

LITOSTROJ GROUP

**CODE OF CONDUCT AND
ETHICS**



 **LITOSTROJ**

1. Introduction

Litostroj Group is committed to upholding the highest standards of business ethics and conduct. All our processes and activities are based on honesty, integrity, transparency, and compliance with the law. Our goal is to establish a working environment that encourages innovation, responsibility, and sustainable development. This Code defines the key values we follow and guides our employees in responsible and ethical conduct.

Litostroj Group is committed to conducting business in accordance with applicable national, European Union, and international laws and regulations, including but not limited to regulations related to anti-corruption, competition law, human rights, labor standards, environmental protection, sanctions and export controls, anti-money laundering, and data protection.

We are committed to responsible business conduct principles that include respect for human rights, fair competition, zero tolerance for corruption, responsible supply chain management, environmental protection, and the prevention of financial crime.

We promote a culture of accountability, openness, and ethical decision-making. Employees are encouraged to raise concerns in good faith without fear of retaliation.

Litostroj Group ensures that appropriate governance, internal controls, and compliance measures are in place to support the implementation of this Code across all levels of the organization.

In case of uncertainty regarding interpretation or application of this Code, employees are expected to seek guidance from their manager or responsible internal functions before taking action.

2. Our Employees

Employees are our most valuable asset. Litostroj Group ensures an inclusive, fair, and non-discriminatory work environment that fosters diversity and equal opportunities for all. In recruitment and advancement, we focus on the professional skills and potential of individuals, while respecting all legal frameworks and ethical standards.

How?

- Employees have the right to a safe and respectful work environment.
- Discrimination or harassment is not allowed and must be reported immediately.
- All employees must act professionally, ethically, and in accordance with this Code.

Litostroj Group prohibits any form of discrimination based on gender, age, race, ethnicity, nationality, religion, disability, sexual orientation, political opinion, union membership, marital status, or any other characteristic protected by applicable law.

We are committed to promoting equal opportunities, diversity, inclusion, and mutual respect in all employment-related decisions, including recruitment, compensation, training, promotion, and termination.

Harassment, bullying, intimidation, violence, inappropriate conduct, or any other behavior that creates a hostile or offensive working environment will not be tolerated.

Employees are expected to contribute to a collaborative, respectful, and professional workplace culture and to avoid conduct that could damage the reputation of Litostroj Group.

We support employees' rights to freedom of association and collective bargaining in accordance with applicable legislation and international labor standards.

3. Protection of Human Rights

Litostroj Group is committed to respecting and promoting human rights in all aspects of its operations. We strongly oppose forced labor, child labor, and any form of discrimination.

Our commitments include:

- Creating a safe and dignified work environment.
- Compliance with legislation and international human rights standards.
- Rigorous screening of suppliers and business partners to ensure compliance with our principles.

Litostroj Group supports internationally recognized human rights principles, including the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the core conventions of the International Labour Organization (ILO).

Employees and business partners are expected to respect human dignity, privacy, and personal rights in all business interactions (please see Supplier Code of Conduct).

Litostroj Group applies a risk-based human rights due diligence approach to identify, prevent, mitigate, and where necessary address potential adverse human rights impacts in its operations and supply chain.

Particular attention is given to high-risk areas such as forced labor, child labor, unsafe working conditions, excessive working hours, discrimination, and restrictions on freedom of association.

Where risks or adverse impacts are identified, Litostroj Group will take appropriate preventive or corrective actions and expects the same standard from its business partners.

This Code constitutes Litostroj Group's Human Rights framework and sets the baseline for all related internal procedures and business practices.

4. Our Partners

In selecting and collaborating with business partners, we seek those who share our values of ethics, sustainability, and environmental responsibility. Together, we strive to build responsible and long-term relationships that support sustainable business practices.

How?

- We evaluate business partners based on their commitment to ethical conduct.
- We require and expect contract partners to adhere to the Supplier Code of Conduct.
- We avoid doing business with suppliers involved in unethical or illegal practices.

Business decisions must be based on objective criteria such as quality, reliability, technical capability, price, and sustainability considerations. Personal relationships or private interests must not improperly influence business decisions.

Litostroj Group reserves the right to terminate cooperation with business partners who violate legal requirements, human rights principles, anti-corruption rules, sanctions regulations, or environmental standards, as determined in Supplier Code of Conduct.

We encourage transparent communication and long-term cooperation with partners who actively contribute to responsible and sustainable business practices.

Business partners are expected to provide truthful, complete, and accurate information during tendering, contracting, and cooperation processes. Any form of fraud, misrepresentation, concealment of information, or unethical conduct is prohibited.

Litostroj Group may conduct compliance, integrity, sanctions, and reputational due diligence on business partners where appropriate and in accordance with applicable laws.

5. Sustainable Business Practices

We are committed to sustainable development and responsible management of natural resources. Our sustainability initiatives include reducing our environmental footprint, improving energy efficiency, and supporting the circular economy.

Our goals include:

- Investing in technologies and processes to reduce environmental impact.
- Increasing awareness among employees and partners about sustainable practices.
- Accurate reporting on environmental data and implementing decarbonization measures.

