Reneso, s.r.o.

Code of Conduct



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Foreword

Dear colleagues,

As a domestically and abroad operating company are our business activities based on high ethical and applicable legal standards. We foster a sense of trust with our stakeholders and meet our responsibility of being a reliable and successful business partner by considering integrity as a key element of our business behaviour.

Reneso, s. r. o.'s Code of Conduct is designed to ensure that all our employees, with support from Reneso, s. r. o.'s senior executives and managers, understand and comply with the principles we apply to our business activities. We encourage our employees to personally live up to and consistently value the principles of the Code of Conduct when engaged in Reneso, s. r. o.'s business whether internally or in the public. The principles set forth mark the minimum standards of how Reneso, s. r. o. conducts business and is represented in the domestic marketplace.

We are convinced that our Code of Conduct is an effective instrument of risk prevention to protect us from negative consequences such as monetary penalties or reputational damages. And at the same time, we are convinced the Code of Conduct makes us recognised as a company of integrity whose members apply unquestionable and clear principles in the business.

Hugo Repáň
December, 2024

Introduction

Purpose and Scope

Integrity is a key element of Reneso, s. r. o.'s business behaviour. Reneso, s. r. o. is positioned as a trusted and reliable business partner in all its activities. The Code of Conduct compiles the principles of Reneso, s. r. o.'s business conduct. All principles of the Code of Conduct are equally important and the order in which they are listed is not based on relevance.

The Code of Conduct applies to all employees of Reneso, s. r. o.. Employees are personally obliged to strictly adhere to the principles set out in the Code of Conduct. In cases of doubt, exercising good judgment in line with the spirit of the Code of Conduct is expected.

Responsibilities

The Code of Conduct sets out the expected business principles for Reneso, s. r. o. more specifically the responsibilities concern the roles and functions as follows:

All Reneso, s. r. o. employees must

- follow the principles in the Code of Conduct,
- become aware of, understand, and follow policies relevant to their job, and
- feel comfortable asking questions, seeking advice and raising concerns without fear of retaliation.

When in doubt employees shall ask themselves:

- "Is what I intend to do legally permitted and in line with Reneso, s. r. o.'s Code of Conduct and policies?"
- "Would my managers, colleagues and subordinates view my conduct as ethical?"
- "Would my family and friends view my conduct as ethical?"
- "Would those who are directly involved view my conduct as ethical?"
- "Would I want to be treated the same way?"
- "Would I feel comfortable if my conduct appeared in the media and attributed to me?"

In addition, all Reneso, s. r. o. employees must

- create and encourage a culture of integrity within their sphere of influence – including an openness for asking questions and raising concerns,
- lead by example and actively provide guidance to staff members when questions regarding potentially questionable business conduct arise,
- be fully accountable for the misconduct of their staff,
- supervise their staff members properly,
- select qualified staff members for tasks and provide appropriate instruction in accordance with applicable laws and regulations,
- play an active role in regularly monitoring compliance with the Code of Conduct,
- communicate clearly that violations of laws and / or the Code of Conduct may have serious employment consequences, and
- correct detected misconduct and ensure appropriate disciplinary actions as needed in accordance with applicable internal policies and laws.

Failure to follow the Code of Conduct may result in disciplinary action. Employees are expected to fully cooperate when investigations of misconduct are performed.

Need help?

The Code of Conduct is not exhaustive and cannot cover or anticipate every situation employees may encounter during the course of their employment with Reneso, s. r. o. Although additional policies may provide more specific guidance, there may be instances where employees will still have questions that are not directly addressed by any policy.

When in doubt, employees are encouraged to ask questions. They can consult with their managers for guidance and advice, and can contact various employees of Reneso, s. r. o.'s Legal and Compliance organisation to discuss specific situations or concerns.

Reporting concerns

Employees who become aware of issues or practices that may violate the Code of Conduct or laws are encouraged to report their concerns to managers or any person of trust, such as line managers, internal auditors, legal counsels and compliance officers. As an additional reporting channel, employees can make use of the Confidential Reporting Line (via e-mail, telephone or web-form) to report in a safe, confidential and, if desired, anonymous manner. Additional information regarding the Confidential Reporting Line is available on Reneso, s. r. o.'s intranet.

Non-retaliation policy: employees reporting any concerns in good faith should not fear retaliation and will be under the protection of Reneso, s. r. o. and local laws where applicable. However, knowingly providing false or misleading information may lead to disciplinary action.

