

 Bohemia Müller Group Bohemia Müller Group s.r.o. Loupnická 139, Janov 435 42 Litvínov	 Bohemia Müller Bohemia Müller s.r.o. Loupnická 139, Janov 435 42 Litvínov	 Bohemia Controls Bohemia Controls s.r.o. Loupnická 139, Janov 435 42 Litvínov										
CODE OF CONDUCT												
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1 INTRODUCTION

The Vision of companies Bohemia Müller Group s.r.o., Bohemia Müller s.r.o. and Bohemia Controls s.r.o. (hereinafter BMG Group) is to be well known and established supplier of convenient solutions in power and other industries.

The Code of Conduct is based on OECD Guidelines for Multinational Enterprises and The Universal Declaration of Human Rights published by United Nations.

This Code of Conduct however cannot fully substitute application of general common sense. Our employees are supposed to seek appropriate information in case they meet with problems that are not explicitly adjusted by the provisions of this Code of Conduct herein.

In case of selecting suppliers, customers and business partners we expect they will fully respect and comply with our Code of Conduct during cooperation with BMG Group.

2 COMPETITIVE BEHAVIOUR

2.1 Competing Fairly

To follow principles of fair competition the BMG Group complies with all legal regulations applicable for competitive markets when performing its activities. Our business principles prohibit boycott of certain customers or suppliers as well as any abuse of dominant market position. We approach markets only thanks to powerful products and effective services. All employees of BMG Group are prohibited to exchange sensitive information with competitors or representatives of competitors such as prices, price development or strategies in discount policy as well as any other information that may have impact on competitor behaviour.

We do not enter into any deals with our customers whose purpose is to restrict competition. It particularly means that we deny deals that limit freedom of customers with respect to definition of their sales prices or general purchase terms and conditions, as well as exclusive agreements or duties of an exclusive supplier should these be in conflict with legal regulations.

We expect our business partners and competitors to follow the same principles and standards.

2.2 Company Integrity

BMG Group will not tolerate any form of corruption or bribery. All employees are strictly forbidden to offer, provide or accept bribes. We understand bribes to be any payments and actions whose sole purpose is to influence behaviour of any third person.

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2.3 Gifts and Sponsorship

BMG Group appreciates social involvement as a part of our social responsibility. It is necessary to keep certain rules regarding gifts and sponsorship that serve to avoid an impression that intention of such gift and sponsorship is to apply impact. Perfect transparency, as for using of a gift, must be provided via clear documentation. No gifts can be provided to political parties or individual political persons. In case of sponsorship the financial benefit needs to be appropriate to agreed reciprocal dealing and this relationship must be obvious.

2.4 Selection of Business Partners

BMG Group selects its business partners based on economic criteria. Favouritism or discrimination of suppliers based on not objective reasons is forbidden. Cooperation requires compliance on common values as defined in the Code of Conduct.

2.5 Relations and Communication with Business Partners

The only one basis of successful and long term business relations is honest and proper approach towards customers, suppliers, partners and other business partners. Relations with customers, suppliers, partners and other business partners in BMG Group are based on mutual trust and respect. BMG Group undertakes to follow any contract obligation.

2.6 Confidentiality of Business Information and Information Disclosure

We use only public available information sources to evaluate business, consumer, supplier and technological trends such as planned government regulations and other regulatory provisions and communication campaigns. Information, data and recognitions are key parts of property of BMG Group and its business partners. All employees and business partners are fully responsible for protection of confidentiality, integrity and availability of data executed, accessible, amended, transferred, distributed, saved or used within BMG Group or during performance of business relations of BMG Group regardless to actual place and form (electronic, paper, other physical format etc.).

We disclose to public regular, full, complex and trustful information about our activities and intentions via all relevant media.

3 COMPANY BEHAVIOUR

3.1 Management Culture

Sustainable success is not possible without the most important source of BMG Group which is human resource. We support our employees to act based on their own responsibility or and strengthen their involvement and performance by trainings and other education. Our superior and management staff performs their positions and functions in an exemplary way and thus expect then to follow and comply with principles of this Code of Conduct. Good relations

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with colleagues at work should be encouraged in way which expresses recognition, appreciation and is reliable and also by using social abilities and appreciation of performance.

3.2 Fair and Safety Working Conditions

The highest priority of BMG Group is to provide work performance in safety and health conditions. Company standard is to comply with applicable legal regulations for safety and protection of occupational health and the environment.

