

Code of Ethics

Under the terms of implementation the management system of social responsibility, the Belis Company undertakes to comply with the Principles of Ethical Behaviour, which are prerequisite for maintenance of a good reputation and trust of all interested parties.

Ethics, laws and regulations

The Belis Company (hereinafter referred to as the Company) shall endeavour to maintain a long-term growth and create a true added value for its employees by means of correct manners, politeness, professionalism and responsibility of each customer.

The Company employees shall abide by the rules of ethical behaviour and legal standards and they shall behave in a professional and honest way and observe the highest standard of integrity. Each employee shall ensure the good Company reputation and protect its interests and property.

All employees shall comply with the relevant laws and regulations, including the Company's own regulations, in all areas the Company operates in.

The Company as an employer shall be aware of the value its employees provide and, therefore, the relationships shall be based on mutual respect for human dignity and respect for basic human rights. The Company shall provide a platform for free expression of their own opinion.

The Company shall respect the human rights recognised by the Universal Declaration of Human Rights.

Conflicts of interest, gifts and bribery

Employees shall avoid all conflicts between the interests of the Company and the personal ones. This involves, among others, offering and acceptance of gifts for personal use from all interested parties of the Company, except for the reasonable ones and catering, in which case it is considered as a part of a regular activity. The Company shall reject every single proposal for bribery and shall refrain from engaging in money laundering.

Trading partners

The Company shall endeavour to ensure fair treatment for all its trading partners, politeness and confidentiality, without any bias and discrimination.

The Company shall endeavour to ensure mutual contentment when concluding a contract, mutually-beneficial pricing behaviour and quality of service provided. For that purpose, requirements of ISO Standard 9001 were implemented in its management system.

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The printed Code of Ethics is for information only!		Processed by: Ing. Sanja Susányi (QM)
Approved by: Ing. David Toufar (Member of the Board)		Approved by: Ing. Petr Gabriel (GD, Chairman of the Board)

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The Company shall provide safe working environment for its trading partners and their employees, who are present at the Company's workplace.

The same principles applied while negotiating with the customers shall be applied while negotiating with the suppliers and other interested parties. The suppliers are expected to endeavour to maintain compliance with the same standards of social responsibility as those that are included in this Code of Ethics.

By being published on the website, this Code of Ethics makes the Company more accessible for the interested parties.

Treatment of information

Data protection and privacy, secrecy and confidential information are described in more detail in the *OS Directive 2/2014 Trade Secrets in the Belis Company*.

Safety and Health at Work

Basic principles of ensuring OSH (Occupational Safety and Health) of the employees in the Company and allocation of particular responsibilities for carrying out the tasks within the framework of each function is described in the *OS Directive 8/2016 Assurance of the basic responsibilities within OSH*.

Environmental protection

The Company shall be aware of the importance of environmental protection during the product realization – metal pressings and parts for automotive industry and enamel cookware – and shall undertake to comply with the implemented principles of ISO Standard 14001 described in the *Environmental Policy*.

Each employee shall use the natural resources effectively and assure that his actions have the least possible negative impact on the natural environment.

Protection and proper use of the Company's property

Each employee can use the Company's property solely for working purposes, unless a specific regulation allows private use, and shall treat the property duly and carefully and protect it from damage and loss.

Solving of situations in conflict with the Code of Ethics

Each employee can use the following means for announcements to the company management according to this Code of Ethics:

- Make the announcement using the box located in the production hall "Stamping Hall" and "Enamel Works". The box is located outside the reach of the monitoring system.
- Make the announcement using a postal service provider where the mail shall be addressed to the company management.

The announcement should include in particular following information: identification of suspected offenders and all persons involved in the conduct, description of the infringement, possible evidence of the infringement, other specific evidence supporting the suspicion of an infringement.

The employee can freely choose an anonymous notification option.

Conclusion

All complaints addressed to the company management shall be treated as strictly confidential, including the eventual identity of the notifier. The employer shall not penalize employees who in good faith announced suspicions of negotiation in contrary to the Code of Ethics, infringement and/or corruption. In case an employee makes a direct announcement to the company management, he/she shall be subsequently informed about the decisions of the company management and about any measures taken by the employer regarding the matter of announcement made by him/her.

In the case of legitimate complaints, the employer undertakes to ensure appropriate correction and to take appropriate measures to prevent repeating of similar situation in the future.