

# GOHR

PRODUCTION

OF HEAVY STEEL  
CONSTRUCTIONS

Železničná 9  
082 21 Veľký Šariš, Slovakia  
Tel.: 00421 51 749 2380  
Fax.: 00421 51 749 7351  
e-mail: [gohr@gohr.sk](mailto:gohr@gohr.sk)  
web: [www.gohr.sk](http://www.gohr.sk)

## CODE OF CONDUCT



## Table of Contents

|                                                                                        |    |
|----------------------------------------------------------------------------------------|----|
| <b>Preamble</b> .....                                                                  | 3  |
| <b>Commitment</b> .....                                                                | 3  |
| <b>Vision</b> .....                                                                    | 3  |
| 1. PURPOSE AND CHARACTERISTICS OF THE CODE OF CONDUCT.....                             | 4  |
| 2. VALIDITY .....                                                                      | 5  |
| 3. PRINCIPLES OF THE CODE OF CONDUCT OF THE COMPANY GOHR, S.R.O., VELKÝ ŠARIŠ.....     | 5  |
| 3.1. RELATIONS WITHIN THE COMPANY .....                                                | 5  |
| 3.1.1. Relations within the company.....                                               | 5  |
| 3.1.2. Free choice of employment .....                                                 | 5  |
| 3.1.3. Prohibition on child labour .....                                               | 5  |
| 3.1.4. Working hours .....                                                             | 5  |
| 3.1.5. Wages and benefits.....                                                         | 5  |
| 3.1.6. Employees' motivation .....                                                     | 5  |
| 3.1.7. Humane treatment .....                                                          | 5  |
| 3.1.8. Relations within the company and harassment.....                                | 5  |
| 3.1.9. Prohibition of discrimination.....                                              | 6  |
| 3.1.10. Freedom of association .....                                                   | 6  |
| 3.1.11. Conflict of interests.....                                                     | 6  |
| 3.1.12. Occupational health and safety .....                                           | 7  |
| 3.1.13. Ethics .....                                                                   | 7  |
| 3.1.14. Protection of company's property and name.....                                 | 7  |
| 3.1.15. Commitments of the company GOHR, s.r.o. to the employees.....                  | 7  |
| 3.1.16. Commitments of the employees to the company GOHR, s.r.o.....                   | 8  |
| 3.2. RELATIONS WITH STATE AND PUBLIC INSTITUTIONS, PUBLIC .....                        | 8  |
| 3.3. RELATIONS WITH BUSINESS PARTNERS .....                                            | 8  |
| 3.3.1. Illegal practices.....                                                          | 8  |
| 3.3.2. Relation with business partners .....                                           | 8  |
| 3.4. RELATIONS WITH COMPETITORS.....                                                   | 9  |
| 3.4.1. Fair competition.....                                                           | 9  |
| 3.4.2. Prohibition of collusion.....                                                   | 9  |
| 3.5. RELATION TO SHAREHOLDERS .....                                                    | 9  |
| 4. ANTI-CORRUPTION LEGISLATION .....                                                   | 10 |
| 4.1.1. Gifts .....                                                                     | 10 |
| 4.1.2. Bribery .....                                                                   | 10 |
| 4.1.3. Contributions to charity and sponsorship.....                                   | 10 |
| 4.1.4. Protection of trade secret, protection of privacy and personal information..... | 10 |
| 4.1.5. Intellectual property .....                                                     | 10 |
| 5. SOCIAL RESPONSIBILITY OF THE COMPANY.....                                           | 11 |
| 5.1.1. Environment .....                                                               | 11 |
| 6. RESPONSIBILITY OF THE COMPANY MANAGEMENT.....                                       | 11 |
| 6.1.1. Political and public activity .....                                             | 11 |
| 6.1.2. General commitment of the company GOHR, s.r.o.....                              | 11 |
| 7. APPLICATION OF THE CODE OF CONDUCT.....                                             | 11 |
| 7.1.1. Grievance mechanisms .....                                                      | 11 |
| 7.1.2. General principles .....                                                        | 12 |

## **Preamble**

The company GOHR, s.r.o. was established in 1999, after the breakup of ČKD DUKLA a. s., Strojárenský závod Šariš. The top management of the company consists of three former employees, who worked as managers at various departments – technical, production and commercial. The company focuses on the production of heavy steel structures, with which it has rich experience and necessary technical equipment. Apart from that, the company significantly expanded their machinery equipment, which contributed to significant production autonomy and increased operational efficiency of the production.

