An aerial, top-down view of four rowers on a boat. The rowers are positioned in a line, each in their own rowing station. They are holding oars that extend outwards from the boat. The boat's structure, including the gunwales and the rowing mechanism, is visible. The background is dark, suggesting a night or low-light setting. The word "Draslovka" is written in white in the top left corner.

Draslovka

# Code of Conduct

Guide to Our Values

# Message from the CEO



Draslovka colleagues,

For over 100 years, the art of Draslovka cyanide chemistry has been passed from generation to generation. Today, Draslovka evolved into a global, science-based company producing chemicals that are used in wide range of sectors including agriculture, mining, automotive and pharmaceuticals. Draslovka products are also essential in the production of many items we use in our daily lives.

Our values have helped us create a culture where every one of us is encouraged to act like a business owner, reimagine what is possible, and make decisions that are in the best interest of our customers and shareholders, while protecting our people and communities where we live and work. To help you understand our core values and your personal accountability to deliver on them, we have our Code of Conduct, a living document that we update regularly.

Our Code of Conduct establishes a shared set of values and standards to which all of us are expected to adhere. It is designed to guide our actions and help us make the right decisions, even when it is hard to do so. As we grow and face new challenges, remember that what we must never change is our undertaking to do the right thing.

Our Code of Conduct is only as strong as our commitment to follow it. It is essential not just to read it, but to understand, and live by its principles every day. Please refer to it regularly, so that it becomes your guide on how to conduct business within, and on behalf of, Draslovka. Speak up if you suspect any violation of its principles. Seek help if you are ever in doubt as to what our Code says, what actions are appropriate or what your duties are in upholding the Code. We each have an obligation to hold ourselves and each other accountable.

Thank you for making Draslovka what it is today and for your continuous dedication to our values and integrity.

Sincerely,

**Pavel Brůžek Jr.**

Chief Executive Officer

# Draslovka Values

## We constantly reimagine what is possible

- Creativity
- Problem-solving
- R&D focus
- Leading our industries forward
- Crossing traditional boundaries

## We act like business owners

- Founder-led
- Personal approach
- Accountability
- Excellence
- Sustainability
- Long-term focus
- Rewarding performance
- Ambitious financial and business goals
- Importance of reputation for management

## We build strong relationships

- Customers
- Employees
- Suppliers
- Local communities
- Industry stakeholders

## We always do the right thing

- Transparency
- Ethical behavior
- Personal integrity
- Leveraging diversity
- Cultural tolerance and understanding

## We put safety first

- Manufacturing
- Product delivery
- Environmental care with the “Leave no trace” ideal
- Lifecycle risk mitigation
- Full compliance with all national regulations and leaders in international best practices

# Draslovka Identity



1

## Focused on the future of our planet

Developing products and practices that leave our planet better than it was yesterday

4

## Experts and innovators in chemistry

Developing products and practices that leave our planet better than it was yesterday

2

## A global supplier with a family business approach

Providing dedicated, personal service to our customers around the world

5

## World leaders in manufacturing excellence

Committed to safely and efficiently producing quality products

3

## An international team driven by a shared vision

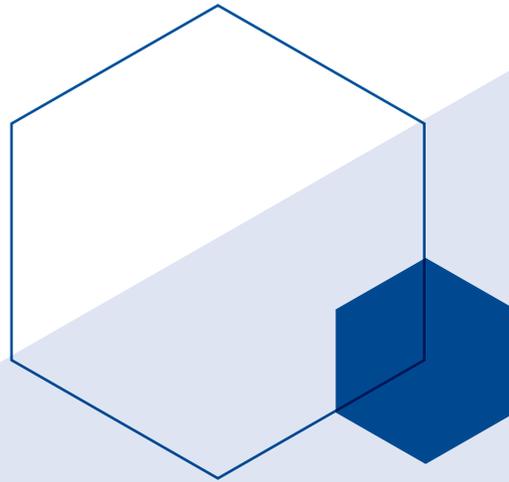
Working across geographies with a conscious ambition to be the best at what we do

6

## Empowering our people

Supporting every person in our organization to help them realize their full potential and lead our company forward

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# About Our Code of Conduct

How each of us behaves at Draslovka affects our overall reputation as a company. Our Code of Conduct (the “Code of Conduct” or the “Code”) underlines the importance of our core values by setting out company’s expectations towards all employees, officers and directors. Its purpose is to help us uphold high standards and translate our values into actions.

Employees are required to comply at all times with applicable laws and regulations, this Code and other company policies and procedures. If any of these standards conflict with each other or if any uncertainty as to applicable law arises, the employee must discuss the matter with Compliance or Legal department. As no code of conduct can cover every possible situation, we should at all times use good judgement and ask for help anytime we have concerns. Any action that intentionally violates a law or regulation or a company policy or procedure, and any effort to conceal such non-compliance, constitutes an ethics violation.

We communicate our Code to business partners and expect them to share our commitment and follow ethical standards laid down by this Code when working with us or on our behalf.

## Kindly Note

This Code of Conduct represents a uniform governance tool that applies equally to all employees and all business units, subsidiaries and operations where Draslovka has a controlling interest.

