

# CODE OF ETHICS

FOR SUPPLIERS AND BUSINESS PARTNERS  
OF THE PPA CONTROLL GROUP

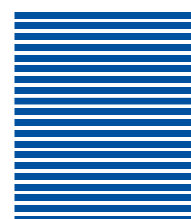
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All companies within the PPA CONTROLL group are required, in the course of their activities, to demand that each of their suppliers and business partners **comply with the rules of conduct** set out in this Code of Ethics for Suppliers and Business Partners.

## PURPOSE AND SCOPE 1.

This Code of Ethics (hereinafter the “Code”) defines the minimum behavioural and conduct requirements for **suppliers and business partners** of the companies in the PPA CONTROLL group in all countries in which they operate. The Code does **not replace** applicable laws. In cases where stricter local regulations exist, the **stricter requirements** shall be applied. Compliance with the Code is a **condition of cooperation**, and the supplier shall ensure its application by **its subcontractors** throughout the entire supply chain.



## 2. OUR VALUES AND PRINCIPLES

The vision, mission, and values of the group of companies in PPA CONTROLL form the fundamental pillar of our corporate identity. In pursuing **our vision**

“TO INSPIRE SUCCESSFUL PEOPLE AND CO-CREATE THE WORLD OF CLEANER AND MORE COMFORTABLE TECHNOLOGIES.”

we are driven by **our mission**

“TO BE A TEAM OF EXPERTS BREATHING LIFE INTO THE TECHNOLOGIES OF THE FUTURE.”

In our everyday decision-making, we are guided by our **core values**. Relationships with our suppliers are built on these values:

- **Stability**
- **Ingenuity**
- **Passion for perfection**
- **Partnership**
- **Ecological entrepreneurship**

We apply the principles of **business ethics** and **corporate social responsibility (CSR)** in all commercial agreements.

## FUNDAMENTAL REQUIREMENTS FOR SUPPLIERS

3.

### COMPLIANCE WITH LAWS AND STANDARDS

3.1

The supplier complies with all international, European, and national legal regulations, including:

- **International Covenant on Human Rights**
- **ILO Conventions (International Labour Organization)**, particularly No. 138 and No. 182
- **Charters of Fundamental Rights of the EU**
- **UN Guiding Principles on Business and Human Rights (UNGPs)**
- **The 10 Principles of the UN Global Compact**

The supplier shall implement **preventive and supervisory mechanisms** to prevent violations, detect them, and ensure proper investigation.

### SOCIAL RESPONSIBILITY AND HUMAN RIGHTS

3.2

Every supplier must ensure:

- **Respect for human dignity:** fair, respectful, and non-discriminatory treatment.
- **Prohibition of forced labour and human trafficking:** no confiscation of documents, wages or property; the right to terminate employment.
- **Prohibition of child labour:** in line with ILO Conventions 138 and 182, employment only from the age of 15 (or higher if required by local law); protection of children’s rights.
- **Protection of working minors (under 18):** prohibition of hazardous work; respect for education and health needs.

### 3.3 WORKING CONDITIONS

All our suppliers ensure and provide:

- **Wages and benefits** at least in accordance with legal requirements, collective agreements and contractual obligations.
- **Working hours:** adherence to local limits, rules for work overtime and breaks as required by law.
- **Occupational health and safety (OHS):** safe workplaces, risk prevention and continual improvement.

## ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

4.

The supplier shall comply with all **environmental regulations**, minimize environmental impacts, promote **environmentally friendly technologies**, **reduce greenhouse gas emissions**, increase **energy efficiency** and prioritize renewable resources, circular economy solutions and responsible waste and chemical management. The supplier shall implement appropriate **targets and metrics** (e.g., carbon footprint, water use and protection, waste management).

### 3.4 EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

The supplier conduct must be free from discrimination based on gender, race, nationality, disability, political opinion, origin, religion, age, sexual orientation or other protected characteristics. Personal dignity and rights must be fully respected.

### 3.5 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The supplier shall respect the right of employees to organize, join associations and participate in collective bargaining and shall not engage in any form of retaliation.



## QUALITY OF PRODUCTS AND SERVICES

5.

The supplier shall ensure that all products and services meet quality and safety requirements as well as legal and technical standards. Any identified deficiencies shall be reported immediately. Upon request, the supplier cooperates on preventive and corrective actions.

