



## **Code of Ethics of ARLAM s.r.o.**

Code of Ethics of Arlam s.r.o. expresses fundamental values and provides a framework for implementing decisions. Ethical conduct is of key importance for the long-term operation and economic interests of Arlam s.r.o. and is an expression of responsibility towards all partners.

All employees of Arlam s.r.o. they are obliged to act in accordance with this code of ethics, to maintain a high moral standard in business and work behavior and to create a working environment of trust and respect. This code sets out the rules of work performance, for cooperation and relationships, including those between management and employees.

### **A. Customer Relations**

- Ensuring compliance with legislation.
- A honest and fair approach to customers, satisfying their needs and interests are a prerequisite for a successful and lasting business relationship.
- Treating customers in discreet and courteous manners, without any advantage, prejudice or discrimination. Arlam s.r.o. commits to use only legitimate business methods and considers the information obtained from the customer to be confidential.
- Providing safe, high-quality products and services that meet established national and international standards that anticipate future user needs.

### **B. Relations with Suppliers**

- Relations with suppliers are based on mutual trust and respect. All information about relations of Arlam s.r.o. and suppliers are confidential.
- Arlam s.r.o. commits to respect agreed terms and conditions. If Arlam s.r.o. due to extraordinary circumstances, it cannot meet the agreed requirements, it enters into negotiations with a business partner as soon as possible with the aim of finding an alternative, mutually acceptable solution.
- Fair dealing by maintaining friendly and constant stimulating and competitive relationships with suppliers.

### **C. Relations with Competitors**

- Arlam s.r.o. respects the laws and rules governing competitive relations. It treats the competitors fairly, in accordance with the good manners of the competition.
- Arlam s.r.o. carries out business activities on the basis of the principles of fair competition.
- Arlam s.r.o. does not attempt to obtain information about competitors' business by dishonest and illegal means (industrial espionage, bribery, or any other dishonest means).

### **D. Relations with Public Authorities**



- Arlam s.r.o. is committed to act as a socially responsible citizen in a relation to state and governmental authorities, local authorities, the region and society as a whole, and to provide them correct and current information.
- Arlam s.r.o. pays taxes properly, deliberately avoids tax evasion and ensures the transparency of all its financial transactions. It complies with all legal provisions against money laundering.
- Maintaining an unyielding attitude with regard against illegal, anti-social and unethical behavior.

#### **E. Environmental Relations**

- Become a company with minimal negative impact on the environment.
- Being aware of the specific nature of PPE production, Arlam s.r.o. emphasizes its activities, products and services to protect the health and safety of employees, consumers and general public.
- Arlam s.r.o. consciously adheres to the concept of environmental protection, as evidenced by the introduction of an environmental management system ISO 14001:2015.

#### **F. Child labour, forced labour/modern slavery**

- ARLAM s.r.o. will not tolerate the hiring of child labor under any circumstances. The minimum age for full-time employment must be as per applicable laws.
- Company ARLAM s.r.o. will not tolerate any form of modern slavery, i.e. slavery, servitude and forced or compulsory labour, retention of identity documents and human trafficking. No employee must be forced to work by force or intimidation in any form, must be able to move freely, leave the workplace after the end of working hours, know the conditions of their work and be paid regularly and on time according to the agreement.

#### **G. Internal Relations**

- Relationships with employees and among employees, as well as between superiors and subordinates in Arlam s.r.o. they are based on the respect and dignity of each human being and on respect for fundamental human rights in the spirit of the UN Universal Declaration of Human Rights.
- Every employee is required to create an atmosphere of mutual respect, trust, belonging and teamwork, without which positive economic results cannot be achieved in the long run.
- Arlam s.r.o. will not tolerate any physical, mental or sexual harassment. Any form of abuse, humiliation, bullying and defamation of the human person or discrimination is inadmissible in society.
- Every employee of the company is responsible for their actions, which is reflected in the consistent performance of tasks. They should behave in such a way that they do not harm their co-workers, that they do not complain about their work and do not hinder their initiative.



- Arlam s.r.o. It bases its success on the professionalism of its employees, expects them to act actively and purposefully, to seek and use opportunities to improve their work and their own performance. Anyone who thinks that they can make a contribution to the improvement of any area of society has the right to be listened and to receive feedback of their suggestions.
- Arlam s.r.o. hires employees and guides their careers on a their preconditions for the given job, without any racial, religious or national discrimination, regardless of skin color, gender, age, condition, sexual orientation.
- The company pays attention to the professional and personal development of its employees. It is committed to creating conditions for the development of knowledge, skills and abilities of its employees corresponding to the current and future needs of the company. We expect employees to actively use these opportunities.
- Arlam s.r.o. is committed to complying with the statutory working hours and to promote fair political remuneration without any discrimination. The method of remuneration should reflect individual results, activity and the importance of the job position in relation to the economic results of the company.
- ARLAM s.r.o. will strive to pay competitive wages based on local market rates. In addition to compensation for regular working hours, employees must also be paid for overtime at the rate required by applicable laws.
- The company must comply with all employment laws, including working hours, time and overtime, and will comply with the agreement with the employee representatives.
- Arlam s.r.o. is committed to respect objective criteria and fundamental ethical standards in the redundancy process. The dismissal process must be legal, timely, and transparent, based on basic psychological knowledge and must not impair the dignity of the human being.
- The management of Arlam s.r.o. creates a space for free expression of each employee's own opinion without the risk of intimidation or sanctions.
- Arlam s.r.o. supports cultivated communication not only between individual employees but also between individual departments of the company. Intentional secrecy of information that would contribute to the improvement of the company's work is considered morally unacceptable.
- All employees of Arlam s.r.o. are committed to protect information that belongs to the company or that is related to its business activities. Such information is considered confidential and may only be used for business purposes and never for personal purposes. Employees who leave Arlam s.r.o. must continue to protect the information belonging to the company.
- Protection of corporate assets - every employee of the company is obliged to protect the intellectual and tangible assets of the company. Phones, e-mail, as well as all computer equipment, hardware and software are generally used for work purposes only.
- An employee of Arlam s.r.o. does not appropriate, borrow or lend company's property without permission. Illegal misappropriation of company property or its use for personal purposes or someone else's use without express permission is considered as serious as direct theft and can lead to termination of employment. The employee's paid working hours are also considered to be company property and should not be used for personal use without proper permission.
- Arlam s.r.o. employees do not give or receive any bribes.