The Code of Conduct is not a contract or a guarantee of continued employment. The company reserves the right to modify, change or alter any part of it at any time, as necessary. In exceptional cases where a waiver of the Code would be appropriate, the Board of Directors (or the Audit Committee, as the case may be) will consider such cases for senior executives and Compliance Manager will consider such cases for other employees.





**We** Always  
Do the Right  
Thing

# We create a culture of mutual respect

We conduct our business activities in accordance with the highest ethical standards and in compliance with all applicable laws. The quality of our workplace affects overall success of our company as open and positive work atmosphere influences motivation and efforts of all of us. We treat all our employees and partners with respect and dignity, creating an environment where everyone has an opportunity to personally contribute, make a difference and excel. We listen carefully to diverse points of view and engage in thoughtful dialogue. Respect is our norm in the workplace, regardless of personal feelings.

## Human Rights

Draslovka promotes human rights in all countries it operates in. We all conduct our business activities in an ethical and responsible manner and fully respect human rights. At Draslovka, we always do the right thing and promote tolerance and understanding. Accordingly, we want to work with companies sharing the same principles and standards. It is the responsibility of each employee to comply with laws protecting human rights. Management of each business unit shall educate, train and motivate employees to understand and comply with applicable laws.

## Modern Slavery and Child Labor

We are committed to ensure that there is no modern slavery, human trafficking, servitude, child labor or any other form of forced or compulsory labor in our business operations or any part of our supply chain. To achieve this we commit ourselves, in particular, to:

- conduct due diligence to assess the risk of modern slavery in our business and supply chains and remediate it, if present
- strictly follow local minimum employment age and verify the age by commonly acceptable proofs
- ensure all employees are paid at least the minimum wage for all hours worked and that work hours do not exceed a maximum set by applicable laws
- ensure all work is voluntary and employees are free to terminate their employment
- have whistleblowing mechanism to report any concern – please refer to Draslovka Group Ethics Hotline and section devoted to No Retaliation
- not knowingly enter into any business involved in slavery or human trafficking

Draslovka expects all its suppliers, contractors, sub-contractors, agents and other business partners to share the principles of zero tolerance to modern slavery and child labor. If we become aware of any facts which would suggest that any of our partners engages in modern slavery, we will thoroughly investigate, and where appropriate, terminate the relationship and report to the responsible national or international authorities.

## Diversity, Equal Opportunities and No Discrimination

Our success is determined by mutual respect. We leverage diverse workplace, promote cultural tolerance and understanding and empower our people to help them realize their full potential. As a company, we remain committed to understanding that a wide range of backgrounds and experience add value to what we do. Equal opportunities approach is part of our respectful workplace, and work-related decisions are never based on age, sex, race, color, religion, national or ethnic origin, sexual orientation, gender identity or expression, marital status, disability, or any other characteristic protected by applicable laws.

Regions and countries may have additional grounds for non-discrimination. The company complies with all applicable laws world-wide.

Make work-related decisions based on skills and abilities, not on characteristics that are improper to consider.

## Prohibition of Harassment

Draslovka does not tolerate harassment of any kind. Harassment may create a work environment in which an employee can feel intimidated or offended. Harassment may include derogatory remarks or comments, personal insults, expressions of intolerance, offers of job benefits in exchange for favors of sexual nature, and other forms of offensive behavior. Harassment includes behavior directed at or by a Draslovka employee, or an employee of the company's customers or suppliers, agents or other business partners. Inappropriate use of company electronic communications resources, regardless of the medium, includes both engaging in sexual, racial, or other types of harassment and discrimination, and accessing sexually oriented and other inappropriate material. Such misuse is considered as serious misconduct and is subject to disciplinary actions. Employees who are aware of any suspected discrimination, disrespectful behavior, or harassment shall report the matter to Human Resources or Draslovka Group Ethics Hotline.

Treat others with respect and never engage in conduct that could be perceived as harassing, hostile or disrespectful.

## We speak up

While we are all expected to abide by our Code, company policies and procedures, and applicable laws and regulations, mistakes can still happen. We must be prepared to speak up if violations of our Code of Conduct are known, seen, or suspected to allow our company to investigate and address the issue. We shall raise questions or concern, openly talk to each other and our managers and if necessary, use Draslovka Group Ethics Hotline for confidential help.

Draslovka Group Ethics Hotline is a free, multilingual service operated by an independent company designed to allow employees, suppliers, customers, agents and other third parties to report concerns or suspected misconduct. Calls and online reports are free of charge. See “Ethics Hotline” on the web page at <https://secure.ethicspoint.eu/domain/media/en/gui/109105/index.html>.

The company treats all reports of ethical concerns, including reports to the Draslovka Group Ethics Hotline (via telephone or internet), as confidential. Management will disclose this information only to employees who need to address the question or concern (in some cases, the company might be required to share the information with certain authorities). Employees may also request anonymity, and the company will try to protect employee’s anonymity where possible and permitted by law.

## No Retaliation

We foster an environment where employees are not afraid to raise potential concerns and issues. Draslovka will not tolerate prohibitions or restrictions on reporting theft, fraud, waste or abuse of materials, persons or property by Draslovka employees or contractors.

