

Code of Ethics

INTRODUCTION

VUJE, a. s. has adopted a Code of Ethics which enshrines the principles of responsible business conduct. This Code sets out ethical rules of conduct that take into account not only external obligations (laws and regulations) but also the internal commitment and proactive approach of the entire VUJE, a. s. organisation. It applies to all employees, suppliers and contractual partners.

1 HUMAN RIGHTS

VUJE, a. s. carries out all its activities with due regard for and respect of fundamental human rights, in accordance with the United Nations Universal Declaration of Human Rights, the European Convention on Human Rights and the Constitution of the Slovak Republic.

VUJE, a. s. undertakes to treat all its employees and all other people on a non-discriminatory basis with regard to their race, skin colour, nationality, ethnic origin, language, religion, worldview, political or other opinion, age, gender, sexual orientation, social, family or other status.

VUJE, a. s. does not tolerate acts of violence, intolerance, bullying, sexual or other harassment, or verbal or physical behaviour that is rude, offensive, threatening to dignity or otherwise infringes upon the privacy and reputation of employees and any other persons with whom employees or persons acting on behalf of VUJE, a. s. come into contact whilst performing their duties.

VUJE, a. s. strictly prohibits any form of child labour, forced or involuntary labour, including work carried out under the threat of sanctions or physical or psychological coercion. The company does not permit the use of prison labour unless it is voluntary and in accordance with the law. VUJE, a. s. requires its suppliers and subcontractors to adhere to the same principles.

VUJE, a. s. respects the right of employees to freedom of association, to form or join trade unions,

and to engage in collective bargaining in accordance with the law. The company undertakes that no employee shall be discriminated against or disadvantaged on the grounds of membership of or activity in a trade union.

VUJE, a. s. complies with all provisions of the Labour Code and the collective agreement relating to working hours, rest periods and breaks. The maximum working hours do not exceed the limits permitted by law.

2 HEALTH AND SAFETY AT WORK

Health and safety at work is a primary objective of VUJE, a. s. in the conduct of its activities. VUJE, a. s. undertakes to strictly comply with all regulations and principles of health and safety at work and likewise undertakes to enforce these principles amongst all our suppliers, persons acting on behalf of VUJE, a. s. and all others involved in the activities of VUJE, a. s. VUJE, a. s. undertakes to create, maintain and monitor a safe and healthy working environment.

VUJE, a. s. also ensures health and safety at work through preventive measures aimed at averting situations that pose a risk to health and safety. VUJE, a. s. undertakes to help raise awareness of health and safety at work.

The principles and procedures for ensuring health and safety at work are enshrined in the internal regulations of VUJE, a. s. and are in accordance with current legislation in this area. Every employee of VUJE, a. s. is obliged to familiarise themselves with the internal regulations on health and safety at work, to comply with them and, whilst performing their duties, to act in such a way as not to endanger themselves, other employees; and, should they discover that occupational health and safety has been compromised or breached, they are obliged to report these facts to their line manager without delay, so that the fault can be rectified as soon as possible.

As a tool for implementing, monitoring and ensuring compliance with occupational health and safety rules, VUJE, a. s. has implemented and maintains an

OHS management system in accordance with the ISO 45001 standard.

3 NUCLEAR SAFETY

Although VUJE, a. s. is not the operator of any nuclear facility (it acts as a contractor or subcontractor for nuclear facility operators), one of our main priorities is a high level of nuclear safety, which must always take precedence over economic and any other interests.

Every employee of VUJE, a. s. must be aware of the importance of their work in relation to nuclear safety, as well as the possible consequences of intentional or unintentional failure, and must accept personal responsibility for their attitudes, actions and potential impacts on safety, and must contribute to strengthening and maintaining a strong nuclear safety culture.

The requirements and procedures aimed at achieving a high standard of nuclear safety culture are binding on every employee of VUJE, a. s., whose activities may have an impact on the safety of nuclear facilities, regardless of whether this impact is direct or indirect.

