

# COMPANY POLICY

## **ADHERENCE TO THE CODE OF CONDUCT AND CORE VALUES**

Adherence to SPOLCHEMIE's rules of conduct, ethical standards, and core values is integral part of all company activities and its employees, regardless of their employment status. We focus on respect for human and labour rights, and the prohibition of discrimination, harassment, bribery, corruption, unfair competition, and child or forced labour. Our top priorities are customer satisfaction, product quality and reliability, sustainability, social responsibility, environmental protection, and safety.

## **COMPLIANCE WITH LEGISLATION AND OTHER REQUIREMENTS**

We comply with all requirements under applicable environmental, health and safety, quality, energy management, sustainability, competition, antitrust rules, fair business practices, and labour laws, including related administrative decisions. We also comply with requirements and commitments under voluntary agreements. Internal directives and regulations establish procedures, effective measures, and clear competencies and responsibilities for all employees in the mentioned areas.

## **MANAGEMENT SYSTEMS AND THEIR CONTINUOUS IMPROVEMENT**

We maintain and develop management systems for environmental protection (as per ISO 14001), occupational health and safety (ISO 45001), quality (ISO 9001), and energy (ISO 50001). Operations at SPOLCHEMIE follow the pre-defined procedures. We periodically and systematically monitor and evaluate our management systems to be at the required level, effective and up-to-date. As a response to any shortcoming, corrective actions are defined and subsequently implemented. We use the results of regular evaluations to improve our company governance and management systems.

## **EMPLOYEE ENGAGEMENT AND JOINT RESPONSIBILITY**

We motivate our employees to understand the impact of our activities to the environmental, safety, and stakeholders. We foster a cooperative culture in the company and enhance co-responsibility of all employees by encouraging them to improve our management systems and to engaging them in the implementation of change and corrective actions.

## **EMPLOYEE TRAINING AND DEVELOPMENT**

All employees undergo comprehensive training to deliver excellence in all aspects of their work and to contribute to the company governance and to the improvement of the management systems.

We use information, open communication, education, and training in order to continuously enhance and strengthen employees knowledge, professional skills and personal development, and to make them more responsible and aware of occupational safety and health, emergency prevention, fire safety, environmental protection, ethical conduct (including anti-corruption principles), and product quality, safety, and sustainability.

## **OPEN AND TRANSPARENT COMMUNICATION WITH THE PUBLIC, SUPPLIERS, AND CUSTOMERS**

Our communication with employees, customers, the public, suppliers, and other stakeholders is open and responsive. We provide and share accurate information about our environmental impact, social impact, and energy management. We aim to build trust in our processes and solutions, to communicate our commitment to long-term sustainability in our business, and to provide customers with comprehensive information about product safety.

## ENVIRONMENTAL AND CLIMATE PROTECTION

### **ENVIRONMENTAL ASPECTS AS AN INTEGRAL PART OF OUR ACTIVITIES**

Environmental considerations are a part of all decision-making and operational processes in the company, mainly in the planning and implementation of new projects where solutions with the lowest possible overall environmental impact are preferred. We respect biodiversity and ecosystems protection.

### **EVALUATION, PREVENTION, AND MITIGATION OF OUR ENVIRONMENTAL IMPACTS**

We monitor impacts, risks, and opportunities in all environmental areas. Regular evaluation of negative environmental impacts allow us to plan and implement of measures to prevent, eliminate, or mitigate both the local and global environmental impacts. Our efforts include pollution control, prevention, and reduction, as well as responsible waste management.

### **CLIMATE PROTECTION**

We are committed to reducing our direct and indirect greenhouse gas emissions and contribute to climate change mitigation. At the same time, we consider the challenges of climate change transition and the need of climate change adaptation. We take actions, make a plan and allocate resources to achieve these objectives.

When developing and implementing SPOLCHEMIE's strategy, business model and financial planning, we take into account the reduction of greenhouse gas emissions as well as the need of resilience to the impacts and risk of climate change and decarbonisation. We strive for using the low-emissions and zero-emissions sources.

### **RESOURCE EFFICIENCY**

We monitor impacts, risks, and opportunities associated with materials and resources. Our aim is responsible, efficient, reasonable, and sustainable use of the resources.

We are committed to a reduction in the consumption of primary resources (especially fossil resources). We support circularity and the use of renewable resources wherever possible and reasonable. We strive to optimise water resource management with respect to the interests of affected and local communities among others.

