



# CODE OF BUSINESS CONDUCT



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## PURPOSE AND INTENT OF THE CODE

The purpose and meaning of this Code is to introduce ICE Industrial Services Inc. (hereinafter referred to as “ICE”), one of the fastest growing automation companies in the Czech Republic, to our business partners through the values it shares.

The purpose and meaning of this Code is to show that ICE is a transparent, modern and innovative European company that prides itself not only on its corporate successes, but above all on its people and on its values, which belongs among the best that can be imagined under the word a modern European company.

The purpose and intent of this Code is to commit to the values expressed herein, with the proviso that we consider them as a self-evident minimum.

We are confident that our business partners, whether they are our customers or suppliers, will confirm that we are not only professionals in our field, but also a responsible company that considers its employees, corporate values and principles equally important as business success.

## TRANSPARENT EUROPEAN COMPANY

ICE Industrial Services is a joint stock company based in the Czech Republic. In the Czech Republic and in accordance with Czech law, we employ people and pay taxes.

The Czech Republic became a member state of the European Union on May 1st 2004. The legal system of the Czech Republic has undergone a demanding adaptation process during the Accession negotiations but in particular during the following years, and the Czech legal system (including institutions) is now harmonized with EU requirements and EU law. The legislation of the Czech Republic, which ICE is primarily governed by, is based on the principles and values espoused by the European Union.

We try to be as transparent company as possible. Detailed information about our company can therefore be found not only on our website [www.ice.cz](http://www.ice.cz) but also and above all in the public commercial register and in related collection of documents.

The real owners of ICE are Czech citizens Petr Otava and Tomáš Vránek.

## OUR VALUES

The entire ICE team has been involved in creating our values based on everyone's personal values. This ensures that these values are not an empty cliché. We actually live them and what's more, they help us find new colleagues - partners who fit in with us. Our values represent how we want to behave among ourselves and how we present ourselves to the outside world.

### 1. TEAM

"WE" are ICE. "WE" is more to us than "Me." Being a team means solving problems together, being helpful, offering help or advice and sharing experiences. Being a team means being reliable, trusting one another, encouraging others, or helping with what needs to be done.

### 2. HONESTY

We're keeping our word and honor our agreements. We are always absolutely open. Being honest means keeping promises and agreements, being honest even when no one is looking, telling the truth, or admitting a mistake.

### 3. PROFESSIONALISM

We're doing the right things right. Perfection lies in the details. Being professional means to have a desire to learn and improve, to solve problems instead of looking for culprits, to look for the most effective solutions and follow through, to have a courage to make decisions and take responsibility, but also to ask for help when I need it, to be an expert and seeing the bigger picture same time.

### 4. FLEXIBILITY

We're flexible. We're in the right place at the right time. Being flexible means to learn quickly, to be where it needs to be, to adapt to the situation and be able to improvise, to know what to do, to cover for another team member.

## 5. FUN

We just enjoy it. Work hard, play hard. Being fun means to create a good atmosphere, deal with things with humor, don't complain, don't take yourself too seriously and smile. When your job just makes you happy.

## LEGAL COMPLIANCE

We act at all times and in all places in accordance with applicable laws and regulations, as well as other obligations and treaties to which we are subject.

We conduct our business activities in compliance with relevant professional standards and practices as well as ethical conduct.

We are committed to transparency and truthfulness of information disclosed to clients, public authorities and the public.



# HUMAN RIGHTS AND LABOR PRACTICES

## 1. FREELY CHOSEN EMPLOYMENT (MODERN SLAVERY)

Our competitive advantage lies in our people and their energy and creativity. Our employees are a diverse, talented and motivated group of people united by our values.

In compliance with the United Nations Universal Declaration of Human Rights, we are committed to voluntary work and support efforts to eradicate human trafficking. The use of forced or bonded labor (including debt bondage) or work involving disadvantageous conditions for the worker, restricting the freedom of movement of workers, withholding of documents, involuntary labor ('modern slavery') or trafficking in human beings is absolutely unacceptable to us. ICE is committed to protecting the rights of all its workers and to preventing all unfair and prohibited practices in this area.

