CODE OF ETHICS

1. Purpose and Scope

This Code of Ethics sets out the fundamental principles of responsible, lawful and ethical conduct at Autometal, spol. s r.o. (hereinafter referred to as "Autometal"). It provides a framework for decision-making and day-to-day conduct in our relationships with employees, customers, suppliers, public authorities and other stakeholders.

The Code applies to all employees, managers and persons acting on behalf of Autometal. We expect our business partners to uphold comparable principles when carrying out activities related to their cooperation with Autometal.

The Code does not replace applicable laws, contractual requirements or internal documentation. In the event of any doubt or conflict, employees must consult their manager.

2. Our Core Principles

- we comply with applicable laws, contractual obligations and legitimate customer requirements;
- we act honestly, professionally, transparently and with respect;
- we protect people's health and safety, the environment, information and assets;
- we reject corruption, discrimination, harassment and any abuse of position or power;
- we promote responsible business conduct and the continual improvement of our activities.

3. Human Rights and Working Conditions

Autometal respects internationally recognised human rights and fundamental labour rights. We treat everyone with dignity and respect.

Equal Treatment and Prevention of Harassment

We provide equal opportunities and reject discrimination on the grounds of gender, age, disability, race, ethnic or social origin, nationality, religion or belief, political opinion, sexual orientation or any other characteristic protected by law. We do not tolerate bullying, harassment, violence or degrading treatment.

Freedom of Association and Open Communication

We respect employees' right to freedom of association, representation and collective bargaining in accordance with applicable laws. We promote open communication and enable employees to express their views constructively, while respecting the rights of others, confidential information and the legitimate interests of the company.

Prohibition of Forced and Child Labour

We reject all forms of forced, compulsory, slave or involuntary labour. We do not use child labour and comply with legal requirements concerning the minimum employment age and the protection of young workers.

Working Hours and Remuneration

We comply with applicable requirements concerning working hours, rest periods, leave and remuneration. We provide employees with wages and other benefits at least to the extent required by law and applicable contractual obligations.

Occupational Health and Safety

We provide safe and healthy working conditions, assess risks and take measures to prevent occupational injuries and ill health. Employees must comply with established rules and promptly report unsafe conditions or conduct.

4. Environmental Protection

Autometal complies with applicable legal and other binding environmental requirements and strives to continually reduce the environmental impacts of its activities, taking technical and economic feasibility into account.

- we prevent pollution and minimise waste generation;
- we promote reuse, recycling and the safe management of waste;
- we use energy, water, materials and other natural resources efficiently;
- we monitor and reduce the significant environmental impacts of our activities, particularly those relating to emissions, water, chemicals and noise;
- we inform and train employees according to their roles and the associated environmental risks.

5. Ethical and Transparent Business Conduct

Corruption, Bribery and Gifts

We do not tolerate bribery, corruption, fraud, extortion, embezzlement or any other dishonest conduct. Employees must not offer, provide, solicit or accept payments, gifts, hospitality or other benefits that could improperly influence a business or other decision, or call its impartiality into question.

Conflicts of Interest

We make decisions based on objective and legitimate business criteria. Employees must avoid situations in which their personal, family or financial interests could influence their professional judgement. Any actual or potential conflict of interest must be reported promptly to their manager or another appropriate internal contact.

Fair Competition

We comply with competition laws and reject cartels, price fixing, market allocation, abuse of a dominant position and any other practices that undermine fair competition. We do not improperly share information on prices, commercial terms, customers, capacity or other commercially sensitive data with competitors.

Money Laundering, Sanctions, Imports and Exports

We maintain business relationships with trustworthy partners and comply with applicable anti-money laundering requirements, trade sanctions and import and export regulations. Suspicious transactions, business requests or circumstances must be referred promptly for internal review.

Accuracy of Records and Information

We maintain accurate, complete and verifiable business, technical, financial and other records. The intentional misrepresentation, concealment or falsification of information is prohibited.

6. Protection of Information and Assets

We protect the personal data, confidential information, trade secrets, intellectual property and assets of Autometal and our business partners. We obtain, use, retain and disclose information only for legitimate purposes and in accordance with legal, contractual and internal requirements.

Employees must use entrusted assets and resources responsibly, protect them against loss, damage, misuse and unauthorised access, and comply with information security rules.

7. Product and Supply Chain Responsibility

We are committed to the safety, compliance and traceability of our products, materials and parts. We take appropriate measures to prevent the use of counterfeit or suspect parts and materials and cooperate in addressing identified supply chain risks.

We support the responsible sourcing of raw materials. Where required by law, contract or customer requirements, we cooperate in obtaining and providing information on the origin of materials used, including tin, tungsten, tantalum and gold (3TG).

8. Expectations of Business Partners

We expect suppliers and other business partners to comply with the laws applicable to their activities and to uphold principles comparable to those set out in this Code, particularly in the areas of human rights, working conditions, health and safety, the environment and business ethics.

Specific requirements for business partners may be established by contract, purchase order, a customer requirement demonstrably communicated to the business partner, or another agreed document. To a reasonable extent, Autometal may request the information needed to assess compliance with the applicable requirements and expects the business partner to cooperate in addressing any identified deficiencies.

9. Reporting Concerns and Protection of Reporting Persons

Any employee who becomes aware of a possible breach of applicable laws, this Code or related internal rules may report their concern to their manager or another appropriate internal contact. Autometal encourages employees to report concerns for which they have reasonable grounds without undue delay.

The company's internal reporting system may also be used to report possible unlawful conduct. The reporting channels, contact details of the competent person and information on the categories of persons whose reports Autometal accepts are published separately in accordance with applicable legal requirements.

Concerns and reports are assessed impartially and handled confidentially to the extent required by applicable laws and internal rules. Autometal prohibits retaliation against any person who had reasonable grounds to believe that the information reported was true. Knowingly false reports and deliberate misuse of the reporting system are not protected.

10. Compliance with the Code

Autometal ensures that the Code is accessible and that employees are appropriately familiarised with its contents. Managers promote ethical conduct, lead by example and enable employees to raise questions or concerns with the appropriate persons. Every employee is responsible for complying with the Code in the course of their work.

Any breach of the Code will be assessed according to its nature and severity and may result in corrective, employment-related, contractual or other measures in accordance with legal, contractual and internal rules.

11. Approval and Review

The Code of Ethics is approved by Autometal's General Manager. The company's management is responsible for administering the document and coordinating its review. The Code is reviewed whenever significant changes occur in legal, customer or internal requirements, and otherwise in accordance with the rules governing documented information.

Effective date: 1.9.2026

Approved by: Ing. Marcel Pacovský

General Manager

Signature: 