

Code of Ethics

INTRODUCTION

VUJE, a. s. has adopted this Code of Ethics, in which the principles of responsible business conduct are established. This Code of Ethics sets out the ethical rules of conduct, taking into account not only external obligations (laws and regulations), but also the internal position and active engagement of the entire company VUJE, a. s. It shall apply to all employees, suppliers, and contractual partners.

To achieve the principles of the Code of Ethics, internal document "Compliance Management" was issued.

1 HUMAN RIGHTS

VUJE, a. s. conducts all its activities with due consideration and full respect for fundamental human rights, in accordance with the UN Declaration of Human Rights, the European Convention on Human Rights, and the Constitution of the Slovak Republic.

VUJE, a. s. commits to treating all its employees and all other individuals on a non-discriminatory basis, regardless of their race, skin colour, nationality, ethnic origin, language, religion, creed, political or other opinion, age, gender, sexual orientation, social or family status, or any other status.

VUJE, a. s. does not tolerate any acts of violence, intolerance, bullying, sexual or other harassment, verbal or physical behaviour that is coarse, offensive, humiliating, or other violations of privacy or reputation of employees or any other individuals with whom employees or representatives of VUJE, a. s. interact in the course of their duties.

VUJE, a. s. strictly prohibits any form of child labour, forced or involuntary labour, including work performed under threat of sanction or physical or psychological coercion. The company does not allow the use of prison labour unless it is voluntary and in accordance with the law. VUJE, a. s. requires

the same principles to be upheld by its suppliers and subcontractors.

VUJE, a. s. respects the right of its employees to freely associate, to form or join trade unions, and to engage in collective bargaining in accordance with the law. The company undertakes that no employee shall face discrimination or any form of disadvantage because of their participation in, or activities within, a trade union.

VUJE, a. s. observes all provisions of the Labour Code and the collective agreement concerning working hours, rest period, and breaks. The maximum length of working time shall not exceed the limits permitted by the law.

2 OCCUPATIONAL HEALTH AND SAFETY

Occupational health and safety is the primary objective of VUJE, a. s. when conducting its activities. VUJE, a. s. undertakes to strictly adhere to all regulations and principles of occupational health and safety. Likewise, it undertakes to enforce these principles with all our suppliers, persons acting on behalf of VUJE, a. s. and all other persons who are involved in the activities of VUJE, a. s. The company undertakes to create, maintain, and monitor a working environment that is safe and does not pose a health risk.

VUJE, a. s. also ensures occupational health and safety by applying preventive measures with the aim to prevent circumstances endangering safety and health. VUJE, a. s. is committed to promoting awareness about occupational health and safety.

The principles and procedures of ensuring occupational health and safety are laid down in internal regulations of VUJE, a. s. and are in accordance with up-to-date legal regulations in the given area. Each employee of VUJE, a. s. is obliged to familiarise themselves with and follow the internal regulations relating to occupational health and safety, and to proceed in a manner that does not to endanger themselves or other employees in the course of performing their duties. In the event that an employee discovers that occupational health and safety has been endangered or violated,

they shall be obliged to immediately report such facts to their superior so that the faulty state can be remedied as soon as possible.

As a tool for implementing, monitoring, and compliance with the occupational health and safety rules, VUJE, a. s. has implemented and maintains an occupational health and safety management system pursuant to ISO 45001 standards.

3 NUCLEAR SAFETY

Despite the fact that VUJE, a. s. does not operate any nuclear device (it acts as a supplier or subcontractor of work for nuclear device operators), our main priorities include a high level of nuclear safety, which must always take precedence over economic or any other interests.

Each employee of VUJE, a. s. must be aware of the importance of their work with regard to nuclear safety as well as of potential consequences of an intentional or unintentional failure, must accept their personal responsibility for their attitudes, conduct, and potential impacts on safety, and must contribute to strengthening and maintaining a strong nuclear safety culture.

The requirements and procedures that lead to the achievement of a strict nuclear safety culture shall be binding to each VUJE, a. s. employee whose activities may have impact on safety of nuclear devices, regardless of whether this impact is direct or indirect.

Staff in leading roles at all levels of management hold primary responsibility in the field of nuclear safety culture, within the scope of tasks arising from their roles. The nuclear safety culture forms an inseparable part of their managerial and monitoring activity.

The key requirement for nuclear safety culture that arises from their leadership position (from their role to lead employees) is to demonstrate their leadership example with regard to safety at all times.

VUJE, a. s. has a designated guarantor for the area of nuclear safety culture, who is responsible for

receiving complaints, including anonymous, about deficiencies or verification of sufficient level of nuclear safety, and for addressing them without delay.

The level of nuclear safety culture and compliance with the principles are assessed regularly.