During the hiring process, each and every employee is always provided with a written employment agreement written in their native language that includes a description of the terms and conditions of employment and other terms required by the Czech Labour Code. Neither the employment agreement nor its individual terms and conditions can be unilaterally changed.

Work in our company is voluntary and employees may leave or terminate their employment at any time without penalty. The standard notice period under the Czech Labour Code is 2 months.

## 2. CHILD LABOR AND YOUNG WORKERS

We do not use child labour at any stage of our manufacturing or the services we provide. The term "child" refers to any person under the age of 15, or a person who has not completed compulsory schooling, whichever is higher.

We comply with all relevant international treaties (especially International Labour Organization Convention No. 182) and European Union regulations (EU Charter of Fundamental Rights, EU Council Directive No. 94/33/EC), which are fully implemented in the Czech legal system, especially through the Labour Code and the Employment Act. Supervision and control in the Czech Republic is exercised by the Labour Offices.

Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. We have implemented an appropriate mechanism to verify the age of workers.

We cooperate with secondary schools, higher vocational schools (in the Czech Republic school system, the above schools are for pupils over 15 years of age) as well as with universities and enable students to get the necessary practice, both compulsory (required for proper completion of the field of education) and voluntary. The compulsory practice takes place on the basis of contracts concluded with the school in accordance with the rules of the Education Act, while the voluntary practice takes place in accordance with Czech labor law.

We ensure appropriate registration and management of student workers and protection of their rights in accordance with applicable laws and regulations. We provide appropriate support and training to all student workers. The remuneration of student workers, interns and apprentices is in accordance with the Education Act or relevant labor regulations.

At the end of 2022, ICE employed a total of 182 employees, with the share of employees with a college degree being more than 51%. The youngest employee is 20 years old.

### **3. WAGES AND BENEFITS**

The wages paid to our employees comply with all applicable wage legislation, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers are also paid for overtime work, the rate of which is increased in accordance with the Labor Code .

Deductions from wages as a disciplinary measure are not permissible. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

Any use of temporary workers, agency workers or outsourcing shall be within the limits set by law. ICE explicitly prohibits employment agencies or other intermediaries from charging workers or potential workers recruitment fees.

In 2022, the average wage in ICE was by more than 40% higher than the average wage in the Czech Republic.

### **4. WORKING HOURS**

We are fully aware of the link between worker strain and reduced productivity, between increased sales and increased injury and illness.

We comply with all relevant provisions of the Labour Code concerning working hours, breaks and minimum rest periods, overtime and on-call time. The Czech Labour Code is in full compliance with the

regulations of the European Union (Directive 2003/88/EC of the European Parliament and of the Council on certain aspects of the organization of working time). In accordance with this Directive, the Czech Labour Code provides a maximum 40-hours working week, continuous weekly rest of at least 35 hours, ordered overtime of no more than 8 hours per week and 150 hours per calendar year.

## **5. WORKING CONDITIONS OUTSIDE THE CZECH REPUBLIC**

If our employees are sent to work outside the Czech Republic, all relevant provisions of both the Czech Labor Code and the regulations in force in the country where they are sent are observed. Each outgoing employee is provided with form A1, which confirms the employee's affiliation to social security in the Czech Republic. ICE is committed to providing or arranging accommodation for its employees that meets all housing and safety standards of the host country. All accommodation complies with applicable safety standards to ensure the safety and comfort of all employees.

## **6. FREEDOM OF ASSOCIATION**

In accordance with Czech labor law, we fully respect the right of employees to form and join unions of their choice, the right to bargain together and engage in peaceful assembly, as well as the right of employees not to participate in such activities.

## **7. EQUAL OPPORTUNITIES / DIVERSITY / NON-DISCRIMINATION / NON-HARASSMENT**

Treating others with respect and offering equal opportunities makes us stronger. We therefore embrace diversity as a competitive advantage and believe that our success comes from teams of diverse individuals who complement each other, represent different perspectives and work as one to achieve our strategic goals.

