

CODE OF BUSINESS CONDUCT

Code of Business Conduct

FORTISCHEM a. s. (hereinafter referred to as "the Company") is a long-established manufacturer of calcium carbide, basic inorganic and specialty small-tonnage organic chemicals. The Company is actively committed to sustainability and responsible behaviour. The Company is aware of its responsibilities within its own organization, to its customers and suppliers, as well as to the climate and society.

In this **Code of Business Conduct** (hereinafter referred to as "the Code"), the Company has formulated its ambitions as well as expectations and requirements for the company's business partners in the area of sustainability. The sustainability requirements are based, among other things, on the Ten Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidelines to support responsible supply chains for conflict and high-risk mineral commodities and the conventions of the International Labour Organization (ILO), in particular the Convention on Fundamental Rights at Work and internationally recognised standards such as the Universal Declaration of Human Rights, as set out in particular in the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).

The Company expects its business partners to comply to the principles set out in the Code and to actively enforce these principles with their own business partners in their value chain. As part of this approach, the Company aims to ensure that business relationships are based on integrity and sustainability and reflect the values and principles that the Company upholds internally and externally. The Code highlights the Company's expectations, and any actions contrary to these basic requirements may jeopardize the business partner's relationship with the Company.

Ethical and legal business conduct

Business partners of the Company must act honestly and in accordance with the highest ethical standards. At a minimum, this requires compliance with all applicable laws, regulations and rules, as well as a commitment to strong governance practices and transparency in all business activities.

1. Corruption, bribery and other improper business conduct

Business partners shall reject and prevent all forms of corruption, including facilitation payments (payment that is made with the intention of expediting an administrative process). Business partners shall ensure that their employees, subcontractors and agents do not provide, offer or accept bribes, improper gifts or other improper payments or benefits to or from customers, officials or other third parties. Business partners must not offer, promise, give, demand or accept gifts, favours or hospitality that go beyond the bounds of courtesy, either in terms of value and frequency, or that would be inappropriate given the time and place.

Business partners will not demand, accept or receive anything of value or undue advantage that could influence their decisions, nor will they seek to influence or participate in decisions where the attendant circumstances, factors or relationships (business, private, economic or otherwise) may create a real or perceived conflict of interest.

2. Import and export control

Business partners shall strictly comply with all applicable laws regarding the import and export of goods, services and information. In addition, the relevant sanctions list in force will be respected.

3. Protection of competition and fair trade

Business partners shall respect fair and free competition and comply with applicable competition and antitrust rules. All information regarding products and services shall be accurate and truthful. Misleading statements intended to gain a competitive advantage (including greenwashing) and disparaging and false claims about competitors are prohibited.

4. Protection of confidential information

Business partners shall ensure that sensitive data (trade secrets and personal data) are collected, processed, stored and deleted in a proper and lawful manner. Business partners shall impose a corresponding obligation on their employees and other involved persons. Sensitive data must not be

transferred to a third party or disclosed in any other form without the necessary authorization and/or consent and must be protected in this respect.

Working conditions and human rights

Business partners of the Company must respect the dignity and human rights of those persons involved in or affected by their activities. At the very least, compliance with all applicable laws, regulations and standards relating to labour rights, employment practices and working conditions is required.

1. Child labour and protection of minors at work

Business partners must comply with the minimum age for employment in their business activities and their value chain in accordance with the relevant applicable legislation and ensure that prohibited child labour does not take place.

2. Forced labour and modern slavery

Business partners must only employ persons who are legally entitled to work and who do so voluntarily. Slavery, forced or compulsory labour, bonded labour, servitude, involuntary prison labour and any other form of exploitation is strictly prohibited within their own business and/or within the value chain.

Business partner employees shall be given a contract upon recruitment that complies with applicable law, is in a sufficiently documented form (e.g. written or electronic), is written in a language they understand, and sets out their rights and obligations in a fair and understandable manner in accordance with the relevant legal regulations.

In addition, business partners shall not mislead or deceive prospective employees about the nature of the work, require employees to pay recruitment fees or unreasonable transportation charges, and/or confiscate, destroy, conceal and/or deny access to employees' passports and other identification documents issued by the relevant authority, and/or restrict employees' freedom of movement, or require employees to involuntarily use accommodations provided by the company without operational reasons.

3. Adequate wages

Business partners shall pay their employees an adequate wage. An adequate wage is at least the minimum wage as determined by applicable law and is otherwise calculated in accordance with the law of the place of work. As far as possible, this wage should cover at least the basic needs of the employees and allow for an adequate standard of living for the employees and their families (subsistence wage). Business partners are obliged to pay employees directly, in full and on time. Deductions from wages must not be used as a disciplinary measure and must not be carried out in violation of the relevant legal regulations.

4. Health and safety at work

Business partners are obliged to provide employees with a clean, protected and safe working environment. All facilities must comply with applicable occupational health and safety laws and regulations. The business partner shall proactively identify and address occupational hazards and provide adequate occupational health and safety training. In addition, it is obliged to put in place measures governing emergency procedures and preparedness and to take reasonable steps to protect its employees from violence and threats of violence while at work.

5. Dignity and respect

Business partners are obliged to treat all their employees fairly, with dignity and respect. Corporal punishment, physical and verbal abuse, inhuman treatment and harassment are prohibited. In addition, employees shall not be subjected to any other derogatory, coercive, hostile, abusive, intimidating, offensive, threatening or unpleasant behaviour in the workplace. Business partners shall not discriminate against current or prospective employees on the basis of race, colour, religion, sex, gender identity, sexual orientation, national origin, citizenship, age, physical or mental handicap, or any other basis that is regulated and protected by law.