Responsibility, quality, uniqueness and integrity are the main values that guide the company GOHR, s.r.o. in all of its activities.

A good name of the company GOHR, s.r.o. and the trust of its clients and employees are the most important assets in the business environment. The company GOHR, s.r.o. respects legislation and generally recognized principles of the competition and acknowledges its social and moral responsibility for all of its business activities.

The company GOHR, s.r.o. is aware of the fact that high quality products also involve ethics. The company decided to embrace this code of conduct, which is binding for all its employees and all persons acting on behalf of the company GOHR, s.r.o. regardless of form, employment relation or partnership as an expression of responsibility for ethical development within the company.

Our goal is to make maximum effort in order to provide our clients with high quality products, which will increase their satisfaction and loyalty to our company as a stable partner.

The company GOHR, s.r.o. joins the companies, which decided to actively contribute to cultivation of the social and business climate in Slovakia through a code of conduct.

The code of conduct of the company GOHR, s.r.o. is a commitment of the company as a whole and every of its individual employees to act with honesty, decency, responsibility to public, business partners, competition, clients as well as to each other.

## **Commitment**

To create conditions for a long-term development of our clients, partners and colleagues through our business activities.

- Contribution of the company GOHR, s.r.o. to development of our clients is seen as the ability to create conditions for improvement of their key processes and so to contribute to increase of their profit by provision of our products.
- Honesty, reliability and trust are our inputs for development of long-term business partnerships.
- Harmonic and constant development of our employees is understood as creation of conditions for success, efficiency of their work and quality of private life.

## **Vision**

Our strategic vision is to create a company, which is stable, able to achieve expected results in a long-term period, prosperity in production, business and all services related to this activity, while the needs and wishes of our clients are the main source for further development of the company.

## 1. PURPOSE AND CHARACTERISTICS OF CODE OF CONDUCT

Apart from the effort to achieve successful growth of the business activities, the company **GOHR, s.r.o.** (hereinafter referred to as GOHR, s.r.o. or “**the company**”) considers a long-term stability on the market with sustainable growth to be the **key goal of the company**. To achieve this goal, GOHR, s.r.o. needs to manage its activities as **ethically and honestly** as possible to gain the trust and support of the partners, including its clients, suppliers, employees, owners and the public.

GOHR, s.r.o. requires the highest business and personal ethical standards. The company is aware that reputation of the company GOHR, s.r.o. is priceless and therefore, it does not tolerate any ethical missteps in its facilities as well as in services provided to any of the relevant parties. The company formalised its requirements in the Code of Conduct of the company GOHR, s.r.o., set of policies and procedures defining the standards for the business practices for each employee of the company GOHR, s.r.o..

The code of conduct of the company GOHR, s.r.o. applies to **all managers and employees** working full time or part time as well as to any other persons acting on behalf of the company. The abovementioned persons are obligated to adhere to the code, act according to all its provisions and support it.

The goal of the code is to increase behavioural moral standard of all employees and to support ethical development of the company.

The code of conduct serves mainly as an internal manual of the company and is binding for all employees working for the company. It represents effort and determination to work and follow the highest principles of the social and business ethics and effective legislation. The code of conduct applies to all company employees without distinction.

All employees are obligated to follow ethical principles and in case of their violation, they will face consequences of their behaviour. The employees, including the management, who are involved in the activity, which is in conflict with these provisions, will undergo an adequate **disciplinary procedure**, which can lead to termination of their employment. Some violations may include involvement of law enforcement bodies pursuant to the **Criminal Code and Penal Procedure Code**.

The code of conduct is structural to the point to include the most important ethical principles and all employees are obligated to act in accordance with this code and to keep high moral standard. No document, however, can include all possible situations. Therefore, it is expected that all involved employees will use their **sound judgement** and will ask questions in case they are in doubt.

The code of conduct fulfils several functions:

- a) empowers internal discipline of the company,
- b) eliminates inappropriate practices, which cause decrease in interest about the company,
- c) teaches to reflect to one's own moral behaviour and behaviour of others,
- d) develops moral thinking,
- e) positively motivates company's employees by reinforcing their consciousness about working in ethical environment with clear rules for each of them,
- f) clarifies the company's policy in delicate matters
- g) is a guarantee for the clients, business partners and the public that our company cares about ethical behaviour and is a reliable partner.

