the expiry of the specified period.

Accurate accounting that gives a true picture of reality is highly important. If an employee witnesses a violation of the stated rules or suspects such activity, he is obliged to immediately inform the company management. His notification must be treated in complete confidence and without the slightest risk of retaliation for the whistleblower.

4.8 Prevention of legalization of criminal proceeds and violation of sanctions

Suppliers fulfill legal obligations to protect against money laundering.

By the legalization of proceeds from criminal activity, we understand the incorporation of illegally obtained funds or property values into the legal financial and economic cycle.

All forms of money laundering are combated, measures are taken against involvement in money laundering, and national and international sanctions, embargoes and other restrictions of international economic law are observed. This also applies to business partners acting on behalf of our suppliers.

We speak of "money laundering" when financial information is manipulated in order to hide the origin of illegally obtained funds or pass them off as legitimate. Money laundering is often associated with violent and illegal activity. Suppliers are committed to proper financial records and require zero tolerance for money laundering within their company. Suppliers fight against money laundering and therefore only accept undisputed payments.

5. Ethical communication

Official statements on behalf of the supplier may only be made by persons authorized to do so.

Although suppliers respect freedom of speech, company employees must ensure that public presentation does not harm good companies. When expressing themselves in private, employees must present themselves as having their own opinions and not those of the company.

Suppliers must communicate with the media, state authorities and third parties in a clear, honest and coordinated manner, regardless of the communication method used: internet, social media, telephone calls, media interviews, etc. Only information that is permitted to be disclosed may be communicated, to the extent of maintaining confidentiality.

5.1 Social networks

Suppliers use the means of social networks and communication applications to communicate with their business partners. However, delegated employees of the company are authorized to communicate with clients via these networks.

Workers may use social media as they choose, but must be aware of the risk associated with this activity. It often happens that information that people believe is intended for a private circle of people can be viewed by the general public on social networks. In case of insufficient attention, confidential information that is the property of the company or interested persons could be disclosed.

If you use Facebook, Twitter, Instagram or any other social network to communicate with your friends and acquaintances, do not forget the interests of the company, nor the interests of your employees and the protection of relevant confidential information.

6. Compliance with the Code

Compliance with laws and regulations for our suppliers is the main principle of economically responsible behavior. Suppliers always comply with valid legal prohibitions and obligations, even if they are associated with short-term economic disadvantages or difficulties.

This Code is intended to help understand the culture and way of working. Nevertheless, it may happen that suppliers and their employees will be confronted with complex situations in which they will feel that the Code does not give them a clear answer. In such a case, we expect from our suppliers that the affected employees have the opportunity to discuss the matter with their direct supervisor or a company delegate.

6.1 Liability

6.1.1 Liability of employees

All suppliers are required to comply with this Code and adopt its principles as a binding standard for their daily work.

6.1.2 Liability of company management

In accordance with the core value of acting as a role model, managers at all levels must shape their behavior according to this Code and must ensure that the Code is also observed in the area of responsibility of the

company's employees. Managers must take all necessary steps to ensure that all employees are familiar with the principles contained in this Code and must be permitted by law to comply with this Code.

6.2 Prevention and notification obligation

The content of the Code has been designed to prevent problems, manage risks and limit the exposure of our suppliers and their employees to the main risks; its effectiveness depends on the personal integrity of each employee and the collective commitment to act in an ethical manner.

It is essential to identify any potential problems in order to avoid violating the law and your policies. In the event that a violation occurs, it is important to react as quickly as possible to prevent a similar situation from happening again.

It is therefore in the company's interest to report any violations of this Code or ethical principles that employees witness or suspect.

In this way, suppliers confirm their commitment to integrity. In the event that employees encounter a worrying situation, they must be able to turn to the responsible employee according to the given organizational structure, or to a superior, if there is a delay in the solution or a refusal.

Employees of our suppliers can be assured that any concerns they report will be taken seriously and promptly investigated.

Suppliers will not tolerate any retaliation against individuals who make a good faith report or participate in an investigation, proceeding or hearing. Notices must be true and accurate. Any announcement that aims to cause damage to the career or reputation of a particular employee must not be tolerated. Regardless of whether anonymous reporting is possible in a country, our supplier employees can always be confident that they have the right to make a report without having to hide their identity.

6.3 Violations and Penalties

Violation of the Code may affect the evaluation of the supplier and the further development of business relationships. For this reason, we ask our suppliers that any violation of the rules and principles of this Code by their employees has a direct impact on the duration of the employee's employment relationship and results in disciplinary measures, including termination of the employment contract, criminal prosecution and claims for damages. In addition, incalculable monetary loss to the company and damage to the company's reputation may also result. In order to ensure compliance with this Code (and applicable laws and internal rules), it is necessary to seek legal assistance in case of doubt before the actual action to be taken.

7. Conclusion

Our Code of Ethics defines our responsibilities and the behaviors we expect from our suppliers to ensure a constructive and productive work environment that supports our core values and beliefs. This Code is a guide for our suppliers to help them make the right decisions and do the right thing.

If you don't have a Code of Ethics handy right now, here are three important questions to ask yourself whenever you're unsure:

1. How would others rate this decision?
2. Am I willing to take responsibility for this decision?
3. Is this decision compatible with the Code of Professional Conduct and Ethics for suppliers of ATEK s.r.o.?

Keep the following in mind: Act if you see a problem. Ask if you are not sure.

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