Senior staff at all levels of management bear primary responsibility for nuclear safety within the scope of the duties arising from their roles. Nuclear safety forms an integral part of their management and supervisory activities.

A key requirement in the field of nuclear safety, arising from their leadership position (and their role in leading staff), is to consistently set an example in matters of safety.

VUJE, a. s. has appointed a designated representative for the area of nuclear safety culture, who is responsible for receiving reports, including anonymous ones, regarding shortcomings or the need to verify that an adequate level of nuclear safety is maintained, and for addressing them without delay.

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

4 COUNTERFEIT, FRAUDULENT OR SUSPICIOUS ITEMS (CFSI)

Combating counterfeit, fraudulent and suspicious items is an important element of the ISM and KJB, as failure in this area can lead to a threat to nuclear safety.

Within VUJE, a. s., measures (prevention, awareness-raising, checks, reporting and rectification) are in place to counter fraudulent behaviour by internal staff and contractors.

Staff are instructed on what to do if they identify a counterfeit or suspicious item, so as to minimise its misuse. Where justified, we also inform the customer of such findings.

5 ENVIRONMENTAL PROTECTION

VUJE, a. s. regards the protection of the environment and all its components as an integral part of the management and direction of its activities. In carrying out its activities, VUJE, a. s. strives for a balanced approach to the protection of economic and environmental interests, whilst respecting the rights of future generations. VUJE, a. s. raises environmental awareness amongst its employees and ensures that it uses up-to-date and modern environmentally friendly methods in its operations.

VUJE, a. s. ensures strict compliance with all applicable legislation and incorporates this into its internal regulations, which all employees undertake to observe.

VUJE, a. s. has implemented and maintains an environmental management system in accordance with ISO 14001 as an effective tool for environmental protection.

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

6 PROTECTION OF COMPETITION

VUJE, a. s. and all its employees strictly adhere to and respect the regulations on the protection of competition. When making decisions and handling information, all employees of VUJE, a. s. are obliged to avoid any formal or informal agreements, exchanges of information, or other activities that would restrict or threaten competition, lead to the formation of cartel agreements, illegal price coordination or other similar conduct.

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

7 TAX OBLIGATIONS

VUJE, a. s. strictly fulfils its tax and social security obligations and requires the same conduct from all its partners.

VUJE, a. s. does not in any way participate in illegal activities aimed at reducing its tax and social security obligations, or in the manipulation of information that could be used to misreport these obligations. It is an integral part of VUJE, a. s.'s values to contribute financially to the functioning of the community of which it is a part.

8 CONFLICT OF INTEREST

VUJE, a. s. endeavours to prevent situations arising in which its representatives and employees find themselves in a decision-making or advisory position where their personal interests are, or could even be perceived as, conflicting with the interests of the company (conflict of interest). A conflict of interest arises when personal, family, financial or other interests may influence impartiality, objectivity or trust when making decisions on behalf of the company.

Any employee who finds themselves in a potential conflict of interest is obliged to report this to their line manager. Senior managers at VUJE, a. s. are obliged to prevent conflicts of interest from arising and, if such a conflict is reported to them, are

obliged to take additional measures to eliminate the risks posed by the conflict of interest.

Employees are required to give written notice of, and seek prior consent for, membership of the governing bodies of companies with the same scope of business, participation exceeding the scope of ordinary shareholder rights, or any external activity that may give rise to a conflict of interest.

9 FIGHT AGAINST CORRUPTION

VUJE, a. s. maintains a firm stance of zero tolerance towards corruption in any form and to any extent.

Employees and representatives of VUJE, a. s. are, above all, obliged to report without delay any circumstances indicating corrupt conduct on the part of the company's partners or the company's own employees and representatives, in an attempt to obtain for themselves or others an unauthorised reward, financial gain or any other pecuniary or non-pecuniary advantage.