6. Freedom of association and collective bargaining

In accordance with applicable laws and regulations, business partners are obliged to respect the legal right of their employees to associate in trade unions, employee organisations or any other groups if they wish to be so represented. Business partners recognise the right of trade unions to operate freely and in accordance with the law of the place of employment. This right includes the right to strike and the right to bargain collectively.

7. Minorities, vulnerable persons and indigenous peoples

Business partners shall respect the right of minorities, vulnerable persons and local communities to live in dignity. Business partners shall act responsibly in the local community, taking into account the interests of the inhabitants and ensuring healthy and safe living conditions, while respecting the rights of indigenous peoples to the lands, territories and resources they have traditionally owned or otherwise used.

Environmental protection and sustainability

Business partners are obliged to strive to minimize the adverse environmental impacts of their operations.

1. Permitting and regulatory compliance

Business partners are obliged to obtain, maintain and comply with all environmental permits required for their operations. In addition, they must comply with all applicable environmental laws and regulations, including those governing emissions (and their management), hazardous substances, wastewater and waste.

2. Climate protection

The Company expects business partners to take appropriate measures to reduce the climate relevant impacts of their business activities, particularly greenhouse gas emissions, to actively protect the climate and the environment in accordance with internationally applicable standards and legislation, and to continuously improve the effectiveness of their efforts in this regard.

In addition, the Company recommends that business partners set science-based and time-bound emission reduction targets and renewable energy targets that are consistent with the Paris Agreement and take measures to promote decarbonisation across the value chain.

3. Registration, evaluation and restriction of substances, raw materials

Business partners shall put in place appropriate measures to refrain from or avoid the use of substances and materials with adverse environmental or health effects (e.g. carcinogenic, pathogenic, reprotoxic substances) within the framework of the relevant applicable legislation.

Business partners are required to comply with the requirements of international conventions and other legal instruments relating to the production, use, handling and disposal of certain substances, in particular the requirements of the Minamata Convention of 10 October 2013 on mercury and the Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (POPs), as well as the relevant applicable implementing legislation at national and supranational level.

4. Waste and emissions

Business partners undertake to prevent the generation and disposal of waste and to minimise the release of emissions or materials into the air, water and/or soil that could have a negative impact on human health, ecosystems and/or the climate. Business partners shall take adequate and appropriate measures to reuse resources, recycle and safely and environmentally dispose of residual wastes, chemicals and wastewater.

5. Biodiversity

Within the framework of existing legislation and international regulations on biodiversity, business partners must strive for value chains that do not require deforestation and conversion. These international regulations include, for example, resolutions and recommendations on biodiversity from the Centre for Biological Diversity (CBD) and the International Union for Conservation of Nature (IUCN).

6. Sustainability

Business partners are willing to implement reuse and recycling programs and participate in company-wide efforts to protect and conserve natural resources. Business partners shall take appropriate measures to ensure the efficient use of energy, water and raw materials, the use of renewable sources and the minimisation of environmental and health damage.

Responsible supply chains

In order to identify and mitigate sustainability risks in the value chain, business partners provide the Company with information on their value chains upon request, which the Company needs in order to fulfil its legal obligations. Business partners are also obliged to impose a corresponding information obligation on their business partners, which they in turn are obliged to pass on to their partners.

In particular, in this context, business partners may need to provide the company with information on their value chain up to the point of origin of the raw material (including sourcing points such as smelters and refineries) and to provide evidence of management systems or third-party verifications that demonstrate processes that prevent or mitigate sustainability risks in the supply chain.

In particular, raw material supply chains, given their significant impact on people and the planet, require special due diligence from all actors in the value chain in terms of respect for human rights and environmental protection.

Compliance with the principles of the Code

If a business partner has already established its own code of conduct or formal corporate policy that includes all of the requirements set out in the Code, the Company will require the business partner to demonstrate that it complies with these requirements in their entirety. If the business partner does not have its own code of conduct or formal company policy in place, the business partner hereby agrees to comply with the Code of Conduct and all of the requirements set forth as described above. Compliance with the principles set forth in the Code is a condition of doing business with the Company.

The minimum requirements set out in the Code must be applied throughout the value chain. Therefore, business partners are obliged to communicate these requirements and require compliance with them from their parent companies, subsidiaries and related companies, managing directors, management representatives, employees and any other parties that support their business activities with the company, such as for example consultants or subcontractors.

The Company reserves the right to monitor and verify the compliance of its business partners with the requirements of the Code as described above, either through its own employees, independent third parties, certification or other forms of official assurance.

In the event of a violation of the terms of the Code, the Company reserves the right to take appropriate action to preserve its rights, such as:

- request for improvement measures,
- verification of the improvements/measures indicated,
- exclusion of the business partner from new contracts,
- termination of the contract or contract withdrawal.

The Company may, at its sole discretion, not terminate the contractual relationship by way of termination or withdrawal from the contract if the business partner credibly confirms and proves that it has immediately begun countermeasures to fully prevent future similar violations.

Reporting inappropriate behaviour

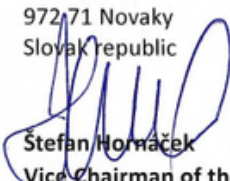
Inappropriate behaviour must be identified at an early stage, addressed and immediately corrected in order to protect employees, business partners, third parties and the Company.

Business partners have established a grievance mechanism that is appropriate for their company. This system allows concerns about business ethics, human rights or environmental issues to be raised anonymously, confidentially and without fear of reprisal, both by their own employees and by other potentially affected persons.

Business partners are required to promptly notify the Company of any violation or suspected violation of the provisions of the Code. Such notifications may be addressed to the Company's contact email: sekretariat@fortischem.sk or at the following address:

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