



Code of Ethics of Železiarne Pobrezová, a.s.

Preamble

Železiarne Pobrezová, a.s. (hereinafter also referred to as "ŽP a.s." or the "Company"), is a significant metallurgical company ranked among the leading manufacturers of steel pipes and related products in Europe. The history of the company dates back to 1840. Its uniqueness lies primarily in the fact that in every historical period it has been able to face numerous challenges and maintain a top position among metallurgical plants.

Since its establishment, Železiarne Pobrezová has been guided by the philosophy that the success and prosperity of the company depend primarily on its people. Considerable attention has long been devoted to the organized professional development of the younger generation and its stabilization. Strong emphasis is also placed on the social, cultural, and sporting activities of employees.

Železiarne Pobrezová, a.s. declares its commitment to base all activities on its corporate values, to act in accordance with ethical principles, and to respect generally accepted rules, laws, and principles of business conduct. All subsidiaries also commit themselves to conducting their business activities in an ethical and lawful manner, in line with the principles and vision of the parent company.

This Code of Ethics represents a set of principles, standards, and requirements that are binding for everyone who decides to operate within the company's working environment under an employment relationship, to accept its values, comply with established regulations, and contribute to common objectives. This Code has been approved by the top management of ŽP a.s., and its values are promoted throughout the entire company.

Purpose and Objective of the Code of Ethics

The Code of Conduct is based on the values and vision of the company and defines what the company expects from its employees and what commitments it undertakes towards them. The Code of Ethics addresses various aspects of human behavior and defines its general areas, not only within the company premises.

Integrity, stability, safety, trust, and good reputation constitute the most important values of the company. Each of us, through personal morality, contributes to the creation, support, and protection of these values, thereby demonstrating respect towards colleagues, superiors, subordinates, customers, suppliers, and all other business partners with whom we come into contact.

The purpose of introducing the Code of Ethics into corporate life is to:

- present the corporate culture to new employees, the wider public, and competitors,
- familiarize new employees with rules, standards, and principles of conduct,
- guide employees in decision-making related to work activities, interpersonal interactions, and business relations,
- represent the corporate brand and promote the company's good name in the business environment and among the general public.

1. Occupational Health and Safety

Occupational health and safety is one of the highest priorities of our company. We strive to create hygienically safe and secure working conditions and to eliminate, to the greatest possible extent, risk factors that endanger employee health. Outside the workplace, we also ensure a high level of social and healthcare support for our employees.

Internal regulations are developed in accordance with applicable Slovak legislation and are implemented at workplaces primarily to protect the safety and health of every employee. Each employee is familiar with the company's safety system and thus becomes responsible (for themselves and their colleagues) for knowing and complying with all applicable occupational health and safety regulations.

Employees are prohibited from bringing, possessing, or consuming alcoholic beverages and other narcotic or psychotropic substances on company premises during working hours or outside the premises, and from reporting to work under their influence.

2. Protection of the Company's Good Name and Property

Each employee represents not only themselves but also the company in public. Employees are therefore expected to behave in a manner that does not damage the good name or interests of the company.

Each employee is obliged to protect the company's intellectual property as well as its tangible assets. Misuse of information, damage to, or theft of company property is considered a serious breach of work discipline.

3. Environmental Protection

In all activities, we respect applicable technological and environmental standards and ensure environmental protection. All employees are required to comply with environmental protection regulations relevant to their job positions.

In the environmental area, the company supports programs aimed at protecting and developing the environment of the region.

4. Human Resources Development and Regional Development

We focus on creating and maintaining job opportunities both within the region and beyond, thereby contributing to economic growth and the improvement of living standards in the region and society as a whole. We provide job security to the region's inhabitants and implement measures aimed at employee stabilization and professional development.

We recognize the importance of building the corporate brand and employee identification with their employer; therefore, we support their professional and personal development through all available means.

In employment relations, we comply with the Labour Code, all generally binding legal regulations, the agreed Collective Agreement, and the Board of Directors' Program. Employees are recruited and assigned without discrimination, taking into account qualifications, expertise, experience, personal competencies, and loyalty.

We value employee loyalty and reward it regularly on work and life anniversaries. Through sponsorships and donations, we support healthcare, cultural, educational, and infrastructure development in our region.

5. Workplace Interpersonal Relations

We require all employees to treat each other with respect, tolerance, and dignity, and to apply principles of teamwork. Employees recognize that they form one team united by common company goals and therefore cooperate willingly, assist one another, and share important information.

Employees must not initiate or participate in any form of threatening, intimidating, hostile, or offensive behavior based on race, skin color, religion, gender, nationality, age, status, disability, or political opinion. Sexual harassment in the form of any sexual advances is strictly prohibited in the workplace.

Managers treat their subordinates with respect and dignity, excluding any form of discrimination, humiliation, or abuse. They address conflict situations promptly and impartially, thereby contributing to a positive workplace climate.

6. Relations with Customers and Suppliers

The company builds long-term relationships with customers and suppliers based on mutual trust, honesty, and openness. We respect the culture and traditions of customers and suppliers regardless of their origin.

We commit to complying with agreed contractual conditions. We regularly analyze customer needs, requirements, and expectations and respond to them through product quality, delivery times, and pricing, including related services.

We ensure that our products are high-quality, safe, and compliant with national and international standards. Customers are provided with truthful and comprehensible information about our products and services. We support continuous innovation of products, production technologies, and distribution methods.

7. Conflict of Interest

During working hours, employees shall devote themselves exclusively to activities arising from their employment contract, job description, or agreements on work performed outside an employment relationship.

Employees must refrain from any activity that could lead to a conflict of interest between the employee and the company. Employees may engage in business activities identical to the company's scope of business only with prior written consent from the management of ŽP a.s.

Final Provisions

This Code is binding for all company employees. Any breach of the provisions of the Code of Ethics is considered a breach of work discipline and is assessed and sanctioned in accordance with the company's internal regulations and generally binding legal regulations of the Slovak Republic.

Employees are obliged to report any breach of the Code of Ethics to their direct superior or the Human Resources Department. Reports may be made verbally, in writing, by telephone, or by email. The responsible superior must assess the report and forward it to the HR Director.

Deliberately false reporting of a breach of the Code of Ethics with the intention of harming another person is considered a breach of this Code.

This Code of Ethics supplements and extends rules, principles, and standards of conduct defined in certain internal company regulations and documents. It sets boundaries that should not be crossed and defines principles of behavior with emphasis on company values, internal relations, and relations with the external environment.