The code of conduct of the company GOHR, s.r.o. is based on ethical principles of respecting human dignity, honesty, tolerance, responsibility, commitment and justice. It is based on the idea that quality of personal and work life depend on quality of morals, in which humans live.

## 2. VALIDITY

All employees of the company GOHR, s.r.o. and all persons acting on behalf of the company GOHR, s.r.o., regardless the form of employment or partnership are obligated to behave in accordance with this **Code of conduct of the company GOHR, s.r.o.**

The Code of conduct of the company GOHR, s.r.o. enters into validity on the day of its issuance.

## 3. PRINCIPLES OF THE CODE OF CONDUCT OF THE COMPANY GOHR, S.R.O., VELKÝ ŠARIŠ

The code of conduct of the company GOHR, s.r.o. deals with solutions of individual issues, which can appear in the company and proposes procedures for their solutions. These include particularly:

### 3.1. RELATIONS WITHIN THE COMPANY

GOHR has a strong interest in providing its employees with the best working environment possible and therefore the employer completely adheres to and respects the constitution, legislation and all provisions of the penal procedure code. All of the company, management and employee activities are performed in a way that completely fulfils following **conditions**:

#### 3.1.1. Relations within the company

Relations within the company are based on transparency, open communication, mutual trust and respect. Relations with the employees and among supervisors and their subordinates are based on respect to dignity of each person and respect of basic human rights.

Everyone has the right to preservation of human dignity, personal honour, good reputation and to protection of their name. The company management does not interfere with personal and family lives of its employees, does not tolerate any psychological abuse, physical abuse and motivates its employees to express their opinion and to open discussion.

#### 3.1.2. Free choice of employment

GOHR, s.r.o. or any other partner must not use any form of forced or non-voluntary labour.

GOHR, s.r.o. adheres without distinction to the right to free choice of employment in accordance with ***the Constitution of the Slovak Republic and the Labour Code.***

#### 3.1.3. Prohibition on child labour

GOHR, s.r.o. must not and does not use child labour. The notion of “**child**” refers to any person younger than **15 years of age** or a person older than 15 years of age until the completion of their compulsory education. We support legally stated programmes of apprenticeship at our workplaces, which are in accordance with all laws and provisions related to the apprenticeship. Employment of young persons before the age of 18 can only be made in exceptional cases and in accordance with the legal system of the Slovak Republic.

#### 3.1.4. Working hours

The employees of the company GOHR, s.r.o. must not exceed common working hours stated by the law and agreed upon in the **employment contract**. Moreover, GOHR, s.r.o. compensates overtime adequately, at least to the minimum level required by the state.

GOHR, s.r.o. provides **breaks in work** and uninterrupted break in work during the day, free days in week and leave fully in accordance with the legal system of the Slovak Republic.

#### 3.1.5. Wages and benefits

GOHR, s.r.o. fulfils all applicable laws and provisions related to wages and working hours, including those related to the minimum wages, overtimes, individual rates and other features of financial and non-financial compensations at least at the minimum level and provides legally stated benefits.

#### 3.1.6. Employees' motivation

The company strives for a proper motivation of its employees. The goal of the motivation is to achieve a permanently high level of their performance in the first place. A properly motivated employee is **indispensable** for the company and contributes to the company's development. A considerable emphasis is put on **education** and development of knowledge, abilities and skills of company's employees.

#### 3.1.7. Human treatment

GOHR, s.r.o. management and all employees approach all employees with respect and dignity and do not use any **corporal punishment**, threats of violence or any other forms of physical or mental pressure or abuse.

#### 3.1.8. Relations at workplace and harassment

Relations at workplace are based on transparency, open communication and mutual trust and **respect**.

Every employee is responsible for **their acts and behaviour**, so they do not harm their colleagues, complicate their work, interfere with their initiative and do not use their status against other employees to promote their personal opinions and interests.

The company does not tolerate any form of **bad treatment, slander, bullying or harassment** of the employees or other involved parties. Any form of **aggressive, threatening or insulting** behaviour is unacceptable, nor is the **sexual harassment**.

**Bullying** is the type of behaviour that results or can result in threats, embarrassment, belittlement, humiliation or insults to a natural person and the intent or result of which is or can be an interference with freedom or human dignity (e.g. sexual advances, request for sexual affections and other verbal or physical behaviour of sexual nature at workplace, physical contact, comments with sexual content, display of pictures with erotic tone, etc.).

