

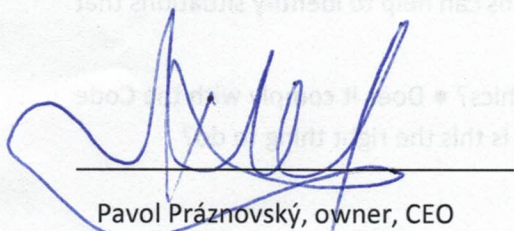


## GRIZZLY S.R.O. CODE OF ETHICS AND BUSINESS CONDUCT

### Message from Pavol Práznovský a Kristína Práznovská, owners of GRIZZLY s.r.o.

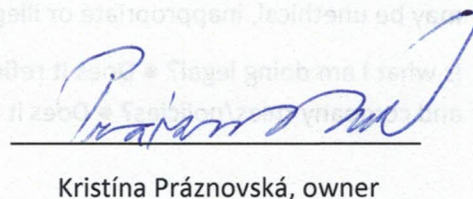
Our commitment to ethical behaviour and the solid ethical foundations are one of the most essential components of GRIZZLY operation. We are committed to doing business the right way, based on a culture of ethics and compliance.

Thank you for upholding our values and helping us doing things right. It does not only mean that we provide well made, fairly priced and of exceptional quality products and services, but it also means that ethics and integrity is always born in mind. We monitor our entire operation for compliance with our Code.



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Pavol Práznovský, owner, CEO



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Kristína Práznovská, owner

### 1. Introduction

This CODE OF ETHICS AND BUSINESS CONDUCT of GRIZZLY s.r.o. serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders. We, at GRIZZLY s.r.o. are committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for the GRIZZLY s.r.o. (including owners, directors, managers, team leaders, employees, temporary, or consultant staff).

GRIZZLY s.r.o. expects its staff to be impartial and honest in all affairs relating to their job. All staff bear a responsibility in general, to be of good faith and do nothing to destroy the trust necessary for employment.

All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.

GRIZZLY s.r.o. is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting a misconduct in good faith.

Managers and leaders has higher responsibility for demonstrating, also through their actions, the importance of this Code. Managers and leaders are responsible for promptly addressing every raised ethical question or concern. Employees must cooperate in investigations of potential or alleged misconduct.

Non-compliance to this Code considered as a misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases.



## 2. Ethical Values

Acting with Honesty and Integrity

Promoting Teamwork and Collaboration

Creating values for all employees

Maintaining health and safety

Personal responsibility and reliability

## 3. Ethical Decision-making

Ethical conduct is a value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate or illegal. Ask yourself:

Is what I am doing legal? • Does it reflect our company values and ethics? • Does it comply with the Code and company rules/policies? • Does it respect the rights of others? • Is this the right thing to do?

## 4. Compliance with laws and regulations

Our commitment to integrity begins with complying with laws, rules and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

## 5. Human rights

We are committed to respect human dignity and rights of each individual and community whom we interact with during work. We shall not, in any way, cause or contribute to the violation of human rights. Our staff shall treat everybody with dignity, respect and care and uphold human rights.

## 6. Fair labour practices and working conditions

We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws. We are firmly opposed to employ or contract child or slave labour or any form of forced or compulsory or bonded labour. We condemn all forms of illegal, unfair, unethical labour practice that exploits workforce, destroys social security or serves as tax evasion, including but not limited to undeclared and "grey" work or holding back wages.

Our staff shall act with integrity and treat their colleagues and others through the work with full respect.



## **7. Discrimination and harassment**

We provide equal opportunity in employment, and we do not tolerate any discrimination or harassment or any type from abuse. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstance, like gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, sexual orientation, employee representation, property, birth or other status. Any kind of discriminatory behaviour, harassment, bullying or victimization is prohibited.

All staff is expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behaviour that could be taken as offensive, intimidating, humiliating, malicious or insulting.

## **8. Health, Safety and Environment**

We provide clean, safe and healthy work conditions and we are dedicated to maintaining a healthy environment. We are committed to minimise the impact on the natural environment of our operations. We make efforts to reduce the use of finite resources, like energy or water, and the harmful emissions, like waste.

All staff must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times.

## **9. Security, protection and proper use of company assets**

We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment and information are provided for legitimate business use only. Occasional personal use is permissible as long as it is lawful, does not affect job performance or disrupts workplace morale.

All staff is obliged to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

## **10. Bookkeeping, true reporting and financial integrity**

Our books, records, accounts and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipt or accounting fake expense invoices.

All staff must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. All staff must not improperly influence, manipulate or mislead any audit.



**11. Anti-Fraud**

Fraud – the act or intent to cheat, steal, deceive or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g. submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

**12. Privacy, personal data protection**

We respect people’s privacy and we acknowledge customers, employees and other natural persons’ need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply GDPR and all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.