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## 1. Foreword

This AAH PLASTICS Code of Conduct is based on the principles and values that guide the conduct of every member of our organization. It is important that AAH PLASTICS and its personnel meet the standards of conduct expected of a responsible business. The Code of Conduct lays down the ethical standards that AAH PLASTICS colleagues need to observe in their professional lives. Our Code has evolved to reflect global best practices and regulatory changes in key markets in which we operate. It clarifies the duties and responsibilities of AAH PLASTICS and its personnel in relation to various stakeholder groups.

The Code is intended to be a contemporary and relevant guide for our times. It cannot, however, provide an answer to all possible questions or ethical dilemmas that may arise at the workplace. AAH PLASTICS Personnel who feel uncertain about the appropriate professional conduct in any situation must seek guidance from their managers or from the Compliance team, using appropriate channels or platforms identified in the Code.

Our success and reputation are due in large measure to the integrity and professional commitment of our colleagues. Consequently, we must not only comply with the laws and regulations that govern our business but strive to go beyond and set an example of business conduct that meets the highest ethical standards.

Each AAH PLASTICS colleague has the ability to make a vital difference to the quality of life of the communities we serve. This Code represents our individual and mutual commitment to discharge our responsibilities through the most sustainable and ethical means, and our shared determination to reinforce the reputation of AAH PLASTICS.

## 2. AAH PLASTICS values

AAH PLASTICS has always been values-driven. The five core values that underpin the way we conduct our business activities are:

### **COURAGE**

We are proud of what we do. We embrace creative ways of thinking and push boundaries to meet or exceed the expectations of all our partners.

### **LOYALTY**

We recognize our company, defend its interests, and undertake anything to ensure that work benefits our entire organization. We create a cohesive team where everyone contributes by adhering to common rules. Everyone is a part of the whole system. We seek solutions creatively and take responsibility with maximum effort to achieve the company's goals.

### **ENTHUSIASM**

Under all circumstances, we remain positive and seek solutions. We are willing to grow, learn, and face challenges. We do things as best as we can and surpass ourselves. We show enthusiasm in realizing how great we can be.

## HUMANITY

We treat each other with respect and support each other. We learn from each other in the areas of innovation, production, and share our knowledge. We do not tolerate rude or disrespectful behavior, recklessness, insensitivity, and arrogance. We have a duty to communicate openly. We provide enough space for mutual conversations and listening to each other.

## HONESTY

We are committed to always dealing with all stakeholders honestly, openly, and ethically. When we say we will do something, we will do it; in the agreed quality, quantity, and timeframe.

Our most valuable asset is our people, nothing is more important than their safety and well-being. These universal values serve as the foundation for this Code of Conduct.

## 3. Scope and purpose of this code

This Code sets out how we conduct ourselves with regard to:

- AAH PLASTICS Personnel, or those who work with us;
  - Our customers;
  - Our competitors;
  - The communities and environment in which we operate;
  - Our value-chain partners, including suppliers and service providers, retailers, importers, distributors, contractors, channel partners, consultants,
- In this Code, “we” or “us” mean AAH PLASTICS, our director, managers, other employees and those who work with us, as the context may require.
  - The term “AAH PLASTICS Personnel” refers to AAH PLASTICS managers, director and employees, together with any other persons acting on AAH PLASTICS’s behalf, including agency workers and consultants
  - This Code sets out our expectations of all those who work with us. We also expect those who deal with us to be aware that this Code underpins everything we do and in order to work with us, they need to act in a manner consistent with it.

## 4. Our core principles

These core principles guiding the company's operations and values. Here's a breakdown of what each principal entail:

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**Adaptability:** AAH Plastics emphasizes the importance of being adaptable in response to changing market conditions, customer needs, and technological advancements. This principle encourages the company to remain flexible and proactive in adjusting its strategies and processes to stay competitive and relevant.

**Accountability:** Accountability at AAH Plastics means taking responsibility for actions, decisions, and outcomes. Employees are expected to uphold high standards of accountability in their work, ensuring that commitments are met and promises are fulfilled. This principle fosters a culture of reliability and trustworthiness within the organization.