### **ENVIRONMENTALLY FRIENDLY PRODUCTS**

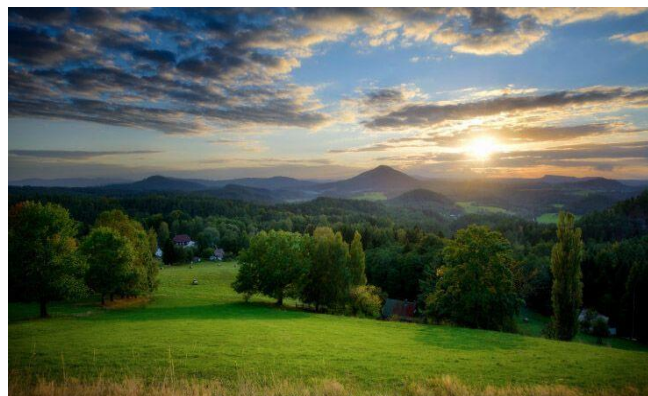
We continue to develop production of environmentally friendly products by implementation of the best available technologies (BAT), fostering innovation, adapting our product portfolio, and use of environmental friendly and safe processes.

### **COOPERATION ON RAISING AWARENESS OF THE ENVIRONMENTAL ASPECTS OF CHEMICAL PRODUCTION**

We actively cooperate with experts, professional communities and the Czech and EU associations to raise general awareness of environmental aspects behind production, distribution, and use of chemicals.

### **DISPOSAL OF OLD ENVIRONMENTAL BURDENS**

We remove the impact of old environmental burdens stemming from intensive industrial production in the past.



## HEALTH AND SAFETY

### HEALTH AND SAFETY AS AN INTEGRAL PART OF OUR ACTIVITIES

We ensure safety as a fundamental public interest. The safety and health protection of our employees is our utmost priority. We achieve this by maintaining safe and healthy working conditions, adhering to legal requirements and other standards, and implementing internal programmes to foster a safety culture and prevention of accidents and injuries. We also protect people in and around our company premises and other relevant stakeholders.

In all decision-making and operational processes, as well as during change or implementation of new technologies and products, we consistently assess the circumstances and conditions of the changes, their potential influence, and their impact on health and safety. We prefer state-of-art technologies that significantly reduce the risk of occupational injury, health impairment, accidents, and serious incidents.

### SAFETY CULTURE AND AWARENESS

We develop and enhance the safety culture at SPOLCHEMIE, promote our health and safety principles in close cooperation with employees, trade union representatives, the public, and other stakeholders (such as suppliers, customers, and visitors). The safety culture is advocating through effective two-way communication, an open approach, and dialogue.

We encourage all employees to take responsibility for their own health and safety and that of others, and to accept health and safety as a common priority. We facilitate the exchange of health and safety information internally across different levels and functions in SPOLCHEMIE.

### IDENTIFICATION AND ELIMINATION OF HAZARDS AND RISKS, INNOVATION AND IMPROVEMENT

We systematically identify hazards and assess potential risks to life and health and the risk of serious incidents, taking into account the nature and scope of SPOLCHEMIE's operations, processes, and products. We take appropriate actions to eliminate hazards and mitigate the risks of occupational injury, health impairment, accidents, and incidents. We inform workers and other relevant stakeholders about these steps and measures.

We seek out and assess opportunities to increase safety level.



## QUALITY

### **COMPLIANCE WITH CUSTOMER REQUIREMENTS**

We consider quality as a one priority in our relations with customers. We strive to meet general and contractually defined requirements for product quality, properties, and safety. We are committed to compliance with applicable legislation.

### **REGULAR EVALUATION AND CONTINUOUS ENHANCEMENT OF QUALITY**

We conduct objective and independent quality control of our products to ensure that they meet the quality standards. We set goals and take actions to continuous improvement based on received feedback from our customers and other stakeholders. We regularly evaluate the quality criteria and the effectivity of the implemented measures.

### **HIGH-QUALITY AND SUSTAINABLE PRODUCTS**

We develop high-quality products with the added value that bring environmental benefits to our customers. All our products comply with relevant legislation of safe handling of chemicals. We provide customers with all mandatory information and information how to use our products.

### **QUALITY REQUIREMENTS**

We share information about our quality management system and require that suppliers and the third party providing services at SPOLCHEMIE premises comply with them.

## ENERGY MANAGEMENT

### **EFFICIENT ENERGY MANAGEMENT AND CONTINUOUS IMPROVEMENT**

Our mission is to foster efficient energy management, promote environmental and climate protection, drive continuous improvement, help to develop the region where we operate, and ensure long-term sustainability. We focus on using low-emission and zero-emission energy resources and are working on develop of renewable energy resources.

### **PERMANENT REDUCTION IN ENERGY CONSUMPTION IN ALL OUR ACTIVITIES**

We strive to make efficient use of energy and improve energy performance in our production and other activities so that we can reduce our environmental footprint and safeguard the environment for present and future generations. The key tool in this effort is an innovative approach to processes and technologies, supported by our research and development.