Litostroj Group is committed to conducting business in an environmentally responsible manner and complying with all applicable environmental laws, regulations, permits, and standards.

We strive to continuously improve environmental performance by reducing emissions, waste generation, energy consumption, and the use of hazardous substances.

Employees are encouraged to use resources responsibly and support initiatives related to energy efficiency, recycling, sustainable procurement, and climate protection.

We support the principles of the circular economy and seek to integrate sustainability considerations into our products, services, investments, and operational decisions.

Environmental data and sustainability-related disclosures must be accurate, complete, and transparent in accordance with applicable reporting obligations and standards.

Litostroj Group supports responsible supply chain management and encourages suppliers and business partners to reduce environmental impacts, improve resource efficiency, and comply with applicable environmental and sustainability standards.

Litostroj Group supports continuous improvement in environmental, social, and governance (ESG) performance and aims to integrate sustainability considerations into strategic planning, investment decisions, and operational processes.

6. Confidentiality and Data Protection

Litostroj Group ensures compliance with all legal requirements related to data protection. We respect the confidentiality of personal and business information and ensure its safe handling.

How?

- We use data only for the purposes for which it was obtained.
- We ensure data security with restricted access and appropriate protection.
- We comply with all applicable regulations, including GDPR legislation for companies based in the EU.

Confidential information, trade secrets, intellectual property, technical documentation, financial information, customer data, and other sensitive business information must be protected against unauthorized access, disclosure, misuse, or loss.

Employees may only access information necessary for the performance of their duties and must not disclose confidential information to unauthorized persons during or after employment.

All processing of personal data must be lawful, fair, transparent, and limited to legitimate business purposes in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR).

Appropriate technical and organizational measures must be implemented to ensure cybersecurity and protect company systems, devices, and information from cyber threats and unauthorized use.

Employees must immediately report any suspected data breach, cybersecurity incident, or unauthorized disclosure of information.

Employees must use company IT systems, communication tools, software, and digital resources responsibly, securely, and in accordance with internal IT and cybersecurity policies. Unauthorized software, unsafe data handling, or misuse of company systems is prohibited.

7. Occupational health and Safety

We are committed to ensuring a safe and healthy work environment for all our employees and partners. We take care to implement appropriate safety measures and prevent accidents and illnesses in the workplace.

Our commitments include:

- Regular safety checks and training for employees.
- The use of protective equipment and adherence to safety procedures.
- Monitoring and reducing risks in the workplace.

Health and safety are integral parts of all business activities and operational processes. Litostroj Group aims to prevent workplace injuries, occupational illnesses, unsafe conditions, and incidents.

Employees are required to comply with all health and safety rules, use prescribed protective equipment, participate in mandatory training, and immediately report unsafe conditions, near misses, accidents, or incidents.

Managers are responsible for promoting a strong safety culture and ensuring that employees have appropriate training, equipment, and resources to work safely.

The use of alcohol, illegal drugs, or other substances that may impair an employee's ability to work safely is strictly prohibited in the workplace.

Contractors, visitors, and other third parties performing work on company premises are required to comply with all applicable health and safety requirements and instructions.

Litostroj Group promotes continuous improvement of occupational health and safety standards through risk assessments, preventive measures, employee participation, and regular monitoring of safety performance.

8. Fair Competition

We are committed to complying with all laws and regulations governing fair competition. We operate in accordance with international regulations to ensure free competition and fair business practices.

How?

- We do not engage in unlawful agreements with other companies regarding prices or terms of business.
- We respect competition laws and report any potential violations.
- We avoid disclosing confidential information that could affect the company's competitiveness.

Litostroj Group supports free and fair competition and strictly prohibits any anti-competitive behavior, including but not limited to cartels, price-fixing, market or customer allocation, bid-rigging, abuse of dominant position, or unlawful exchange of competitively sensitive information.

Employees must comply with all applicable competition laws in the jurisdictions where Litostroj Group operates.

Contacts with competitors must be limited to legitimate business purposes and must not involve the exchange of any competitively sensitive information, whether directly or indirectly.

Interactions with competitors, customers, suppliers, and industry associations must always be conducted in a lawful and appropriate manner. Employees must exercise particular caution in meetings, trade associations, conferences, and informal discussions.

Any concerns regarding potential anti-competitive conduct must be reported immediately to management or the responsible compliance function.

This Code constitutes Litostroj Group's Competition Compliance framework and defines the minimum standards for lawful and fair market conduct.

9. Anti-Corruption and Conflicts of Interest

Litostroj Group has zero tolerance for bribery, corruption, fraud, embezzlement, or any other form of unethical or illegal business conduct.

How?

- Employees must not offer, promise, give, request, or accept any bribes or improper advantages.
- Any actual, potential, or perceived conflict of interest must be disclosed immediately through internal channels.
- Gifts and hospitality must always be reasonable, transparent, and not influence business decisions.

Employees and business partners must not offer, promise, give, request, or accept bribes, kickbacks, facilitation payments, or other improper advantages intended to influence business decisions.

Gifts, hospitality, invitations, donations, sponsorships, or other benefits may only be offered or accepted if they are lawful, reasonable, transparent, and do not create the appearance of improper influence or conflict of interest.