Prohibition of discrimination and respect for equality in employment relations in the Czech Republic are regulated by the Anti-Discrimination Act, the Labour Code and the Employment Act. These laws implement and further develop ILO International Convention No. 111 on Discrimination. As an employer, we comply with the rules set out in these Acts.

As an employer, we do not discriminate in recruitment, selection, compensation, training, job assignment, promotion, termination, or other employment-related activity on the basis of race, color, national origin, religion, sex, age, ethnic or national origin, marital status, sexual orientation, union membership or activity. We protect our employees from coercion, intimidation, retaliation or discrimination for filing a complaint. We do not tolerate sexual harassment, bullying or unlawful discrimination of any kind.

## 8. LOCAL COMMUNITIES SUPPORT

Supporting local communities is a fundamental part of ICE's social responsibility.

Our main motive is to support education across generations. I am one of the founding supporters of the alternative primary school Na Radosti in Žďár. We organize excursions for children from the age of 5 (in cooperation with local kindergartens) to university students and other interested parties from the public. For elementary school children, we organize robotics clubs: ICE Lego Robots (ages 10-13) and Basics of Robot Programming (ages 13-15). In cooperation with the Secondary Industrial School, students receive additional points in the secondary school entrance process for completing our clubs. For students aged 15-20, we organize clubs such as Basics of PLC/HMI Programming and Advanced PLC/HMI Programming. We naturally collaborate with other secondary and higher education institutions across the country.

For those over 20, we organize further education courses in PLC programming, robotics, and Lean training, with the support of the Employment Office of the Czech Republic.

## 9. RIGHTS OF MINORITIES

As an employer, we follow an equal opportunities policy.

We do not discriminate against any minorities (indigenous peoples) in our recruitment process, selection, compensation, training, job assignment, promotion, termination, or other employment-related activity on the basis of race, color, national origin, religion, sex, age, ethnic or national origin, marital status, sexual orientation, union membership or activity. We protect our employees from coercion, intimidation, retaliation or discrimination for filing a complaint. We do not tolerate sexual harassment, bullying or unlawful discrimination of any kind. Employees from ethnic minorities and indigenous peoples are not restricted in any way from using their language or other cultural aspects associated with their ethnicity.

ICE supports modern global trends regarding access to the rights of indigenous peoples and local communities, including their rights to access and use their traditional natural resources (land, forests, water bodies), even though this is not something that directly affects us in the areas where we operate.

By the very nature of its business, ICE has never mined, does not mine, and does not plan to mine resources in locations where indigenous peoples are present. We consider any form of forced eviction of indigenous peoples for economic interests to be unacceptable.

## 10. USE OF PRIVATE OR PUBLIC SECURITY FORCES

ICE does not create or use any physical security forces, whether private (security agencies, security consultants) or public.

## HEALTH AND SAFETY

We're fully aware that minimizing work-related injuries and illnesses is essential to maintaining a good work environment, the quality of our products and services, and employee morale. We know that ongoing employee feedback and ongoing education are essential to minimizing health and safety issues in the workplace.

We strive to identify, evaluate and mitigate impending safety risks through health and safety management procedures. These procedures include, but are not limited to, prevention, risk reduction, replacement of unsafe practices or materials, conducting regular inspections and providing ongoing training. Where hazards cannot be completely eliminated, we equip workers with appropriate personal protective equipment. We ensure regular education and training of our employees.

Workplace health and safety will remain our first priority in everything we do, and we will ensure that all employees, managers, supervisors and contractors are actively engaged in this ideal.

Health and Safety issues are regulated in more detail in the company's internal documents.

### 1. PERSONAL PROTECTIVE EQUIPMENT

If work hazards cannot be completely eliminated, we provide employees with personal protective equipment and appropriate washing, cleaning and disinfecting agents.

Personal protective equipment is protective equipment that must protect employees from risks, must not endanger their health, must not hinder the performance of work and must meet the requirements set out in regulation laying down technical requirements for personal protective equipment.