**Honesty:** Honesty is a fundamental value at AAH Plastics, promoting transparency, integrity, and ethical behavior in all business dealings. This principle guides how the company interacts with customers, employees, suppliers, and the community. By prioritizing honesty, AAH Plastics aims to build long-term relationships based on mutual respect and trust.

**Quality Commitment:** Upholding the highest standards of quality in the production of automotive plastic parts to ensure complete customer satisfaction.

**Customer-Centric Partnership:** Striving to exceed customer expectations and become their preferred partner by delivering exceptional service and products.

**Technological Excellence:** Utilizing state-of-the-art technology from premium manufacturers to guarantee stable quality and efficiency in production.

**Sustainable Practices:** Committing to environmentally responsible manufacturing processes and contributing to sustainable development in the industry.

**Employee Expertise:** Valuing the long-term experience and skills of our employees, fostering a culture of continuous learning and professional growth.

These core principles not only shape the company's culture but also serve as guiding principles for decision-making and daily operations at AAH Plastics. They reflect the company's commitment to ethical conduct, customer satisfaction, and continuous improvement.

## 5. Our personnel

We provide equal opportunities to all AAH PLASTICS Personnel and to all eligible applicants for employment in AAH PLASTICS.

At AAH PLASTICS, everyone is welcome regardless of age, gender, race, orientation, or religion. We create a safe and respectful work environment that accepts people as they are. We embrace the fact that we are diverse as people in terms of age, gender, ethnicity, religion, disabilities, sexual orientation, education, and nationality.

When recruiting, developing and promoting AAH PLASTICS Personnel, our decisions will be based solely on performance, merit, competence and potential.

### 5.1 Dignity and respect

In accordance with the laws of the Slovak Republic, which protect employees from certain types of discriminatory practices, such activities are not tolerated in the company:

- An employee must not engage in any form of threatening, intimidating, hostile conduct, or insult based on race, skin color, religion, gender, nationality, age, veteran status, disability, or political views.
- This also includes sending or displaying written or graphic materials in the workplace that would constitute such hostility towards an individual or group.

Sexual harassment in the workplace is expressly prohibited.

Sexual harassment is defined as unwanted sexual advances, requests for sexual favors, or any other unwanted verbal or physical conduct of a sexual nature in the workplace, as well as any other similar conduct that creates an unpleasant working environment. The AAH PLASTICS has an internal procedure for handling complaints of this nature promptly.

We create an environment where diversity, inclusion, and belonging prevail.

**Diversity** - Diversity means tolerating, accepting, and recognizing all dimensions by which people may differ from each other, whether it's gender, age, culture, style, sexual orientation, or other characteristics that make individuals unique.

**Inclusion** - Inclusion is determined by the behavior of the company and cultural norms. It involves focusing on individual needs to create a workplace with the right conditions and opportunities for every employee to express their views and develop their full potential.

**Belonging** - Belonging is a genuine sense of acceptance, inclusion, safety, and support in the workplace for our uniqueness, not in spite of it. Only belonging can create real company membership and positive, lasting connections among employees.

### 5.2 Human right

We do not employ anyone under the age of 16 at our workplace.

We do not use forced labor in any form. We do not confiscate personal documents of AAH PLASTICS Personnel or force them to make any payment to us or to anyone else in order to secure employment with us or to work with us.

Applicants interested in working for our company must have completed compulsory school attendance.

#### 5.2.1 Working hours policy

##### **Purpose**

The purpose of this policy is to establish clear guidelines regarding working hours, breaks, and overtime to ensure efficient operations while promoting a healthy work-life balance for all employees at AAH PLASTICS s.r.o.