We do care that all employees are familiar with safety rules and regulations valid in BMG Group and that they strictly follow them. Personal protective equipment is defined for the individual work positions and using of PPE is obligatory. All employees are obliged to perform their works responsibly. Superior and management staff is responsible that their respective subordinate employees know the relevant regulations, act in corresponding way and are regularly trained.

3.3 Protection of BMG Group Property

Objective evaluation and assessment of risks is a part of everyday work of all employees. All employees must assess existing risks and notify about them based on the internal risk management system. The purpose of the risk management system is to protect intangible and tangible property of BMG Group.

3.4 Data Protection

BMG Group collects, processes, or uses data which are subject of legal regulations for data protection and which relates to employees, suppliers, customers or other business partners only in case that such activity is lawful and in compliance with relevant regulations for data protection or if the other party agrees to do so.

3.5 Publishing, Social Media and Customer Relations

BMG Group undertakes to lead responsible communication. We disclose to broad public regular, full, complex and trustful information about our activities and intentions via all relevant media. Responsible communication includes also moral advertising. The companies that are members of BMG Group keep open, transparent, well-balanced, and two-way communication with external interested persons.

All and any public communication on behalf of BMG Group toward investors represents publishing that requires care and proper understanding of legal and media questions and is therefore permitted only after proper approval. Information published in social media of BMG Group is regulated by company top management. Activities of employees with respect to social media belong to area of private lives of employees which BMG Group fully respects. However, employees are not entitled to act in social media on behalf of BMG Group, nor any individual member company of BMG Group, and are not entitled to publish, share or otherwise disclose company information, particularly protected business information, nor they

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can refer to BMG Group or state the company in the way that is in conflict with company values.

3.6 Corporate Loyalty

Our obligation is to protect investments of engaged persons and provide long terms incomes that can compete with incomes of other leading companies in the same industry. To reach this objective, we, in BMG Group, avoid any conflict of interests. We protect company interests, property, business secrets, intellectual property and we also provide data safety.

4 COMPANY AND EMPLOYEES

4.1 Respecting of Human Rights

BMG Group is obliged to respect human rights of its employees and all personas that can be affected by activities of BMG Group. BMG Group provides for its employees safe working environment without risks.

4.1.1 Child Labour

BMG Group strictly denies child labour. Protection of children against economic exploitation has absolutely essential meaning. We keep minimum permissible age for employing that is in compliance with conventions of the International Labour Organization (ILO).

4.1.2 Unfree Labour

BMG Group strictly prohibits unfree or forced labour and any physical disciplinary measures.

4.1.3 Discrimination and Harassment

Important aspects of our international cooperation with persons from different cultures, different nations and religion persuasion are tolerance and mutual respect and tribute. Any kind of discrimination or harassment, particularly sexual harassment, is strictly prohibited. We deny preferring or discriminating employees or business partners due to their gender, religion persuasion, and participation in the Trade Union or any political party, due to family situation, age, health impairment or ethnic origin.

4.1.4 Remuneration and Contributions to Social Benefits

Remuneration and contributions to social benefits reimbursed by BMG Group are fully in compliance with locally usual wages and salaries, which is specific for the given industry. Employees are allowed to receive the same remuneration for their work regardless their gender.

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4.2 Protection of Environment and Effective Source Management

Important criteria of business activities performed by BMG Group are, among others, environmental compatibility and saving of sources. A continuous optimizing of our material and power consumption and effective using of sources help us to avoid any adverse impacts on our environment. All members of BMG Group follow legal regulations for waste disposal, particularly dangerous waste or chemical substances and compositions. We apply the same standards when selecting our suppliers.

4.3 Privacy Policy

BMG Group undertakes to respect privacy of persons and confidentiality of their personal information. We shall receive and save only those personal data and information which we need to operate our company effectively and in compliance with law.

BMG Group undertakes to adopt preventive safety provisions to save personal data in the databases to avoid any risk of destroy, loss or unauthorised access.

5 CODE OF CONDUCT APPLICABILITY

All employees of BMG Group, regardless their locality, are obliged to follow all principles stated in this Code of Conduct when providing and performing their everyday works and activities. Superior and management staff is responsible for application and supervision of this Code of Conduct on all levels within their responsibility.

In Litvínov, 02. 03. 2020

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Karel Müller
Chief Executive Officer