- An employee of Arlam s.r.o. may carry on a 'business activity' which is identical with the subject of the company's activity, only with its prior written consent.
- Arlam s.r.o. employees should behave in such a way preventing disputes. In the case when a dispute or conflict arises in the workplace, they resolve it in a cultured, non-violent way, through dialogue with all stakeholders. All participants should avoid escalation into personal hostilities.

## **H. Ethical Responsibility of Management**

- The managers of the company consider the employees to be co-workers, for whom they prepare the conditions for their effective use of their potential, paid working hours, accepting their responsibilities and contributing creatively to the development of Arlam s.r.o. They create a positive working atmosphere.
- Company managers make efficient use of available resources, including the potential of human resources. In this regard, I can do a high | apply the principles of delegation of responsibility, authority and information.
- Managers of Arlam s.r.o. they are obliged to acquaint employees with the values and requirements stated in this code of ethics and train them to comply with it, and they are obliged to follow the example in respecting it. They are also obliged to create an environment that is socially just and in which dialogue is developed so this Code will not be violated.

## **I. Conflict of interests**

- ARLAM s.r.o. are obliged to refrain from situations where their personal, family or financial interests could interfere with their ability to make impartial and objective decisions on behalf of the company and could damage the good name and interests of ARLAM sro Employees must inform their superior of any personal interests that could be related to the performance of their job. Conflicts of interest in the market arise where there is a conflict between our personal interests and the duties of our employees or company representatives. Even the appearance of a conflict of interest can have a negative impact as a conflict of interest. Hospitality, donations, charitable contributions, sponsorship, and close relationships with an entity that trades or competes with ARLAM s.r.o.
- ARLAM s.r.o. employee policy:
  - 1) Always make decisions against partners, regardless of personal gain.
  - 2) Do not engage in activities that directly create a conflict of interest or the appearance of a conflict between your personal interests and the interests of society.
  - 3) Avoid situations that may create a conflict of interest or the appearance of a conflict of interest.
  - 4) Immediately report any potential conflict of interest in accordance with applicable company procedures.

## **J. Competition**

- ARLAM s.r.o. is based on compliance with the rules of fair competition and fully supports the antitrust law and antitrust laws. Any unfair business conduct that could cause a competitor is prohibited. The following unfair commercial practices are strictly prohibited: price agreements, capacity agreements, market share agreements, regional market sharing, customer distribution, the submission of false tenders, abuse of a



dominant market position. Also, illegal / cartel agreements between competitors that distort free and fair competition in order to gain or maintain a monopoly are not allowed. Any benefits that a company receives can only come from the exceptional quality of its products and services, never from unethical or illegal behavior towards competitors. It is prohibited to trade / provide services to countries or entities subject to international sanctions.

#### **K. Freedom of association and collective bargaining**

- Supplier shall respect employee's freedom of choice to be legally represented by an employee representative body without fear of retaliation.

#### **L. Retribution**

- ARLAM s.r.o. does not tolerate the required form against employees who have reported a good violation of the Code of Ethics in good faith. "In good faith" means that to the best of your knowledge and belief, everything you have reported is true and you have reported everything you know. Any employee who becomes involved in retaliation will be subject to disciplinary action. If you think you have been the victim of retaliation, you should report it as a suspected violation of the Code of Ethics.

#### **M. Money laundering**

- ARLAM s.r.o. is committed to enforcing a ban on money laundering and does not engage in commercial activities that promote or finance crime or terrorism.
- Money laundering is the act of concealing illegal funds and property and using them in a way that obscures their illegal origin or the purpose of using them to commit crime or terrorism (loans, borrowings, transfers to third parties, bank transfers, etc.)
- One of the company's goals is to constantly build business relationships with collectors, suppliers and business partners who have a good business reputation whose funds come from legitimate sources. All employees must follow anti-money laundering procedures and laws, be aware of and suspect the suspicious behavior of all business partners, suspicious payment methods or other transactions that could involve money laundering.

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The Code of Ethics of Arlam s.r.o. applies to all managers and employees of the company, as well as to other persons acting on behalf of Arlam s.r.o. Everyone is obliged to comply with the Code, to act in accordance with its provisions and to support it. All employees of Arlam s.r.o. must be aware that any breach of the ethical standards set out in the Code will be assessed as a breach of the workplace discipline.

In Trenčín, 22.11.2022

**Arlam s.r.o.**  
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