##### **Working Hours and Their Distribution**

1. Working hours refer to the time period during which an employee is available to the Employer, performs work, and fulfills obligations in accordance with the employment contract. The Employer records working hours through an electronic attendance system, with each employee assigned an electronic card.
2. Rest time is any period that is not considered working time.
3. A working shift is a portion of the established weekly working hours that the employee is required to work within 24 consecutive hours according to a predetermined shift schedule, including breaks during work.
4. Shift work is a method of organizing working hours where employees alternate with one another at the same workplace according to a specific schedule, working at different times over a certain period of days or weeks. This also applies in cases where there is simultaneous work performed by employees in consecutive shifts.
5. The employer determines the start and end of working hours and the scope of work shifts.
6. For employees with a uniform distribution of established working hours, flexible working hours may be applied based on the approval of the company's managing director and the plant manager if the nature of the work permits. This is usually agreed upon directly in the employee's employment contract or its amendment.
7. On individual working days within the flexible working period, the employee can choose the start and end of working hours within the time intervals specified by the employer. However, the employee is obliged to be present at the workplace and perform work daily during the core working hours, meaning the start of working hours is no later than 09:00 and the end of working hours is no earlier than 15:00, unless otherwise agreed in the employment contract or its amendment.
8. Flexible working hours do not apply if the employer sends the employee on a business trip. For this purpose, the employer will set a fixed start and end of the work shift.
10. For employees who work shifts in the Production department (37.5 hours/week, 12-hour shift), the start of the work shift is at 6:00 AM and 6:00 PM. Employees alternate on the day shift from 6:00 AM to 6:00 PM and on the night shift from 6:00 PM to 6:00 AM according to the following shift schedule - example:

	Týždeň 1							Týždeň 2							Týždeň 3							Týždeň 4						
	PO	UT	ST	ŠT	PI	SO	NE	PO	UT	ST	ŠT	PI	SO	NE	PO	UT	ST	ŠT	PI	SO	NE	PO	UT	ST	ŠT	PI	SO	NE
R (6:00-18:00)	A	C	B	A	C			B	A	C	B	A			C	B	A	C	B			A	C	B	A	C		
N (18:00-6:00)	B	A	C	B	A			C	B	A	C	B			A	C	B	A	C			B	A	C	B	A		

11. The assignment to work shifts A, B, and C is determined by the Production Manager.
12. For employees in other departments outside of production, the shift schedule is determined by their direct supervisor. Generally, employees working in a 12-hour shift, unless specified otherwise, will follow the calendar of the production department according to their assignment to shifts A, B, or C.
13. An employee may request an adjustment to their working hours in writing to their supervisor. The request must include the reasons for which the employee is asking for the adjustment. In making the adjustment to working hours and granting approval, the employer will consider the uninterrupted operation of the workplace.
14. Other matters related to the planning of working hours are governed by the relevant provisions of the Labor Code.

**Break for Rest and Meals**

1. The employer shall provide employees in a 12-hour shift with a break for rest and meals lasting 45 minutes (0.75 hours). The employee shall allocate the break in the ratio of 30 minutes for lunch and the remaining 15 minutes according to personal needs during their work shift.
2. The employer shall provide employees in an 8-hour shift with a break for rest and meals lasting 30 minutes (0.5 hours).
3. Breaks for rest and meals shall not be provided immediately at the beginning or before the end of a shift, and they shall not be counted as working time.
4. Breaks for rest and meals are not counted as working time.
5. In accordance with Section 91, paragraph 3 of the Labor Code, the utilization of breaks shall be determined as follows:

**Employees in a 12-hour shift:**

- **Morning shift:**
  - 30-minute break - from 9:30 AM to 12:00 PM
  - 15-minute break - from 2:00 PM to 4:00 PM
- **Night shift:**
  - 30-minute break - from 9:30 PM to 12:00 AM
  - 15-minute break - from 2:00 AM to 4:00 AM

**Employees in an 8-hour shift:**

- From 11:00 AM to 2:00 PM

6. Other provisions related to planning breaks for meals and rest are governed by the relevant provisions of the Labor Code.

5.3 Bribery and corruption

No one may directly or indirectly demand or accept a bribe. All financial transactions must be accurately, properly, and honestly recorded in the company's relevant accounting books and other business records, and must be approved in accordance with the company's principles.

All accounting records must be available for inspection by the company's auditors in accordance with the established quality management system.

5.4 Gifts and hospitality

Employees are prohibited from accepting gifts from anyone who has or is seeking a business relationship with the company.

Gifts in the form of cash, gift vouchers, or other cash equivalents, stocks, securities, or similar tradable items are not allowed under any circumstances. This provision does not apply to gifts valued at a maximum of 50 €.