As an employee, you are expected to report suspected violations of the law, the provisions of this Code of Conduct, or other Company policies and procedures. You are expected to cooperate and provide accurate and complete information in the investigation of misconduct. Never attempt to cover for a person who does not comply with a law, regulation or company policy or procedure. Also, never authorize or ask another party (e.g. an outside agent, representative, supplier or contractor) to perform an act that is not authorized by Draslovka employees.

In addition, Draslovka will not permit any retaliation or intimidation against anyone who, acting honestly and in good faith, raises a concern, reports suspected misconduct or provides information in connection with an investigation of suspected misconduct. We will investigate all instances of potential retaliation and will discipline employees who have retaliated against the person who has reported suspected misconduct.

## Manager Duties

We all have a duty to conduct ourselves and our business activities in accordance with highest ethical standards and in compliance with applicable laws and company policies and procedures. Due to nature of their role, managers have a profound influence on how their subordinates conduct business. Generally speaking, subordinates follow the practices and behavior of their managers and, therefore, every manager is expected to:

- lead by example and promote high ethical standards and Draslovka values in everyday actions
- treat all employees with professionalism, fairly and with respect
- ensure that business decisions are made in the best interest of the company
- be open for constructive discussion and any employee’s concern without fear of retaliation
- address an employee report of suspected misconduct

# We act in the best interest of the company

At Draslovka, we do not improperly influence others' business decisions. We do not make illegal or unethical payments and take careful approach towards giving and receiving gifts, handling business payments and conducting business abroad. We stand firm against corruption and expect the same from our business partners. We regularly evaluate our business relations and stop cooperation if we suspect corrupt practices. At all times, we must exercise good judgment to avoid even the appearance of business misconduct.

## Bribes and Kickbacks

Draslovka is strongly against any type of improper or illegal payments, such as bribes and kickbacks. We follow anti-bribery and anti-corruption laws and expect the same from our business partners.

Bribes and kickbacks are illegal in almost every country. Any offer of a payment or anything of value to influence an individual's business decision or the actions of a government agency or official can be considered as a bribe or kickback. An employee must never, directly or indirectly through a third party, offer, demand, accept or indicate a willingness to accept bribes, kickbacks or other payment or benefit that may be perceived as improper or illegal, no matter whether dealing with commercial or governmental customers. Special caution must be used in every single case as even non-monetary gifts may be perceived as a bribe. Unofficial "facilitating" payments to expediate any official or governmental action, permit or regulatory approval are strictly prohibited.

## Gifts and Entertainment

Gifts and entertainment may only be exchanged in exceptional circumstances and only if it is not perceived as an improper attempt to influence a business decision.

Our company focuses on strengthening relationships with all customers, suppliers and business partners. As a matter of principle, we do not make illegal or unethical payments and do not encourage giving or receiving gifts in order to influence a business decision or obtain preferential treatment. In all cases, we must exercise sound judgment and avoid improper conduct.

The company does not support giving or receiving gifts, even if a gift is perceived to be in the company's interest. In cases where business entertainment is appropriate or where, exceptionally, a gift has been given or received, an employee should ensure that such gift or entertainment:

- has a clear business purpose
- is consistent with regional business practice
- will not be seen as an attempt to improperly influence business relationship or any official decision or any other improper payment
- does not violate laws, regulations or ethical standards
- has been given in accordance with Draslovka policies and procedures

Stricter standards may apply within regional units or specific functions and/or in relation to government officials. Employees are expected to seek guidance from our Legal or Compliance department if unsure whether any gift or entertainment can be considered as improper or illegal.

## Payments for Products and Services

Any payment for products or services made by the company to external parties shall always be of reasonable value and not considered as inappropriate.

Sales commissions, discounts, rebates, credits and allowances are customary business practices. Employees must avoid illegal or unethical payments and must comply with applicable laws and regulations (including tax, accounting, currency and exchange controls, anti-bribery and anti-money laundering laws).

Any payment made or received by or on behalf of the company should always be of reasonable value that corresponds to goods and services exchanged and to industry and market standards.

All payments shall be properly documented, ideally in a form of a contract or, where not reasonably possible, a record clearly defining the nature and purpose of the business transaction must be made by responsible department. The documents must be accurate and contain complete information, while the payment must be invoiced and made to the legal entity specified in the contract (not to officers, employees, agents or to another entity) and under agreed payment means and terms. The person approving the transaction is responsible for understanding the entire transaction and ensuring that the transaction is appropriate and consistent with company's policies and procedures. If you are not sure about legality of a payment or have a concern regarding its documentation, contact Legal or Compliance.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

## Anti-Money Laundering

Money laundering is a process through which illegally obtained funds are altered to make those funds appear legitimate. Such funds may be acquired through criminal activities, acts of terrorism, weapons smuggling, drug trafficking or tax avoidance. Relationships with entities that engage in money laundering can severely damage our reputation and integrity. We will not tolerate any violation or even exposure to risk of violation of anti-money laundering or counter terrorist financing laws. In compliance with applicable anti-money laundering laws, we never knowingly accept funds acquired through illicit means. If you have any concern, seek guidance from Compliance.

If you suspect that any of our customers or business partners may be engaged in money laundering activities, immediately report your concerns to Compliance.

## Conflict of Interest

As employees, we must ensure that our private activities and interests do not conflict with our responsibilities to the company. An employee is obliged to report every conflict of interest and any situation that can even appear to create a conflict of interest, so that the company management can properly assess the situation – it is not up to an employee to determine whether a conflict of interest exists.

