

CODE OF CONDUCT



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INTRODUCTION

TATRAVAGÓNKA, a. s. Is the largest manufacturer of railway freight wagons and bogies in Europe, and it belongs among the most significant companies in the Slovak Republic.

As such, it has not only obligations resulting from business relations, but also moral and ethical obligations. The environment, in which we spend a significant part of our lives, undoubtedly influences and shapes us to a certain extent.

Each of us is co-responsible for the way we communicate with each other, how we treat each other, how considerate and tolerant we are to each other.

There is no difference - physical, cultural, religious or other - that would make us less valuable individuals, and it is only up to us to create an atmosphere of mutual respect, tolerance and understanding at the workplace.

What applies within the company, it also applies in relations with external companies. We work in the company that has built its name for more than 100 years, and therefore, with our responsible approach to the product, to society, to the environment and to business partners, we must represent the legacy

of the generations that built this company before us and preserve these values for generations to come.

MANAGEMENT LEADS BY EXAMPLE AND REINFORCES KNOWLEDGE OF THE CODE

As the management of the company, we are committed to the consistent application of the principles stated in the code. Without exceptions and differences that would reduce its value.

We will support moral and ethical behaviour, highlight its manifestations and consistently suppress behaviour that contradicts it.

We will follow the code ourselves, so that there is not even the slightest doubt that we perceive this code not only as an obligation for the company, but also for ourselves.

It is our joint duty to ensure that every colleague in our company knows and is aware of this code, so that it is an integral part of our working life.



Ing. Juraj Hudáč
General Director of Tatravagónka, a. s.

OUR VALUES

Our code of conduct stands on the core values, which we proudly support as the employees.

Responsibility – we behave professionally and we want to constantly learn new things and improve both humanly and professionally. We approach the living, social and cultural environment responsibly.

Cooperation – is based on two pillars self-confidence and humility. Each of us believes in ourselves and remembers that we can do it together. We work together to achieve our common goal. We are all members of one team and work together for integrity, responsibility, quality, excellence and expertise. An important element of our cooperation is open communication across the entire company. We share not only the same values but also the same information.

Innovation – we are appropriately curious and with an open mind we create, implement and look at innovative solutions in the rail freight market. The personal development and education of all our employees brings us creative solutions, approaches and perspectives from little things to big projects. We push the boundaries and look for new challenges that materialize in real products thanks to our creativity.

Trust – is our common moral value, by which we express our unequivocal attitude towards the TATRAVAGÓNKA, a. s. company as well as towards every single colleague. This value unites us and manifests itself in loyalty to the company. We trust each other, and at the same time we are trustworthy. We also show trust to our colleagues, whether it is a superior or a subordinate within the vertical organizational structure. We also treat our partners openly, transparently and ethically, building our credibility and respect in business relationships.

Safety – is paramount for all of us. We value human life the most. Our highest priority is to create a safe work environment.

We do not compromise on security, nor is it affected by the achievement of the company's goals, quality, costs and deadlines.

We are aware of our responsibility for our own safety. At the same time, we assume collective responsibility for the safety and health of each one of us.



ZERO TOLERANCE

The company TATRAVAGÓNKA, a. s. expresses its fundamentally negative attitude and zero tolerance in the area of:

- corruption, bribery, fraud, money laundering, illegal practices, unfair economic competition, insider trading (conclusion of agreement and business based on knowledge of non-public information),
- criminal activity, terrorism,
- violation of human rights, child, illegal and forced labour, modern slavery,
- racism, discrimination- the right to self-determination, religion, orientation,
- sexual harassment, use of alcohol and narcotic substances,
- unequal treatment, within all parties involved in work, business and social contact.

WE CREATE OUR WORKING ENVIRONMENT

Each of us participates in creating the work environment, in which we spend a proportional part of our day. It is only up to us, what kind of work environment we create.

Respecting the personal integrity and diversity of opinions of its employees, TATRAVAGÓNKA requires the highest level of personal morality and compliance with the principles of this Code of conduct at workplace.

WE ALL HAVE SOMEONE WAITING FOR US AT HOME

We place great emphasis on observance and support of rules and principles ensuring safety at workplaces, without any distinction.

We are aware of the fact that we all have our share of responsibility in creating safe working conditions with a constant effort to improve.

In order to achieve this goal, we also use tools to increase awareness of occupational safety and education with a form of positive motivation. We continuously monitor, evaluate and improve our responsibility in this area.

OUR CHANCES ARE EVEN

We support decent and partner coexistence, based on tolerance and an open approach without prejudice. We provide equal opportunities regardless of race, gender, skin colour, age, religion, disability, or social origin. We make decisions based only on qualifications and abilities. We support our employees with a broad training program, we look for talents and give them space to develop their skills for the benefit of our company. We have opened doors for decent expression of ones opinions freely and without fear of consequences.

