

# CODE OF CONDUCT

As the company ROBE lighting s.r.o. we have adopted this Code of Conduct to express the principles that we have been building and developing since our inception, and which are our priority.

The fact that everyone in the company behaves honestly, ethically and as a high-principled individual is part of our success not only in the Czech Republic but also around the world. These rules of conduct apply anywhere, at any time

and are binding for the entire ROBE family, i.e. for all persons who work with us.

True, open and timely communication is also part of our culture.

Our statutory body, top management and other senior employees fulfil an exceptional and responsible role. They have the function of a role model, and for this reason, higher demands are placed on them than on others. These individuals must prevent inappropriate behaviour within the company, protect our employees, and represent us in accordance with all ethical and moral principles to the best of their knowledge.

This Code of Conduct represents a summary of the rules and principles of our company in the economic, social and ecological fields. Although we would like to, this text cannot contain all the principles we honour. Therefore, we hereby appeal to all those affected by this code to always apply the principles of good manners, consideration, truthfulness and friendliness in their behaviour.

This Code of Conduct is complemented by internal guidelines and employment contracts.

We comply with the Czech and international legal regulations that apply to us. We condemn all activities based on fraud, breach of duty in the management of someone else's property, extortion, theft, embezzlement or other criminal act committed against our property, our customers, cooperating entities or third parties.

Failure to comply with the principles of conduct contained in this Code may have serious negative consequences for us, our employees, but also for our business partners and other entities.

In the event that any of the concerned persons suspects that there may be a violation of this Code of Conduct within our company or with business partners, they must inform their superior about it if they are unable to prevent the violation themselves.

Violation of this code may lead to penalties in the field of labour law, civil law or criminal law, depending on the severity of the violation. If it concerns business partners, the duration of further cooperation, and possibly other steps, will be considered.

Everyone in our company has an obligation to familiarize themselves with this Code of Conduct, implement it in their actions and follow it. If in doubt, you can contact your superior or the head of the HR department.

## HUMAN RIGHTS

Human rights are the most important rights that belong to every person without distinction. Their protection is enshrined not only at the national level but also at the world level, such as in the

Universal Declaration of Human Rights or in the European Convention for the Protection of Human Rights and Fundamental Freedoms.

We respect, protect and perceive the importance of the protection of human rights.

We fundamentally reject:

- any child labour;
- forced and involuntary labour;
- any form of modern slavery and human trafficking;
- any type of physical, psychological, sexual or other harassment or abuse;
- genocide or any other war crimes.

We also require respect for human rights from all our business partners. In the event that our business partner is an employer, we also require this partner to comply with relevant labour law regulations.

### **EQUAL TREATMENT**

Equal treatment and equal opportunities are important rights of every person. We honour this policy to the maximum extent possible. **We exclude any discrimination based on gender, race, religion, age, disability, sexual orientation, skin colour, political attitudes or other legally protected characteristics.**

Our employees are hired primarily on the basis of their qualifications and abilities.

### **PROFESSIONALISM**

A professional approach is an important principle for us, which plays a significant role in building our good name. Professionalism is expected from everyone who works with us.

### **FRIENDLY APPROACH TO BUSINESS PARTNERS**

We greatly appreciate all our business partners. For us, a friendly approach to all partners to the maximum extent possible, courtesy, respect, flexibility, timeliness of negotiations and decent and fast communication is a priority for us.

### **TEAMWORK AND RESPECT FOR OTHERS**

We are a big team and teamwork is one of the fundamental pillars of our culture. Team behaviour includes both cooperation with other colleagues and respect for their work.

Each of us has an obligation to respect our colleagues, regardless of their age, religion, nationality, race, etc. Everyone also has an obligation to respect the opinions of others, even if they may not agree with the opinions of the given individual. Respect for everyone's personal and work space is an important principle for us. This also includes the proper and timely fulfilment of one's obligations to the other.

### **LOYALTY TO THE COMPANY**

Each of us has a duty to defend our good name and act in accordance with our good reputation. Our interests are a priority. Compliance with internal regulations is required.

## **TALENT MANAGEMENT AND PERSONAL DEVELOPMENT**

We emphasize the personal development of each individual, who thus grows together with us. The prerequisite is the individual's personal commitment, readiness and willingness to constantly improve and learn new things.

A large space is also devoted to the education of new talents. We give an opportunity to all who have the potential and desire to prove something. Feedback is part of regular employee evaluation.

## **HEALTH AND SAFETY PROTECTION AT WORK**

The protection of employees' health and safety is a priority for us. We comply with all applicable legislation in this area and aim to continuously improve working conditions.

Each of us has a duty to comply with regulations regarding health and safety at work. It is prohibited under all circumstances to endanger the safety and health of colleagues or third parties.

