

CODE OF CONDUCT

ACE TECH

ADVANTAGE THROUGH ► TECHNOLOGY

May 2019

ACE-TECH s.r.o. Code of Conduct

ACE-TECH s.r.o., (hereinafter referred to as "the Company") adopts this code of ethics as a set of elementary values and attitudes to the enterprise which ACE-TECH s.r.o adheres to in the performance of its business activities.

Among the most important objectives the company includes maintenance of goodwill and confidence of all parties concerned.

The Company's code of ethics is not a generally binding legal regulation nor an internal directive of the Company.

Compliance with the code of ethics on the part of the Company is considered a moral obligation, addressing the behavior and conduct of all its employees towards the Company, customers and other business partners, administration authorities and the public.

Customer relations

Honesty and fairness towards the customers are deemed by the Company as the basis for successful and continuous business relationship.

The Company is mindful that its products conform to declared quality parameters and requirements as contained in national and international standards. The Company is aware of the importance that all deliveries be prompt.

In its effort to carry out the sale of its products, the Company shall not use any means other than lawfully recognized business methods. The Company considers corruption practices of any kind as impermissible.

The customer's information is regarded by the Company as confidential.

Supplier relations

The selection of suppliers is carried out in accordance with the rules of business competition in relation to the applicable legal regulation (the Act on commissioning public contracts, as amended) and the internal set of managing acts concerning these issues.

In the purchase of products, services, etc. the Company shall not use any means other than lawfully recognized business methods and shall never abuse its position in the market. The Company considers corrupt practices of any kind as impermissible.

The Company respects all contractual stipulations and payment morals.

All information concerning the relations with its suppliers is regarded by the Company as confidential.

Shareholder and other investor relations

The Company's annual reports are truthful, exact and timely. The Company strives to provide the investors with yields attractive in the long term.

The Company informs its investors on a regular basis of its business policy, results attained and expectations.

Relations with administrative authorities, municipalities and regional authorities

In the course of its business activities, the Company also takes into consideration the interests of wider community including national and regional interests.

The Company communicates with administrative authorities using truthful information about itself.

The Company is particular in properly kept books and timely settlement of its financial obligations towards administrative and municipal authorities.

Relations with competitors

The Company fights its competitors resolutely but fairly.

The Company shall not impair the reputation of its competitors.

The Company is mindful that in relation with its competitors its employees respect the confidential nature of business information or otherwise inside information.

The Company shall not try to acquire information on the competitors' business activities in an unfair manner.

The Company shall not use restrictive business practices and shall not in any form abuse its dominant position on the market.

Employees

The relations of the Company towards its employees are based on respect for dignity of individuals.

The Company employs and promotes employees on the basis of their qualifications for the given job without any political, racial, religious or national discrimination, regardless of sex, age, status or disabilities not related to the given work assignments.

In accordance with the best traditions in the sector the Company strives to create a hygienic and safe work environment, auspicious working atmosphere and favorable conditions for enhancing the employees' professional qualifications.

The Company ensures regular rewarding of its employees for the work performed including due payment of wages in terms arranged.

The Company shall not tolerate sexual, physical or mental harassment of the employees.

The organization expects that its employees behave commercially. Drinking, gambling, guns and similar non-professional activities are strictly forbidden during work.

The Company requires that employees respect the principles of safe work and observe and utilize the determined hours of labor.

The Company requires that in relation to the Company's property the employees not act in contradiction with legitimate interests of the employer and manage the entrusted property duly and with a

view to protection thereof.

The information gathered by the employees about the Company during performance of their work shall not be used for personal profit or any purpose other than that it was intended for.

Any personal benefit of an employee or a member of the family gained from the Company's activity must be lawfully acknowledged.

In dealing with contingent labor disputes between the Company and the employees the Company preferentially applies negotiation procedures.

We appreciate employees' commitments outside of the workplace and support our employees in achieving a balance between work and home life.

The ACE-TECH s.r.o. expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Organization.

Employees must not use their positions, or the knowledge gained as a result of their positions, for private or personal advantage.