WE RESPECT OTHERS

We all have the right to be treated fairly and politely by colleagues and superiors. We respect the dignity and privacy of our colleagues and treat everyone with respect, regardless of skin color, nationality, origin, gender, sexual identity, religion, political opinion, body constitution or appearance. We do not participate in any form of bullying, mobbing or bossing, we do not tolerate any form of harassment that affects human dignity and can result in serious psychological and physical problems.

Bullying means unjustified and malicious burdening of a person, placing obstacles, harassing or humiliating behavior towards them or mistreatment by an individual or a group, which may manifest itself in physical or psychological harm. In workplaces, it can be mobbing or bossing.

Mobbing refers to various forms of making life unpleasant in the workplace. It is a form of bullying, the essence of which is repeated verbal, physical or psychological coercion and attacks directed against an individual. They are characterized by concealment, subtlety and insidiousness. The goal of mobbing is to harm another with the aim of subsequent dismissal from employment.

Bossing is psychological bullying in the workplace, which is committed by a superior worker upon his/her subordinate. It is therefore the behaviour of a superior that harms a subordinate in front of his/her colleagues, makes his/her work difficult or impossible for him/her by assigning meaningless tasks and refusing communication.

WE KNOW AND FULFILL OUR OBLIGATIONS

Our basic regulations issued in the company include:

The Organizational order is our basic organizational standard of the company, which has a complex nature; it regulates the principles and rules of the internal organization and relations between the company's departments in the management system.

The Quality policy is a document by which the company's executive management formulates our overall intentions and directions of the company's activities in the field of quality for a period of 5 to 10 years.

The Quality manual is the main document of the quality management system, which provides us with its detailed description and helps us to implement and maintain it.

The Environmental Policy and **the Health and Safety Policy** formulate our goals, commitments and efforts for continuous improvement in the relevant area from a strategic point of view.

The Integrated management system manual is an extension to the technical-organizational procedures, and it describes the IMS model according to the ISO 14001 and ISO 45001 standards.

We all ensure maximum protection of processed personal and other data against their possible misuse in accordance with applicable legislation. When dealing with this data, we maintain confidentiality in accordance with the company's internal regulations as well as the generally applicable GDPR legislation.

WE PROTECT PROPERTY AND INTERESTS OF ALL OF US

The interest of the company's shareholders represents the interest of all of us. Together, we are building an efficient, profitable and competitive company that represents a supportive and stable pillar for its employees. We protect the investments, property, interests, know-how of the company and dispose of them economically.

TRANSPARENCY IS THE SHORTEST WAY TO THE GOAL

We provide all required information on time, in the required form, with an emphasis on their completeness, propriety and correctness of their flow.

We respect legitimate demands of others, and, at the same time, we insist on fulfilling our own demands so that continuity of the information chain is maintained and the information and data we provide lead to the fulfilment of set goals.

We always provide accurate and true values and information, correct data and outputs, and thus we enable fact-based decision-making.

We are considerate of each other and respect the principles of process management, with an emphasis put on the principle of internal supplier and customer.

OUR QUALITY = SAFETY OF OTHERS

Our products are part of public infrastructure, so we place the highest importance on their security; we consider and evaluate all related risks and try to prevent them. In their development, we apply the latest knowledge as well as our long-term experience. We approach production with the highest degree of responsibility; we do it honestly and by using all personal knowledge, while respecting and applying all legislative regulations as well as internal regulations.

WE WANT TO IMPROVE

We are constantly working on improving the quality management systems, safety and health protection at work and the environment.

We are certified in accordance with the latest applicable standards ISO TS 22163, ISO 45001 and ISO 14001, and our goal is to continue in maintaining and increasing the level of certification of the company's systems and products.

All levels of management participate in the continuous improvement of the company, and we contribute to it, to a significant extent, through suggestions for improvement.

We continuously monitor and regularly update the company's goals as well as the related key indicators of all established processes; if necessary, we adopt and control implementation of corrective measures.

We always act in accordance with the motto "TO BE THE FIRST CHOICE" in all aspects.

WE REPRESENT THE COMPANY

WE BUILD UPON THE CORRECT PARTNERSHIP

For us, the correct partnership is not only the necessary fulfilment of the law, but mainly corporate and business culture. We build on correct, transparent relations with all interested parties. By our behavior towards partners and institutions, we represent the company, its values, attitudes and principles, not our personality. We care about the professional reputation of our company. We refrain from any action that could affect our impartial judgment and objective action in the interest of the company.

The so-called **conflict of interests** can occur in many situations and activities, but most often when there are concurrent jobs, when there are family ties in the company and cooperating companies, and investments in cooperating and competing companies. A conflict of interest can seriously damage company's interests and assets and significantly impair work morale.

In the **area of receiving gifts and hospitality**, the company's management expresses confidence in its employees. As an employee, I can accept such a form of commercial attention, but it is excluded that it represents a form of illegal enrichment that will affect my objective judgment and decision-making.