**Harassment** is the type of behaviour that results or can result in threats, embarrassment, belittlement, humiliation or insults to a natural person and the intent or result of which is or can be an interference with freedom or human dignity (e.g. sexual advances, request for sexual affections and other verbal or physical behaviour of sexual nature at workplace, physical contact, comments with sexual content, display of pictures with erotic tone, etc.).

Sexual harassment or other sexually based behaviour, which relates to the dignity of women and men at work, including behaviour of supervisors and colleagues is **forbidden and under no circumstances will be tolerated**.

If the relation between colleagues is other than a working relation, e.g. **familial or friendly relation**, this must not interfere with a normal working performance of an individual or a team. It is necessary to respect the difference between working and personal aspects of mutual relations among colleagues.

### 3.1.9. Prohibition on discrimination

The company will not tolerate any **forms and acts of discrimination**. It is forbidden to endanger, threaten and display hostility to other persons, usage of impolite and insulting expressions.

**Women and men** have the right to equal treatment with regard to access to employment, remuneration and career progression, professional education, working conditions, termination of employment and retirement. These rights are granted without any limitations and direct or indirect discrimination based on sex, marital and family status, sexual orientation, race, colour, language, age, unfavourable health condition or disability, genetic attributes, faith and religion, politic or other affiliation, activity in unions, national or social origin, nationality or ethnic, property, origin or other status **with the exception of** lawfully stated cases, in which there is an actual reason for performance of a specific work due to the preconditions or requirements and nature of work, which an employee does.

Women are provided with working conditions with regard to their physiological preconditions and with regard to their social function in **motherhood** and women and men are provided with working conditions with regard to their family commitments during **child upbringing** and care.

### 3.1.10. Freedom of association

GOHR, s.r.o. supports open communication and direct engagement of employees with management in all sorts of ways as the most effective form of solution of questions concerning workplace and remuneration. The participating partners have to respect the rights of the employees to associate freely, to **become members of the unions**, to seek representation or to join employee committees in accordance with the relevant laws. The employees are able and they are allowed to communicate openly with management about working conditions without fear of retaliatory measures, threats or harassment.

### 3.1.11. Conflict of interests

A conflict of interests occurs, when **personal interests** interfere with employee's obligations and their loyalty to the company and when they could damage or disadvantage the company. Therefore, we must not perform any activity, which could be marked as a conflict of interests.

Managing employee must not perform the activity as a **statutory body** or as a member of the statutory or other body of another legal person with the same or similar business activities, except for the companies, on the business activities of which our company participates.

Business or other trade activity, whose object is identical to the business activity of the company can be performed by the employee only **with a previous approval of the employer**.

No person can use their official status in the company for personal purposes and they must avoid relations, which bring a risk of corruption and which raise doubts about our objectivity and independency in our activities.

Employees are obligated to inform their employer about the fact that their **family member** is an employee or an employer/owner at a **competitor** or a company with similar business activity.

### 3.1.12. Occupational health and safety

The company undertakes to create **healthy, safe working environment** and to adhere to all valid laws and regulations concerning health safety and protection at workplace.

Employees are obligated to adhere to all **safety regulations** of the company as well as to safety rules of work given by the Slovak legislation. The company makes sure that all employees are **acquainted** with the valid laws and regulations and attend relevant trainings concerning the requirements on occupational health and safety. Violation of the rules is considered misconduct.

Employees must not transfer, keep or use alcoholic **beverages, other narcotic drugs and psychotropic substances** on the premises of the company during their working hours and must not come to work under their influence.

Employees are obligated to follow a **no smoking** rule on the company premises, with the exception of reserved spaces.

General principles of prevention and basic conditions to ensure occupational health and safety and to exclude risks and factors conditioning occurrence of **occupational injuries, diseases** and other harm to health are reflected in related internal regulations. Each employee acts in a way that they do not endanger health and lives of their colleagues.

Care about the occupational health and safety and about improvement of working conditions is a part of fulfilment of work duties. **Managing employees** of the company on all levels of management are responsible for fulfilment of the tasks within the given extent.

### 3.1.13. Ethics

In order to fulfil social responsibilities and achieve success on the market, the employees of the company GOHR, s.r.o., including its management must insist on the highest **ethical standards** and general **rules of appropriate behaviour** in all areas of the business activity. Management, as well as every employee, will perform each activity in a way that they support engagement within the company in order to support social and economic development.

