

# CODE OF ETHICS

of the company

## FOXON s.r.o.

**Effective from April 1, 2021**

	Function	Name	Date
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## **1. COMPANY REPRESENTATION**

We act sincerely in the interest of the company and customers. We promote the ethical principles of the company through our professional conduct and expression. We make sure that our personal attitudes and interests are not confused with the attitudes and interests of the company.

We do not present our opinion of colleagues and our workplace on professional websites.

When working with social media as part of our work, we always introduce ourselves as employees.

We do not speak, write or accept any commitments on behalf of our company unless we have an official authorization to do so.

We do not communicate about matters that do not fall within our professional competence.

We do not use our company's letterhead or e-mail addresses to express personal opinions or for private matters.

## **2. LOCAL LEGISLATION AND CUSTOMS**

Our company is committed to complying with laws and other stakeholder requirements regarding quality, health and safety standards, labor law, the environment, corruption and money laundering, data protection, taxation, accurate financial and non-financial reporting and fair competition.

## **3. LENGTH OF WORKING HOURS**

The length of working hours will comply with national legal regulations and industry standards, depending on where there is greater protection.

In no case will employees be required to work longer than 48 hours per week and must be given an average of at least one day off every 7 days. Overtime work will be voluntary, must not exceed 12 hours per week, must not be required regularly and must always be remunerated with a higher salary.

## **4. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING**

All workers, without distinction, are entitled to join a trade union of their choice or to form a trade union and have the right to bargain collectively.

The employer approaches the activities of the trade union and its organizational activities openly.

Employee representatives are not discriminated against and are allowed to perform their functions as representatives at the workplace.

If the right to free association and collective bargaining is restricted by law, the employer will allow the creation of parallel ways of independent and free association and bargaining and will not hinder them in any way.

## **5. TAXES**

We maintain accurate and complete accounting records and statements for tax purposes.

We process tax forms that concern us and are relevant.

We do not allow our company to evade its tax obligations.

## **6. USE OF COMPANY RESOURCES**

We respect and protect company property from loss, damage, misuse and waste. We do not lend, sell or donate it to others without the approval of the company's management.

We keep in mind that all company property and documents belong to our company.

We do not use company property for personal use; Limited use of communication tools such as e-mail, telephone, and the Internet for personal purposes may be acceptable as long as it does not involve disproportionate costs and disrupt our work performance.

We do not improperly use computer technology, corporate electronic mail accounts and the Internet.

We do not use property belonging to a third party (photographs, films, articles, etc.) without verifying that the company is authorized to use it.

## **7. CARING FOR THE ENVIRONMENT**

We prefer renewable resources.

We take all necessary measures to prevent and stop the violation of the ecological mindset of our company.

We undertake to immediately report any accidents or other facts that significantly affect the environment.

By making the right choice with regard to purchasing services and products, we contribute to environmental sustainability.

## **8. HEALTH, SAFETY AND SECURITY**

We take all necessary measures to maintain a healthy and safe working environment.

We ensure that our behavior does not put ourselves or others at risk.

We make sure we know what to do in the event of an emergency in the workplace.

In no case do we ignore company rules regarding safety and health at work.

## **9. CONFIDENTIAL INFORMATION**

We limit the disclosure of inside information to those who need to know it in the interests of our company.

We ensure the secure storage of confidential records (both printed and electronic) of employees, consumers, customers and suppliers.

We always check whether we have the right to disclose inside information to third parties outside our company.

We do not discuss internal information or work with it in public, where someone can listen to someone else's conversation or steal this data.

We do not disclose internal information of our previous employer.

We do not retain any internal information when leaving the company.

## **10. PRIVACY AND PROTECTION OF PERSONAL DATA**

Within the company, we ensure compliance with GDPR procedures. We inform everyone whose personal data we collect of what type of information we collect, how we want to use the information and how they can contact us with any questions.

We only collect personal information that we absolutely need.

We correct any inaccurate or incomplete data.

We ensure the secure storage of such information.

We ensure that such data is provided within the company only to authorized persons who

really need to know it.

We respect the right to privacy of our colleagues.

We ensure that third parties that we entrust to the collection or processing of personal data comply with this policy.

We do not collect information regarding ethnic origin, sexual orientation, political opinion or religion.

## **11. DIFFERENCES AMONG PEOPLE - HUMAN RIGHTS, CHILD LABOR**

We support and promote the company's commitment to respecting diversity among people.

We make sure that our employees know the strategy of diversity among people that we pursue.

Under no circumstances may we discriminate or harass anyone on the basis of their gender, disability, marital status or family situation, sexual orientation, age, political and philosophical views, religion, trade union activity, ethnic, social, cultural background or nationality.

This prohibition of discrimination applies not only to recruitment, but also to all decisions concerning training, promotion, further employment and working conditions in general, as well as to relations with third parties.