WE PROTECT INTELLECTUAL PROPERTY

It is our duty to protect our and others' intellectual property in all its forms – patents, copyrights, licenses, software, trademarks and brands, web and print content, various forms of design and other forms of intellectual property.

WE DO NOT DISCLOSE INFORMATION

To ensure consistency of statements, only individual members of the board of directors and the PR and marketing department may speak on behalf of the company. We are loyal; we maintain confidentiality and do not take photos and videos on the company premises. Any provision of information, photos and videos made in any company to a third party may lead to damage of interests of all parties involved. Respecting privacy and opinions of our employees, employees are not authorized to act on behalf of the company and may not publish or disseminate information about the company on social media. Communication of TATRAVAGÓNKA on social media falls under the responsibility of the PR and marketing department.

WE ARE NOT POLITICALLY ENGAGED

We do not use the company's good reputation, business name or property to support any particular political party or political movement, belief, direction. At the same time, we exclude support on company grounds in any way. As the company and its management are apolitical, it is desirable that any employee's political sympathies or membership in a political party or political movement have no negative impact on proper and honest performance of work.

RELATIONS WITH PUBLIC INSTITUTIONS

Relations with public institutions are based on correct, legal and maximally ethical approach that does not compromise the good reputation of our company. This condition also applies to direct or indirect contributions, expenses, gifts or entertainment provided by employees or other representatives of the company for the benefit of public institutions.

WE ARE COMMUNITY MEMBERS

WE SUPPORT OUR NEIGHBORHOOD

For a long time now, the company TATRAVAGÓNKA ranks among the pillars of the region not only in the field of employment. Our involvement in the field of social development of the region is covered by the Sponsoring and Philanthropic Commission consisting of employees. Its main task is to communicate transparently and to help in satisfying the needs of the region, communities, institutions, individuals and our colleagues in the fields of sports, culture, education and health.

By building the “Employee with a big heart” community, we try to engage, motivate and inspire our colleagues to participate in volunteer activities, which improve our surroundings, quality of life for others and contribute to their personal growth.

Together, we strive to improve public welfare of our region.

WE PROTECT THE ENVIRONMENT

We are committed to protect the environment, taking into account the rights of future generations. In our activities, we strive for a balance between production and environmental interests.

We respect observance of generally binding legal and other regulations, and, at the same time, we try to make goals and results of our activities in the environmental field known to our employees, business partners and all other involved parties. By introducing new technologies with higher standards, we are changing the attitude towards protection of the living and working environment.

We believe that understanding the importance of maintaining environmental sustainability is the way to further progress into the future with preservation of an acceptable environment for all of us.

We focus on prevention and restriction of occurrence of unacceptable risk; at the same time, we increase the environmental awareness of all employees.

The environment is not only an inheritance, but a loan from our children.

CODE OF CONDUCT IN PRACTICE

Only we, employees and managers, can take care of the fulfilment of the Code of conduct in everyday life, by daily observing and improving the corporate culture that we all create. If we encounter a situation related to behaviour outside of our values and good manners defined in this Code, we have the opportunity to contact a director of the relevant department, or the Human resources management department. If the problem cannot be solved by an agreement between affected entities, we will turn to the ethics committee.

ETHICS COMMITTEE

The application of this Code falls under the responsibility of the company's General Director, who directs and convenes the Ethics Committee every time a complaint or suspicion is received and is responsible for checking and preventing possible retaliatory measures against the whistleblower. At the same time, the Committee is obliged to maintain confidentiality about the identity of the submitter.

In addition to assessing these suggestions, the Committee meets at least once a year (at the end of the calendar year) and updates the Code for the next calendar year.

REPORTING A VIOLATION OF CODE PRINCIPLES

In order to protect these principles, the company has created a mechanism for communicating possible questions and reporting violations or suspected violations of the principles of the Code. Notification of a complaint and suspicion is not a breach of the contractual obligation to maintain confidentiality, even if it is an obligation resulting from the performance of employment, profession, position or function (does not apply to business, telecommunications, tax, banking, postal secrets, data from health documentation, or provision of legal services).

Questions, reporting of suggestions and violations are possible to be submitted via e-mail:

etika@tatravagonka.sk

A condition for any notification is good faith of notification, which means that a person, given the circumstances known to him/her and the knowledge he/she has at the time of notification, reasonably believed that the stated facts were true.

The Committee undertakes to deal with the suggestion without delay and to submit a written opinion within 30 working days.

if the Ethics Committee, on the basis of reporting, detects violations of internal regulations and the Labour Code, it will forward the issue of labour discipline violation to the Human resources management department.

ETHICS COMMITTEE PROCESS DIAGRAM





TATRAVAGÓNKA, a. s.
Štefánikova 887/53 | Poprad 058 01 | SLOVAKIA
<https://tatravagonka.sk>