

CODE OF CONDUCT

Introduction

You are opening the pages of the Code of conduct of Gelpo, s.r.o. This document contains moral obligations, moral attitudes, behaviour and actions towards the company, co-workers, customers, business partners and the general public.

The importance of the Code of conduct lies in the definition of the basic values that underpin the company's philosophy. Our effort is to ensure an open, customer and business oriented, safe, responsible and humane approach.

WE WANT TO BE A SUCCESSFUL AND SOCIALLY RESPONSIBLE COMPANY, therefore we do not tolerate any violation of the laws of Czech Republic and ethical principles.

The goal is:

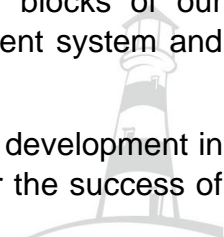
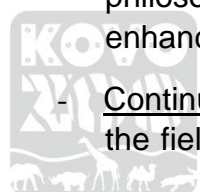
- to comply with the laws of the Czech Republic
- to treat our colleagues, suppliers, customers, business partners and the general public affected with our activities with respect
- to act honestly and morally
- to protect the property, information and know-how of Gelpo, s.r.o. and be loyal to Gelpo, s.r.o.

This Code of conduct should serve as a guide and aid to all employees, management and owners in their work activities, helping them to comply with the principles set out in the Code and to put them into practice.

Employees of the Company have an obligation to follow and comply with the ethical principles defined in this Code.

Our company philosophy is based on the following criteria:

- Environmental responsibility, which is one of the basic building blocks of our philosophy, with the aim of improving the environmental management system and enhancing environmental performance.
- Continuous improvement of quality achieved through joint work and development in the field of recycled products. Working together is a prerequisite for the success of



the company and depends on the responsibility and quality of work of each individual in all positions.

- Good interpersonal relationships we build in our workplace between subordinates and supervisors.
- Pride in our work, which represents working with secondary raw materials as a resource that can save the environment.

Pavel Hartman,

Managing director of Gelpo, s.r.o.



GELPO s.r.o.
Vazová 2143
688 01 Uherský Brod
Czech Republic

VAT: CZ 29370035

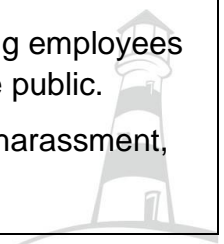
Phone: +420 734 758 017
E-mail: obchod@gelpo.cz
www.gelpo.cz


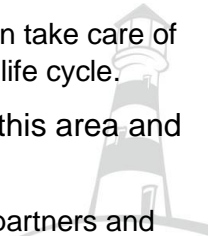
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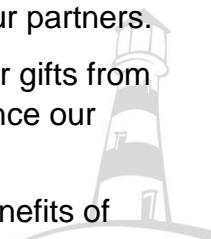



ETHICAL PRINCIPLES OF THE COMPANY

<p>1. We comply with legal regulations</p>	<p>The company complies with all laws of the Czech Republic, especially in the following areas:</p> <ul style="list-style-type: none"> - Occupational Health and Safety and the Environment - Labour law regulations - Laws on accounting - Environmental aspects - Governing anti-corruption, unfair and non-competitive conduct and behaviour
<p>2. We comply with internal company documents</p>	<p>All employees must know and comply with the internal documents that govern their work activities.</p> <p>Managers have a key role and responsibility for creating the documentation, implementing it and ensuring that all employees understand their responsibilities under the documentation.</p>
<p>3. We respect human rights</p>	<p>We do not tolerate any form of discrimination.</p> <p>We want to create an atmosphere of mutual trust and respect.</p> <p>We do not tolerate any form of discrimination based on gender, age, religion, race or color, political opinion, health condition/disability, belonging to a nation or minority, marital status or sexual orientation.</p> <p>Regardless of the diversity of opinions, cultural, national or social values of individuals, we are committed to providing everyone with equal opportunity in hiring employees.</p> <p>The employment decision must be based only on the requirements for the given position and the applicant's qualifications.</p> <p>We rely on decent behavior both among employees and towards business partners and the public.</p> <p>We do not tolerate any form of sexual harassment, abuse, intimidation or gossip.</p>