Employees must avoid situations where personal interests could conflict, or appear to conflict, with the interests of Litostroj Group. Conflicts of interest must be disclosed without delay through internal reporting channels. All disclosed conflicts will be assessed and appropriately managed, documented, and where necessary mitigated by the responsible internal function.

Company assets, resources, funds, and property must be used responsibly and only for legitimate business purposes. Fraudulent, abusive, or unauthorized use is prohibited.

Litostroj Group has adopted a dedicated Group Anti-Corruption and Anti-Money Laundering Policy, which establishes detailed rules and procedures regarding anti-bribery, gifts and hospitality, conflicts of interest, donations, sponsorships. All employees and business partners are expected to comply with this policy.

Employees must exercise particular caution when dealing with public authorities, state-owned entities, intermediaries, consultants, agents, or other third parties acting on behalf of Litostroj Group, as corruption risks may be elevated in such situations.

10. International Trade, Sanctions, and Anti-Money Laundering

Litostroj Group complies with all applicable international trade laws, export controls, customs regulations, sanctions programs, and anti-money laundering requirements.

How?

- Employees must comply with all applicable sanctions, export control, and trade regulations.
- Suspicious transactions, payments, or counterparties must be reported immediately.
- High-risk transactions (e.g. offshore structures, cash, unclear purpose) must be treated with enhanced caution.

Employees involved in international business transactions must ensure compliance with applicable restrictions concerning sanctioned countries, entities, individuals, goods, technologies, and financial transactions.

We do not participate in money laundering, terrorist financing, or any activities intended to conceal the origin of illegally obtained assets or funds.

Any suspicious transaction, payment structure, intermediary arrangement, or business relationship must be reported immediately.

Litostroj Group has adopted a Group Anti-Corruption and Anti-Money Laundering Policy. Compliance with this policy is mandatory for all relevant employees and business partners.

Employees must pay particular attention to unusual payment methods, requests involving offshore structures, anonymous counterparties, cash transactions, or transactions lacking clear economic purpose, and report any concerns immediately.

11. Accurate Records and Financial Integrity

Litostroj Group is committed to maintaining accurate, complete, and reliable business and financial records.

How?

- All business and financial records must be complete, accurate, and properly documented.
- Falsification, alteration, or concealment of records is strictly prohibited.
- Records must be stored and retained in line with legal and internal requirements.

All accounting records, reports, invoices, timesheets, expense claims, and business documents must be truthful, properly authorized, and maintained in accordance with applicable laws and internal procedures.

No employee may intentionally falsify records, conceal information, manipulate reporting, or misrepresent financial or operational data.

We cooperate transparently with auditors, regulators, public authorities, and other authorized stakeholders.

Records and documents must be retained in accordance with applicable legal requirements and internal document retention rules. Unauthorized destruction, alteration, or concealment of records is prohibited.

Litostroj Group is committed to transparent communication with shareholders, auditors, regulators, customers, and other stakeholders. Public statements and disclosures must be accurate and authorized.

12. Reporting Concerns and Whistleblower Protection

Employees are encouraged to report concerns regarding violations of laws, this Code, internal policies, or unethical conduct. Reports may include concerns related to corruption,

discrimination, harassment, fraud, safety violations, human rights abuses, environmental misconduct, data breaches, or other improper behavior.

Litostroj Group prohibits retaliation against any person who raises concerns or reports suspected misconduct in good faith. Retaliation itself constitutes a violation of this Code.

Reports will be treated confidentially to the extent possible and investigated appropriately in accordance with applicable whistleblower protection laws and internal procedures.

Employees are expected to cooperate honestly and fully in internal investigations.

Litostroj Group maintains reporting channels that enable employees and other stakeholders to report concerns confidentially and, where permitted by applicable law, anonymously.

All reports are assessed fairly, objectively, and without retaliation against individuals who raise concerns in good faith, even if the reported concern is ultimately unsubstantiated.

Litostroj Group has adopted a Group Whistleblowing Policy, which defines reporting channels, investigation procedures, confidentiality requirements, and the protection of whistleblowers against retaliation. All employees and relevant stakeholders are expected to comply with and support the principles set out in this policy.

13. Application of the Code

Every employee in the Litostroj Group is responsible for understanding and complying with this Code. Leadership positions carry the additional responsibility of ensuring that employees adhere to these guidelines and act in accordance with our values.

Litostroj Group Code of Conduct and Ethics is the foundation of our business practices. Companies within the Litostroj Group are committed to meeting the highest standards in all our activities.

Violations of this Code may result in disciplinary measures, termination of employment or cooperation, legal action, or other appropriate consequences in accordance with applicable law. Managers and supervisors are expected to lead by example, promote ethical conduct, and ensure that employees understand their responsibilities under this Code.

This Code will be reviewed regularly and updated where necessary to reflect legal, regulatory, organizational, and business developments.

By acting with integrity, responsibility, and respect, we strengthen the trust of our employees, customers, partners, shareholders, and communities, and contribute to the long-term success and sustainability of Litostroj Group.

14. Effective Date

This Code becomes effective on June 1, 2026.