### 3.1.14. Protection of company's property and name

Employees and management use the property of the company in an economic and effective way, so they prevent its **damage or loss**. Misuse or illegal use of the property of the company GOHR, s.r.o. is strictly **prohibited**.

Every employee of the company must protect its **good name and interests**. They are loyal to the company and all work related issues are solved within the company. Employees do not slander and discredit the company **in public or in privacy**. Every employee has an **obligation to protect** intellectual property and material wealth of the company.

**Usage of the company property**, including working equipment, supplies, facilities or other property for personal advantage is forbidden, unless it is expressly allowed by an agreement between an employee and the employer. **Illegal appropriation or lending** the company property for personal purposes or to third parties, which is in conflict with an internal regulation of the company and without its approval is considered to be as serious as a direct misappropriation of property.

Misappropriation of **co-worker's property** or other person's property entering the company premises is considered theft and is **forbidden**.

Employees are obligated to **use their working hours effectively** and it is forbidden to use it for dealing with private matters.

**Intellectual property** is a valuable asset and has to be protected from unauthorised usage or disclosure. Such property includes trade secret, confidential information, copyright, trademarks and logos and also lists of clients, business opportunities, product specifications and whether the company or business partners own them.

### 3.1.15. Commitments of the company GOHR, s.r.o. to its employees

Management of the company GOHR, s.r.o. is clearly and prominently aware that the essential of its business lies in **people**, who work for the company. Creative people with vast skills and knowledge in the given area of expertise, personal qualities and personal ambitions in conformity with the vision and commitment of the company are its **biggest wealth**.

The company undertakes to act in accordance with the **Labour Code**, relevant legal measures and internal regulations of the company GOHR, s.r.o., which govern employment relations.

The company makes sure that the employment relations are **legal, objective, transparent and ethical**.

As far as the wages are concerned, the company undertakes to adhere to just **wage policy** in accordance with the relevant regulations.

With regard to employees, standard **employment contracts** are concluded in accordance with the legislation of the Slovak Republic, while no forbidden forms of employment relations are tolerated.

The company GOHR, s.r.o. cares about creating optimal **social conditions**, pleasant and calm ambiance for its employees for highly qualified and creative work.

Each employee is obligated to submit proposals to possibly improve any area of the company and has the right **to be heard**. Employees have the right to **express their opinion** without any consequences or sanctions.

The company GOHR, s.r.o. fully supports **professional growth of its employees**, which is in conformity with the needs of its growth and the goal to create a unique team of highly qualified experts in the area of production information systems for the industrial practice.

#### **3.1.16. Commitments of the employees to the company GOHR, s.r.o.**

All employees of the company GOHR, s.r.o. participate in creation of the ambiance of openness, collegiality and integrity. In case of **conflicts** or any misunderstandings, responsiveness and willingness to participate in finding a solution to the issue is required.

The company GOHR, s.r.o. asks its employees for their loyalty. Loyalty to the company, however, does not exclude critical attitude to what is happening in the company. A **critique** is, however, constructive and objective, should be presented in a cultivated manner, so it does not dishonour another person or people.

Each employee of the company GOHR, s.r.o. represents not only themselves as a private person, but also as a **representative** of the company, therefore they care about its good name. In public, they provide only generally accessible information about the company.

Employees protect **good name of the company** and its interests. They do not profit at the expense of the company. They protect **intellectual and material** property of the company. They use it only for work related purposes, unless stated otherwise.

Employees act fairly, honestly towards the company and do not profit **at the expense of the company**.

An employee is obligated to **inform** the company about important matters concerning the subject of the activities of the company should such matters have negative influence to further activity and development of the company. The company GOHR, s.r.o. considers **concealing** of such information immoral. All information concerning the operation of the company is considered highly confidential.

Each employee, who has **information and knowledge** professionally related to the activity of the company is obligated to **share** them with other co-workers. Non-disclosure of information gained during **trainings and courses** paid by the company is forbidden.

### **3.2. RELATIONS WITH STATE AND PUBLIC INSTITUTIONS, PUBLIC**

Relations with state and public institutions are built on **correct basis**, in accordance with the **law and moral**. The company undertakes to provide the abovementioned institutions with timely and true **information** concerning its activities and resulting from the requirements of the valid legislation.

If the company provides **aid or support to public institutions**, lawful and maximally ethical procedure has to be followed.