Employees and representatives of VUJE, a. s. are obliged, when carrying out activities on behalf of the company, to refrain from accepting gifts, regardless of their value, personal benefits or inappropriate hospitality from the company's business partners, and likewise not to offer such gifts, benefits or inappropriate hospitality.

Employees and representatives of VUJE, a. s. exercise particular caution when dealing with representatives of central government, local government, public figures and politically active individuals, and refrain from anything that could be deemed unlawful or unethical.

VUJE, a. s. guarantees anonymity and protection to those who report corrupt practices and ensures that they are not punished or disadvantaged in any way if they draw attention to such practices.

10 INFORMATION SECURITY

VUJE, a. s. and all its employees strictly adhere to the rules governing the handling of sensitive information. Technical and organisational measures protect confidential documents from unauthorised

persons. Every employee of VUJE, a. s. is obliged to protect the company's commercial interests; therefore, all information may only be communicated to authorised recipients, whether they are internal staff or third parties. Information published on behalf of VUJE, a. s. may only be provided by persons authorised 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. In public communications and on social media, employees shall act responsibly and with restraint. When commenting on technical matters, they shall always state that they are expressing their personal opinion and not the company's position. The use of the company's 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 report immediately any circumstances suggesting that measures to protect information have been breached or that VUJE, a. s.'s information and communication resources have been misused.

VUJE, a. s. undertakes to respect copyright. Only legally purchased software may be used within the company. Intellectual property (patents, know-how, trade secrets, works created by employees) is protected. Technical solutions may only be shared outside VUJE, a. s. following an assessment of legal protection and approval. Property rights to employees' works are exercised by VUJE, a. s. When transferring technical data abroad, the company complies with any applicable export controls and sanctions restrictions.

11 PERSONAL DATA

VUJE, a. s. strictly complies with the applicable legislation on the protection and processing of personal data, approaching the processing of personal data responsibly and sensitively, and always ensuring the preservation and respect for privacy, the confidentiality of information and the other rights and freedoms of data subjects whose personal data is being processed.

VUJE, a. s. collects personal data for specific, legitimate purposes, to the extent that is appropriate and proportionate to the purpose of the processing; it processes such data correctly and, where necessary, updates it in a lawful manner; and it stores it in accordance with the company's security policy, relevant internal regulations and the requirements of the GDPR for the period necessary to achieve the specific purpose arising from legal requirements and in the context of the Records Management Policy and Plan of VUJE, a. s.

To ensure the thorough protection of personal data, VUJE, a. s. has implemented technical and organisational security measures in the areas of physical and information security in accordance with the information security management system implemented in accordance with ISO 27001.

When disclosing personal data to third parties and when transferring data to third countries, VUJE, a. s. acts in accordance with the GDPR (appropriate safeguards, contractual obligations and technical and organisational measures).

12 SUPPLIERS AND SUBCONTRACTORS

VUJE, a. s. requires all suppliers and subcontractors to comply with the principles set out in this Code of Ethics, particularly in the areas of human rights, the prohibition of child and forced labour, health and safety at work, environmental protection, the fight against corruption and fair business practices. Where justified, VUJE, a. s. requires suppliers to have appropriate compliance management mechanisms in place to ensure compliance with legal and ethical requirements. VUJE, a. s. reserves the right to terminate its cooperation with any supplier who breaches the principles set out in this Code.

VUJE, a. s. applies the principles of responsible procurement when selecting suppliers. It requires its partners to comply with applicable legislation in the areas of human rights, health and safety at work, environmental protection, international sanctions, export and import restrictions and controls, and ethical standards. VUJE, a. s. carries out

appropriate due diligence on suppliers in accordance with the level of risk and maintains a register of approved suppliers.

VUJE, a. s. conducts relationships and tenders in accordance with public procurement regulations in a transparent manner, ensuring equal treatment and prohibiting collusion, and always requires complete and accurate documentation.

