



CODE OF CONDUCT FOR BUSINESS PARTNERS OF THE EXACT SYSTEMS CAPITAL GROUP



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Dear Partners,

We would like to familiarize you with our Code of Conduct for Business Partners of the Exact Systems Capital Group, in which we have included all the most essential principles and standards that we, as a Capital Group, follow in our daily work and which we expect from you as well.

As entrepreneurs, we are committed to continuous development and raising the bar for ourselves; also, in the field of ethical conduct.

In this Code of Conduct of the Exact Systems Capital Group you will find the most important guidelines and principles that we expect you to comply with on a daily basis both in your business relations with Exact Systems and outside of them.

We do believe that this Code will become a signpost to reinforce the ethical culture in our businesses.

Paweł Gos, CEO Exact Systems





MISSION AND VISION



The Code of Conduct of the Exact Systems Capital Group (hereinafter collectively as “CG” or “Exact Systems” and separately, each of the Companies comprising the Capital Group as: “Company”) is a set of rules that guide us in our daily work and when making critical decisions for the CG and each of the Companies.

At Exact Systems, we place emphasis on the compliance of our activities with the law and ethical principles. The mission of CG Exact Systems is to be close to the Client and have a real impact on safety by providing flexible solutions in the field of quality control, production support and logistics for the automotive industry and other businesses.

The vision of CG Exact Systems is to be a leader in the quality control industry in Europe, using the opportunities offered by globalization with respect for the natural environment at the same time. We believe that only by observing the law and acting in a transparent and ethical manner are we able to constantly develop and meet the adopted goals. We also require our Business Partners to comply with the principles and standards set out in this Code. We are jointly responsible for shaping the business environment in which we operate.



COMPLIANCE WITH LAWS AND REGULATIONS



At Exact Systems, we act in accordance with the law and principles, and we expect the same of our Business Partners – clients, contractors, and suppliers.

Exact Systems Business Partners shall adhere to ethical standards and take into account the rules, customs, traditions and social norms in force in the places where they provide services. In the event of a conflict of generally applicable law provisions with local customs or traditions – the provisions of generally applicable law shall prevail.

HUMAN AND LABOUR RIGHTS



Business Partners are obliged to strictly respect human rights in all countries in which they operate, also if there is no relevant legislation in this area in a given country.

In particular, our Business Partners should be close to the values set out in the United Nations Charter, the Universal Declaration of Human Rights, the European Convention on Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and local law.

We expect from our Business Partners in particular:

- do not do business with entities connected with child labour;
- do not allow any forms of forced labour, including modern slavery, human trafficking and any unfair recruitment practices;
- to maintain a work environment free from violence, harassment and discrimination in any form;
- to offer a fair salary and adhere to local laws on minimum salary and minimum hourly rate;
- to comply with regulations on working hours and breaks;
- respect employees' right to association;
- to create safe and hygienic workplaces and comply with health and safety regulations.



PREVENTION OF DISCRIMINATION AND HARASSMENT



Exact Systems Business Partners may not use any discrimination. At Exact Systems, we do not tolerate any manifestations of harassment or discrimination, direct or indirect, due to gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, religion or sexual orientation.

We want to create an environment free from prejudice and an atmosphere of equality and support, where every Employee and Business Partner feels respected. Harassment or discrimination in any form will be severely punished.



SUSTAINABLE GROWTH

Sustainability and integrity make the pillars of our business. We strive to ensure that the services offered to our Clients meet the highest quality standards. At the same time, our goal is to optimize the negative impact of our activities on the environment.

We expect that our Business Partners will also do their best to run their business in a responsible manner, in accordance with the principles of sustainable development.

Decisions regarding the purchase of goods and services and the scope of processes are made not only with the business side in mind, but we are also guided by the care of minimizing their negative impact on the environment.





ENVIRONMENT PROTECTION



At Exact Systems, we are aware of the importance of environmental protection. We treat the protection of the environment and the planet as our commitment to Employees, Business Partners, local communities and future generations.

We expect our Business Partners to comply with all environmental protection regulations and take the initiative on their own to minimize the negative impact on the climate and the environment, in particular by limiting the emission of harmful gases and dust and appropriate waste and sewage management, reducing electricity consumption, as well as through implementation and application of internal environmental and climate policies.



HANDLING CONFIDENTIAL INFORMATION, PERSONAL DATA AND INTELLECTUAL PROPERTY RIGHTS



At Exact Systems, we protect confidential information and the information made available to us by our Business Partners.

Confidential information is unknown to third parties and is not disclosed to them because they have or may have economic value. Each Group company's confidential information includes information on the selection check, inspection, production methods, cost data, business plans and strategies, information on employees, a list of customers, and financial information. All of the information listed here is an important asset to Exact Systems.

We are aware that by entering into business relationships, we may also come into possession of the confidential information of our Business Partners. We protect the information shared with us just like our own. We expect our Business Partners to protect our confidential information in the same way.

We are aware of the value of the intellectual property. We respect and protect all forms of intellectual property belonging to Exact Systems and our Business Partners. We also expect our Business Partners to respect the property of Exact Systems.

FAIR COMPETITION



Free, unlimited and fair competition is the main principle of the market economy and the foundation of Exact Systems' organizational culture. Our competitiveness policy is based solely on the quality of our services and focuses on our Clients' needs.

Therefore, we do not tolerate any behaviour that violates national and international regulations and competition standards on the part of our Business Partners.

Any anti-competitive practice is prohibited, and Exact Systems will strongly condemn any display of such behaviour.

ANTI-CORRUPTION



Exact Systems promotes a zero-tolerance policy for corruption in all aspects of the Capital Group's operations. Preventing, reporting, detecting and combating bribery and corruption is the responsibility of each Exact Systems Business Partner.

Bribery and corruption are always and in any form prohibited, regardless of whether they are direct or indirect actions, both inside the CG and in external relations with its Business Partners.

There are no circumstances that would exclude the application of a zero-tolerance policy towards corruption. Exact Systems operates in a transparent, responsible manner and with respect for the highest ethical standards and requires the same of its Employees, Associates and Business Partners.

PREVENTION OF CONFLICT OF INTEREST



We expect our Business Partners to behave in a manner that does not lead to a conflict of interest and, in the event of such a conflict being detected, immediately report this fact to Exact Systems.

We expect our Business Partners not to offer, promise or give any kind of benefit in return for gaining a privileged position in business dealings.

Partners must require their employees to prevent situations in which such benefits are offered or received.

ANTI-MONEY LAUNDERING AND COMBATING TERRORISM



We comply and expect our Business Partners to comply with anti-money laundering laws and do not participate in any money laundering activity.

We do not engage in any way, and do not tolerate our Business Partners getting involved, direct or indirect, in terrorist activities, regardless of their nature.

CONTACT

In case of questions or doubts related to the issues contained in this Code, please contact the following e-mail address: compliance@exactsystems.com

CAPITAL GROUP

This Code of Conduct of the Exact Systems Capital Group applies to Business Partners of all Exact Systems Capital Group companies, both existing at the time of its issuance, as well as those created or which will become part of the Exact Systems Capital Group in the future. On the day of issuing this Code, the Exact Systems Capital Group consists of Exact Systems sp.z o. o., Exact Systems Slovakia s.r.o., Exact Systems Czech Republic s.r.o., Exact Systems GmbH, Exact Systems Kalite Kontrol Kft. Lti., Exact Systems B.V., Control + Rework Service NV, Exact Systems Ltd., Exact Systems Unipessoal Lda., Exact Systems S.L., Exact Systems China Ltd., Exact Systems SRL, Exact Systems Hungary Kft.