Management, accountability and control of senior management

A culture of ethical behavior begins at the top management of the company. All members of the organs, managers and executives are an example and create an environment and culture within the company, have a thorough knowledge of the rules and ensure their implementation and compliance in practice, communicate and ensure employee training, proactively identify issues and risks, and take appropriate preventive measures to minimize risks.

It creates an environment where employees are not afraid to warn of breaking rules. In case of detection of breach of the rules, they shall take unconditional and immediate action.

Employee engagement

We support openness and honesty in all our relationships.

We work globally and expect mutual respect and cooperation among all our people.

We are engaging our people in improving business and welcoming their feedback.

We resolve the disputes fairly.

We respect the relevant processes and laws in the countries where we work. We evaluate performance goals fairly and consistently.

We regularly monitor the performance of our people and provide constructive feedback.

We invest in training, education and development to improve our employees' skills and entrepreneurship.

Environment

The Company is continuously concerned with improving the quality of the environment.

The Company actively participates in removing the consequences of its enterprise and by means of modification of technological processes it strives to minimize the impact of the industrial process on the environment.

The Company informs its environs about its environmental program.

In its business activity, the Company respects the standards established in the sphere of waste, emissions, etc.

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Business meeting

The company offers and sells its products and services based on their quality and price. All business operations must be approved.

Business relationships must comply with generally binding legal regulations and are documented by appropriate documents.

In the business, employees are concerned about the legislation in the area of measures against the legalization of proceeds from crime.

Business courtesy, anti-bribery corruption

Business courtesy, anti-corruption behavior. Employees must respect anti-corruption regulations.

It is forbidden to develop activities that could be perceived as corrupting and influencing a partner in order to gain an unjustified advantage for a company or group.

Employees respect the rules and regulations for subsidies, tenders and other contracts of state and public

institutions. It is forbidden in any way to influence the representatives of these institutions in order to obtain an unjustified advantage.

Employees of the Group cannot give or receive gifts and attention that could be perceived as a bribe or special advantage. An exception is corporate gifts of small value with the company logo.

Other donations must be tacitly refused.

Employees of the Group may not directly, indirectly, offer, give, require or accept bribes to acquire or maintain business relationships.

Conduct principles

Professionalism

Professionalism also means emphasizing the personal development of every individual who grows up with the company and keeps it at a high level. This requires personal passion, willingness to accept assigned tasks and the will to acquire the necessary knowledge.

Teamwork

Teamwork is a basic principle of work in ACE-TECH s.r.o. That is why we place emphasis on team behavior and behavior that involves not only working with colleagues, but also respecting the work of others.

Only a strong team of people is able to create values and move the company on.

Loyalty

Under all circumstances, it is the responsibility of each employee to defend the company's reputation and to act in accordance with the company's good reputation. At the same time, it means the incompatibility of any enforcement of one's own interests that would be contrary to the interests of society. It is assumed that the internal guidelines and internal rules are observed.

Respect for others

Every employee of ACE-TECH s.r.o. is obliged to respect the other colleague, regardless of age, religion or nationality. At the same time, we require respect for the opinions of others, even if they do not have to coincide with the opinion of the individual. It is important that everyone respects the personal and workspace of everyone and plans personal meetings and business matters with regard to the individual's schedule. This includes the early fulfillment of one's obligations towards each other and, in the event of inability to meet the given deadline, the timely apology and the proposed new term.

Compliance with the law

ACE-TECH s.r.o. strictly complies with applicable laws in the country in which it operates. Particular attention is paid to the principle that the company is delaying the funding of any political party or political activity and rejects any form of active or passive corruption.

Privacy Notice

We comply with the high demands of the General Data Protection Regulation (GDPR) of the European Union.

In the context of the business relationship with ACE-TECH s.r.o., ACE-TECH s.r.o. may process the following categories of personal data of current and future contact persons at our customers, suppliers, vendors and partners.

Financial statements

All reports, reports, data sets, drawings for internal and external needs must be correct and true to reality.

In accordance with the principles of sound bookkeeping, the data must be complete, correct, and timely in the economic administration software.

Defined processes, approval mechanisms, and controls ensure that all operations are performed according to specified approval mechanisms, and any unauthorized or unauthorized transactions are identified.

Contact information

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