## 6. INTEGRITY AND ETHICAL BUSINESS CONDUCT

### 6.1 ANTI CORRUPTION

The supplier shall apply a **zero tolerance policy** toward bribery, kickbacks, improper advantages, and facilitation payments. Both the direct and indirect offering or acceptance of any inappropriate benefits or considerations are strictly prohibited.

### 6.2 CONFLICT OF INTEREST

The supplier is obliged to **promptly disclose** any circumstances that may constitute an actual or potential conflict of interest (including personal or financial links).

### 6.3 FRAUD AND ACCOUNTING INTEGRITY

The supplier is prohibited from engaging in any form of fraudulent conduct and shall maintain **accurate, complete and truthful records**.



### COMPETITION LAW 6.4

The supplier shall comply with competition (antitrust) laws; cartels, bid rigging, market sharing, price fixing and abuse of dominant position are strictly prohibited.

### TRADE RESTRICTIONS, IMPORT AND EXPORT COMPLIANCE 6.5

The supplier shall adhere to **sanctions regimes**, embargoes and import–export regulations, including preventive mechanisms and controls to avoid violations.

## 6.6 CONFIDENTIALITY, TRADE SECRETS AND INTELLECTUAL PROPERTY

The supplier shall protect the confidential information, data and intellectual property (IP) of the companies in the PPA CONTROLL group and third parties. Unauthorized disclosure or use of confidential information and data is prohibited, even after the termination of contractual obligations.

## PERSONAL DATA PROTECTION 6.8

The supplier shall ensure compliance with all applicable data protection regulations (including GDPR) and adhere to the internal Personal Data Protection Terms of the companies in the PPA CONTROLL group (as published on the website of PPA CONTROLL group).

## 6.7 ANTI MONEY LAUNDERING AND COUNTER TERRORIST FINANCING

The supplier shall comply with Anti-Money Laundering (AML) / Combating the Financing of Terrorism (CFT) requirements and perform appropriate due diligence on its business partners.



## 7. COMPLIANCE MONITORING AND CONSEQUENCES OF NON COMPLIANCE

### DUTY TO REPORT 7.3

#### 7.1 SUPPLIER DECLARATION

The supplier commits to complying with this Code and ensures that its **subcontractors** are familiarised with it and follow its rules.

The supplier shall **promptly** inform any company of the PPA CONTROLL group of **any breach or suspected breach** of this Code **in writing** (including breaches by subcontractors), cooperate in investigations and disclose the results.