Acceptance of such a gift will not be considered a violation of the Code of Conduct. Additionally, employees are prohibited from accepting non-monetary gifts, such as entertainment (e.g., event tickets).

### 5.5 Freedom of association

We recognize that AAH PLASTICS Personnel may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of AAH PLASTICS.

AAH Personnel must notify and seek prior approval for any such activity that may create an actual or potential conflict with the interests of AAH PLASTICS, as per the 'Conflicts of Interests' clause of this Code and in accordance with applicable Corporate Policies and law.

### 5.6 Working outside employment with us

AAH PLASTICS Personnel who take on employment, accept a position of responsibility, or engage in business outside of their employment with AAH PLASTICS, in their personal time, whether or not they receive payment, may affect their ability to work effectively at AAH PLASTICS or lead to conflicts of interest. Such activities must not involve any AAH PLASTICS business customer, supplier, distributor, or competitor of AAH PLASTICS.

AAH PLASTICS Personnel must inform and obtain prior approval for any such activity that may create an actual or potential conflict of interest with AAH PLASTICS's interests, in accordance with the 'Conflicts of Interest' clause of this Code and JLR Corporate Policy on Conflicts of Interests.

### 5.7 Security and integrity of information and assets

Each employee represents not only themselves but also our company, of which they are an employee. For this reason, every employee should uphold the good reputation of the company and protect its interests:

- Every employee is obliged to protect the company's intellectual property and material assets.
- Phones, email, as well as computer equipment including hardware and software, may only be used for work purposes, with exceptions as necessary.
- Employees must not reproduce or replicate copyrighted software without proper authorization. Therefore, employees should ensure that all software used is either owned by the company or provided to the company under a valid written license agreement.



Our company emphasizes the protection and security of our confidential information, trade secrets, and intellectual property. Any information not publicly disclosed by AAH PLASTICS is considered confidential.

It is our responsibility to ensure that any confidential information obtained in connection with our business activities is kept strictly confidential, not improperly used, abused, or disclosed to third parties.

Our company respects confidential information belonging to suppliers and customers and uses it only in accordance with applicable legal requirements or contractual agreements. AAH PLASTICS's intellectual property, such as trademarks, logos, designs, ideas, or strategies, constitutes invaluable assets of the company that must always be protected. Any work created by employees in connection with their job duties belongs to AAH PLASTICS.

Copying, reproducing, or providing such protected materials is prohibited unless authorized. The obligation to protect confidential information, trade secrets, and intellectual property continues even after the termination of employment with AAH PLASTICS.

#### 5.8 Use of AAH PLASTICS company vehicles

AAH PLASTICS Personnel driving company-owned vehicles shall do so carefully and safely at all times and obey all traffic laws. Vehicle users are required to have a valid driving licence, must wear seatbelts at all times, and must require all passengers to wear seatbelts. Use of vehicles while under the influence of, or impaired by, alcohol or drugs is strictly forbidden and may result in disciplinary procedures.

#### 5.9 Prohibited drugs and substances

Employees of AAH PLASTICS are not allowed to bring, store, or consume alcoholic beverages and other intoxicating or psychotropic substances on company premises, during working hours, or outside of these premises, nor are they permitted to report to work under their influence.

#### 5.10 Conflicts of interests

Conflict of interest arises when personal interests interfere with an employee's duties and loyalty to the company they represent. The company has the right to investigate suspicious relationships and inappropriate behavior of its employees.

Employees are expected to avoid any direct or indirect associations (e.g., with family members or close friends) or investments that could, or could appear to, influence independent judgment in acting in the best interests of the company.

**Financial interests:** Conflict of interest may arise when an employee or a family member directly or indirectly engages in the same type of business as the one in which the employee works, or owns significant profit interests in a competing company.

**Outside activities:** Conflict of interest may arise when an employee or a family member holds a position as a director, executive, employee, or representative of an organization that is competitive with or has a current or prospective business relationship with the company.

Employees are expected to self-disclose any actual or potential conflicts of interest and propose how they should be resolved. Failure to disclose circumstances that could lead to a conflict of interest constitutes a violation of these principles.