Suppliers are also obliged to:

- protect confidential information, trade secrets and the intellectual property rights of VUJE, a. s. and its business partners. This information may be used solely for the purpose of fulfilling contractual obligations and must not be disclosed to unauthorised persons.
- to carry out their activities in a manner that minimises negative environmental and social impacts, particularly in the areas of waste management, energy and water management, the protection of natural resources and the reduction of emissions, in accordance with the relevant environmental legislation.
- to inform VUJE, a. s. without delay of any breach of legislation or ethical principles that may affect the performance of the contractual relationship or the reputation of VUJE, a. s.

In the event of a breach of the principles set out in this Code of Ethics, VUJE, a. s. is entitled to demand that corrective measures be taken. If the supplier fails to take appropriate measures or if the breach is serious, VUJE, a. s. reserves the right to suspend performance, withhold payments or terminate the contractual relationship with the supplier.

13 SOCIAL RESPONSIBILITY

VUJE, a. s. recognises its social responsibility and strives to contribute to the development of the communities in which it operates by supporting education, safety, health, culture and environmental protection.

VUJE, a. s. takes environmental, social and economic impacts into account in its decision-making. It is committed to operating sustainably, reducing its environmental footprint and supporting

scientific and research initiatives that contribute to the development of energy efficiency and social welfare.

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

VUJE, a. s. takes the view that charitable donations, sponsorship and support for research and development must not be used to gain undue advantages or for political purposes; they are assessed transparently, with an emphasis on environmental and safety benefits.

14 RESEARCH ETHICS AND PROFESSIONAL OBJECTIVITY

VUJE, a. s. carries out research and technical activities with the utmost objectivity and independence. The results of its work must be truthful, verifiable and in accordance with scientific and professional ethics. Deliberate falsification of data, manipulation of results or concealment of facts constitute a serious breach of ethical principles.

VUJE, a. s. maintains impartiality towards all partners, customers and sponsors. Research and project outputs are based on facts, not on commercial or political pressure.

Before publishing research results that may contain protected know-how or intellectual property, an internal assessment is carried out to determine the scope of legal protection and compliance with any export restrictions.

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), the European Union (EU), the Slovak Republic or other relevant bodies of the international community. These measures serve as a tool for maintaining international peace, security, the protection of human rights and the rule of law.

VUJE, a. s. undertakes not to engage in any activities that would contravene the applicable sanctions regimes, either directly or through intermediaries, subcontractors, business partners or other third parties.

Employees and representatives of the company are obliged to ensure compliance with these rules, to prevent breaches of sanctions measures and to report any suspicion of such a breach to their line manager without delay.

16 REPORTING ILLEGAL, ANTI-SOCIAL AND UNETHICAL ACTIVITIES

VUJE, a. s. guarantees the protection of whistleblowers who report breaches of the Code of Ethics and takes appropriate measures to investigate and rectify any breaches identified, in accordance with Act No. 54/2019 Coll. on the protection of whistleblowers reporting anti-social conduct. Every report is treated confidentially, with respect for anonymity and without any repercussions for the whistleblower.

16.1 Whistleblowers

Under this Code of Ethics, a whistleblower may, in all cases, be an employee. In the case of reporting serious anti-social conduct within the meaning of the Act, a person as defined in Section 2 of the Act may also act as a whistleblower in accordance with the rules of the Act, in addition to employees.

16.2 Scope of reporting

An employee may report:

- serious anti-social conduct within the meaning of the Act,
- breaches of the principles of equal treatment within the meaning of the applicable legislation concerning themselves or other employees and members of the company's bodies within the meaning of the Anti-Discrimination Act (Act No. 365/2004 Coll., as amended),
- facts indicating that the company is in breach of the principles of fair competition (in particular within the meaning of Act No. 187/2021 Coll.), or

that unfair competition is taking place (in particular within the meaning of Sections 44 to 52 of the Commercial Code, as amended),

- facts indicating that activities are taking place within the company which fulfil the elements of any offence under the Criminal Code, as amended,
- conduct or behaviour, regardless of whether it is punishable under applicable legislation, which is unjustifiably hostile towards an employee and constitutes group bullying (mobbing), bullying by a superior (bossing), or sexual harassment,
- a breach of the VUJE Code of Ethics.

