

# Code of Ethics

## INTRODUCTION

VUJE, a. s. has adopted the Code of Ethics laying down the principles of responsible conduct of business. The Code defines the rules of ethics that take into consideration not only external obligations (laws and regulations), but also internal decisions and an active approach of all stakeholders in VUJE, a. s.

It provides guidance to all of our employees, suppliers and all persons who cooperate with us.

A procedure for reporting violation of the Code of Ethics principles is described in [Reporting illegal, criminal and unethical conduct](#).

## 1 HUMAN RIGHTS

VUJE, a. s. performs all of its activities while considering and respecting basic human rights in compliance with the UN's Universal Declaration of Human Rights, the European Convention on Human Rights and the Constitution of the Slovak Republic.

VUJE, a. s. is committed to treat all of its employees and any other persons without any discrimination based on their race, colour, nationality, ethnic origin, language, religion, world view, political or other attitudes, age, sex, sexual orientation, social, marital or any other status.

VUJE, a. s. does not tolerate any manifestations of violence, intolerance, bullying, sexual or any other harassment, verbal or physical manifestations that are coarse, insulting, intimidating or otherwise violating privacy and reputation of employees or any other persons with whom employees or representatives of VUJE, a. s. interact within the performance of their obligations.

## 2 OCCUPATIONAL HEALTH AND SAFETY

Occupational health and safety is the primary goal of VUJE, a. s. in the performance of its activities. VUJE, a. s. undertakes to thoroughly adhere to any and all regulations and rules of occupational health

and safety; it also undertakes to enforce adherence to such principles and rules by all of its suppliers, persons acting for VUJE, a. s., as well as any other persons who participate in activities performed by VUJE, a. s. VUJE, a. s. undertakes to create, maintain and control safe working environment that is free of any hazards to life.

VUJE, a. s. also ensures occupational health and safety through preventive measures aimed at avoiding situations that jeopardise safety and health. VUJE, a. s. undertakes to facilitate increasing awareness of occupational health and safety.

The occupational health and safety principles and procedures are laid down in the by-laws of VUJE, a. s. and they comply with the relevant regulatory requirements. All employees of VUJE, a. s. are obliged to become familiar with the internal regulations regarding occupational health and safety, respect them, and perform their duties so that they do not endanger themselves or other employees; in case they become aware of any threat to or violation of occupational health and safety, they are obliged to report that without any delay to their superiors so that such negative situations may be eliminated as soon as possible.

VUJE, a. s. has established an occupational health and safety management system, based on ISO 45001 standard, in order to provide an instrument for the implementation, control of and adherence to the occupational health and safety rules.

## 3 NUCLEAR SAFETY

Although VUJE, a. s. does not operate any nuclear facility (it only acts as a supplier or subcontractor of works for operators of nuclear facilities), our key priorities include high-level nuclear safety that must always prevail over economic and any other interests.

All employees of VUJE, a. s. must be aware of the importance of their work with regard to nuclear safety and of potential consequences of intentional or unintentional failures, accept their own liability for their attitudes, conduct and potential effects on

safety, and they must contribute to strengthening and maintaining strong nuclear safety culture (hereinafter referred to as the NSC).

The requirements and procedures that lead to achieving strong nuclear safety culture are binding for all employees of VUJE, a. s. whose activities may affect safety of nuclear facilities, regardless of whether such effects are direct or indirect.

The key NSC responsibilities are assigned to managers at all management levels within the scope of their occupational duties. NSC represents an integral part of their managerial and controlling activities.

A key requirement related to NSC that follows from their managerial job positions (a task to manage employees) is to constantly act as a role model with regard to safety.

VUJE, a. s. has appointed a guarantor of nuclear safety who is responsible for receiving reports of any safety concerns, including anonymous reports, for verifying that the level of nuclear safety is sufficient, and for taking immediate actions.

A level of the nuclear safety culture and adherence to the relevant principles are constantly assessed.

#### **4 COUNTERFEIT, FRAUDULENT OR SUSPICIOUS ITEMS (CFSI)**

The fight against counterfeit, fraudulent and suspicious items is an important element of the integrated management system and nuclear safety culture, as failure in this area can go as far as endangering nuclear safety.

Within VUJE, a. s. there are defined measures (prevention, awareness-raising, controls, notification, and correction) against fraudulent actions by internal employees and suppliers.

#### **5 ENVIRONMENTAL PROTECTION**

VUJE, a. s. regards the protection of the environment and all of its components to be an integral part of the process of managing and guiding the company's activities. In the performance of its activities, VUJE, a. s. endeavours

to take a balanced approach to the protection of its economic and environmental interests while taking into consideration rights of the future generations. VUJE, a. s. increases awareness of environmental protection among its employees and makes sure that it applies the latest and up-to-date environment-friendly methods when performing its activities.

