

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

Our management commits to providing the conditions and resources for implementing, maintaining, and continuously improving the Integrated Management System (IMS). 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. The validity of the company policy is approved by the company management as part of the annual IMS review.

We establish measurable quantitative objectives (reduction of Scope 1 and 2 GHG emissions, waste production and wastewater pollution, and decreasing the number of incidents and occupational injuries) to fulfil our commitments. Progress in achieving the objectives is evaluated annually.

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.

CYBERSECURITY

To ensure cybersecurity and compliance with European standards (including the NIS2 Directive), we commit to implementing technical and organizational measures to protect our IT systems and credentials. We regularly assess cyber risks, conduct audits, and ensure a reporting system is in place.

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 act in accordance with the principles of Responsible Care and the UN Global Compact. We respect biodiversity and ecosystems, and we assess the impacts and dependencies on biodiversity within our activities as well as across our supply chain.

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.



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.

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. We ensure that our products are as safe as possible for users' health, and we actively identify and mitigate risks in this area.

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 and high safety standards for our customers.

All our products comply with the relevant legislation regarding the safe handling of chemicals. We provide our customers with all relevant safety and application information. Already during the research and development phase, we focus on products with lower environmental impacts (lower pollution, energy consumption, and carbon footprint, etc.).

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.

CUSTOMER HEALTH, SAFETY & PRODUCT STEWARDSHIP

REGULATORY COMPLIANCE & SDS PROVISION

We ensure compliance with all applicable chemical legislation, including REACH, CLP, and GHS standards. Compliant, accurate, and up-to-date Safety Data Sheets (SDS) are provided to all customers.

HAZARD COMMUNICATION PROCEDURES

We maintain robust procedures for clear and transparent hazard communication. All product labelling, technical documentation, and safety documentation explicitly detail potential risks, mandatory personal protective equipment (PPE), and safe handling guidelines.

CUSTOMER AWARENESS

We actively support our customers, distributors, and partners by providing application information, technical guidance, and data focused on the safe transport, highly efficient use, storage, handling, and maintenance of our products to help our customers reduce waste generation, water usage, and

energy consumption during the product use phase. Already during the research and development phase, we focus on products with lower environmental impacts (lower pollution, energy consumption, and carbon footprint, etc.).

PRODUCT END-OF-LIFE & CIRCULARITY

We focus on reducing the environmental impact of our products at the end of their lifecycle. To ensure safe waste management, we systematically provide our customers with clear disposal information and guidelines. We support closed-loop material systems and participate in take-back and recycling programs where feasible.

PRODUCT SAFETY INCIDENT REPORTING & RESPONSE

We have established an effective internal system for reporting, investigating, and responding to any product safety incidents, quality non-conformities, or customer complaints. In the event of an identified risk, we are prepared to take immediate corrective actions.

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.

We commit to respecting human and labour rights as defined in the Universal Declaration of Human Rights, the Convention for the Protection of Human Rights and Fundamental Freedoms, the Charter of Fundamental Rights and Freedoms of the Czech Republic, ILO standards, and other conventions that form part of the legal order of the Czech Republic. We assess risks in the area of human and labour rights, maintain records of them, and adopt corrective measures. To fulfil our human rights commitments, we have developed this policy based on the UN Guiding Principles on Business and Human Rights. Details are included in the Code of Ethics, PS250.

ANTI-CORRUPTION MEASURES

We promote integrity and apply a zero-tolerance policy toward corruption. We do not tolerate bribery or conflicts of interest, and we act in accordance with the laws and the UN Convention against Corruption (UNCAC). We actively use control mechanisms and protect whistleblowers who report unethical conduct.

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.



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 impact on the environment and climate, to use resources (especially primary fossil resources) responsibly and rationally, to increase their efficiency, and to prefer environmentally friendly solutions, including sustainable and renewable ones.
- 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 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.