The company **cooperates closely with the city and the region** on common projects and supports their activities conforming to the policy and subject of interests of the company. The company undertakes to provide timely and true information, pay **taxes** properly, not to avoid taxation consciously and to follow all lawful regulations to avoid money laundering.

### **3.3. RELATIONS WITH BUSINESS PARTNERS**

#### **3.3.1. Illegal practices**

The company activities **follow valid laws and legal regulations**, which it also requires from its business partners.

The company does not participate in **illegal business** with products (tobacco products, alcohol...) and in drug business.

We try to be successful in **transparent market environment**. We do not seek competitor benefits through illegal or unethical practices.

#### **3.3.2. Relation with business partners**

In communication with business partners, any unclear, false information, which could mean loss of their trust, as well as damage to the name of the company GOHR, s.r.o. is inadmissible. The clients are provided

with current, adequate, exact and clear information about our products and services. The company GOHR, s.r.o. undertakes to provide its business partners with true information about its **economic status** and such information is required from its partners as well.

The company GOHR, s.r.o. is customer oriented and is aware that its economic situation and further development depend on **customer satisfaction** with its products and services. The company GOHR, s.r.o. is happy for its clients' success and is proud to be a part of it through its products.

If the company GOHR, s.r.o. cannot fulfil a **wish of a customer** or keep the **deadline** for some reason, the company immediately informs the customer about such fact and seeks an optimal solution for both sides.

All employees must act **honestly and correctly** in dealings with its business partners, avoid manipulative practices, non-disclosure of relevant information, misuse of **confidential** information or any **dishonest** behaviour.

Our relations with business partners are based on pre-defined **contractual terms and conditions** and rules. The company GOHR, s.r.o. undertakes to follow all obligations resulting from the concluded business contracts. If the company is unable to fulfil its obligations due to any unexpected serious reasons, it will **immediately inform** its partners and **seek solution**, which will be acceptable for all involved parties.

The company GOHR, s.r.o. does not damage good name and property of a client. The company undertakes not to provide information about its **business partners**. This information is considered **confidential** and in relation to them, we oblige our employees to **confidentiality**.

We share the principles of ethical behaviour, social engagement and respect to environment with our suppliers, subcontractors and mediators. We present these principles to our **business partners** and motivate them to follow the same norms as we do.

### **3.4. RELATIONS WITH COMPETITION**

#### **3.4.1. Fair competition**

The company respects the laws regulating competition relations. The company GOHR, s.r.o. considers its competitors equal professional partners and **economic competition** a natural part of business. The company respects and supports competition fair-play and does not commit to **dishonest practices**. The company deals with its competitors honestly, in accordance with decency and with regard to its good name. The company promotes itself only by its high quality products on home and foreign markets.

GOHR, s.r.o. respects competitors' property and good name and deals with all of them as equal subjects. The company must not try to obtain information on competitors by **dishonest or illegal way** (e.g. industrial espionage, bribery, requiring secret information from the clients, or any other dishonest way). The employees must not disclose internal information, which could be used by third parties to their benefit or on the basis of which, they could benefit.

#### **3.4.2. Prohibition of collusion**

To **collude/conclude a secret agreement** in order to misuse and/or obtain unfair advantage over a third party, competitor, clients, employment candidates or persons in negotiation dealings is considered a collusion, which is **not allowed and is strictly prohibited**.

Prohibition of collusion also applies to secret definition of **prices, wages, secret reductions or pretending mutual independency**, while conspiring in order to achieve a common benefit.

Research and comparison (**benchmarking**) of prices, wages, services, procedures, employee benefits, other business and technical matters provided by the subject on the market is not considered violation of these rules if the benchmarking information is acquired from **publically accessible sources** or are voluntarily provided by the subjects on the market.

### **3.5. RELATIONS WITH SHAREHOLDERS**

Our obligation is to **protect investments of the owners** and to ensure **their long-term evaluation**. In accordance with the legal regulations, we provide the owners with information about the company and we take into consideration their interests. We follow legal regulations ensuring transparent publication of information. Each owner has the right to influence company activities.

## 4. ANTI-CORRUPTION PROGRAMME

### 4.1.1. Gifts

No employee can use their status in the company for their **private purposes** and must avoid relations and situations, which raise doubts about their impartiality and objectivity (accepting gifts, various benefits and considerations from a third party).

The company undertakes not to require **financial or non-financial gifts** from its business partners, suppliers and anybody who are interested in business relations with the company. We can accept only **promotional gifts and refreshment** if we do not commit ourselves to favour their provider. Gifts in the form of finances, shopping vouchers, provisions or other financial values are not allowed under any circumstances.