VUJE, a. s. pursues strict adherence to all applicable regulatory requirements and strives to transpose them in its by-laws, which all employees commit to respect.

VUJE, a. s. has established and maintains an environment management system, based on ISO 14001, as an effective tool for the environmental protection.

#### **6 PROTECTION OF COMPETITION**

VUJE, a. s. and all of its employees strictly adhere to and respect the regulations governing the protection of competition. In decision-making and information handling, all employees of VUJE, a. s. are obliged to refrain from entering into official or unofficial agreements, information sharing or any other activities that would limit or endanger competition or lead to establishing cartel agreements, illegal pricing coordination or any other similar conduct.

VUJE, a. s. promotes fair and honest competition and expects these principles to be abided by all of its business partners and third parties it interacts with.

#### **7 TAX OBLIGATIONS**

VUJE, a. s. strictly fulfils its tax and deduction obligations, and expects the same conduct from all of its partners.

VUJE, a. s. does not participate, in any manner whatsoever, in illegal activities aimed at reducing its tax and deduction obligations, nor it is involved in any manipulation with the information that might be used in improper reporting of such obligations. The values of VUJE, a. s. include a commitment to

make financial contributions to the community it operates in.

## 8 CONFLICT OF INTEREST

VUJE, a. s. is committed to avoid any situations in which its representatives and employees would be in a position of making decisions or consult on matters in which their personal interests would or even might potentially be perceived as being in conflict with the interests of the company (conflict of interest).

Every employee who faces a potential conflict of interest is obliged to report such a situation to their superior. Managers of VUJE, a. s. are obliged to prevent conflicts of interest, and in case they become aware of such a conflict, they are obliged to take additional actions aimed at avoiding the threats arising from such conflicts.

## 9 ANTI-CORRUPTION PRINCIPLES

VUJE, a. s. holds a firm position of zero tolerance of corruption in any form and scope whatsoever.

Employees and representatives of VUJE, a. s. are primarily obliged to report any facts indicating corruptive behaviour of company's partners, employees or representatives aimed at obtaining any inappropriate reward, financial benefit or any other material or non-material benefit for themselves or for any other person.

When acting on behalf of the company, employees and representatives of VUJE, a. s. are obliged to refrain from accepting any gifts, regardless of their value, or any personal advantages or inappropriate hospitality from the company's business partners, and they are obliged to refrain from providing such gifts, advantages or inappropriate hospitality.

Employees and representatives of VUJE, a. s. must proceed with particular caution when negotiating with officials of public administration authorities, self-government authorities, public officials and politically active persons, and they must refrain from any conduct that might be perceived as illegal or unethical.

VUJE, a. s. guarantees anonymity and protection of corruption whistleblowers, and it makes sure that such persons are not subjected to any retaliation or disadvantages for pointing out any corruption issues.

## 10 INFORMATION SECURITY

VUJE, a. s. and all of its employees strictly adhere to the rules regarding manipulation with sensitive information. Technical and organisational measures are aimed at protecting confidential documents against unauthorised persons. All employees of VUJE, a. s. are obliged to protect the company's business interests; therefore, all information may only be communicated to authorised persons, whether the employees or third parties. The information published on behalf of VUJE, a. s. may only be provided by persons who have been authorised by the management of VUJE, a. s. Employees of VUJE, a. s. must refrain from any conduct that might endanger good reputation of the company or its business partners in the public space.

Employees and representatives of VUJE, a. s. are obliged to report without any delay any and all facts indicating that any of the measures aimed at data protection have been violated or that any ICT means of VUJE, a. s. have been abused.

VUJE, a. s. undertakes to respect copyright. In the company, it is permitted to use legally purchased software only.

## 11 PERSONAL DATA

VUJE, a. s. strictly adheres to the applicable regulatory requirements regarding protection and processing of personal data, processes such data in a responsible and sensitive manner, and constantly pursues preserving and respecting privacy and confidentiality of information as well as other rights and freedoms of data subjects whose data is processed.

VUJE, a. s. collects personal data for specifically determined legitimate purposes and in the scope that is adequate to and corresponding with the

purpose of processing such data, processes it in a correct manner and updates it as prescribed by law, stores the data in compliance with the company's security policy, relevant by-laws and GDPR requirements for the period necessary for the fulfilment of the specific purpose arising from the statutory requirements and in context with the Registry Code and Plan of VUJE, a. s.

In order to ensure consistent protection of personal data, VUJE, a. s. has implemented technical, organisational and regime-related precautions regarding physical and information security in compliance with the implemented data protection system based on ISO 27001.