



## Initial Message

This Code of Conduct presents a set of rules outlining the responsibilities and proper practice that reflect our organization's expectations in relation to the standards of conduct and ethics in the performance of our activities in the global market. Our commitment to operate in an ethical, upright and transparent way in all activities related to our employees and external providers (suppliers), has been a key element in our business strategy and the development of our business.

Compliance means knowing, understanding and enforcing the laws and regulations that govern our business, in addition to this Code of Conduct and our internal rules, which were designed in order to ensure our organization's reputation and to preserve the company's assets, as well as to guarantee a good and appropriate relationship with our employees, directors, officers, shareholders, customers, suppliers and service providers, governments and society as a whole.

As a result, we neither accept nor tolerate that the ethical commitment and standards of conduct presented here are compromised. We encourage and stress the need to carefully read, understand and adhere to the principles and guidelines contained in this Code of Conduct, which is applicable to all members of our organization, in any place and at any time.

We recommend that you check it on a regular basis and seek guidance whenever you have any doubts or feel that it is necessary. Your personal commitment to preserving and honoring the expectations established in this Code of Conduct is vital for the continuity, growth and success of our organization and our future.

## 1 Social and Environmental Responsibility

TSS fulfills its social responsibilities by carrying out its activities with productivity, supplying quality products and providing good services, complying with the applicable laws and regulations, avoiding waste and respecting the environment, cultural values, human rights and social organization of the communities in which it operates. In this way, it satisfies its customers, creates job opportunities, contributes to the sustainable development of the regions in which it operates and generates wealth for society. TSS fulfills the requirements by implementing **quality management system** into its processes.

The Company's activities are conducted in a responsible way with regard to protecting health and preserving the environment, seeking, whenever feasible and over time, to reduce and minimize the environmental impact caused by its operations, as well as to spread this commitment with sustainability among its employees, directors, officers, external providers and customers as well as to the community at large. TSS has issued **Environmental Policy** and **Health and Safety Policy**.

TSS also seeks to support the socioeconomic and cultural development of the communities in which it operates, and encourages and values the voluntary participation of its employees, directors and officers in community actions and activities that foster the exercise of citizenship.

## 2 Human Rights and Working Conditions

Human rights represent the universally agreed minimum conditions that enable all people to maintain their dignity. Human rights are inherent to all of us, whatever our nationality, place of residence, sex, national or ethnic





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origin, colour, religion, or any other status. **TSS** respects all recommendation of ILO (International Labour Organization) as well as national laws.

1. **TSS** prohibits employment of children under 15 years of age. Legally young workers under 18 year of age do not work at night or overtime and are protected against conditions of work which are harmful for their health and safety and their work duties don't interfere with their school duties.
2. **TSS** complays the minimum wage or salary and any additional entitlements payable by the employer to the worker and arising out of the worker's employment. **TSS** respects national law in such a situation as paid sick days, family and medical leave, paid overtime, etc.
3. Regular work weeks don't exceed 48 hours, in emergency situation 60 hours. All overtime is voluntary and paid according to national law.
4. **TSS** refuses forced or compulsory labour (forced overtime, retention of identity documents, human trafficking, etc.).
5. **TSS** guarantees freedom of association as the right to freedom of peaceful assembly and to freedom of association at all levels, in particular in political, trade union and civic matters, which implies the right of everyone to form and to join a process of negotiations between employers and a group of employees aimed at reaching an agreement that regulates working conditions.
6. **TSS** has implemented Health and Safety Policy.
7. **TSS** define desirable behavior in „**10 rules of behavior in TSS**“ document. **TSS** does not tolerate any type of harassment, including moral, sexual or economic harassment, or any other types of abusive conduct in the relationship between employees, directors, officers and external providers that causes a hostile environment, of intimidation or physical or psychological discomfort, such as:
  - inappropriate physical contact, with or without the other party's consent,
  - sexual advances, the exhibition of objects or images or communication with a sexual connotation, or other acts of sexual harassment,
  - exposure of employees, directors, officers or Suppliers to humiliating or embarrassing situations in the workplace or in the performance of their duties,
  - intimidating actions, such as insults, bullying or threats,
  - abuses of power or authority in order to solicit personal favors or services from subordinates.

### 3 Business Conduct and Compliance Policy

**TSS** issues following rules to help drive business ethically, honestly, and in full compliance with all laws and regulations. Those principles should be applied to every business decision in every area of the company.

**TSS** expects applying the rules to employees, independent contractors, external providers, consultants, and others with whom business has been done. That is why **TSS** has issued **Code of Ethics and Business Conduct**.

1. **TSS** does not tolerate any type of corruption, bribery, extortion.
  - Corruption is defined as the abuse of entrusted power for private gain. This can mean not only financial gain but also non-financial advantages.
  - Bribery is an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business.



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- The solicitation of bribes is the act of asking or enticing another to commit bribery. It becomes extortion when this demand is accompanied by threats that endanger the personal integrity or the life of the private actors involved.
- 2. **TSS** respects the right to privacy, which is defined as: "No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks." **TSS** complies the General Data Protection Regulation (GDPR).
- 3. **TSS** fulfills its financial responsibility by accurately recording, maintaining, and reporting business documentation to stakeholders and regulatory authorities, when appropriate. Books and records are expected to be maintained in accordance with applicable law and generally accepted accounting principles and public according to rules of disclosure of information in accordance with applicable regulations and prevailing industry practices.
- 4. **TSS** complies rules of fair competition and anti-trust and does not tolerate to any breach of them. It includes for example business practices that unlawfully restrain competition, improper exchange of competitive information and price fixing, bid rigging, or improper market allocation.
- 5. **TSS** avoids conflict of interest (an individual or a corporation (either private or governmental) is in a position to exploit his or their own professional or official capacity in some way for personal or corporate benefit).
- 6. **TSS** develops, implements, and maintains methods and processes appropriate to its products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. **TSS** has established effective processes to detect counterfeit parts in certificated quality management system (QMS).
- 7. **TSS** respects intellectual property as creations of the mind, such as inventions, designs and symbols, names and images used in commerce. It is protected in law by, for example, patents, copyright and trademarks, which enable people to earn recognition or financial benefit from what they invent or create.
- 8. **TSS** refuses any type of retaliation which is defined as a direct or indirect adverse administrative decision and/or action that is threatened, recommended or taken against an individual who has reported suspected wrongdoing that implies a significant risk or cooperated with a duly authorized audit.

## Conclusion

**TSS** encourages its employees, directors, officers, external providers and third parties in general to report any activity or situation that they believe is or may be a breach of this Code of Conduct, of **TSS** internal rules or of the laws and regulations that apply to it, providing the maximum amount of information available to facilitate and expedite the investigation of the case to the hands of Person responsible for Corporate social responsibility.

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POSITION: Managing Director