Employment Practices

1. Employment Practices, Diversity and Equal Opportunities

Knowledge, experience and the entrepreneurial spirit of employees determine the success of Reneso, s. r. o. Managers are expected to act as role models. Behaviour that is contrary to Reneso, s. r. o.'s standard of business ethics should be identified, discussed, changed, and re-occurrence prevented.

Respected and Fostered Principles

- Reneso, s. r. o.'s working environment creates and fosters professional development opportunities.
- Compensation and working hours on the basis of laws and mandatory standards regarding minimum wages and working hours
- Employment conditions, as well as remuneration, aim to stimulate high performance and to consistently reward excellent results.
- Reneso, s. r. o. supports a culture of diversity and inclusion, free from harassment and discrimination, supports women´s rights.
- Managers and employees establish open and honest team cooperation.
- Reneso, s. r. o. respects the privacy and data protection rights of individuals.

Not Tolerated

- Reneso, s. r. o. does not tolerate harassment and discrimination.
- Employment must never be illegal and unfair.
- Substance abuse and illegal drugs in the workplace are prohibited.

2. Human Rights and Dignity

Human rights are moral principles or norms that describe standards of human behavior, and are protected as natural and legal rights by law. They are commonly understood as inalienable fundamental rights "to which a person is inherently entitled simply because she or he is a human being", and which are "inherent in all human beings" regardless of their nationality, location, language, religion, ethnic origin or any other status.

Respected and Fostered Principles

- Business activities must be delivered according to the commonly accepted principles of Human Rights and Dignity.

Not Tolerated

- Reneso, s. r. o. opposes violations or limitations of Human Rights and Dignity of any kind which includes, but is not limited to, any form of discrimination, slavery and torture, human trafficking, or forced child and young work and labour.



Safeguarding People & Assets

3. Safety & Health

Reneso, s. r. o.'s business is subject to various laws, regulations and contractual obligations thatrequire a safe and healthy work environment for its employees, business partners, customers, suppliers, and communities in which it operates.

Respected and Fostered Principles

- Reneso, s. r. o. is committed to creating and maintaining a healthy and safe working environment, including fire protection.
- Reneso, s. r. o. proactively promotes health and safety awareness for its employees.
- Reneso, s. r. o. provides dedicated health and safety trainings to its employees through computer-based and classroom training.
- Employees are expected to be familiar with health and safety requirements and actively identify and report areas of improvement, unsafe acts and conditions, and near-miss incidents to ensure that preventative measures are taken to deter any potential harm.
- Reneso, s. r. o. ensures that its employees and suppliers are committed to obeying relevant laws and regulations, working instructions and safety measures at all times.
- Employees take care of each other, work to prevent harm, and intervene or stop activities deemed unsafe.
- Reneso, s. r. o. creates great working conditions for employees strictly avoiding to critical limits for noise, vibrations, stress, and other conditions harmfully affecting health of their employees.

4. Environment

Business activities can have a major impact on the environment. As such, Reneso, s. r. o. continuously identifies andmeasures its environmental footprint to improve its performance and reduces its impact on the environment.

Respected and Fostered Principles

- Reneso, s. r. o. establishes effective controls to monitor the usage of resources to avoid or reduce waste (prevention).
- Reneso, s. r. o. is looking for opportunities to use renewable energy sources.
- Reneso, s. r. o. supports biodiversity improvement, proper use of soil, and protects against deforestation.
- Reneso, s. r. o. protects quality of soil by proper use.
- Reneso, s. r. o. conducts recovery operations to re-use products or their components from waste (re-use).
- Reneso, s. r. o. recycles raw materials according to globally accepted standards and quality protocols (recycle).
- Reneso, s. r. o. produces energy such as fuel, heat and power as well as materials from waste (recover).
- Ultimately, Reneso, s. r. o. carefully manages its waste at registered landfills and incinerators (disposal).



5. Data Privacy and Protection

Not with standing Reneso, s. r. o.'s contractual obligation of confidentiality, it is also compulsory to maintain the confidentiality of proprietary information of Reneso, s. r. o., its customers and suppliers. Data protection laws grantindividuals certain rights in connection with the way in which their personal data is used.