You must promptly disclose to your manager any personal interest that could potentially conflict with the company's interests, including, but not limited to, other employment and competing activities and financial interests, handling and sharing of inside

information, business opportunities that belong to the company and conflicts of interest involving family members and other personal relationships.

Common conflict of interest situations we must avoid:

### **OUTSIDE EMPLOYMENT, WORK AND OTHER ACTIVITIES**

While employed with Draslovka, we share a commitment to advancing our company's interests and giving a full effort to fulfil our role. Though Draslovka does not seek to limit our opportunities, we shall not accept outside employment that might conflict with our ability to perform our job at Draslovka.

Conflict of interest may arise in relation to employee's activities outside the company, such as:

- simultaneous employment or other role with a competitor, customer, supplier, agent or other Draslovka business partner
- serving as a board member in another organization
- acting as an agent, broker or other intermediary for another party in a business transaction that involves or may potentially involve the company or its interests
- other activity including independent business or government activity, if such activity conflicts with the employee's role in the company
- acting in a position of public administration or representation, if such action conflicts with the employee's responsibilities to the company
- using a title of employee's position in relation to outside activity that might imply company's support
- any other activity or arrangement, including family or other personal relationships, that might be perceived as discouraging the employee from acting in the best interests of the company

The employee should consult with his/her manager before publishing presentations, articles or similar materials related to the employee's professional field, and such activities should not interfere with the performance of the employee's job duties. Employees should also not use any company suppliers or facilities in connection with their outside activities. Every outside employment must be carefully reviewed. Before accepting any outside employment or other engagement, always check with your manager, Compliance or Legal.

### **WORKING HOURS**

Do not use your working hours during which you work for the company for side activities or your own personal interests and business.

## **CORPORATE OPPORTUNITIES**

While working at Draslovka, employees are likely to learn about or be directly or indirectly involved in developing new products, procedures or methods or other business opportunities. Employees shall not take improper personal benefit of these opportunities or compete directly or indirectly with the company advantaging any information or asset gained as an Draslovka employee.

## **FAMILY MEMBERS AND PERSONAL RELATIONSHIPS**

Conflict of interest may involve a family member of an employee who receives, directly or indirectly, improper personal benefits (e.g. from the company's business partners) as a result of the employee's position in the company. Also, a manager shall not supervise its immediate family member or household member or engage in romantic relationship with reporting employee. Management and/or HR might mitigate such situations, but in any case, such personal engagement shall be disclosed.

## **NOTIFICATION AND MANAGEMENT OF POTENTIAL CONFLICT OF INTEREST**

Employees are required to promptly and thoroughly disclose any conflict of interest or even potential conflict of interest to management as soon as it occurs. Your manager may request written notification or confirmation. The company will treat all disclosures confidentially to the extent necessary to protect the company's interests. Management will review these matters with Compliance and take steps to eliminate potential conflicts of interest.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.



## Insider Trading

As Draslovka employees, we may not trade Draslovka securities listed (or filed for listing) on any stock exchange or regulated market while in possession of any inside information. Inside information is generally any non-public information that is so material that, if disclosed, may affect the price of such company's securities. In other words, it refers to any information that would be considered important by a reasonable investor in determining whether to buy, hold or sell company's financial instruments. Information is considered non-public until the public has become aware of it in accordance with the relevant market rules and regulations.

Employees must not trade in any of the listed company's securities on the basis of inside information or disclose such information to others who might use it to trade the listed company's securities for their or others' benefit. This restriction applies to trading Draslovka listed shares, bonds or other financial instruments listed on regulated markets issued from time to time as well as similar financial instruments of other companies about which employees may have inside information. Furthermore, we shall not advise or "tip" others to trade on the basis of the inside information we may possess. Accordingly, such insider trading restrictions are applicable not only to the publicly traded companies but also to private companies that have issued listed bonds, debentures or other financial instruments.

Violations of insider trading regulations are not only violations to this Code but might potentially also violate the law and expose individuals and our company to civil and criminal penalties. If you are in any doubt, contact the Legal or Compliance for advice and do not trade the securities.

Examples of inside information:

- information about expected earnings or losses, pending or proposed mergers or acquisitions, major product launches or new contracts or investments of significant value
- intellectual property developments or research discovery that is expected to transform marketplace
- information about the progress of significant litigation



# We Build Strong Relationships



# We believe in fair competition

Competition is an inseparable part of our business, success and continuous improvement. Through competition in the marketplace, we can serve our clients the best and deliver the best quality products and services. Still, we must remember that our company is subject to competition laws in vast majority of countries it operates in and that we must compete within such legal boundaries. These laws vary from country to country, but generally take consistent approach to restricting certain behavior that reduces competition or restrains trade. In case of any concern, Legal shall be consulted.

Use only fair means to compete with other companies and to develop and maintain relationships with customers and suppliers.  
Do not steal any information from a competitor or another business.

