

**Supplier Code of Conduct AVT Group a.s.**  
**(IČ: 01691988)**

KONZULTACE

PROJEKTY

REALIZACE

Released: 1.1.2023

Effective from: 1.1.2023

Approved by: Ing. Petr Vlček, sole member of the Board of Directors

**1) Purpose of the document**

The Code of Ethics applies to all companies that supply products or services to AVT Group a.s. and its subsidiaries, joint ventures, divisions or controlled affiliates. AVT Group a.s. makes it a condition of business cooperation that suppliers and their employees undertake to comply with this Code of Conduct. AVT Group a.s. suppliers must comply with the laws, rules, regulations and policies of AVT Group a.s. applicable in the countries and territories in which they operate. Suppliers should familiarize themselves with the business practices of their suppliers and subcontractors and hold them accountable for compliance with all policies and requirements of this Supplier Code of Conduct. AVT Group a.s. may terminate business relationships with suppliers who fail to comply with the Code.

**2) Health and Safety**

Suppliers must provide a healthy and safe working environment for workers and visitors. They should put in place proactive measures to prevent accidents and minimise exposure to health risks. Their operations must comply with all laws relating to occupational health and safety.

**3) Environment**

Suppliers should conduct their operations in a sustainable manner to minimize the impact on natural resources and protect the environment, customers and employees. Suppliers should demonstrate corporate social responsibility within the communities in which they operate. They must ensure that their operations comply with all applicable laws relating to soil protection, air emissions, water discharge, toxic and hazardous substances, packaging and waste disposal. Laws and regulations (e.g., EU RoHS, EU REACH, California Proposition 65, U.S. TSCA) applicable worldwide ban or restrict certain substances or require manufacturers and suppliers to provide information about the composition of their products. We expect suppliers to comply with all applicable laws and regulations regarding products or materials supplied to or manufactured for AVT Group Inc.

**4) Labour and human rights****LABOUR AND HUMAN RIGHTS**

At AVT Group a.s., we honor human rights and respect the individual dignity of all people in the world. This commitment is consistent with the values and practices of AVT Group Inc. We strive to ensure human rights for all workers in our supply chain and expect our suppliers to do the same.

**CHILD WORK**

Suppliers must not employ workers under the age of 15 and must comply with International Labour Organization regulations. If local laws set a higher minimum age, suppliers must comply. Workers under the age of 18 must not perform work that could endanger their human rights, health, safety or education.

**Supplier Code of Conduct AVT Group a.s.**  
**(IČ: 01691988)**

KONZULTACE

PROJEKTY

REALIZACE

#### FORCED WORK

Contractors must comply with laws governing labour. Suppliers are prohibited from engaging in practices that constitute modern slavery, such as human trafficking; the use of forced, involuntary, or bonded labor; or the purchase of materials or services from entities that use forced, involuntary, or bonded labor. Suppliers must be able to demonstrate that the materials contained in their products comply with the labour and modern slavery laws of the country or countries in which they do business.

#### RECRUITMENT AND EMPLOYMENT PRACTICES

When recruiting new employees, suppliers must, among other things, verify that they have the right to work legally in the country and ensure that all mandatory documents, such as work permits, are available. AVT Group's suppliers are expected to provide equal opportunities to all workers, including the right to freedom of association and collective bargaining.

Contractors must prohibit discrimination on the basis of age, race, color, national origin, sexual orientation, sex, gender identity or religion, maternity, marital or partner status, familial status, genetic information, ancestry, geographic background, national origin, disability, union membership, military or veteran status, or any other class or status protected by applicable laws of the country, state or local area.

#### DIVERSITY IN SUPPLIERS

We encourage suppliers to promote diversity, equality and inclusion in their workplaces. We also encourage them to adopt a supplier diversity sourcing programme to support small or disadvantaged business enterprises.

#### OBSERVATION

Suppliers must treat all workers with respect and consideration. They must not subject employees to corporal punishment and physical, sexual, psychological or verbal harassment or abuse. Suppliers must provide an environment where employees can raise issues without fear of retaliation. Where permitted by law, suppliers should have a system in place for anonymous reporting of employee concerns.

#### REMUNERATION AND WORKING HOURS

Contractors must comply with relevant laws and regulations governing wages and hours of work for employees. Suppliers should act to limit overtime to a level compatible with a humane and productive work environment.