#### CORRECTIVE ACTIONS 7.4

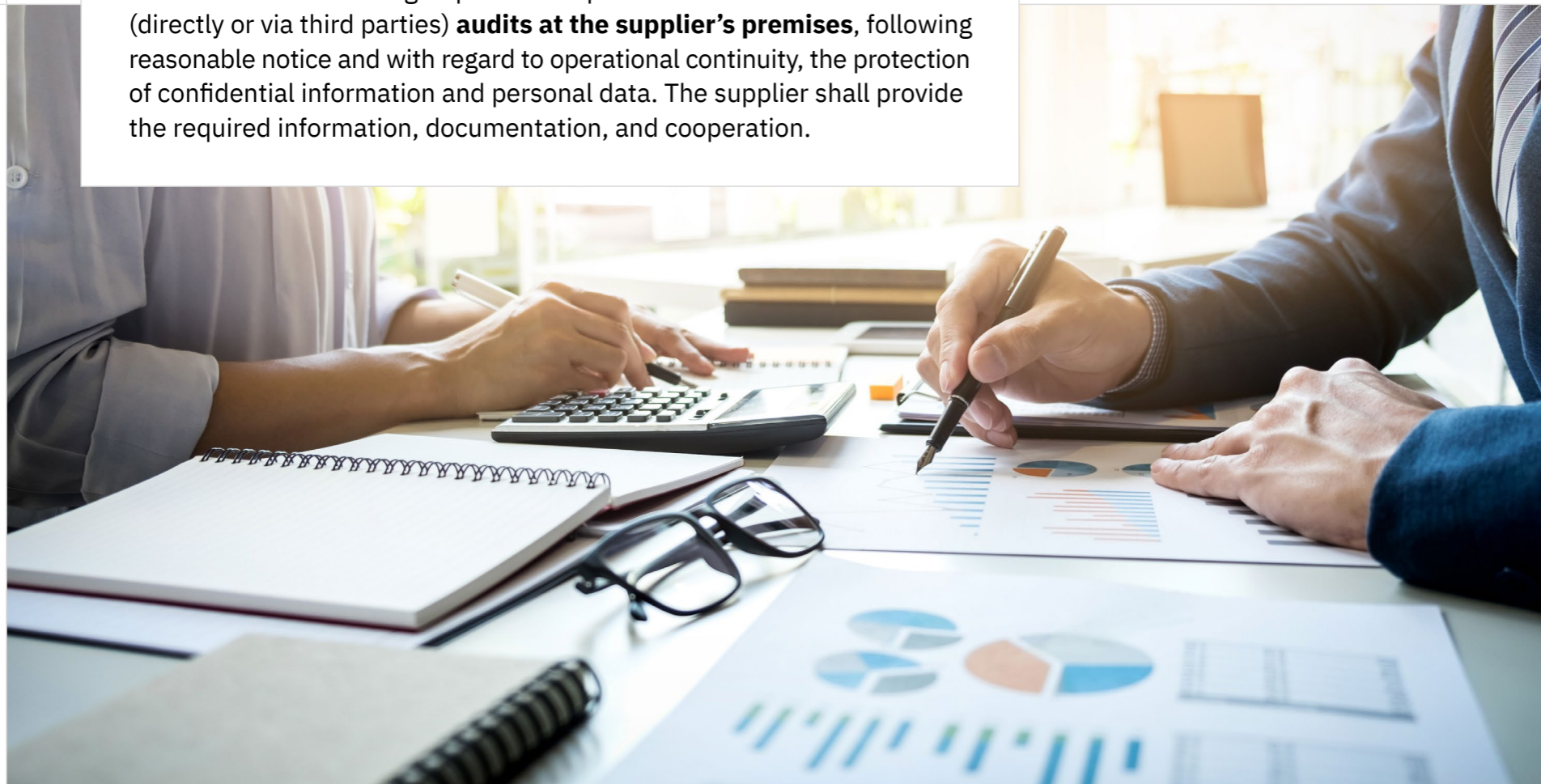
#### 7.2 AUDITS AND VERIFICATION RIGHTS

PPA CONTROLL and the group of its companies are entitled to conduct (directly or via third parties) **audits at the supplier's premises**, following reasonable notice and with regard to operational continuity, the protection of confidential information and personal data. The supplier shall provide the required information, documentation, and cooperation.

Upon request from the companies in the PPA CONTROLL group, the supplier shall develop and implement a **corrective action plan** with an appropriate timeline. The company in the PPA CONTROLL group may propose its own corrective action concept and the supplier is obliged to cooperate accordingly.

#### TERMINATION OF CONTRACTUAL RELATIONSHIP 7.5

Serious or persistent violations of this Code by a supplier may lead to the **contract termination** and the exercise of further legal claims.



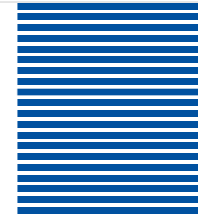
## REPORTING CONCERNS (WHISTLEBLOWING)

All parties involved (suppliers, business partners and their subcontractors) are required to report any breaches or suspected breaches of this Code.

### Reporting channels:

- **E-mail:** marek.jurina@ppacontroll.sk
- **Postal address:** PPA CONTROLL, a. s.  
Legal Department  
Vajnorská 137  
830 00 Bratislava  
Slovakia

Reports may be submitted anonymously and will be treated confidentially. **Whistleblowers are protected** against adverse retaliatory actions in accordance with applicable legislation.



## IMPLEMENTATION AND UPDATES

The PPA CONTROLL group may **update** the Code as necessary (e.g. due to legal changes or emerging risks). Suppliers will be informed of such updates. After a revised version of the Code is published, suppliers are expected to promptly **adjust** their internal processes accordingly.

### Appendix A: Quick Compliance Checklist for Suppliers

1. Do we have an internal policy on **human rights** and **zero tolerance for corruption**?
2. Can we provide evidence of **OHS training**, accident records, and preventive measures?
3. Do we keep verified records of your employees' age (minimum 15 years) and rules for working minors?
4. Do we have **environmental targets** (emissions, energy, waste) and documentation?
5. Do we maintain a **subcontractor management process** (flow down, audits)?
6. Do we have established whistleblowing channels and internal investigation procedures?
7. Are GDPR and data confidentiality compliance, **records of processing**, data processing agreements and security measures ensured?
8. Do we comply with **competition law, sanctions** and **export control regulations**?

**Approved by:** Ing. Bystrík Berthoty  
Chief Executive Officer

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