Promotional objects, which the company GOHR, s.r.o. offers are seen as **image support** of its business name.

Every employee, who has not an opportunity to refuse to accept a gift must immediately **inform** their supervisor about such situation. The supervisor follows valid legislation and additional rules and usual honest way.

### 4.1.2. Bribery

The company undertakes not to offer, provide and accept bribes in any form with regard to its business partners, bodies of state administration and employees.

### 4.1.3. Contributions to charity and sponsorship

All charity contributions and sponsorship are provided in a transparent way under clearly defined criteria, so they cannot raise suspicion about corruption. All such contributions are accessible on the company website.

### 4.1.4. Protection of trade secret, privacy and personal information

The employee is obligated to maintain **confidentiality** about all information marked as trade secret, about which they are informed during their employment and which are impossible to disclose to third parties due to the interest of the employer. An obligation to maintain confidentiality about the trade secret is embedded in **employment contract**.

This obligation also applies to the period after termination of the employment with the company. The information on financial results and business transactions must not be made public without previous **authorisation** in order to protect owner's interests.

In **accordance with the Art. 17 of the Commercial Code**, trade secret is information, which meet all features of business, production or technical nature related to company, has actual or at least potential material or non-material value, is not commonly accessible within the relevant business, has to be kept confidential according to the company's decision and the company ensures its confidentiality by corresponding measures.

In case that the trade secret is disclosed to other legal or natural persons, e.g. within the business relations, they have to sign a **confidentiality agreement**.

If an employee finds out that there is a loss, misuse or disclosure of a trade secret, they have to **inform** their direct supervisor about such situation and the supervisor is obligated to take measures to prevent undesirable consequences.

The company respects confidential nature of **personal information**, which is required according to relevant valid legal regulations. An access to such information is granted only to the employees of the company, who have adequate **authorisation** and need such information for the purposes of the company. In accordance with the relevant legal regulations, personal information is the **data related to a natural person**, who can be identified on the basis of an identification number (birth registration number) or on the basis of features, which form physical, physiological, mental, economic, cultural or social identity. This personal information is **forbidden** to access or publish without previous approval of the involved person, except for the cases, when such act is in accordance with general binding legal regulations of the Slovak Republic.

**Wage level** is also considered personal information, therefore, employees are forbidden to publish and investigate wage levels of other employees

### 4.1.5. Intellectual property

It is necessary to adhere to **copyright**. **Transfer of technology and know-how** is made solely in a way, which protects copyright and intellectual property.

Employees and other persons are **forbidden** to appropriate or create drawings, sketches or records of any kind for private purposes. All documents and data mediums related to work assigned to an employee or

other person are in the ownership of the employer and in case of employment termination or termination of other relation with the company, they have to be returned to the company automatically.

## 5. SOCIAL RESPONSIBILITY OF THE COMPANY

Since the beginning, the company GOHR, s.r.o. focuses its attention on **community**, in which it act (public, business partners, employees...), as well as on **environment**. Our company continuously tries to develop activities in these directions and to be socially responsible. We care about constant development of the living standard in the company, in which we live and for which we work. Our employees are the main instruments of this communication. Social responsibility is a specific state of mind of our company and transformation of ideas into reality.

### 5.1.1. Environment

The company undertakes to follow valid laws and regulations concerning **environmental protection** in its business activities. Apart from that, it tries to **preventively mitigate possible harmful effects** of its activities on environment and to ensure constant improvement of **ecology in its production processes**.

The company requires its employees to follow all valid laws and regulations concerning **environmental protection** related to their work responsibilities.

Every employee is obligated to **acquaint themselves with adverse effects** of their activity on the environment.

We systematically identify and evaluate possible **ecological suggestions**. By adopting corrective measures, we **eliminate their effects** and we constantly work on improvement of our environmental behaviour and on increase of efficacy of our resources.

## 6. RESPONSIBILITY OF THE COMPANY MANAGEMENT

Management of the company respects **principles of management ethics** and its members are obligated to act with regard to its highest principles.

The company GOHR, s.r.o. cares greatly about respecting rights and ethics **in the area of information technology**, therefore its employees can use only **legally purchased software**.

Management of the company provides the employees with regular and true **information** about its business plans, so every employee is acquainted with the intentions and goals of the company and can identify with them.