#### 5) Ethics

##### GLOBAL BUSINESS COMPLIANCE

Suppliers must comply with applicable laws, rules and regulations regarding sanctions and export and import controls. Suppliers must not provide AVT Group Inc. with goods, materials or services from embargoed countries or sanctioned parties. Suppliers must also respond timely and accurately to AVT Group a.s.'s requests for information regarding country of origin and free trade agreements.

**Supplier Code of Conduct AVT Group a.s.**  
**(IČ: 01691988)**

KONZULTACE | PROJEKTY | REALIZACE

**GIFTS AND REWARDS**

Suppliers may not offer gifts to AVT Group Inc. employees. This also applies to gifts of negligible value. While in some cultures it is acceptable to offer gifts in business dealings, AVT Group a.s. requires suppliers to respect its policy of not accepting gifts from suppliers. This ensures fair and impartial judgments in the best interest of AVT Group Inc.

**A CLASH OF INTERESTS**

Suppliers are expected to avoid any situation that may involve a conflict or potential conflict between their personal interests and the interests of AVT Group Inc. Examples of potential conflicts of interest:

- A supplier employs a current employee of AVT Group Inc. to perform work for them.
- The Supplier is partly or wholly owned by an employee of AVT Group a.s. or a member of his family.
- The Supplier is in some way associated with or supervised by an employee of AVT Group a.s. with whom the Supplier has a close personal relationship.

Actual or potential conflicts of interest should be reported immediately to a supervisor.

**IMPROPER PAYMENTS**

Bribes, illegal commissions and similar payments are strictly prohibited. This prohibition applies even when local laws permit such activities. Employees, contractors and agents acting on behalf of AVT Group Inc. are strictly prohibited from accepting or making such payments under any circumstances.

**CONFIDENTIAL INFORMATION**

Proper handling of confidential information is essential to the success of AVT Group a.s. and its suppliers. Suppliers must collect and process information in accordance with laws and regulations. Suppliers must protect all confidential information, including data, personal information, and intellectual property, with appropriate controls, safeguards, and security measures that are commensurate with the sensitivity of the confidential information and that are at least as protective as they apply to their own similar information. Suppliers may receive, use and disseminate Confidential and Personal Information only as expressly authorized and approved by AVT Group Inc. and for the purposes for which the Confidential and Personal Information was provided. Our suppliers can rely on AVT Group Inc. to protect their confidential and personal information in the same manner. Suppliers may not use AVT Group Inc.'s intellectual property, trademarks, images or other copyrighted materials unless expressly authorized by AVT Group Inc. If suppliers receive confidential information that is not intended for them, they are expected to remove it immediately and not use it inappropriately with respect to AVT Group Inc. or its suppliers.

**6) Ensuring sustainable supply****SUPPLIER MANAGEMENT SYSTEM**

Suppliers should have a management system in place to ensure compliance with relevant laws, regulations and AVT Group a.s. policies; compliance with the Supplier Code of Conduct; and identification and mitigation of operational risks associated with the Code. The system should also support continuous improvement and compliance with changing laws and regulations. To meet EHS requirements, the use of an Environmental, Health and Safety (EHS) management system such as ISO

**Supplier Code of Conduct AVT Group a.s.**  
**(IČ: 01691988)**

KONZULTACE

PROJEKTY

REALIZACE

14001 or ISO 45001 is strongly recommended. SUPPLY CHAIN TRANSPARENCY Supply chain transparency is required to confirm compliance with this Code of Conduct. If there is a known and verified concern affecting AVT Group Inc.'s operations, AVT Group Inc. may request documentation, conduct on-site audits, review and approve corrective action plans, and verify implementation. These measures include, but are not limited to, AVT Group Inc.'s restricted substances and conflict minerals reporting requirements. We also expect suppliers to provide appropriate documentation of supply chain compliance with the Supplier Code of Conduct upon request.

**COMMUNICATION**

Suppliers should support AVT Group Inc. in the implementation of the Supplier Code of Conduct. They should therefore make their managers, employees and suppliers aware of its principles and hold them accountable for compliance. In addition, suppliers should ensure that everyone in their supply chain is aware of the opportunity to report non-compliance to AVT Group a.s. and to report any concerns or activities that are in violation of the Supplier Code of Conduct.

**7) Reporting Violations**

If Suppliers have any questions or comments about the Code of Conduct, they may contact a representative of AVT Group Inc. Supplier employees are expected to address internal issues and concerns within their organization. However, behavior that is in violation of the Supplier Code of Conduct or unethical behavior by an AVT Group Inc. employee may be reported in confidence to an AVT Group Inc. manager.