<p>4. We respect freedom of association and the right to collective bargaining</p>	<p>All workers without distinction are entitled to join or form a trade union and have the right to collective bargaining.</p> <p>Employee representatives are not discriminated against and are allowed to perform their representative functions at the workplace.</p>
<p>5. We reject any use of child and forced labour and modern slavery</p>	<p>We reject any use of child and forced labor as well as any other form of modern slavery and human trafficking, not only in our company but also within our supply chain.</p> <p>We are committed to maintaining a minimum age for employment so that all work is voluntary and employees are free to terminate employment.</p> <p>We expect the same intolerance towards child labor and modern slavery from our suppliers.</p>
<p>6. We comply with the principles of occupational health and safety</p>	<p>Employees are obliged to comply with the principles of occupational health and safety and Gelpo, s.r.o. is committed to providing the appropriate conditions for this.</p> <p>Gelpo, s.r.o. actively educates its employees in the field of OSH and FP.</p> <p>We comply with legal regulations.</p> <p>It is strictly forbidden to enter the workplace and carry out work activities under the influence of alcohol or intoxicants.</p>
<p>7. Protecting the environment</p> 	<p>The company's philosophy is based on the processing of secondary raw materials, which is the cornerstone of environmental protection. Throughout the entire cycle of our production, we take care to minimize the impact of our activities on the environment (living and non-living nature, including the ecosystem, soil, air and water) and strive for sustainable development and optimization of the use of natural resources.</p> <p>Our products are again recyclable – we can take care of our products after the end of the product's life cycle.</p> <p>We actively educate our employees in this area and comply with legal regulations.</p> <p>We motivate all our employees, business partners and</p> 

	<p>the general public to actively contribute to environmental protection beyond the requirements of the law</p>
<p>8. We pay attention to energy efficiency and save natural resources</p>	<p>The processing of secondary raw materials is not our only contribution to improving the environment. During its processing, we continuously monitor and evaluate the consumption of energy, fuel and water, we introduce new technologies to reduce their consumption and to increase the share of renewable resources not only in the production process, but also to provide the operation of buildings.</p>
<p>9. We adhere to the Code of Conduct.</p>	<p>Our employees are required to maintain a high level of professional conduct and ethics, regardless of their level of management or position in the company. Everyone's conduct is intended to contribute to our ability as a company to meet our obligations to all business partners.</p> <p>Company employees generally have the following responsibilities when acting on behalf of the Company:</p> <ul style="list-style-type: none"> - To act in a representative manner and contribute to building the company's reputation. - To wear appropriate attire that is appropriate to the job and does not detract from the seriousness of the business being conducted. - Not to bring the Company into disrepute. - To use the company's logos and markings in accordance with internal procedures so that they are not used in a disparaging manner.
<p>10. We build good relationships with business partners and the public.</p> 	<p>We build relationships based on trust and honesty with business partners (customers, suppliers) and the public. We treat all business partners transparently and respect confidentiality, trade secrets and business know-how.</p> <p>We expect the same behaviour from our partners.</p> <p>We do not accept or solicit any offers or gifts from our business partners that could influence our business decisions.</p> <p>We do not accept or provide gifts or benefits of</p> 