In general, competition laws prohibit agreements among competitors with intention to:

- fix or control prices or set other terms and conditions of sales contracts
- share markets (division or allocation of customers, suppliers, products or geographic areas)
- engage in bid rigging
- boycott specific customers or suppliers
- limit production or sale of products

Such and similar agreements represent a major distortion to the economic environment and violations of these and other competition laws can lead to heavy penalties. Employees must be aware of relevant regulations, especially if their activities involve interacting with competitors, suppliers, customers or distributors, gathering competitive information or participating in trade associations. Also, we can only collect information about Draslovka's competitors using fair means, and never by stealing or misrepresenting information or using another person to improperly collect information.

Given the complexity of competition law and heavy penalties for its violations, employees should work closely with Legal to properly understand their obligations and in particular are expected to consult Legal before any interaction with competitors, trade association or developing any price communication. Employees should always take due care so that their activities cannot be misrepresented as a violation of competition law.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

# Business Across Borders

Each location where Draslovka conducts its business has different laws, regulations and market practice. The national and international laws and agreements might impose significant limitations on our activities (including government licenses, permits and various filings) and non-compliance might lead to heavy penalties. When doing business across borders, each of us must therefore understand national and multinational laws and rules on exporting and importing products, services and technology from one country to another. Employees should consult with Legal any concern about laws governing export or import of products, services and technology and their reexporting.

## Boycott and Anti-Boycott Measures

Laws of many countries require companies either to refuse or not to refuse to conduct business with a particular country, its companies or citizens. These laws can contradict each other and following them might not be easy. When conducting business activities across borders, employees are expected to get familiar with relevant laws and regulations and, among other obligations, employees shall report information requests they receive that could be used to boycott a country or a company. Legal must be consulted when any boycott or anti-boycott request or issue arises.

## Sanctions

Sanctions regulations might prevent us from trading directly or indirectly with specified countries, companies or individuals. Such sanctions may be imposed by the governments (such as United States government), international organizations (such as United Nations) and supranational bodies (such as European Union). The restrictions can include ban on dealings with certain persons, entities, governments and geographies that may be engaged in activities such as terrorism, prohibited support of a sanctioned country or illegal export or re-export of controlled goods, services or technology. Most sanctions regimes also prohibit actions taken to circumvent applicable sanctions or to facilitate activities by another person or entity that would violate sanctions.

It is our responsibility to know and follow the applicable restrictions in the locations where we are doing business. Employees who engage in any dealing or transacting with counterparties shall screen all transactions conducted with or facilitated for all counterparties to comply with sanctions laws. Standard of diligence shall correspond to the risk profile of the particular counterparty and/or transaction. Employees shall maintain records for all sanctions screening and underlying information. Compliance must be consulted before entering in or continuing an even potentially risky relationship, transaction or activity.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

# Political Activities

## Political Involvement

Being part of civil society includes political involvement. Draslovka encourages us to participate in the political process, but we are careful to make it clear that our views are our own and not those of Draslovka. We have a right as an individual to be engaged in political affairs and activities, we may do so at our own time and at our own expenses. We should not use company technologies like email or phone to solicit on behalf of any political party. We must never use Draslovka time, funds, property or resources for personal political activities or contributions. Using premises as a venue for political events might also be considered as a contribution to a political party and must be approved by the company. We inform our managers when we or our family members seek public office, or if our political activity might have an impact on Draslovka.

Draslovka as a company may engage in political activities that represent our values and mission. When doing so, we comply fully with applicable laws that govern such activity. No one is allowed to exert any kind of pressure on employees to support any political party or candidate or mandatorily provide any contribution.

You must ensure that personal contributions to political parties or politicians and activities related to politics do not involve company funds or other assets.

## Political lobbying

Draslovka may also engage in lobbying activities, always strictly following applicable laws and regulations. Lobbying includes various activities such as communications with government officials, legislators and regulators. Provided your role in Draslovka includes political lobbying, you must consult applicable laws with Compliance and always consult the strategy with the Group CEO.

# Relationships with Government

Business interactions with government organizations, officials, candidates and state-owned businesses have its own rules and might be subject to strict laws and regulations. At all times, we must comply with applicable laws, demonstrate the company's commitment to ethical conduct and avoid even an appearance of impropriety.

If you are authorized to conduct business with government entity or officials in a given country, you must understand the rules and regulations governing such interaction, including conflict of interest rules or gifts or entertainment. Sometimes, even a meal or gratitude of a small value can be perceived as a bribe or other illegal activity. You must always consult with Legal or Compliance before any anticipated interaction with a government representative.

Additionally, when supplying products or services to government or a state-owned enterprise, whether directly or indirectly, specific and sometimes more prudent legal and regulatory requirements might apply. Employees must always make sure that such special rules, regulations and practices are followed and shall always consult Legal or Compliance before entering into such business relationship or any contract. Non-compliance may lead to serious civil and criminal penalties.

## Contributions and Donations

While we are all encouraged by Draslovka to support our personal community activities, we must never use Draslovka time, funds, property or resources for personal donation or charitable purposes and volunteerism, unless officially sponsored by Draslovka. Any contributions or activities on behalf of the company or involving use of company funds or resources is subject to prior approval of Draslovka management.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

# Privacy and Personal Data

Draslovka recognizes the value of each individual and the right to privacy. It is our responsibility to handle personal data in a secure manner and in accordance with company policies as well as with applicable laws. Personal data refer to information that is sufficient to identify an individual. This information includes a name, date of birth, account verification, contact details, credit card number, biometric data, passport number, or national identification number. We shall use personal data only as necessary for business purposes and protect it from unauthorized disclosure.

