

CODE OF ETHICS

SECURITY, RESPONSIBILITY, QUALITY

MSM LAND SYSTEMS s. r. o. (hereinafter referred to as the “Company or MSM LS”) is a successful business company, conducting business in the area of national and foreign commerce of military equipment. The objective of the company is long-term and successful activity in the area of special land equipment production for security and rescue units, as well as special equipment and other military materials in the area of domestic and international commerce, including the ability of the company to introduce new products to the global market that are the result of the Company’s own research and development. During the conduct of its business, the Company puts emphasis on security, responsibility and quality of its products, reflected mainly in securing the life and health, property, environment, economic competition, fair market competition, goodwill, prestige and reputation of the Company.

MSM LAND SYSTEMS s. r. o. is a member of the CZECHOSLOVAK GROUP and follows the same values as declared by the entire group. It respects and observes these values. The result of this responsible approach of the company is not only the implementation of these values into its own rules, but also their development, leading to the creation and formation of its own internal comprehensive system of rules, procedures and regulations, whose aim is the compliance of required behaviour of employees and any other persons, with the basic human rights, general ethical values, morality, legal order and internationally accepted standards. The Code of Ethics forms part of this system and covers all Company employees, including the members of Company bodies and external subjects, such as consultants, suppliers or intermediaries representing the Company (hereinafter referred to as the “Workers”).

MSM LAND SYSTEMS s. r. o. does not tolerate any actions by its Workers that could be considered in any way illegal, corrupt, unethical, unfair or immoral. The Company considers such behaviour as condemnable and unacceptable within the pre-set frame of behaviour and acting. The Code of Ethics, as an ethical standard of conduct for employees, is linked to the rights and obligations set out in generally binding legal regulations and the working rules.

BASIC ETHICAL AND MORAL VALUES OF THE COMPANY’S POLICY

BASIC PRINCIPLES OF EMPLOYEE BEHAVIOR

1. The MSM LS employee performs his / her work and tasks in accordance with the Constitution of the Slovak Republic, laws, other generally binding legal regulations and provisions of this Code of Ethics, in the interest of the employer, in accordance with ethical rules, good morals and moral principles. An MSM LS employee never acts in a conflict of interest.
2. The staff member shall give due reasons for his decision and shall carry out his work in such a way as to ensure the performance of the tasks to the required extent, quality and time. The employee always submits his work completely done.
3. The staff member shall act in accordance with the objectives and tasks of the employer and shall not, under any circumstances, be able to influence the intentions of other persons or to accept any financial or other advantage for his personal benefit. An MSM LS employee will never be corrupted, and does not support corruption in any of its forms.
4. The employee is obliged to perform his tasks arising from his job classification personally honestly, responsibly, carefully, conscientiously, in good faith and in accordance with the objectives of the MSM LS.
5. The employee is responsible for his actions and decisions to the employer, and is aware of the possible control to review his procedures and decisions.
6. An employee of MSM LS never provides or knowingly disseminates false or misleading information related to the performance of work that could damage the reputation of MSM LS or other employees.
7. The employee of MSM LS is obliged to always act in such a way that there is no damage to the property and equipment of the employer. He is obliged to use these efficiently and economically, and not to misuse them for personal gain or for the benefit of those close to him.
8. The employee shall take extra care to ensure that there is no violation of international or domestic sanctions, or imposed embargoes, in the case of trafficking in natural and legal persons or specific goods, as well as money laundering.
9. Managers are always obliged to properly present and uphold the rules contained in the company's internal documents. Individual employees become role models for their subordinates, where ethical, moral, legal, anti-corruption and decent behaviour is their main priority and advantage. Managers are responsible for the behaviour of their subordinates and the condition of the workplace, at least to the extent that they have the obligation to control compliance with company rules.

10. Any unlawful conduct or manipulation in relation to public procedures, public and private contracts and tenders, tenders, etc., such as, in particular, lying, misleading, extortion, use of violence, fraudulent conduct, etc., is prohibited.
11. In the event of a reasonable suspicion of conduct that is grossly unethical, undermining occupational safety, environmental protection, discriminating, treating, unequally or damaging the reputation of MSM LS, the employee should report through the MSM LS Ethics Line or otherwise designated to report such complaints. . However, the reported suggestions must not be petty, without evidence or even untrue in order to harm someone personally. Such conduct may be sanctioned and contrary to the code of ethics.