	<p>unreasonable value to our business partners or customers because such conduct could give rise to the suspicion of impermissible competitive influence. It is permissible to give or receive gifts of small value that cannot influence the sound judgment of the donee and cannot be considered as an attempt to influence competition.</p> <p>When entering into any contract, we always act with regard to the benefit, advantage and financial benefit to the company. Contracts may only be entered into by employees authorised to do so and always in accordance with the law and internal procedures.</p> <p>We strive to build the company's reputation and participate in recycling and waste education events. We want to build good relationships with local communities.</p>
<p>11. Media</p>	<p>Our goal is to create positive relationships with the media. We want to communicate openly and transparently.</p> <p>Speaking on behalf of Gelpo, s.r.o. is only possible with the prior approval of the company's management.</p>
<p>12. We do not tolerate corrupt behaviour</p>	<p>We actively oppose all forms of corrupt behaviour.</p> <p>Employees are prohibited from making any promises (payments, rights, etc.) to obtain or retain contracts or to influence defined procedures.</p> <p>Employees are prohibited from soliciting any improper advantage in order to obtain a business opportunity or a more favorable market position, nor may they use third parties to do so.</p>
<p>13. Company employees</p> 	<p>Gelpo, s.r.o. aims to build long-term relationships with its employees and to create a motivating environment and conditions for them to achieve the company's goals.</p> <p>We comply with all legal regulations governing, for example, working hours, overtime and the right to rest, and we guarantee the right to fair remuneration for work performed.</p> <p>Senior employees lead by example with their honest behaviour and actions. They comply with legal and</p>

	<p>internal regulations and procedures and ensure that their subordinates fully understand their job responsibilities. They are also obliged to answer any questions related to this Code of conduct.</p> <p>All employees contribute to building the company culture.</p>
<p>14. Cooperation with state and local authorities</p>	<p>We provide all necessary cooperation and relevant information to all state authorities.</p> <p>Employees are obliged to cooperate with public authorities in areas where their professional knowledge and experience can contribute to assist in the performance of a task of public interest or to prevent environmental hazards.</p>
<p>15. Competition and Conflicts of Interest</p>	<p>We encourage free competition in all business relationships. We do not enter into any pricing or market sharing agreements with business partners that would restrict free competition. We obtain information about competitors only in a legal way and use freely available sources. We do not share any sensitive information with competitors and we do not harm competitors with misleading information about their products or services.</p> <p>Employees avoid conflicts of interest in their work activities and have a duty to disclose their potential conflict of interest or that of another employee to their supervisor. We maintain a policy of avoiding conflicts of interest in our dealings with business partners and do not involve family members in supplier-customer relationships.</p>
<p>16. Consistent bookkeeping</p>	<p>Our records and accounts are kept in accordance with the law to provide information about the true properly and financial structure. No employee of the Company shall intentionally or negligently misrepresent or influence these records.</p> <p>The Company ensures through internal procedures that all transactions are properly authorized, verifiable and accurately recorded.</p>
<p>17. Sponsorship</p>	<p>Gelpo, s.r.o. does not sponsor any political parties, movements or politically active persons, either</p>

	<p>financially or materially.</p> <p>It actively supports public benefit activities in the fields of environmental protection, education and sports. All such sponsorship activities are in compliance with applicable laws and regulations.</p>
18. Property management	<p>All employees are obliged to properly handle the company's property in accordance with legal and internal regulations and to protect it against misuse, theft, damage or destruction. Every employee has the obligation to take such steps to prevent damage and to prevent damage from occurring through his/her activities.</p>
19. Confidentiality of information and protection of personal data	<p>We always use adequate technical and organizational means to protect all information about the company, customers and business partners and employees against unauthorized access, misuse, theft, damage.</p> <p>We comply with the relevant regulations and internal procedures when protecting data and only provide data to authorised persons.</p>
20. Customer health and safety	<p>The products that we manufacture from secondary raw materials meet the criteria of hygienic safety for specified uses given by the technical sheet</p> <p>In case of any doubts, customers can contact their sales manager or call the number: +420 731 155 421</p>

The goal of Gelpo, s.r.o. is for every employee to participate in fulfilling and sharing the above-mentioned ethical principles to which we are committed as a company.

Every employee has the right to ask questions at any time about anything related to ethical rules and procedures. All employees are obliged to report this fact to their supervisor or company executive in the event of suspicion of unethical or illegal behavior by another employee of the company or a third party.





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