Depending on the type of information, some jurisdictions impose significant restrictions regarding how personal data must be treated. Being part of a global entity, we must familiarize ourselves and comply with all applicable laws and regulations on privacy. When transferring personal data across country borders, the company might be required to use data transfer agreements or other arrangements.

## Customer and Consumer Privacy

Employees who handle personally identifiable information of our customers, consumers, suppliers or other third parties must be familiar with the laws governing the collection, transfer and use of personal data, and other internal controls that protect personal information.

## Privacy of Draslovka employees

Draslovka informs employees about personal data it collects and how this information may be used or shared for activities such as compensation, benefits and computer systems access and security. Employees should however not expect privacy when they use company facilities, equipment and services such as offices, company telephones, computers and communications systems as such equipment is intended for company business. Draslovka needs to protect workplace safety and security and prevent criminal activities and, therefore, reserves the right to monitor the workplace and company communications, and conduct searches of company property, subject to and in accordance with applicable laws. Any of these communications, information, or materials may be provided to authorities or as part of a court or legal order.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

# We Act Like Business Owners



# Company Assets

It is a fundamental responsibility of every employee to protect and properly use company assets and resources. While we are sometimes permitted to use certain company resources for personal use on a limited basis, we should never take this privilege for granted when using these resources or assume we have a right to privacy when using company resources.

Company assets include, without limitation, any non-public information, intellectual property (such as patents and inventions, brands, trademarks and copyrights), data and records of any kind, any computer and communications systems, networks, software and other digital services and related equipment.

We must always acquire, use, share, or dispose of company assets in the best interests of the company.

Employees shall have the following responsibilities when using company assets:

## ACQUIRING

- Use good judgment when acquiring assets that will be used by the company. Ensure that Draslovka acquires assets and materials for a fair price.

## USING

- Take proper care when using company assets to prevent loss of their value due to improper use.
- Share company assets outside the company only when authorized to do so and only if such sharing is in accordance with laws and regulations and company policies.
- Protect company assets against misuse by other persons and report any misconduct.
- Use company asset and information in accordance with applicable asset and information classification policies and procedures.

## PROTECTING

- Protect company assets, intellectual property and non-public information from misuse or theft by another person.
- Get familiar with security policies and procedures to safeguard company assets, data, information and systems to prevent unauthorized access, improper use or removal, loss or any other malicious activity including cyberattacks.

## DISPOSING

- Dispose of company assets when authorized to do so and in accordance with laws and regulations and company policies and procedures.

# Non-public Information and Trade Secrets

All employees must effectively protect company information that has not been made public and safeguard it from unauthorized access, use or disclosure. Breach of this obligation might have detrimental effect to the company.

Non-public information includes, without limitation, trade secrets (business plans, cost and pricing information, research and development plans and strategies, research and invention data, information on product composition and ingredients, process and design information, if not already made public) or inside information.

Trade secrets and other confidential information may be disclosed to others only pursuant to a written agreement (such as non-disclosure or similar agreement). If confidential information is disclosed to a third party, such information and samples must be marked "Confidential". Any disclosure must always be limited to a level necessary to fulfill the business purpose. Non-disclosure agreements might not be entered into without sign-off from the Legal department. Also, we should exercise caution when discussing confidential information in public places as such information should be reserved for private locations.

We shall protect company's trade secrets appropriately.  
Also, we must not misappropriate trade secrets of others.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

## Inventions

Invention refers to a unique or novel device, method, composition or process. Inventions, like trade secrets, can produce opportunities for Draslovka to gain a competitive advantage. The protection of company's inventions may involve filing for patents or keeping the invention a trade secret. We all must help Draslovka to protect its inventions including patents and trade secrets.

Employees shall also help the company to prevent infringement of valid patents of others. Before releasing a new product or implementing a new industrial process, the responsible business unit or employee should consult with Legal about conducting an appropriate patent review.

## Brands, Trademarks and Copyrights

Draslovka protects its intellectual property under trademarks, copyrights, patents, and trade secrets laws, among other tools. Intellectual property forms part of Draslovka's most important assets and must be effectively protected. In case we identify any abuse or infringement to Draslovka intellectual property, we shall immediately report it to Communications department. In addition, we must also respect intellectual property of third parties.

# Records and Reporting

Any information Draslovka creates or produces is considered a record regardless how the information is maintained. Records include, without limitations, financial, accounting, sales and production records, business plans, safety records, invoices, personnel files, contracts, marketing and PR information.

- We must create and properly maintain accurate and reliable records and ensure that these records clearly identify relevant facts and true value and nature of a business transaction, asset, liability or equity. Records must be supported by necessary documentation.
- Many types of records are subject to various laws and regulations (like health and safety, anti-money laundering, data protection, accounting standards etc.) and we must strictly follow these regulations. In addition to regulatory requirements, we must also follow internal record keeping and retention policies when producing, storing or destroying records and documents. Legal or Finance shall be consulted in case of any concern.
- We should never make or leave an incorrect, false, misleading or incomplete entry in the company's records or intentionally conceal any errors.
- Any record in a wet ink copy shall also be digitalized and properly stored unless digitalization is not feasible due to nature of the record.
- Records relating to accounting transactions and financial reporting shall be in accordance with the company's accounting policies and generally accepted accounting principles and standards.