Based on value-oriented management and with regard to internationally recognized human rights, the basic principles of the International Labor Organization and the laws in force in different countries and places, as well as the expression of recognition of different cultures, we apply the following principles:

- Behavior towards employees: We respect and protect the human dignity of each individual. Discrimination and harassment will not be tolerated. Discrimination based on ethnic or cultural characteristics, disability, gender, religion, age or sexual orientation will not be particularly tolerated. All our employees have the right to be treated fairly, politely and with respect.

- Child labor and forced labor: Child labor and forced labor will not be tolerated and will be rejected without exception, even in the case of our business partners. We do not employ children at any stage of the provision of our services. The term "child" refers to any person under the age of 15.

## **12. HARASSMENT AND BULLYING, SEXUAL HARASSMENT**

We create and maintain a work environment free of harassment, bullying and sexual harassment.

We are polite. We treat our colleagues and business partners as we would like them to treat us.

We do not knowingly harm, bother, or persuade anyone to make a mistake.

We refrain from any sexual harassment, whether in relation to employees or third parties we encounter at work.

We do not behave in a way that is marked as undesirable.

## **13. COMPANY CONTRIBUTIONS**

We realize that charity is a long-term commitment. All actions, regardless of their scope, must be implemented with a clear idea of how they will contribute to building a long-term partnership.

Our company must not be associated with events that do not comply with our ethical principles and the group's charitable strategy.

We do not force employees or business partners to make donations or funds to charitable projects that our company supports.

#### **14. FAIR COMPETITION**

We refrain from disrespectful remarks about competitors, including false statements about their products and services.

We refrain from forcing customers or our providers to breach contracts with competitors.

We do not enter into exclusive contracts without prior legal consultation.

We do not obtain information about competition by illegal means or by hiding that we are employees of FOXON s.r.o.

#### **15. ILLEGAL TRADING**

We maintain the confidentiality of any information to which we have access to prevent accidental disclosure.

We do not share inside information with anyone outside the company, including family members, or anyone within the company.

We do not trade in the shares of the company or any other company based on the inside information obtained about this company.

#### **16. CONFLICT OF INTEREST**

We notify our supervisor immediately if there is a potential conflict of interest that could affect or act as an influence on decisions and actions (for example, if a family member is an employee of the provider), or if we hold a position or have a financial or other interest in any organization that is a competitor, a customer, a provider or other business partner of our company, if this position could affect business relationships.

We may not and do not withhold any information about conflicts of interest.

#### **17. SELECTION OF EXTERNAL PROVIDERS AND FAIR TREATMENT OF THEM**

We select providers on the basis of an open tender and we evaluate the offers of individual suppliers impartially and honestly.

Transparent selection and provision of information to rejected candidates based on objective facts is a common principle of our communication.

We lead all our providers to understand and respect our ethical requirements and expectations.

We make payments to our providers on time and according to agreed conditions.

We protect providers' confidential information as if it were our own.

We set suitable conditions for our providers (e.g. payments, deadlines, etc.).

We refuse to continue cooperating with a provider who repeatedly fails to meet our requirements and expectations or does not respect our ethical principles, especially in the area of human rights or the fight against corruption.

#### **18. FINANCIAL AND BUSINESS STATEMENTS AND THE FIGHT AGAINST MONEY LAUNDERING**

In all circumstances, we play our part in maintaining accurate financial and business statements, whether financial or non-financial.

We cooperate with our external and internal auditors.

We do not sell, transfer or otherwise dispose of any of the company's assets without proper approval and documentation. Unless otherwise agreed and if the amount for which such a transaction is permitted by law, each cash transaction must be explicitly approved, properly

recorded and documented.

In no case do we make payments secretly using third parties.

## **19. GIFTS AND BENEFITS**

All the gifts and benefits we offer will be appropriate and in accordance with the ethical principles of our company.

When establishing a new business relationship, we ensure that all parties are informed from the outset about our company's principles for giving and receiving gifts and benefits.

We immediately notify our supervisor of any gift or invitation we receive.

We do not accept gifts or benefits unless they are merely symbolic in value.

We do not give or accept monetary donations.

## **20. BRIBERIES AND FINANCIAL INCENTIVES**

We ensure that our business partners and intermediaries are familiar with our standards and commit to them.

We inform our supervisor of any conduct that may be in conflict with our anti-corruption strategy.

We inform a manager that someone is blackmailing us or trying to do so, that is, that he is asking for cash or something of value in exchange for not immediately hurting our company's employees or representatives.

We do not offer or provide money, financial incentives or anything of value (gifts, benefits, etc.) to representatives of a state body or political party, or to politicians, unions and persons who have any relationship with unions.

We do not offer or provide money or anything of value (gifts, benefits, etc.) to charities and similar organizations in order to obtain any benefits for our company from representatives of government agencies, political parties or trade unions.

We do not offer or provide employees or representatives of another company with money, financial incentives or anything of value (gifts, benefits, etc.) that could lead to a breach of duty to their own company.

We do not accept or solicit money or anything of value (gifts, benefits, etc.) that could lead us to a breach of our obligations to our company or that could be judged to affect business relationships.

We do not authorize third parties to do something that we may not or do not dare do directly.