### **GUIDING EMPLOYEES TOWARDS RESPONSIBLE ENERGY MANAGEMENT**

As part of their training, all employees are acquainted with the principles of sustainable energy management. We motivate employees to responsible use of energy and actively approach to the measures that reduce energy intensity and enhance efficient use of resources.

### **EFFICIENT PROCUREMENT OF ENERGY, PRODUCTS, AND SERVICES**

When purchasing products and services, we prefer energy-efficient options by considering their sustainability and environmental impact. We engage our supply chain this way in sustainable development initiatives and support companies that share our commitment to environmental protection.

## HUMAN RESOURCES

**At SPOLCHEMIE, our employees are key to our success. Our HR policy is based on a company culture, shared core values and ethical standards outlined in our Code of Conduct. Our aim is to be a transparent, stable, attractive, and promising employer.**

### **CORE VALUES AND ETHICAL STANDARDS**

Our core values include customer orientation, innovation, expertise, teamwork, and accountability.

Our core ethical standards include respect for human rights, equality and non-discrimination, respect and health relations among employees, anti-corruption principles, staff training and development, the elimination of negative impacts on the environment and the affected communities, the protection of health and safety, information security, etc.

### **WHISTLEBLOWING SYSTEM**

We encourage employees to report suspicions of violations of the Code of Conduct or of law infringements. We have implemented a whistleblowing system for raise concerns, reporting misconduct, recording, and addressing reports while protect whistleblowers.

### **EMPLOYEE SELECTION AND RECRUITMENT**

The employee selection and recruitment process is transparent and competency-based. All candidates are given equal opportunities and are evaluated on their abilities, skills, experience, and performance. Any form of discrimination and favouring based on other criteria or personal relationships is prohibited in all aspects of hiring, evaluation, remuneration, training, and career advancement.

### **REMUNERATION**

We comply with remuneration law and pay fair wage to our employees. We offer competitive wages and benefits that support health and well-being of our employees.

### **WORK- LIFE BALANCE, EMPLOYEE BENEFITS**

We enable employees to maintain healthy work-life balance that strengthen their satisfaction. Our benefits package is designed to be comprehensive and adaptable, aligning with the latest employee well-being initiatives.

### **PROTECTION OF EMPLOYEES' INFORMATION AND DATA**

We respect the confidentiality of personal information and communication of our employees. We protect data, information, and intellectual property. Rules and measures governing these aspects are outlined in SPOLCHEMIE's internal documentation.



## SUSTAINABLE PROCUREMENT

**When selecting and evaluating our suppliers, we consider not only reliability and economic criteria but also sustainability. We cooperate with our suppliers to integrate sustainable practices into operations. We expect our suppliers to conduct their relationships with us, any of our partners and other suppliers on a fair and ethical basis, in compliance with our Supplier Code of Conduct and in compliance with the core principles of sustainability.**

### COMPLIANCE WITH LAWS AND STANDARDS

- We expect our suppliers to fully comply with applicable international, national, state and local laws and legal standards, including all environmental, health and safety, and labour laws.
- All products supplied to us must be compliant with the EU REACH regulation and other legislation on chemicals.

### ENVIRONMENTAL AND CLIMATE PROTECTION

- We expect our suppliers to reduce their environmental and climate impact, to use resources responsibly and reasonably, and to improve the efficiency of resource use and to prefer environmentally friendly solutions including sustainable sources.
- We expect our suppliers to implement responsible waste management and to avoid pollution by their operations.
- We expect our suppliers to respect and protect biodiversity and affected and local communities.

### ADHERENCE TO HUMAN AND LABOUR RIGHTS, ANTI-DISCRIMINATION POLICY

- We expect our suppliers to comply with human and labour rights and to prevent them from being violated in their interactions with stakeholders.
- The use of any form of forced, compulsory or child labour is prohibited. We expect our suppliers to ensure compliance with specific working conditions of young workers.
- We expect our suppliers to prevent any form of discrimination and to treat their employees with dignity and respect. Any form of physical or verbal assault, harassment, threats or other forms of intimidation are prohibited.
- We expect our suppliers to support diversity.

### OCCUPATIONAL HEALTH AND SAFETY

- A healthy and safe working environment shall be provided for all employees, in accordance with international and domestic laws and standards, and at a level comparable to SPOLCHEMIE's own standards.

### ANTI-CORRUPTION POLICY

- We do not tolerate, permit or engage in any bribery or unethical behaviour in any aspect of our business.

### CONFIDENTIALITY OF INFORMATION, INTELLECTUAL PROPERTY

- We require our suppliers, contractors and their team members to maintain and respect the confidentiality with regard to all information they have access to through their cooperation with us.
- We also expect suppliers to protect all intellectual property of SPOLCHEMIE.