To protect health from the effects of heat or cold, we provide employees with protective drinks.

In environments where clothing or footwear is exposed to extreme wear and tear or contamination at work or performs a protective function, we provide work clothing or footwear as personal protective equipment. Substituting financial benefits for the provision of personal protective equipment is unacceptable.

OSH managers are obliged to maintain personal protective equipment in usable condition and control their use.

## **2. MACHINE SAFEGUARDING**

All production machines and other electrical devices are subject to regular inspections and safety checks in accordance with Czech legislation. We take care and properly maintain interlocking devices and barriers where machines pose a risk of injury to our workers.

Machine and electrical equipment safeguarding at ICE is specified in detail for each individual class of machinery and equipment.

## **3. EMERGENCY PREPAREDNESS**

Risk prevention is ensured in accordance with the Act on Ensuring Other Conditions of Health and Safety at Work, both with the help of an external risk prevention expert and internally through the company's OHS manager.

We regularly assess potentially threatening emergencies and incidents and seek to minimize their impact through emergency plans and procedures, evacuation procedures, employee training and exercises.

Emergency drills are conducted in accordance with applicable legislation. Emergency procedures and plans include, but are not limited to, fire suppression equipment, clearly marked and unobstructed passageways, adequate exit facilities and contact information for emergency services.

## **4. INCIDENT AND ACCIDENT MANAGEMENT**

The employer is obliged to investigate the causes and circumstances of the accident in the presence of the employee, if his/her health permits. If an employee suffers damage to his/her health or death as a result of an accident (work-related accident) in the course of or in direct connection with the performance of his/her work tasks, the employer shall be liable for the damage, who is insured for this eventuality.

If a work accident occurs, the employee who suffered the accident (if he is unable to do so, this notification will be made by the employee who witnesses the work accident), immediately to his superior manager and in person or through his superior manager also to OSH manager and HR managers. OSH manager (for serious or complex injuries in cooperation with an external professionally qualified person in risk prevention) will carry out with the participation of the employee (if the employee's health allows it) and of the employee supervisor investigates the circumstances and causes of the accident and makes an entry in the branch's accident book. The employer keeps records of all accidents in the accident book, even if they did not cause incapacity for work.

An accident book is kept at each branch by the OSH manager. OSH manager (or another authorized manager) keeps records of all accidents in the book of accidents, i.e. from minor injuries to serious or fatal work accidents. This registration will be made by the OSH manager immediately after learning of the occurrence of a work accident and subsequently notifying the HR manager.

The investigation of the causes and circumstances of a work accident shall be carried out by the OSH manager in the presence of the injured party (if the employee's health allows), the immediate superior manager or witness(s) of the accident, and, where appropriate, a trade union representative or an employee representative for the OSH, without delay after notification of the accident by the affected employee.

At each workplace, a first aid kit must be equipped to provide first aid in the event of an accident. The OSH manager is responsible for equipping the workplace with this first aid kit. It is the duty of every employee to provide first aid.

The incident and accident management or proper procedures is specified in detail in ICE in other internal documents.

## **5. WORKPLACE ERGONOMICS**

Workplace safety requirements include: maintaining order and cleanliness in the workplace, layout of the construction site according to the relevant documentation, location of the workplace, its accessibility, determination of roads or space for the arrival and movement of natural people, production and work means and equipment, ensuring material handling requirements, prevention of health risks when working with loads, carrying out inspections before first use, during use, during maintenance and regular inspections of machines, technical equipment, devices and tools during use in order to eliminate deficiencies that could adversely affect safety and health, meeting the requirements for the professional competence of natural people performing work at the workplace, identification and treatment of storage areas, especially hazardous substances, preparations and materials, fulfilment of conditions for disposal and removal of hazardous waste, storage, handling, disposal and removal of waste and material residues, adapting the time needed for individual works or their stages according to the actual progress of work, prevention of threats to the life and health of natural people who may be present at the workplace with the awareness of OHS manager, ensuring cooperation with other people, prevention of the risks of interaction between activities carried out at or in close proximity to the workplace, keeping records of the presence of employees and other natural people at the workplace, which was handed over to him, taking appropriate measures if work and activities that endanger employees' lives or damage their health are performed at the workplace.