All employees in managing positions behave as **examples** for the rest of the employees of the company.

### 6.1.1. Political and public activity

The company GOHR, s.r.o. **does not obstruct** political engagement of its employees. However, it is considered a **private activity**, which cannot be dealt with during working hours or on the premises of the company.

The company GOHR, s.r.o. does not support financially or otherwise any **political parties or groups**.

### 6.1.2. General commitment of the company GOHR, s.r.o.

The company GOHR, s.r.o. endorses the theory of social responsibility of the companies and accepts responsibility for its activities with regard to all stakeholders, i.e. to groups, which are affected by its activity and which affect its activity back. They include: suppliers, clients, employees, management, shareholders, various associations related to ecology, state, representatives of the region.

## 7. APPLICATION OF THE CODE OF CONDUCT

Violation of any part of this document by an **employee** is considered **gross misconduct**, which can result in immediate termination of employment and in taking relevant legal measures.

Failure to adhere to this document and violation of any part of this document is unacceptable for any participating **partner**. The process in such violation or violation of other relevant provision from a partner is agreed upon in the contract or agreement and can lead directly to taking **legal measures**.

### 7.1.1. Grievance mechanisms

Employees of the company are **obligated to speak out** about any violations or potential violations of the code of conduct, which they know of. For this purpose, a directive was issued for the proposals, verification and recording of grievances submitted in accordance with the Act no. 307/2014 Coll.

It is recommended that everyone, **who is unsure** of its acts complying with the Code of conduct of the company GOHR, s.r.o., seek advice with their direct supervisor or with responsible person, i.e. manager of the economic department.

**Suggestion** can be submitted in writing, verbally on the record or electronically by e-mail.

**A written suggestion** is submitted directly into the hands of the responsible person or it is possible to put it into a **box** accessible in the economic department on the first floor of the administrative building of the company, which is opened **daily** by the responsible person. It is necessary that the suggestion is in closed envelope, which needs to be marked as: "**SUGGESTION – DO NOT OPEN**".

Submission of a suggestion **verbally on the record** can be made via the responsible person.

Submission of a suggestion **electronically by e-mail** is possible to make by sending it to the e-mail address of the responsible person: [podnet@gohr.sk](mailto:podnet@gohr.sk). Suggestions sent by e-mail to the address of a person other than the responsible person have to be immediately sent to the responsible person to the abovementioned e-mail **address**.

**The responsible** person for the company GOHR, s.r.o. is the **manager of the economic department**. Manager of the economic department is also responsible for verification of the suggestions, processing of personal information submitted in the suggestion and recordkeeping of the suggestions.

Responsible person is obligated to ensure **anonymity** of the whistle-blower. To reveal their identity is possible only with the **consent** of the whistle-blower.

There will be **no sanctions** against the employee, who informs about the violation of the code of conduct. An exception is a deliberately **untrue** notification about the violation of the code of conduct with the intention to hurt another person, in which case the situation is assessed as violation of the code of conduct.

#### 7.1.2. General principles

The code of conduct serves as an **internal manual** of the company GOHR, s.r.o. and it is binding for all employees working for our company.

**By adoption** of the code of conduct, **uniform** requirements for the employees in the area of ethical behaviour are defined. The employees are informed about required behaviour in the company and outside the company and the code ensures protection of the employees in the grievance and comment procedure.

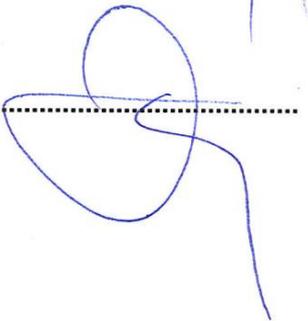
**The aim** of the code of conduct is **not to control the employees**, but to inform them about what behaviour is expected by the company and to invite them to openly express their opinion and inform relevant supervisors about suspected violation of these rules.

**Changes** to the code of conduct can be made only by the manager of the company through the manager of the economic department and upon grievance of any of the company employee or involved party.

This code of conduct was **discussed and approved** at the meeting of the wider management of the company GOHR, s.r.o. on 18.11.2015 and **binds** the company management to create conditions for implementation of this code of conduct.

Code of conduct of the company GOHR, s.r.o. enters into force on **1.10.2015**.

Prepared by: Jaroslav Klimko   
.....  
Chief Economical Officer, The responsible person

Approved by: Ing. Ľubomír Olejár   
.....  
Chief Executive Officer