## 6. Our customers

At AAH PLASTICS, we are committed to providing exceptional products and services while maintaining the highest standards of integrity and professionalism in our interactions with customers. Our Code of Conduct outlines the principles and expectations for all employees regarding customer interactions:

1. **Respect and Courtesy:** We treat every customer with respect, courtesy, and fairness. We value diversity and ensure that all customers receive equal and unbiased treatment.
2. **Transparency and Honesty:** We communicate openly and honestly with our customers. We provide accurate information about our products and services, pricing, terms, and conditions.
3. **Quality and Service Excellence:** We strive to deliver products and services of the highest quality. We are dedicated to meeting customer expectations and addressing their needs promptly and effectively.
4. **Confidentiality and Privacy:** We respect the confidentiality and privacy of our customers' information. We handle customer data securely and in accordance with applicable laws and regulations.
5. **Conflict Resolution:** We are committed to resolving customer concerns and complaints promptly and fairly. We provide accessible channels for customers to voice their feedback and seek resolution.
6. **Compliance:** We comply with all applicable laws, regulations, and industry standards in our dealings with customers. We uphold ethical business practices and avoid conflicts of interest that may impact our customers.
7. **Continuous Improvement:** We continuously strive to improve our products, services, and customer interactions. We welcome feedback from customers to enhance their experience with us.

By adhering to this Code of Conduct, we uphold our commitment to building trust, fostering long-term relationships, and achieving mutual success with our customers.

## 7. Our communities and the environment

### 7.1 Communities

We are committed to good corporate citizenship, and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate.

We engage with the community to minimize any adverse impact that our business operations may have on the local community and the environment.

AAH PLASTICS actively supports and utilizes the services of sheltered workshops whenever possible.

### 7.2 The environment

In the production and sale of our products and services, we strive for environmental sustainability and comply with all applicable laws and regulations.

We seek to prevent the wasteful use of natural resources and are committed to improving the environment, particularly with regard to the emission of greenhouse gases, consumption of water and energy, and the management of waste and hazardous materials.

We regularly monitoring and reviewing our environmental performance to ensure continuous improvement.

AAH PLASTICS promotes environmentally responsible behavior among its employees, suppliers, and customers.

## 8. Our value – chain partners

We shall select our suppliers and service providers fairly and transparently.

We seek to work with suppliers and service providers who can demonstrate they share similar values. We expect them to adopt ethical standards comparable to our own.

Our suppliers and service providers shall represent AAH PLASTICS only with duly authorized written permission from AAH PLASTICS. They are expected to abide by the Code in their interactions with us, and on behalf of us, including respecting the confidentiality of information shared with them.

## 9. Our governments

We shall act in accordance with the constitution and governance systems of the country in which we operate. We do not seek to influence the outcome of public elections, nor to undermine or alter any system of government. We do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence / favour with any political body or

person, and we do not offer or give any company funds or property or other resources as donations to any specific political party, candidate or campaign.

We do not impede, obstruct or improperly influence the conclusions of, or affect the integrity or availability of data or documents for, any government review or investigation.

## 10. General provisions

The Code reflects the general principles guiding employees in ethical behavior and is not intended to address every specific situation. In this sense, the company is not restricted from initiating disciplinary action regarding a particular event that does not align with ethical principles not mentioned in this Code. Amendments to the Code can be made by the company's director with their signature.

If you have any suspicions of violations of this Code, other ethical rules, or legal regulations, please report them to: AAH PLASTICS s.r.o, Družstevná 1090/86, 956 17 Solčany, or via email at: podnety@aahplastics.sk.

Doubts regarding compliance with our company's rules will be investigated. The investigation process includes:

### **ESTABLISHING A TEAM TO HANDLE THE MATTER**

Employees with appropriate knowledge are assigned to the investigation.

### **CONDUCTING THE INVESTIGATION**

The team gathers facts through interviews or document reviews.

### **CORRECTIVE ACTIONS**

If necessary, the team will recommend corrective actions to the relevant managers.

### **FEEDBACK**

The individual who reported the concern non-anonymously will receive feedback on the outcome.

This version of the AAH PLASTICS Code of Conduct supersedes all earlier versions and associated documents and stands effective from 04 march 2024.