## **6. FIRE PROTECTION**

We have taken all necessary measures to ensure fire safety in accordance with all legislative requirements. Senior staff at all levels of management continuously monitor compliance with fire safety regulations as part of their functions.

Fire protection at ICE is governed by detailed documentation for each individual site.

## **7. HEALTH AND SAFETY TRAINING**

Every new employee must complete an extensive online training course administered by CRDR Ltd. with modules on Health & Safety in the workplace. This online training includes a test that must be passed by each person. Without this training employment in our company is restricted.

The OHS training system also includes participation in OHS training courses at our customers' sites.

## **8. HEALTH AND SAFETY CERTIFICATION**

Compliance with health and safety rules is subject to regular inspection and certification by an independent body (TÜV - SÜD) as part of the regular verification of ISO 9001 certification.

## ENVIRONMENT

We are fully aware and recognise that environmental responsibility must always be an integral part of our business. Although we are a low environmental risk company, we always strive to recognize the environmental impact of our business and minimize adverse effects on the community, the environment and natural resources, along with ensuring the health and safety of the public. Our company believes in sustainable development while maintaining cost-effective growth. This approach extends beyond the company's own walls, and where possible we are influencing the decisions of our suppliers and our customers.

Our Energy Management System (EMS) is based on ISO 14001 standard, whose certification is valid from June 2023 and industry best practice and is part of the company's overall management system. Every new ICE employee is introduced to the EMS as part of their onboarding process to understand the company's commitment to the environment.

We are committed to complying with all applicable environmental laws and regulations, including laws and regulations governing the handling of hazardous materials, air and water emissions and waste. We are committed to obtaining and maintaining all necessary environmental permits and registrations. We are committed to striving to reduce or eliminate waste of all types, including water discharge and energy loss.

### 1. GHG EMISSIONS, AIR QUALITY, ENERGY EFFICIENCY

We recognise that emissions and discharges of pollutants and the generation of waste must be minimized or eliminated at source, e.g. by modifying product, maintenance procedures and equipment or otherwise.

There are no direct GHG emissions connected with our core business (the provision of automation services), but we recognize the potential for an environmentally friendly approach in common activities such as traveling or facility management, and we are looking for ways to improve energy efficiency and minimize energy consumption.

As a company, we therefore maintain a fleet of small-cylinder, low-emission vehicles. We use lighter weight vehicles, which represents a significant saving in operational costs and fuel consumption, and we also introduced a carpooling app for our employees. As part of our business, where we design and build sophisticated automation production lines, we are always looking for low-energy technologies

and we provide our customers with energy management software that can switch off machines to achieve lower energy consumption.

We recognize that diesel exhaust from goods movement is a major contributor to air pollution. To avoid this, we carefully plan our logistics to ensure the most efficient and least damaging operation.

## **2. WATER QUALITY, CONSUMPTION & WATER MANAGEMENT**

As a company providing services with a low environmental impact, our activities have only a limited impact on water quality and consumption, except for normal daily use in offices and facilities. However, we respect the importance of water management and take several steps to minimize consumption, including regular monthly monitoring of water consumption in offices and using environmentally friendly cleaning products.

## **3. SUSTAINABLE RESOURCES MANAGEMENT & WASTE REDUCTION**

We recognize that the use of natural resources, including water, fossil fuels, minerals and pure forest products, must be protected through modifications to production processes, appropriate maintenance, material substitution, reuse, conservation, recycling or otherwise. We have a systematic approach in place to identify, manage, reduce and responsibly dispose of or recycle solid (safe) waste.

Reduce, reuse, recycle and recover are the core directives of our natural resources and waste policy. Reduction and reuse of packaging materials where possible is utilized.