4 COUNTERFEIT, FRAUDULENT AND SUSPECT ITEMS (CFSI)

Fight against counterfeit, fraudulent and suspect items is a crucial element of IMS and nuclear safety culture, since a failure in this area may lead to a threat to nuclear safety.

VUJE, a. s. has established measures against fraudulent conduct by internal employees and suppliers (prevention, raising awareness, inspections, reporting, and remedy).

Employees are instructed on what to do in case of identifying a counterfeit/suspect item in order to minimise its improper use. In justified cases, we also inform the customer of such findings.

5 ENVIRONMENTAL PROTECTION

VUJE, a. s. considers the protection of the environment and all areas thereof as an inseparable part of managing and directing its activities. When conducting its activities, VUJE, a. s. strives to achieve a balanced approach to protecting economic and environmental interests with regard to the rights of future generations. VUJE, a. s. raises awareness of environmental protection among its employees and makes sure to use state-of-the-art, environmentally friendly methods in the course of its activity.

VUJE, a. s. ensures compliance with all applicable legal regulations and their incorporation into its internal regulations that all employees undertake to comply with.

As an efficient tool for environmental protection, VUJE, a. s. has implemented and maintains an environmental management system pursuant to ISO 14001.

VUJE, a. s. places emphasis on the achievement of climate targets, efficient energy and water management, responsible waste management, and biodiversity protection. It also applies these principles in the supply chain and requires compliance therewith in the contracts with its partners.

6 PROTECTION OF COMPETITION

VUJE, a. s. and all its employees strictly adhere to and respect competition protection regulations. In decision-making and handling information, all employees of VUJE, a. s. are obliged to refrain from any formal or informal agreements, exchange of information, or any other activity that would restrict or jeopardise competition, lead to cartel agreements, illegal price fixing, or any other similar conduct.

VUJE, a. s. pursues the principles of fair and honest competition and requires the same from all its business partners and third parties with whom it comes into contact.

7 TAX OBLIGATIONS

VUJE, a. s. meticulously fulfils its tax and contribution obligations, and requires the same conduct from all its partners.

VUJE, a. s. does not participate in illegal conduct with the aim to evade its tax and contribution obligations or in manipulating information that could be used for incorrect reporting of these obligations in any way whatsoever. Contributing financially to the functioning of the community of which it is a part forms an integral part of the values of VUJE, a. s.

8 CONFLICT OF INTEREST

VUJE, a. s. strives to prevent situations where its representatives and employees are in a capacity, in a decision-making position, or in an advisory position, in which their personal interests would be or could possibly be assessed as being in conflict with the interests of the company (conflict of interest). A conflict of interest arises if personal,

family, financial, or other interests may influence impartiality, objectivity, or trust in decision-making on behalf of the company.

Each employee who gets into a potential conflict of interest is obliged to report such fact to their superior. The leading staff of VUJE, a. s. are obliged to prevent the emergence of a conflict of interest, and if such a conflict is reported to them, they shall be obliged to adopt further measures to eliminate threats arising from conflict of interest.

Employees are obliged to notify the employer and obtain prior approval in the event of membership in bodies of companies with the same business activity, in the event of participation in a company beyond the scope of common rights of a shareholder, or in the event of any external activity that may give rise to a conflict of interest.

9 FIGHT AGAINST CORRUPTION

VUJE, a. s. firmly holds a position of zero tolerance of corruption in any form and to any extent.

In particular, employees and representatives of VUJE, a. s. are obliged to report any facts that are indicative of corrupt practices of company partners or company employees and representatives themselves, in an effort to obtain an unlawful reward, financial benefit, or any other pecuniary or non-pecuniary advantage for themselves or for other persons.

In the course of activities conducted on behalf of the company, employees and representatives of VUJE, a. s. are obliged to refrain from accepting gifts regardless of their value, personal advantages, or inappropriate hospitality from company business partners. At the same time, they shall not offer such gifts, advantages, or inappropriate hospitality.

Employees and representatives of VUJE, a. s. shall proceed with particular caution in negotiations with representatives of state administration, local and regional authorities, public officials, and politically active persons, and shall refrain from any behaviour that could be assessed as illegal or unethical.

VUJE, a. s. guarantees anonymity and protection of whistleblowers who report corruption and shall ensure that whistleblowers will not be punished or disadvantaged in any way whatsoever should they report corrupt conduct.

10 INFORMATION SECURITY

VUJE, a. s. and all its employees strictly adhere to the rules on handling sensitive information. Technical and organisational measures protect confidential documents against unauthorised persons. Each employee of VUJE, a. s. is obliged to protect business interests of the company, and therefore any information may only be communicated to authorised recipients, regardless of whether they are internal employees or third parties. Information published on behalf of VUJE, a. s. may be provided only by persons authorised to do so by the management of VUJE, a. s. Employees of VUJE, a. s. shall refrain from any conduct that could jeopardise the reputation of the company or its business partners in the public sphere. Employees shall act responsibly and with restraint in public communications and on social media. If they comment on professional issues, they shall always state that they express their personal opinion and not the opinion of the company. The use of the company name and logo in external materials is subject to prior approval by an authorised person.