Respected and Fostered Principles

- Confidential or proprietary information may only be disclosed to third parties upon respective written authorisation given by the responsible manager, or if the disclosure is required by law.
- Such confidential information includes all non-public information that might be of use to competitors or harmful Reneso, s. r. o., its customers or suppliers if disclosed. It also includes intellectual property of our company.
- Reneso, s. r. o. and employees shall comply with the applicable data protection laws, thereby safeguarding data privacy rights Reneso, s. r. o.'s customers, suppliers and employees.
- Employees have the responsibility to comply with all applicable data protection laws and in particular the EU General Data Protection Regulation, while safeguarding the rights of people and enabling effective business operations around the world.

Not Tolerated

- Employees are not allowed (neither during nor after their employment) to disclose any confidential or proprietary information which was received during their employment at Reneso, s. r. o. to anyone not employed by Reneso, s. r. o.

6. Handling of Company Property

Reneso, s. r. o.'s business services are delivered with the support of assets such as property, plants and equipmentowned by the company.

Respected and Fostered Principles

- The use of Reneso, s. r. o. assets is only allowed for legitimate business purposes.
- Devices and equipment in Reneso, s. r. o. offices and facilities are to be used as efficiently as possible.

Not Tolerated

- It is the obligation of every employee to protect Reneso, s. r. o.'s property against any improper handling such as carelessness, waste or destruction as well as against theft or other forms of unauthorized removal.
- Unauthorized personal use of business equipment is prohibited.



7. Company Books and Records

Business activities are reflected and recorded in the company books and records. Applicable laws regulate public disclosure obligations of such books and records.

Respected and Fostered Principles

- Reneso, s. r. o. is committed to maintaining its books and records in accordance with applicable laws and regulations respecting the integrity of Reneso, s. r. o.'s record-keeping and reporting systems at all times.
- Reneso, s. r. o. requires honest, accurate and timely recording and reporting of financial information in order to make responsible business decisions.
- Reneso, s. r. o. books, records, accounts and financial statements must represent the nature, extent and purpose of activities recorded, in compliance with company policies, in reasonable detail and without omitting material facts. They must not include any misleading information, inaccurate events, exaggeration, or derogatory remarks.
- Records and documents must be kept in compliance with applicable document retention laws and internal policies.

Not Tolerated

- Management and employees shall never, directly or indirectly falsify Reneso, s. r. o. books and records.

8. Business Continuity

In case of unforeseeable or unpredictable events such as systemic failures or catastrophes, plans for business continuity and disaster recovery enable mitigation procedures for staff, assets and partners, thus limiting interruption or other adverse effects on operations.

Respected and Fostered Principles

- All Reneso, s. r. o. sites maintain documented business continuity and disaster recovery plans.
- Respective plans are communicated and tested to identify gaps, improvements and to reduce potential adverse effects.
- Emergency procedures and communication processes are known to all employees.



Business Ethics

9. Bribery and Corruption

Bribery can take many forms beyond cash payments such as gifts, travel, entertainment or any other undue advantage. Reneso, s. r. o. will not engage in any form of active ("giving") or passive ("receiving") bribery and expressly prohibits its Employees from engaging in any form of bribery. The prohibition also applies to any contributions or payments made through consultants, suppliers, or other third parties on behalf of Reneso, s. r. o.

Violations of anti-bribery laws can lead to costly enforcement actions and harsh criminal penalties against companies and the individuals involved.

Additionally, Reneso, s. r. o. prohibits facilitation payments which are usually small payments mostly made to lower-level governmental employees to secure the performance of routine government actions.

Respected and Fostered Principles

- Employees must familiarise themselves with all relevant anti-corruption laws and conduct business in strict compliance with these laws. Transactions that appear to be illegal or unethical should be rejected.
- Suspected violations of bribery laws and requests for payment by or for government officials should be immediately reported to a superior or Legal and Compliance representatives.
- Third parties engaged by Reneso, s. r. o. must be carefully supervised - never "turn a blind eye" on suppliers.
- If employees believe their own or others' lives or health may be in danger, making facilitation payments may not be a violation of Reneso, s. r. o.'s prohibition. However, such payments must always be accurately recorded in Reneso, s. r. o. accounts and immediately reported to their management.