Our goal is to operate without paper. That's why our company has implemented a suite of tools for sharing and storing electronic documents. Printers are equipped with technology that tracks the number of printed pages; this tracking feature does encourage staff to be more accountable for their usage.

## **4. CHEMICAL MANAGEMENT**

As a low-impact service organization the company's direct operations have a limited use of chemicals, and in the systems designed by us there are usually none or limited chemicals such as lubricants that are required.

However, when we handle hazardous substances, we follow all legal rules for their labeling, handling, movement, storage, use, recycling and disposal.

## 5. RENEWABLE ENERGY

Electricity we use in our day-to-day operations has an impact on the environment. Where possible, we procure electricity supplied from renewable sources. In planning our new headquarters, we are making maximum use of renewable resources and smart solutions.

## 6. BIODIVERSITY, LAND USE AND DEFORESTATION

We recognise that biodiversity and Soil quality is the basis for maintaining the balance of nature. We are committed to minimizing the ecological impact of our corporate activities and to protecting the environment in perpetuity.

Due to the nature of our business, we do not use any pesticides, herbicides, or other chemical agents that reduce or directly destroy the natural soil environment in our operations. We also do not plant any non-native species around our facilities.

Our current operations are leased in existing buildings, and we do not anticipate taking agricultural land in the event of further growth of the company.

ICE does not use native forest land for its business or otherwise support the deforestation process. On the contrary, it promotes reforestation and the restoration of natural habitats for fauna and flora.

## 7. ANIMAL WELFARE

ICE does not use animals in any aspect of its business operations.

In a general sense, we support the proper treatment of animals in commercial and non-commercial environments, ensuring animal welfare and respecting their natural needs and behaviour.

We comply with the noise limits in our premises according to the legislation in force, so that the noise does not harm the health of both employees and possibly wildlife.

## BUSINESS ETHICS AND MANAGEMENT SYSTEM

Sustainable management, social responsibility and ethical business conduct have a very important place in our list of values. We strive to manage and conduct our business in accordance with these ideals. We believe that acting sustainably, responsibly and ethically is not only beneficial for our business, but enables us to identify risks and opportunities early and make the necessary changes.

We strive to ensure that each area of our business has a clearly designated responsible representative within our organizational structure who is accountable for that particular issue and management area and who is subject to the control of the Company's senior management.

### 1. ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

The highest standards of integrity are to be upheld in all business interactions. We practice a zero-tolerance policy that prohibits any and all forms of bribery and corruption.

Bribes or other undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly, in order to obtain or retain business, or otherwise gain an improper advantage. We use good judgment when exchanging business favors and are aware that gifts, meals, entertainment, treats and trips that are ostentatious or non-transparent may be considered bribes or perceived as an attempt to influence decision-making.

We condemn all practices resulting in money laundering and therefore strive to maintain business relationships only with reputable customers, partners and companies whose business activities comply with legal requirements and whose financial resources are of legitimate origin. We are committed to doing our best not to facilitate money laundering or terrorist financing, either directly or indirectly.

### 2. PERSONAL DATA PROTECTION A DATA SECURITY

Data protection plays an important role in the digitalised world. The loss or misuse of personal data can have serious consequences for the individuals as well as for our company. It is important for us to ensure that this personal data (personal data of employees, customers or third parties) is effectively protected and only used for legitimate purposes.

We have implemented a data protection system (Personal Data Handling Guidelines) that is fully compliant with the EU Data Protection Regulation 2016/679 as well as the related Czech legislation. We only handle personal data in a manner that is consistent with the purposes of use as they arise from European legislation and internal directives.

### **3. DISCLOSURE OF INFORMATION**

We conduct all business dealings transparently and, in our own interest, ensure that they are recorded in our project records. We consider it unacceptable to alter records or misrepresent terms or procedures.

In accordance with legal requirements, we disclose and keep up-to-date in the public commercial register information relating to our company, including financial statements.

### **4. INTELLECTUAL PROPERTY, COUNTERFEIT PARTS**

We respect intellectual property rights. We carry out technology and know-how transfers (licensing) in a way that respects and protects intellectual property rights.