Employees and representatives of VUJE, a. s. are obliged to immediately report any facts indicating a violation of data protection measures or a misuse of information and communication resources of VUJE, a. s.

VUJE, a. s. undertakes to respect copyright. Only legally purchased software is permitted for use in the company. Intellectual property (patents, know-how, trade secret, works created by employees) is protected. Sharing technical solutions outside VUJE, a. s. shall take place only after legal protection assessment and upon approval. Property rights over employee works are exercised by VUJE, a. s. In the event of transfer of technical data abroad, the company shall comply with potential export controls and sanction restrictions.

11 PERSONAL DATA

VUJE, a. s. strictly adheres to applicable legal regulation in the area of personal data protection and processing, always processes personal data in a responsible and sensitive manner, and always pays attention to preserving and respecting privacy, confidentiality of information, and other rights and freedoms of data subjects whose personal data are being processed.

VUJE, a. s. collects personal data for specific legitimate purposes, to the reasonable extent that corresponds with the purpose of processing, processes such data correctly and updates them legally if applicable, stores them in accordance with the corporate security policy, applicable internal regulations, and requirements of the GDPR, for the period necessary for the achievement of the specific purpose arising out of legal requirements and in the context of the Records Management Rules and Retention Schedule of VUJE, a. s.

In order to ensure strict personal data protection, VUJE, a. s. has technical and organisational security measures in place in the area of physical and information security, in accordance with the implemented system of information protection pursuant to ISO 27001.

When handing over personal data to third parties and during transfers to third countries, VUJE, a. s. proceeds in accordance with the GDPR (using appropriate safeguards, contractual obligations, and technical and organisational measures).

12 SUPPLIERS AND SUBCONTRACTORS

VUJE, a. s. requires all suppliers, subcontractors, and business partners to comply with the principles laid down herein, mainly in the area of human rights, prohibition of child labour and forced labour, occupational health and safety, environmental protection, fight against corruption, and fair business conduct. VUJE, a. s. reserves the right to terminate cooperation with a supplier who/which violates the principles laid down herein.

When selecting suppliers, the company applies the principles of responsible procurement and

requires its partners to comply with applicable legal requirements in the area of human rights, occupational health and safety, environmental protection, and ethical standards. VUJE, a. s. performs reasonable due diligence screening of suppliers according to the level of risk, and maintains a registry of approved suppliers.

VUJE, a. s. manages relationships and conducts competitions subject to public procurement regulations in a transparent manner, with equal treatment, and with a prohibition of collusion. The company requires complete and accurate documentation at all times.

13 SOCIAL RESPONSIBILITY

VUJE, a. s. is aware of its social responsibility and strives to contribute to the development of communities where it operates by means of supporting education, safety, health, culture, and environmental protection.

VUJE, a. s. takes into account environmental, social, and economic impacts in all its decisions. VUJE, a. s. undertakes to exercise sustainable management, decrease its environmental footprint, and support scientific and research initiatives that contribute to energy efficiency development and social benefit.

The company is politically neutral and does not engage in supporting any political parties, movements, or individual candidates.

VUJE, a. s. believes that charity donations, sponsoring, and support of research and development may not be used for obtaining improper advantages or for political purposes, and shall be assessed in a transparent manner with emphasis on environmental and safety benefits.

14 RESEARCH ETHICS AND PROFESSIONAL OBJECTIVITY

VUJE, a. s. conducts research and technical activities with maximum objectivity and independence. The results of work must be true, verifiable, and in accordance with scientific and

professional ethics. Intentional falsification of data, manipulation of results, or concealment of facts are serious violations of ethical principles.

VUJE, a. s. maintains its independence vis-à-vis all partners, customers, and sponsors. Research and project outputs are based on facts, not on commercial or political pressure.

Prior to publishing research results that may contain protected know-how or subject matter of intellectual property, internal assessment of legal protection options and compliance with potential export restrictions shall be conducted.

15 INTERNATIONAL SANCTIONS

VUJE, a. s. fully respects and complies with all applicable international sanctions, embargoes, and restrictive measures imposed by the United Nations (UN), European Union (EU), Slovak Republic, or any other relevant international community bodies. These measures represent an instrument for maintaining international peace, safety, human rights protection, and the rule of law.

VUJE, a. s. undertakes not to conduct any activities that would be contrary to applicable sanction regimes, whether directly or through intermediaries, subcontractors, business partners or any other third parties.

Employees and representatives of the company are obliged to ensure compliance with these rules, prevent violations of sanction measures, and immediately report any suspected violations thereof to their superior.