We may be asked to participate in an internal or external audit or investigation of our company's records or compliance with company's policies. All employees are expected to provide the auditors or investigators with requested information. Delaying or impeding any investigation by hiding, destroying or otherwise tampering relevant documentation is prohibited.

Improper accounting, documentation and fraudulent financial reporting is contrary to company policy and regulatory requirements. Such conduct may lead to civil and criminal penalties.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

# Travel, Entertainment and Other Expenses

As Draslovka employees we must use company's financial assets only for approved purposes. We are expected to incur travel and entertainment expenses that are consistent with business needs of our company. Business travel or entertainment should not bring us neither financial gain nor loss. We should always spend company funds carefully and diligently and speak up if we see Draslovka funds misused.

Use the company's financial assets only for approved purposes. Never ask for reimbursement of non-business expenses or double reimbursement. Ensure that travel expense reports include only expenses incurred as a result of business activities and are properly approved.

Employees who submit or approve travel, entertainment or other expenses are required to ensure that the expenditures are accurate, reasonable and provided in a timely manner and that necessary receipts or support documents are provided.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.



# Communication with Third Parties

We need a clear and consistent voice when providing information about our business activities, results or position on public issues to the public, including the media, analysts and shareholders.

Only those employees who are authorized by Draslovka's management to speak on behalf of the company should communicate with journalists, research analysts, government officials or any other outside party. Unless an employee obtains prior approval of Draslovka's management to discuss company's business activities with any outside party, he or she shall refer any enquiry to Communication department. Employees are strictly prohibited from disclosing non-public information outside the company, especially to persons working in media.

If you are contacted by a journalist in any manner related to business activities of Draslovka, do not respond and refer to Communication department.

## Social Media

Use social media wisely. Make it clear on your social media that your views are your own, and not that of the company. Any official statement or information posted on behalf of Draslovka must be approved by the Communications department. Also, when you come across any post that is negative or requires a reply, contact Communications department to handle the situation.

Social media should never be used in a way that violates any Draslovka policy or other legal or ethical obligation. You should not publish or post sensitive or proprietary business information about Draslovka, our customers, suppliers, or other business partners. Discriminatory remarks, harassment, threats of violence or other inappropriate or unlawful conduct will not be tolerated and may result in disciplinary action.

# Departing the Company

We need to make sure that integrity of our workplace and our assets including intellectual property are continuously preserved, even in cases when an employee leaves the company. When leaving the company, an employee must:

- promptly return all company property, including physical and information assets, such as computers, mobile phones, phone cards, payment cards, access cards, electronic storage media and any related equipment
- not make or take copies of Draslovka information or take documents of any kind
- not disclose Draslovka's non-public information and intellectual property to a third party after leaving the company

Failure to comply with these obligations can result in serious civil and criminal penalties.



**We** Put  
Safety First



# We Put Safety First

Draslovka shares a personal and professional commitment to protecting the safety and health of our employees, contractors, customers and all people who are part of our world-wide business community. We create safe work environments and integrate safety and health into our operational practices and expect the same from our business partners.

We believe that all injuries, occupational illnesses, and safety and environmental incidents are preventable, and we strongly promote work safety for employees. It is an utmost responsibility of every employee to comply with applicable health and safety laws and regulations as well as company's policies and procedures. Management in each business is responsible for educating, training and motivating employees to understand and comply with applicable safety and health laws, policies and procedures.