ICE operates with a certified ISO 9001:2016 accreditation. In all cases ICE specifies the use of original equipment manufacturer's goods, and sourcing spare parts from licenses after-market suppliers. ICE policies are consistent with international law and other trade standards developed or proposed in this regard (TRIPS, ACTA). ICE will continue to be observant and vigilant in its business activities with respect to counterfeit goods in the supply chain.

### **5. FAIR COMPETITION AND ANTITRUST**

We will adhere to fair trade, advertising and competition standards. We will actTo act in accordance with national and international antitrust laws and e.g. not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

### **6. CONFLICT OF INTEREST**

Our company Conflict of Interest Policy refers to any case where an employee's personal interest might be in conflict with the interest of the company.

This policy will outline the rules regarding conflict of interest and the responsibilities of employees and the company in resolving any such discrepancies. Company conflict of interest policy applies to all

prospective or current employees of the company, as well as independent contractors and persons acting on behalf of the company.

The relationship of the company with its employees should be based on mutual trust. As the company is committed to preserve the interests of people under its employment, it expects them to act towards its own fundamental interests.

## **7. EXPORT CONTROLS AND ECONOMIC SANCTIONS**

ICE is committed to a policy of compliance with the strategic export control laws, regulations and procedures of all relevant jurisdictions and regimes in which it operates. All employees must, within the scope of their responsibilities, ensure that applicable export and import laws and regulations are complied with when transferring goods, services, software or technology.

ICE undertakes to monitor and comply with approved economic sanctions imposed by the Czech Republic, the EU or international organizations of which the Czech Republic or the EU is a member, in all jurisdictions and regimes in which ICE does business.

## **8. SUPPLIER RESPONSIBILITY**

Given its economic relevance, ICE has limited ability to enforce the principles set out in this Code on its suppliers. However, this does not mean that we do not examine whether our suppliers are in compliance with our values and the principles underlying this Code of Business Conduct. If there exists reasonable doubt as to who is the true owner of the supplier, or have information that they have incompatible values and standards, we have the option of selecting a supplier that is more compatible with us.

In 2024, ICE has all direct suppliers from Europe, mainly from EU countries (mostly from the Czech Republic, Slovakia, and Germany).

## GRIEVANCE MECHANISM

One of our most important values is openness. That's why at ICE we put a lot of effort into learning how to give feedback. Openness means that every employee can speak directly to management without any fear of retaliation.

### 1. FEEDBACK, PARTICIPATION, SUGGESTIONS

We want this Code to be a living document. Any feedback, suggestions for change or modification is therefore very welcome. It is also welcome and helpful to be advised that any of the principles expressed in this Code are not properly implemented. Please do not hesitate to address your complaints, suggestions and comments to the responsible person listed below. The person responsible for this Code of Business Conduct is: Tomáš Kroupa, e-mail: [kodex@ice.cz](mailto:kodex@ice.cz)

### 2. WHISTLEBLOWING AND PROTECTION AGAINST RETALIATION

Employees who report misconduct or suspected violation must be protected from retaliation. We don't want to silence complaints. Whether accusations are true or false, our company wants to prevent victimization and other retaliatory behavior towards the employee. We believe it's important that employees aren't afraid to speak up about any issues. We'll follow all legal prohibitions for retaliation and will grant employees the right to speak about misconduct.

We have therefore adopted an internal whistleblower protection directive in accordance with EU Directive no. 2019/1937 and related Czech legislation. This internal directive regulates the conditions and procedure for receiving notifications, the methods of handling notifications and the way of handling the information obtained. The competent person for whistleblower protection activities is: Pavla Tomanova, e-mail: [zapiskej@ice.cz](mailto:zapiskej@ice.cz)

The principle of non-retaliation applies to all official and unofficial reports. All complaints are considered confidential.

Release date: August 2024

On behalf of ICE Industrial Services a.s.

Barbora Stupková  
vice-chairman of the Board of Directors

Josef Pokorný  
member of the Board of Directors