

BBH TSUCHIYA s.r.o.

CODE OF ETHICS
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CODE OF ETHICS

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BBH Tsuchiya s.r.o establishes a Code of Ethics, which sets out the rules of conduct for daily work that must be observed by all employees of BBH Tsuchiya s.r.o. and persons engaged in business activities. BBH Tsuchiya s.r.o. ensures ethical business practices and these standards by establishing appropriate procedures and these procedures are applied to strengthen long-term and ongoing compliance with these ethical rules.

I. Protection of human rights

BBH Tsuchiya s.r.o. supports the protection of internationally declared human rights, including minimum wages and working hours.

II. Discrimination prevention

BBH Tsuchiya s.r.o. declares equal opportunities and equal treatment to be one of the guiding principles of all its activities. It further prohibits any form of discrimination. No employee may be discriminated against on the basis of their age, marital status, gender, sexual orientation, nationality, ethics, medical condition, political, religious or personal beliefs.

Any overt or covert discrimination against, harassment or humiliation of employees of any kind, based on these aspects, is completely unacceptable, must be reported immediately to a supervisor and will be adequately punished by the company.

III. Prohibition of child labor

BBH Tsuchiya s.r.o. prohibits and abstains from any form of child labor within its organization.

IV. Ensuring freedom of association and collective bargaining

BBH Tsuchiya s.r.o. respects the right of its employees to freely associate, organize and bargain collectively in accordance with applicable national law.

V. Anti - slavery and human trafficking measures

BBH Tsuchiya s.r.o. takes measures to prevent modern-day slavery in our organization and our supply chain.

VI. Principles of internal communication

During daily joint work, communication takes place on a horizontal and vertical level. The company is interested in ensuring that each of its employees always has at its disposal in time such a summary of information that is necessary for him to perform his tasks safely and with quality.

Each manager is responsible for the complete, correct and timely transmission of this information to his subordinates. On the other hand, it is the right of every subordinate to respond to any information that he considers incomplete, inaccurate or submitted late.

In such a case, if he acts in good faith, he has the full right to address his superior at any time and, if necessary, his superior. In such a case, he must not be penalized for this activity in any way.

BBH Tsuchiya s.r.o. maintains an "open door" policy and at the same time calls on all employees to use it. The company has a lockable box for comments, complaints and warnings about unethical behavior, where employees will be able to express themselves anonymously. The mailbox will be managed by a human resources manager and comments will be handled by the Company's Executive Officer.

VII. Use of technology

BBH Tsuchiya s.r.o. they use various technological equipment in the performance of their work activities, especially machinery and mechanical equipment, printers, copiers, desktop and laptop computers, telephones and mobile phones, company cars, etc.

All employees - in connection with specific job positions - are responsible for protecting such company property from loss, damage and misuse. Each employee may only use equipment that has been properly familiar with its versatile use.

VIII. Business ethics

The supplier BBH Tsuchiya s.r.o. undertakes to adhere to these principles, which apply to all employees and persons involved in business activities.

- Prohibition of corruption, which is defined as the abuse of power for private gain.
- Prohibition of violent enforcement - demanding bribes is an act of solicitation or incitement to another persons for bribery.
- Prohibition of bribery - offering or accepting any gift, loan, bribe, reward or other benefit to or from any person as an incentive to do something dishonest, illegal or breach of trust in the course of business.
- The right to privacy is defined as "No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to judicial protection against such interference or attacks. "
- GDPR - the aim is to protect all EU citizens from invasion of privacy and abuse personal data with the ever-increasing current use of data.
- Financial responsibility is the responsibility of the company to accurately record, maintain and report business documentation, including, financial reports, reports to control bodies, if necessary. They are expected to be maintained in accordance with applicable laws and generally accepted accounting principles.
- Disclosure of information relates to the Company's responsibility to disclose financial and non-financial information in accordance with applicable regulations and general procedures.

- Fair competition and antitrust measures relate to encouraging businesses to comply with fair trade rules.

. Compliance with competition rules is a fundamental responsibility of companies.

- A conflict of interest arises when an individual or legal entity (either private or public) is in a position to use its professional or official means for personal or corporate enrichment.

- Counterfeit parts: companies are expected to develop, implement and maintain methods and processes appropriate to their products and services to minimize the risk of use counterfeit parts and materials in the delivered goods.

- Intellectual property refers to goods created by human intellectual activity, such as inventions, designs, and commercially used symbols, names, and pictorial materials. It is protected by law, for example through patents, copyrights and trademarks, which allow individuals to gain recognition or financial reward for their inventions or creations.

- Export control measures and economic sanctions apply to restrictions on the export or re-export of goods, software, services and technology, and may also apply to certain trade restrictions involving certain countries, territories, enterprises or entities and individuals for exports to third and dangerous countries.

- Whistleblowing - Employees who selflessly and in good faith report a suspected violation of this Code cannot be penalized.

IX. Compliance with environmental, health and safety legislation

In BBH Tsuchiya s.r.o. we are in full compliance with the relevant national law on environmental protection, safety and health at work. In order to prevent accidents and occupational diseases, regular training of our employees is provided.

Further in BBH Tsuchiya s.r.o. we have an effective environmental policy in place and we comply with all applicable national laws, regulations and standards that protect the environment.

X. Product compliance with environmental regulations

BBH Tsuchiya s.r.o. provides products that fully comply with all applicable environmental compliance legislation. Compliance with restricted or prohibited substances is reported through the IMDS.

XI. Conflict Minerals Provisions (Dodd-Frank Law Reform, Sec1502)

BBH Tsuchiya s.r.o. ensures to customers worldwide and throughout our supply chain that all its products, which contain electronic components that use a certain amount of gold, tin, tantalum and tungsten, do not originate in the Democratic Republic of the Central African Republic, South Sudan, Zambia, Angola, Republic of the Congo, Tanzania, Burundi, Rwanda or Uganda, or any other neighboring countries or countries subject to embargoes by the US sanctions authorities, European authorities or any national authority.

Because we must collect proof of the origin of all four of these metals, even if they do not contain such a critical mineral, we require our suppliers to provide a report on the deliveries made to BBH Tsuchiya s.r.o. given the origin of these four metals.

XII. Data protection

BBH Tsuchiya s.r.o takes care of maximum security of external and internal data. The collection, distribution and dissemination of this data outside BBH Tsuchiya s.r.o.