GIFTS AND OTHER BENEFITS

1. An MSM LS staff member shall never, in connection with the performance of the tasks entrusted to him, be placed in a position where he is obliged to repay a proven service or advantage or which deprives him of impartiality and independence in deciding any matter.
2. The staff member shall never solicit or accept gifts, favours or other benefits which could have a real or even apparent influence on his decision-making and professional approach in the matter, nor shall he induce third parties to do so. The employee may not participate in the supplier and business relations of MSM LS on the part of the supplier or customer of goods and services directly or indirectly, and may not have any personal benefit from these relations from an entity other than MSM LS. The employee reports the risk of conflict of interest to the personnel department (compliance officer).
3. Any financial or non-financial gift, service, attention or benefit that is offered to an employee because he takes it over on behalf of the employer must be reported immediately to his superior.

ABUSE OF WORKING POSITION

1. A staff member may not, during or after the performance of his work, misuse information obtained in the course of his duties to obtain any property or other benefit for himself, for the benefit of close persons or other natural or legal persons.
2. A staff member shall neither offer nor confer any advantage on his employment.
3. The staff member shall not own, for his own benefit and for his own benefit, any resources, property or funds of the employer and shall not knowingly contribute to the execution of anyone else.

4. An employee shall not, for the benefit of his own or other benefit and to the detriment of the employer, perform or permit the unauthorized interference with the accounting, reporting, information documentation or information system of the employer.
5. The employee shall not abuse his access right to the employer's premises or information system, nor the access right of colleagues to perform activities that are in conflict with his job description and internal regulations.
6. The company and each of its employees shall comply with the competition rules, in particular, shall not engage in any conduct that could be considered unfair, and shall always act fairly, professionally and transparently.
7. The employee is obliged to maintain confidentiality about the facts of which he learned in the performance of his tasks, about the work intentions of the employer, which in the interest of the employer can not be communicated to other persons, and this obligation continues even after termination of employment. This does not apply if he has been released from this secrecy by a statutory body or a person authorized by him. Any employee who processes or otherwise treats personal data in the performance of his or her duties is obliged to act in accordance with the law and regulations of the European Union.
8. An employee of MSM LS uses working hours to conscientiously perform their job duties.

In case of any doubts related to the compliance program of the Company, its employees may and will turn to their superior and head employees.

CHECKING THE OBSERVANCE OF ETHICAL REGULATIONS AND RULES AND THE POSSIBILITY OF SUGGESTIONS SUBMITTED TO THE COMPANY

1. The Company declares and takes care that this Code of Ethics is always precisely observed by every Worker. Each Worker shall notify his superior or the Company about any breach of the legal rules, inter-corporate standards or regulations.
2. With regard to the efforts to keep transparency as high as possible and to react flexibly to any actual and occurring situation, the Company prepares possibilities for the ways Workers or any third parties can inform the Company about such situations, should they become witness to any breach of the above-mentioned regulations.

These possibilities are provided through the Company's communication channels, in particular:

- A box for suggestions (may be submitted anonymously), placed at the entry to the main building of the Company

- A special hotline: +421 915 885 693
- Company e-mail – etikamsl@msm.sk,
- A paper through the mailbox (may be submitted anonymously)
- Through the superior

Suggestions may also be submitted through the controlling CSG holding:

- Special hotline: +420 733 678 454
- Holding e-mail - etika@czechoslovakgroup.cz

EACH WORKER TAKES INTO ACCOUNT THAT THE MISUSE OF THE POSSIBILITY TO SUBMIT SUGGESTION OF APPLICATION OR THE SUBMISSION OF SUGGESTION THAT IS UNJUSTIFIED OR HARASSING IS CONSIDERED UNETHICAL AND IMMORAL BEHAVIOUR AND RESPECTIVE CONSEQUENCES WILL BE INFERED THEREOF.

FINAL PROVISIONS

1. Each Worker takes into account that a regulatory breach of the Code of Ethics is considered a Worker deviation and will be considered a breach of his obligations, when, in reasonable cases, this could be considered as a gross violation of working obligations with consequences pursuant to the Labour Code. Each breach of regulation or rule may be the cause for an imposed sanction or the termination of the employment relationship.

THE CODE OF ETHICS IS BINDING FOR ALL COMPANY WORKERS FROM THE MOMENT THEY BECAME OR SHOULD BECOME AWARE THEREOF.

In Trenčín, on 01.12.2020

MSM LAND SYSTEMS s. r.o.

Ing. Erika Chrenková, v.r.

Executive head