## **PROTECTION OF PERSONAL DATA**

We take the protection of personal data very seriously. We respect and protect the personal data of our employees and other affected entities.

We have adopted internal regulations dealing with the protection of personal data and compliance with them is required.

## **INTELLECTUAL PROPERTY**

We are the owners of internationally protected patents, and we also have extensive trade secrets and considerable know-how in our field. Our intellectual property is one of the key drivers of our success.

Unauthorized transfer of intellectual property to a third party can cause us very serious damage. Such unauthorized transfer is prohibited. In the event of a violation, the responsible person will bear all labour, civil and criminal consequences depending on the size of the violation.

## **DONATIONS, SPONSORSHIP AND CHARITY**

We recognize that not everyone has access to resources to meet their basic needs. Also, not everyone is lucky enough to grow up in good health. That is why every year we contribute to these charitable causes or organize collections or enable charity events to take place on our premises.

Sponsorship donations are provided mainly in the field of sports, culture and education because in our opinion these areas are very important for the proper psychological and physical development of any person. We place a great emphasis on the development and support of youth.

## **PRODUCT COMPLIANCE AND SAFETY**

Many people come into contact with our products every day. It is our responsibility to ensure that the risks and disadvantages arising from the handling of these products for the health, safety, environment and property of customers or third parties are eliminated as far as possible.

This policy is not only our priority but also a legal obligation. Our products represent state of the art and are developed in accordance with applicable legislation. Emphasis is placed on a rigorous production process and subsequent thorough inspection of the product before it leaves our

company's premises. The quality of the individual components is also important, which is why their continuous control is required.

In case of any suspicion of deviations, it is necessary to intervene and notify the superior employee so that appropriate measures can be taken in time.

## **ENVIRONMENTAL PROTECTION**

We comply with all applicable legislation related to the protection of all components of the environment and all activities in waste management are carried out in accordance with the law and decisions issued by state administration bodies.

We are aware of the importance of protecting the environment, which is why we continuously take measures to reduce our impact on it.

## **COMMUNICATION**

We emphasize open communication, both within our company and externally. All our employees are responsible for following the internal communication rules to ensure fair and uniform conduct of our company.

The rules for communication apply to everyone in our company even outside of work, especially if the person concerned expresses themselves at public, cultural, professional or other events, or on the Internet and social networks, it must always be emphasized that this is the personal opinion of the person, and not our official opinion.

## **PROHIBITION OF CORRUPTION**

We reject corruption in any form. Any form of corruption is prohibited. Corrupt behaviour can lead to sanctions or criminal consequences.

We provide small gifts, hospitality and the like to our partners only within a reasonable framework and to the extent permitted by law. Under these conditions, we also accept small gifts, hospitality and the like. This applies to everyone in our company.

## **PROHIBITION OF THE LEGALIZATION OF THE PROCEEDS OF CRIMINAL ACTIVITIES AND THE FINANCING OF TERRORISM**

Laws against the legalization of the proceeds of criminal activity (so-called money laundering) and the financing of terrorism are adopted in almost all countries of the world. This issue is also addressed at the transnational level.

The financing of terrorism occurs when funds are provided for terrorist criminal activity or for the support of terrorist associations.

We carefully check the identity of external entities such as customers, suppliers and other business partners. We only maintain business relations with serious partners.

We properly account for all financial transactions.

## **BOOKKEEPING**

We keep our accounts properly in accordance with legal regulations. We are aware that proper financial and accounting management is one of the pillars of our credibility.

Irregularities can have serious consequences for our company and for the responsible employee.

The processes in our company must be set up so that all financial data can be properly and timely recorded in the accounting system.

## **TAX AND CUSTOMS REGULATIONS**

We operate in many places around the world, which is why it is very important that the tax and customs laws not only of the Czech Republic but also of other countries or international communities are followed when they are applied to the export or import of goods and services.

If there were any irregularities in this area, we could suffer significant financial harm and our reputation could also be damaged. There would also be negative consequences for the responsible employee.

## **FAIR ECONOMIC COMPETITION**

There are also laws for the protection of economic competition and anti-monopoly laws adopted, and not only in the Czech Republic. Compliance with these laws guarantees equal and fair conditions for all competitors/market participants. Abuse of competition is prohibited. Abuse means unfair competition and illegal disruption of economic competition (abuse of a dominant position, etc.).

Abuse of competition can result in significant fines and other recourse.

We conduct business exclusively in accordance with the law and honour these ethical principles.

## **CONTRACTUAL PARTNERS**

We have many contractual partners, including suppliers and providers of various services. Our contractual partners are selected based on objective criteria. Unreasonable favouring of one entity over another is prohibited.

We value all our business partners. Each of us has a duty to treat our business partners with courtesy, respect and decency.