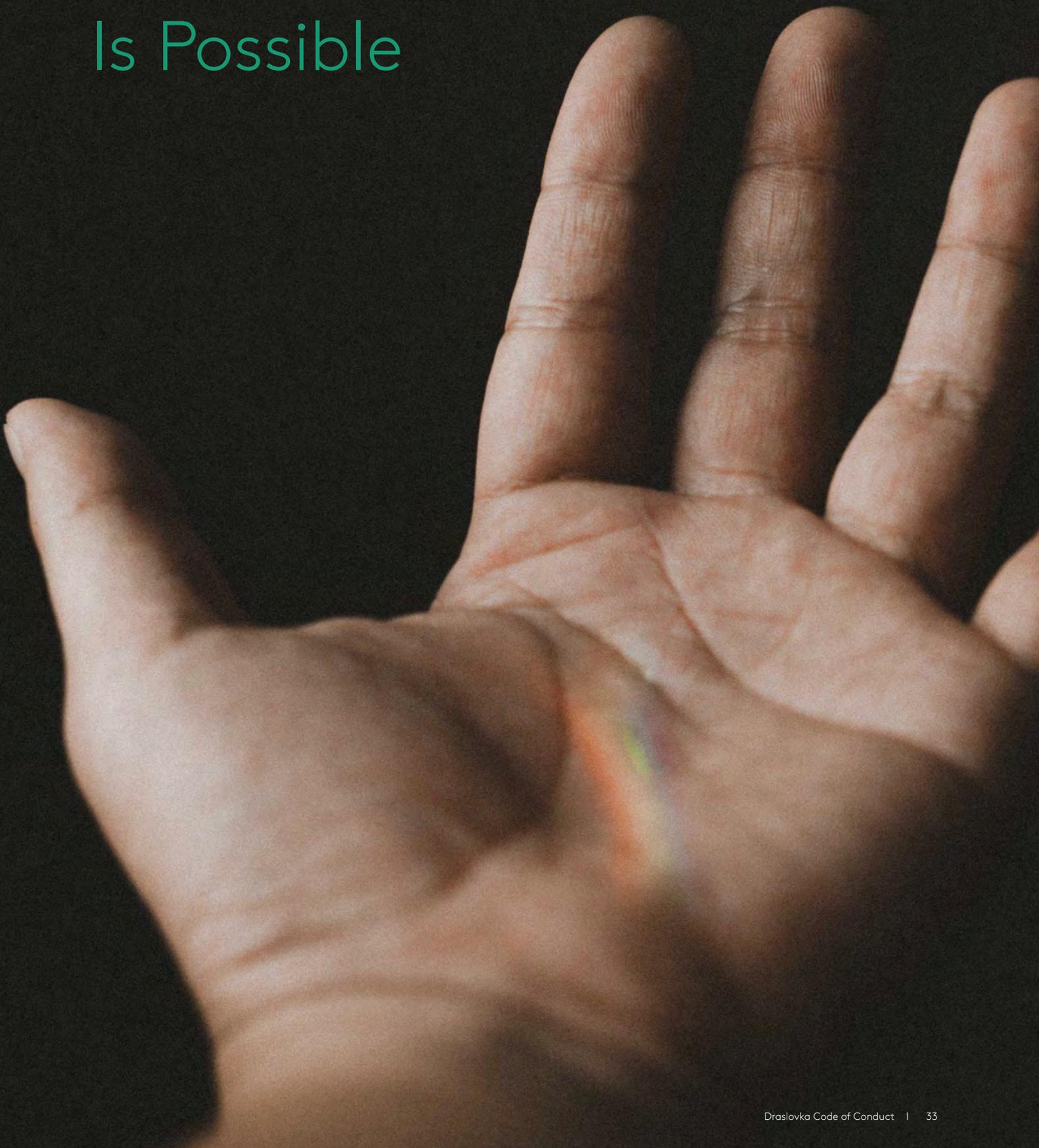
Always take precautions to protect health and safety of persons. If you are aware of any unsafe practice or work condition, or anything that could interfere with your safety or safety of your co-workers, you must immediately report it.

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

## Alcohol and Drugs at Workplace

Alcohol and drugs limit our ability to perform our work safely and responsibly. We must never work under the influence of alcohol, illegal drugs or prescription medications which may impair our ability to perform our work duties or create an unsafe work environment. Limited exceptions apply in cases when alcohol is served during official company events or celebrations. However, even during such events, we are expected to exercise moderation and good judgment.

**We** Constantly  
Reimagine What  
Is Possible



# We focus on the future of our planet

At Draslovka, we aim to build a better world for everyone. We conduct our business in compliance with the laws and industry standards while developing products and practices that leave our planet better than it was yesterday. Our ability to bring lasting solutions to the market is a natural expectation of our customers, shareholders, employees and our communities. We are empowering the world with the necessary innovations based on science to continuously discover and deliver results that matter. Sustainable growth while protecting our planet is our utmost goal.

Draslovka constantly seeks to find sustainable solutions and manage its businesses to protect the environment and preserve the natural wealth for current and future generations. We all care about the environmental protection and sustainability and comply with ethical standards, communities' expectations and applicable environmental laws and regulations. We are all expected to minimize resources and energy consumption, recycle waste and act in the best interest of our environment. Management in each business shall educate, train and motivate employees to understand our values, laws and company policies and expectations.

Protect the environment by minimizing pollution, reducing waste and complying with company policies and programs on sustainability

Additional information can be found on Draslovka intranet in section devoted to corporate policies and procedures.

# We Raise Concern and Address Misconduct



# How to consider an ethical issue

When facing ethical dilemma or a difficult situation for which an appropriate answer might not seem clear, we should ask ourselves the following questions:

- Is it the right thing to do?
- Can I potentially violate a law or regulation?
- Is it consistent with values anchored in our Code of Conduct or other Draslovka policies?
- How would my action look if the facts appeared on the internet or in the newspaper?

At Draslovka, no one is expected to face ethics or compliance concerns alone. Employee's immediate manager or supervisor is usually the first and best resource, since this person is familiar with individual roles and duties. If the manager or supervisor is not available, or if the employee is not comfortable discussing the matter with a direct supervisor, the following resources are also available:

- Management of a business unit, department or workplace of an employee
- Compliance, Legal, HR or Finance department
- Compliance confidential mailbox **ethics@draslovka.com**
- Draslovka Group Ethics Hotline

## Addressing Misconduct

The company will investigate reported instances of misconduct, such as violations of the law, regulations, this Code, or other company policies and procedures. We are all expected to fully cooperate should there be a company investigation.

Where misconduct is identified, responsible individuals will be held accountable and disciplined, as applicable, up to and including employment termination and possible civil or criminal action. Making an intentionally false accusation of wrongdoing is considered as misconduct. Retaliation or intimidation for good faith reporting or question will not be tolerated.

# Draslovka

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