

GOTEC Code of Conduct

This Code of Conduct defines how work should be performed by all GOTEC employees, as well as the principles of cooperation and requirements that GOTEC imposes on its suppliers and business partners. It also serves as a guide regarding their responsibilities towards people and the environment. Through our corporate policies and continuous development efforts, we aim to achieve a system of values and goals that is recognized by our employees and accepted as a commitment. With this, we strive to turn our investments into secure and future-oriented workplaces.

The GOTEC Group and its associated companies are committed to adhering to the ten principles of the UN Global Compact and expect the same from their business partners.

We understand environmental protection to mean more than just meeting legal requirements. It is a collective responsibility, and every one of our employees contributes to this goal according to their responsibilities, duties, knowledge, and skills.

Key objectives pursued by our management policies include the prevention or continuous reduction of environmental pollution and the consumption of energy and resources during the production, use, and disposal of products. The environmental impact of products is incorporated into the company's decision-making processes, alongside considerations of quality management.

GOTEC reserves the right to amend this Code of Conduct in case of relevant changes to the GOTEC compliance program. In such cases, GOTEC expects its suppliers to accept such appropriate changes.

The service provider, business partner, and/or intermediary declares as follows:

Article 1: Compliance with laws and regulations

- They will comply with the laws and regulations applicable in the legal framework, regardless of the economic losses that may result;
- They will not act against official orders.

Article 2: Anti-corruption and anti-money laundering

- They will not tolerate corruption, bribery, or the acceptance of benefits in any form, nor will they directly or indirectly contribute to it. They will not offer, guarantee, or promise any benefits to public officials or private sector counterparts to influence actions or gain unfair advantage;
- They will obligate their employees, company representatives, and third parties (e.g., consultants, intermediaries) not to accept any benefits derived from or influencing business relations;
- Donations will always be transparent, reflect social engagement, be voluntary, and without any expectation of return. The purpose, recipient, and confirmation of the donation will be appropriately documented;
- They will take all necessary measures to prevent money laundering within their sphere of influence.

Article 3: Fair competition, cartel law

- They will act in accordance with national and international competition laws and will not engage in any price-fixing, market or customer-sharing agreements, or bid rigging;
- They will not, either directly or indirectly, engage in espionage, theft, or other illegal methods of obtaining information about competitors or their businesses;
- They will treat confidential information obtained from clients, suppliers, and third parties in the same way as they handle their own information.

Article 4: Conflict of interest

- They will avoid any conflicts of interest that could negatively impact business relationships and will promptly report their existence if necessary.

Article 5: Whistleblower protection and retaliation

- They will not discriminate against employees who report irregularities or conflicts of interest;
- They will implement mechanisms that allow employees to report irregularities without fear of retaliation.

Article 6: Prohibition of discrimination and harassment

- They will support equal opportunities and fair treatment of employees regardless of their skin colour, race, nationality, social origin, potential disabilities, sexual orientation, political or religious views, gender, or age;
- They will respect personal dignity, privacy, and personal rights;
- They will not tolerate unacceptable treatment of employees, such as excessive psychological pressure, sexual harassment, mobbing, or discrimination;
- They will not tolerate any behaviour (including gestures, statements, or physical contact) that is of a sexual nature, constitutes pressure, or threatens, abuses, or exploits.

Article 7: Diversity, equality, and inclusion

- They will promote diversity in the workplace by employing people from different backgrounds and cultures;
- They will create an inclusive work environment where all employees feel respected and valued.

Article 8: Rights of minorities and indigenous peoples

- They will respect the rights of minorities and indigenous peoples, ensuring equal treatment and opportunities;
- They will engage in consultations with indigenous peoples on matters concerning their land and resources.

Article 9: Land, forest, and water rights; forced evictions

- They will respect the land, forest, and water rights of local communities;
- They will not conduct forced evictions without appropriate consultations and compensation.

Article 10: Women's rights

- They will promote gender equality in the workplace by ensuring equal opportunities and pay for women;
- They will offer support to working mothers, such as flexible working hours or parental leave.

Article 11: Modern slavery

- They will not employ anyone against their will or force anyone to work;
- They will not tolerate the exploitation of workers;
- They will promote ethical business practices.

Article 12: Wages and employee benefits

- They will ensure proper wages and provide the legally mandated minimum wage for each country;
- They will offer additional benefits such as health insurance, paid leave, and retirement programs.

Article 13: Working hours

- They will adhere to the legally established maximum working hours in each country;
- Where possible, they will offer flexible working hours and remote work options to support work-life balance.

Article 14: Freedom of association and collective bargaining

- Where legally permissible, they will recognize employees' freedom of association and will not discriminate against members of employee organizations or trade unions;
- They will allow employees to conduct collective bargaining to improve working conditions.

Article 15: Prohibition of child labor

- They will not employ anyone under the age of 15. In countries classified as developing according to the International Labor Organization Convention No. 138, the minimum employment age may be reduced to 14.

Article 16: Ethical recruitment

- They will ensure transparency and fairness in recruitment processes, avoiding fraud and abuse;
- Prospective employees will not bear the costs associated with recruitment.