Not Tolerated

- Reneso, s. r. o. explicitly prohibits its employees from making improper payments, whether to public officials, private persons or legal entities, active or passive.
- Employees are strictly prohibited from offering, paying, giving or otherwise transferring funds or assets, directly or indirectly to someone in a public office or a person with political influence, to someone applying for a public office, to a political party or any other third party, for the purpose of obtaining or retaining an improper advantage or otherwise securing or retaining business.
- Reneso, s. r. o. strongly avoids and prohibits any conflict of interest of its emoloyees with other internal or external parties. Every such a conflict is subject of investigation.

10. Gifts, Hospitality and Entertainment

Reneso, s. r. o. recognises that business gifts, hospitality and entertainment on a modest scale can be a regular part of doing business and are commonly used to build goodwill and strengthen working relationships among business partners. However, if offers of gifts, hospitality or entertainment are frequent or of substantial value, they may create the appearance of or create an actual conflict of interest or improper payment.

Respected and Fostered Principles

- The use of gifts, hospitality and entertainment must always be in accordance with Reneso, s. r. o.'s standards of transparency and in compliance with our approval and reporting procedures.
- Employees may only accept or offer unsolicited non-monetary gifts if at a minimum the following conditions are fulfilled: the gifts do not go beyond common courtesy and are accepted by local business practices; the value of the gift does not imply obligations on the part of the recipient; the gift is appropriate with respect to the recipient.
- Employees may accept or offer unsolicited hospitality and entertainment. Such hospitality and entertainment must be infrequent, separated from influencing business decisions, and reasonable in value; must take place in settings that are reasonably appropriate and fitting with the employees' roles in the related business.

Not Tolerated

- Gifts, hospitality and entertainment to government officials are generally prohibited. Any exceptions require prior written approval.
- Employees are prohibited from soliciting or offering gifts, personal benefits or unjustified advantages to third parties connected with business dealings in monetary form or otherwise.

11. Interactions with Suppliers and other Third Parties

As a leader Reneso, s. r. o. deals with a large network of suppliers and other third parties that play an important role as enablers for sustainable growth and overall success. The way supplies are purchased and operations are contracted out affects Reneso, s. r. o.'s reputation as a responsible corporate citizen.

Reneso, s. r. o. has set forth principles that are key for economic, social and environmental sustainability in order to ensure long-time success of Reneso, s. r. o. and its stakeholders in the Reneso, s. r. o.

Where necessary, provisions relating to laws, regulations, compliance trainings and auditing, are included in contracts with third parties. Additionally, in an effort to minimise and manage compliance-related risks, Reneso, s. r. o. has implemented a risk-based Integrity Due Diligence process for third parties.

Respected and Fostered Principles

- Reneso, s. r. o. requires its suppliers to adhere to the principles of the supplier Code of Conduct and to use reasonable efforts to ensure that their own suppliers will also comply with these principles.
- Collaboration must be based on clear and fair criteria. Employees are responsible for monitoring the business relationships with suppliers to continuously ensure their qualification for Reneso, s. r. o.
- As Reneso, s. r. o. does not work directly with mineral resources, requires from its suppliers responsible use of mineral resources (Conflict mineral regulations, declaration, audits etc.)



12. Competition and Fair Dealing

Worldwide, anti-trust laws generally prohibit agreements, understandings and actions which may restrain trade or reduce competition. Violations of such laws do not require explicit promises or trade reducing agreements; violations can be established with circumstantial evidence. Due to the complexity of anti-trust law, employees are strongly advised to consult the Legal and Compliance organisation with any questions.

Respected and Fostered Principles

- Reneso, s. r. o. performs its business with honesty, fairness and integrity. Reneso, s. r. o. seeks competitive advantage through excellent performance, never through unethical or unlawful business practices.
- All customers, suppliers, competitors and employees should be dealt with fairly and lawfully. Reneso, s. r. o. must offer customers the best prices and services, independent of what its competitors are doing.
- Employees must principally conduct business with customers without any interaction with Reneso, s. r. o.'s competitors.

Not Tolerated

- Taking unfair advantage on anyone through any illegal trade practice like manipulation, abuse of privileged information or misrepresentation of material facts is prohibited. Co-operation or alignment with competitors for the purpose of gaining new business from customers is strictly prohibited.
- Employees must strictly act within the law, and must also avoid anything that might appear as collusion or improper action. Entering into collusive agreements or commitments with competitors concerning price fixing, allocations of customers or territories, customer / supplier boycotts or other similar agreements is not permitted. It is also prohibited to "team" or work with other companies in order to limit competition, e.g., for "bid rigging" or to exchange confidential information with competitors about the aforementioned subjects.
- Employees must not enter into discussions with competitors about the above mentioned subjects.