16 WHISTLEBLOWING

VUJE, a. s. guarantees the protection of whistleblowers who report violations of the principles of the Code of Ethics, and adopts appropriate measures to investigate and remedy identified violations in accordance with Act No. 54/2019 Coll. on the protection of whistleblowers. Each report is reviewed confidentially, with respect for anonymity, and without any consequences for the whistleblower.

16.1 Whistleblowers

Under this Code of Ethics, a whistleblower may in any case be an employee. Pursuant to the rules laid down in the Act on the protection of whistleblowers, in case of reporting serious anti-social behaviour pursuant to the Act, along with employees, a whistleblower may also be a person within the meaning of Section 2 of the Act.

16.2 Scope of reporting

An employee may report:

- serious anti-social behaviour pursuant to the Act;
- violations of the principles of equal treatment pursuant to applicable legal regulations concerning the employee themselves or other employees and members of company bodies pursuant to the Anti-Discrimination Act (Act No. 365/2004 Coll., as amended);
- facts indicating that violations of the principles of competition (in particular pursuant to Act No. 187/2021 Coll.) occur in the company or that unfair competition (in particular pursuant to Sections 44 to 52 of the Commercial Code, as amended) occurs;
- facts indicating that activities that fulfil the elements of any criminal offence pursuant to the Criminal Code, as amended, occur in the company;
- conduct or behaviour, regardless of whether it is sanctionable pursuant to applicable legal regulations, which is unreasonably hostile towards an employee, meets the criteria for harassment by a group of people (mobbing), or criteria for harassment by the superior (bossing), or sexual harassment;
- violations of the Code of Ethics of VUJE, a. s.

16.3 Responsible person

For the purposes of fulfilment of the conditions set out in Section 10 (1) of the Act on the protection of whistleblowers, pursuant to the decision of the Board of Directors of VUJE, a. s., I appoint the responsible person by means of letter of appointment. The responsible person pursuant to

Section 10 of Act No. 54/2019 Coll. on the protection of whistleblowers and on the amendments to certain acts shall be JUDr. Ing. Mária Rudnická.

16.4 Manner of reporting

Anti-social behaviour may be reported:

- a) using the whistleblowing form available on the website <https://www.vuje.sk/whistle-blowing>;
- b) by e-mail sent to protispolocenska@vuje.sk, which will be subsequently converted to paper format;
- c) by phone to +421 905 634 593, which will be subsequently converted to paper format;
- d) anonymously — a locked box is located at the registrar's office.

On the date of receiving a report, the responsible person shall create a written record (the Verification of Report of Anti-social and Unethical Activity form), in accordance with the Act on the protection of whistleblowers.

VUJE, a. s., represented by the responsible person, is obliged to accept every report, verify it, and notify the whistleblower of the verification result and measures taken within 90 days of confirmation of the acceptance of the report, or if the acceptance of the report was not confirmed, within 90 days of the expiry of the period of 7 days from the report acceptance [Section 10 (8) of the Act].

The identity of the person submitting the report must be kept confidential; in the case of a written request, persons must be protected from unjustified retaliation in the employment relationship pursuant to Section 7 of the Act.

A written record of the report verification result (the Verification of Report of Anti-social and Unethical Activity form) must be created. Based on the verification results, if required or appropriate, the responsible person shall propose additional measures to improve the system of prevention and reporting of illegal or serious anti-social activity.

VUJE, a. s. prohibits all employees, plenipotentiaries, statutory representatives, and

other persons acting on its behalf from taking any measures, decisions, orders or actions that could, separately or in conjunction with other actions, restrict, impede, or otherwise prevent reporting of illegal or serious anti-social activity pursuant to this policy.

Personal data that are recorded within the processing of a report are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and Act No. 18/2018 Coll. on personal data protection and on the amendments to certain acts.

The Director General shall decide on any potential further actions that may be taken on the basis of the submission of the report and/or the report verification.

16.5 Records of reports

VUJE, a. s. is obliged to keep records of reports for three years from the delivery of a report, to the extent laid down in the Act on the protection of whistleblowers:

- a) date of delivery of the report;
- b) name, surname, and address of residence of the person who submitted the report — the whistleblower; if the report is anonymous, a note shall be made that it is an anonymous report;
- c) subject matter of the report;
- d) report verification result;
- e) date of completion of the report verification.

The responsible person is responsible for record keeping of reports.

16.6 Notification of the result of the verification

The responsible person shall notify the whistleblower of the result of the report verification and of any measures, if taken based on the report verification, within ten days of the report verification. If the verification of the report was

completed by referring the matter for handling pursuant to the Criminal Procedure Code, the responsible person shall request the result of handling the matter to the extent permitted by a special regulation, and shall acquaint the whistleblower with this result within ten days of delivery thereof.