16.3 Responsible person

For the purposes of fulfilling the conditions set out in Section 10(1) of the Act, and pursuant to a decision by the Board of Directors of VUJE, a. s., I hereby appoint a responsible person by means of this appointment decree. The responsible person within the meaning of Section 10 of Act No. 54/2019 on the protection of whistleblowers and on amendments to certain acts is JUDr. Ing. Mária Rudnická.

16.4 Method of reporting

Anti-social conduct may be reported:

- a) using the form for reporting anti-social behaviour available at vuje.sk/oznamenie-protispolocenskej-cinnosti,
- b) by email to protispolocenska@vuje.sk ; the report will then be converted into paper form,
- c) by telephone on +421 905 634 593; the report will then be transcribed onto paper,
- d) anonymously – a locked box is located in the registry office.

On the day the report is received, the responsible person shall draw up a written record (form FRA-71-01 Investigation of Reports of Anti-Social and Unethical Conduct), in accordance with the Act.

VUJE, a. s., represented by the responsible person, is obliged to accept every report, investigate it, and notify the reporter of the outcome of the investigation and the measures taken within 90 days of confirming receipt of the report, or, if receipt of

the report has not been confirmed, within 90 days of the expiry of 7 days from the date of receipt of the report (Section 10 (8) of the Act).

The identity of the person making the report must be kept confidential; in the case of a written request, protection must be provided to individuals against unauthorised reprisals in the employment relationship in accordance with Section 7 of the Act.

A written record (FRA-71-01) must be drawn up regarding the outcome of the investigation into the report. Based on the results of the investigation, where necessary or appropriate, the responsible person shall propose additional measures to improve the system for the prevention and reporting of unlawful or serious anti-social conduct.

VUJE, a. s. prohibits all its employees, authorised representatives, statutory officers and other persons acting on behalf of the company from adopting any measures, regulations, orders or actions which, individually or in conjunction with other actions, could restrict, impede or otherwise prevent the reporting of unlawful or serious anti-social conduct within the meaning of this policy.

Personal data recorded during the processing of a report is 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 the protection of personal data and amending certain acts

The Director General shall decide on any further steps that may be taken following the submission of a notification and/or the examination of a notification.

16.5 Record of notifications

VUJE, a. s., is obliged to maintain a register of notifications for a period of three years from the date of receipt of the notification, to the extent specified in the Act:

- a) the date of receipt of the report,
- b) the first name, surname and address of the person – the whistleblower – who made the

report; in the case of an anonymous report, a note shall be made stating that it is an anonymous report,

- c) the subject matter of the report,
- d) the outcome of the investigation into the report,
- e) the date on which the investigation of the report was concluded.

The designated person is responsible for maintaining the register of reports.

16.6 Notification of the outcome of the investigation

The designated person shall notify the complainant of the outcome of the investigation into the complaint and any measures taken as a result of the investigation within 10 days of the investigation being completed. If the investigation of the report was concluded by referring the matter for resolution in accordance with the Code of Criminal Procedure or specific regulations, the designated person shall request the outcome of the resolution to the extent permitted by the specific regulation and shall inform the reporter of this outcome within 10 days of receiving it.

17 COMPLIANCE MANAGEMENT

VUJE, a. s. conducts its activities in accordance with the applicable and effective legislation of the Slovak Republic, European Union law and the binding requirements arising from contractual relationships.

VUJE, a. s. has established and maintains the fundamental principles of a compliance management system in accordance with ISO 37301, the aim of which is to ensure the identification, management and monitoring of compliance with legal and other binding requirements.

Employees, senior staff and persons acting on behalf of VUJE, a. s. are obliged to comply with the relevant legislation and internal compliance management rules. A breach of these obligations is regarded as a breach of work discipline.