13. Trade Controls

The movement of goods, services, software, intellectual property and technology across borders is regulated in each country. Many countries also implement trade controls, such as export controls, sanctions embargoes and boycotts, which may have an impact on how Reneso, s. r. o. conducts business. Compliance with trade controls is critical to Reneso, s. r. o.'s success. A violation can severely damage Reneso, s. r. o.'s reputation and give rise to civil and / or criminal penalties.

Respected and Fostered Principles

- Reneso, s. r. o.'s global operations shall conduct business in compliance with applicable trade controls, including relevant international and local trade control laws and regulations.
- Members are accountable and are expected to exercise responsible supervision and control over their operations to ensure compliance with applicable trade controls.



14. Political Contributions

Political and democratic initiatives can be actively and passively supported by the people.

Respected and Fostered Principles

- At their discretion, employees can participate in political activities in their own personal capacity as long as their position does not conflict with their work and measures are taken to separate their professional from political interests. When needed, such conflicts are to be transparently disclosed to Reneso, s. r. o.

Not Tolerated

- Reneso, s. r. o. does not make political contributions, whether in monetary payments or donations in kind to political parties or their institutions, agencies or representatives, anywhere in the world.

15. Charitable Donations

Charitable donations are voluntary unilateral contributions from donors for charitable purposes only, without the expectation of services in return. Donations may fall under certain laws and regulations in some countries and maygive rise to tax implications in some instances.

Respected and Fostered Principles

- Charitable donations shall always be in line with Reneso, s. r. o.'s corporate social responsibility as well as applicable laws and regulations.
- Charitable donations shall always be given transparently and be comprehensively evidenced.

16. Sponsorships

Reneso, s. r. o. funds may be used for sponsoring activities. Sponsorships must be based upon bilateral agreements in which the involved parties agree to specific services and services-in-return. Most often such services-in-return relate to marketing and promotion.

Respected and Fostered Principles

- Sponsorship agreements shall be in writing with the services and services-in-return comprehensively evidenced.
- Most commonly sponsorships have commercial purposes.

Not Tolerated

- Sponsorships shall never be misused for obtaining undue advantages.

17. Conflicts of Interest

Conflicts of interest exist when positions within Reneso, s. r. o. are used for personal gain aside from the normal compensatory rewards of employment. Conflicts of interest also exist when business connections are entertained with competitors, customers or suppliers beyond the regular business relationship, or when family members or friends of employees have interests in third parties that are in business with Reneso, s. r. o. Conflicts of interest may also arise when an employee's personal interest takes precedence over Reneso, s. r. o.'s while that employee is acting within her or his capacity as a Reneso, s. r. o. employee. Even appearances of conflicts of interest could damage Reneso, s. r. o.'s or its employees' reputation.

Respected and Fostered Principles

- Business decisions should always be based on sound business judgment and not be motivated by potential personal gains.
- When potential conflicts of interest arise, Members are expected to immediately inform a superior and disclose the conflict in writing.

Not Tolerated

- Employees are to avoid situations, activities, involvements, or investments that conflict with Reneso, s. r. o.'s business.

18. Money Laundering

Money laundering is defined as an illegal process where funds from illegitimate activities are transformed into assumed legitimate assets. Often such activities are related to financing terrorism or evading international sanctions.

Respected and Fostered Principles

- Reneso, s. r. o. is committed to complying with anti-money laundering and anti-terrorism laws throughout the world. The company will conduct business only with reputable customers that are involved in legitimate business activities with funds derived from legitimate sources.
- Employees are to collect and understand documentation about their customers and business partners to ensure that they are involved in lawful business activities and their funds are of lawful origin.
- Reasonable steps must be taken to prevent and detect unacceptable and suspicious forms of payment.

Not Tolerated

- Reneso, s. r. o. will not process information deemed to be of illegitimate nature or unlawful.
- Reneso, s. r. o. will neither enter into nor tolerate arrangements which facilitate or appear to be used for facilitating acquisitions, retentions, uses, or control of money payments intended to disguise crimes.



Reneso, s. r. o.
Dr. Jánskeho 25/59
Žiar nad Hronom 965 01
Slovenská republika

Contact:

Telephone: +421 907 285 636
e-mail: info@reneso.eu
Web: https://www.reneso.eu