Article 17: Health and safety of employees (Occupational Health and Safety - OHS)

- They will take responsibility for the health and safety of their employees;
- They will reduce risks and ensure the best possible ways to prevent accidents and occupational diseases;
- They will provide training and ensure the competence of all employees in occupational health and safety;
- They will organize and implement an appropriate OHS management system.

Article 18: Environmental protection

- They will comply with legal requirements and international standards on environmental protection;
- They will minimize environmental pollution and continuously improve environmental protection measures;
- They will organize and implement an appropriate environmental management system.

Article 19: Sustainable resource management

- They will use resources (materials, air, water, energy, land) efficiently;
- They will consider the environmental impact of products from the design stage;
- They will hold the necessary permits and certifications for environmental protection required for the purchased activity.

Article 20: Biodiversity, land use, and deforestation

- They will take action to protect biodiversity and minimize negative impacts on ecosystems;
- They will strive for sustainable land use, avoiding deforestation and environmental degradation.

Article 21: Soil quality

- They will implement practices to protect soil quality by preventing erosion and contamination.

Article 22: Noise emissions

- They will take steps to reduce noise emissions in accordance with local regulations and international standards.

Article 23: Animal welfare

- commits to respecting the five animal rights formulated by the World Organization for Animal Health regarding animal welfare.

Article 24: Water quality and consumption management

- They will implement water-saving practices and technologies that improve water-use efficiency;
- They will protect local water resources from pollution and overuse.

Article 25: Air quality protection

- They will take action to reduce air pollution emissions in compliance with local regulations and international standards.

Article 26: Greenhouse gas emissions

- They will aim to reduce greenhouse gas emissions by implementing appropriate technologies and practices.

Article 27: Energy efficiency

- They will implement technologies and practices to increase energy efficiency in line with local regulations and international standards.

Article 28: Renewable energy

- They will aim to increase the share of renewable energy sources (RES) in their energy mix.

Article 29: Decarbonization

- They will take steps to reduce carbon dioxide and other greenhouse gas emissions, supporting global decarbonization goals.

Article 30: Responsible chemical management

- They will apply safe chemical management practices, minimizing their impact on the environment and human health.

Article 31: Data protection and security

- They will collect, store, or process personal data of employees, clients, and business partners only when necessary for clearly defined and legally permitted purposes;
- They will support data security and processing through appropriate technical and organizational measures;
- They will implement appropriate regulations for handling and deleting data to comply with the General Data Protection Regulation (GDPR).

Article 32: Financial responsibility (accurate and reliable accounting records)

- They will maintain ongoing records of economic transactions in a manner that ensures accurate, proper, and complete accounting;
- They will enter accounting records in chronological (by date) and systematic (by balance and profit/loss accounts) order;
- They will document their records.

Article 33: Supply chain

- They will appropriately support the enforcement of this Code of Conduct among their suppliers;
- They will adhere to non-discrimination principles in supplier selection procedures and relationships.

Article 34: Information disclosure

- They will disclose sustainability information to assist investors who want to invest in companies and projects that support sustainable development goals in making informed decisions.

Article 35: Intellectual property protection

- They will respect others' intellectual property rights;
- They will comply with industrial property law and copyright law;
- They will implement appropriate regulations and procedures regarding intellectual property.

Article 36: Compliance with export restrictions and economic sanctions

- They will comply with economic sanctions and will not violate sanction laws to gain economic benefits.

Article 37: Use of private or public security forces

- If applicable, in accordance with local law.

Article 38: Conflict minerals

- They will take appropriate steps to prevent the use of raw materials in their products that indirectly or directly finance armed groups that violate human rights.

If any court or other competent authority finds one or more provisions of these regulations wholly or partially ineffective, invalid, unenforceable, or inapplicable, it will not affect the effectiveness, validity, enforceability, or applicability of all other provisions or the remaining part of these regulations. A provision that closely aligns with the economic objective of the ineffective provision will automatically replace it, and that new provision will be effective, valid, and enforceable.

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Supplier's Name/Company Name:
(Printed)

Hereby confirms they have read and understood the above provisions and commits to their implementation.

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Location and Date:
(Signature)
(Company Stamp)

Explanations:

The term "public official" should be interpreted broadly and, regardless of national legal definitions, always includes officials, employees of public offices, public corporations, state-owned companies, and international organizations, as well as deputies, senators, and representatives or collaborators of political parties.

Unlike donations, sponsorships for the GOTEC Group or individual companies involve a return service, such as communication or marketing activities. All sponsorship activities must be based on written agreements and proportional to the sponsorship services provided. Sponsorship must not serve as a workaround for donation provisions.

- A proper environmental management system includes:
- Environmental protection guidelines (environmental policy);
- Determining responsibilities and tasks in environmental protection;
- Ensuring that employees and management involved in environmental protection or whose activities affect the environment are qualified and aware of environmental impacts;
- Assessing the environmental aspects of activities, products, and services;
- Assessing legal requirements and committing to compliance;
- Defining and implementing processes to realize environmental policies and achieve environmental goals concerning significant environmental aspects;
- Internal guidelines for designing environmentally friendly products;
- Setting goals and creating programs to achieve them;
- Records of environmental protection training;
- Emergency preparedness and response;
- Regular monitoring of processes with significant environmental impacts;
- Records of regular audits;
- Evaluation of the environmental management system.