

VIVA/ALPER Corporation Code of Ethics

Companies Kovárna VIVA a.s., ALPER a.s. and VIVA CV s.r.o. hereby declare their joint intent to respect rules of ethics, morality, social responsibility and good business dealing as well their observance of legal regulations and international contracts.

For this purpose, Kovárna VIVA a.s., ALPER a.s. and VIVA CV s.r.o. (hereinafter referred to as “Company”, which stands for Kovárna VIVA a.s, ALPER a.s., and VIVA CV s.r.o.) accept this Code of Ethics as a set of basic rules, values and approaches, which they follow in performance of their everyday business activities. The Company is interested in adherence to the rules of the Code of Ethics in all its activities and under all circumstances, and therefore interested in the basic values and approaches of the Company being adhered to.

Company Values

The Company is proud of its history based on permanent values, traditions and customs, which it follows in its further development. The Company Values are based on the respect to legal regulations and an adherence to them, they make provision for basic moral and ethical principles as well as the fundamental principles of good business dealing.

The Company acts and makes its decisions in accordance with the principles of company culture, social responsibility, employee collegiality and good business dealing as well as in accordance with rights and obligations resulting from legal regulations, decisions of public authorities and from contractual relationships it participates in.

Negotiations of business partners in accordance with the law and ethic principles are considered an unforgettable condition of mutual cooperation by the Company.

Controlling activities of the Company include control of business and process risks in accordance with the standards of the International Organization for Standardization (ISO), International Quality Management Standards (QMS) including the IATF 16949 standard, principles of Corporate Social Responsibility – CSR), which are consistently enforced by the Company, their efficiency is continuously evaluated and measures for their improvement are constantly being accepted.

The 4 following pillars represent the fundamental key values of the Company

CUSTOMERS

The Customer is a partner, which brings the Company profit and knowledge, because of which the Company and individuals both can develop in the long term. The Customer is a partner the

position	HR Director	positior	Board Member	position	Chairman of the Board	positior	HR Director
compiled	Martin Lutonský	verifie	Pavel Krajča	approv	František Červenka	revised by	Martin Lutonský
on	18. 7. 2018	on	14. 9. 2018	on	14. 9. 2018	on	4.6.2019

Company listens to, so that it would understand him and knew how to work with him efficiently. The Company strives for the best companies of the world industry to be its most satisfied customers.

The Company deals with all business partners fairly and transparently, with respect and justly, and it considers such behavior to be the basis of a successful and permanent business relationship.

The Company selects its contractors with proper care in order to keep the quality of their products.

The Company is interested in constant cooperation with its business partner. The success of the business partner is also a success of the Company. The Company believes in unity of words and actions; it fulfills its promises. The Company supports ethical business culture; it fulfills its obligations thoroughly, fairly and honorably.

EMPLOYEES

The Company strives for all the employees to understand their work, to know how to handle it properly, to understand its meaning within the Company and to be remunerated for it justly and in time. The Company provides the employees with social and other benefits beyond the law. The Company creates good work conditions, it builds on mutual cooperation and inner motivation of employees. The Company is interested in keeping the work life and the private life of its employees balanced.

Company values its employees

The Company respects human rights and accepts them as a matter-of-course, does not incite or tolerate any discrimination. The Company condemns any form of forced labor. The Company protects the privacy of its employees. The Company emphasizes performance of work in the labor relationship in accordance with generally binding legal regulations. It does not accept any other and does condemn other types of performance of work.

On its sites, the Company provides professional training of trade school and university students on the basis of contracts with these schools in a special regime corresponding to the age, knowledge and experience of the pupils and students.

The Company respects the rights of employees including the right to associate and negotiate collectively. The Company respects the position of the trade union as a representative of its employees and the Company considers the union to be its partner in social dialog.

The Company constantly communicates with the employees, including meetings and

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conferences with the Company management and other managing employees, and provides information on the current events to its employees via efficient information channels. The Company performs regular assessments of happiness and motivation of its employees.

The Company enforces the policy of warning of harmful phenomena – **Whistle-blowing policy**. The Company allows its employees and third parties to warn of harmful phenomena, to ask questions and submit complaints. The Company consistently investigates all warnings, questions and complaints, resolves them and uses them for further improvement. The Company guarantees everyone protection from any recourses on the account of the warnings regarding harmful phenomena, questions or complaints made in good faith.

The Company does not employ any person below the age limit set by law for the establishment of labor relationship.

The Company continuously cares for health and safety

Safety and health protection of Company employees is an indivisible part of all of its activities and it has the highest priority. The Company creates the most favorable working conditions. The Company follows a safety program of failure preventions; it sees to every work activity to be performed in accordance with safe work procedures.

The Company has processed and constantly evaluates and updates the system for identification and evaluation of risks of possible health hazards at work, which includes measures for removal of health hazards. The Company provides the employees with personal protection in accordance with the lists created for every work position.

The Company rigorously provides evaluation of medical fitness of its employees in a system of employee medical examinations and it does not allow performance of work other than corresponding to the medical fitness of the employees.

The Company emphasizes prevention. The Company continuously educates and teaches its employees about safe work and protection of health.

IMPROVEMENT

The Company is constantly looking for ways to reduce waste and to manufacture products faster, simpler and cheaper while keeping the maximum quality.

The Company is bound by the obligation to create values for its business partners. With regard to its products, the Company applies the principle of continuous improvement and an increase of their added value with simultaneous decrease of the environmental impact. The Company applies zero-error strategy.

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RESPONSIBILITY

The Company accepts responsibility for its actions, for entrusted activities and measures. The Company accepts the principle of responsibility as an inner obligation which the others can rely on. It is our quality on every level and in each and every one of us.

The visions, plans and decisions of the Company always consider the interests of its business partners and employees, impact upon regions in which the Company operates and the effect upon their inhabitants and environment.

The Company strives for long-term, stable relationships with business partners, public authorities, its employees, the trade union and the public, based on mutual respect and on legitimate faith in good dealing.

The Company supports the regions it operates in and it tries to contribute to further increase in quality of life of its inhabitants.

The Company condemns any and all corruption

The Company observes zero tolerance towards offering or accepting bribes.

The Company strictly guides the employees to refrain from any corruption action; in connection with performance of work for the Company, its name or with a reference to it, nobody can request or accept any performance in exchange for provision or a promise of provision of any advantage, nor offer or provide such performance.

The Company respects economic competition and intellectual ownership, it protests personal information

The Company supports an honorable, fair and just economic competition; it does not perform any activities which would interfere with such competition.

The Company and its employees do not act in contradiction to generally binding legal regulations governing the economic competition.

The Company meticulously protects the rights resulting from intellectual ownership and it adheres to all legal regulation governing this matter. The Company observes protection of trade secrets as well as sensitive and private information on its customers and business partners, which it acquired in connection with its activities.

The Company processes the personal information of its employees, as well as the personal information any other people provided to it, only in accordance with legal regulations and it adheres to all the principles of its protection set by legal regulations.

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The Company protects environment

Environmental protection is a fundamental part of Company policy. The Company is continuously interested in improvement of quality of the environment.

The Company actively assists in removal of consequences of its business activities and it attempts to minimize the impacts of manufacturing processes upon the environment through modifications of its technological processes.

In order to meet the requirements of the environmental protection principles, the Company has established and it applies waste management systems favoring recycling, chemical substance handling and energy management.

Final provisions

This Code of Ethics is the basis for the internal regulations of the Company.

This Code of Ethics governs all activities and decisions of the Company and all employees are obligated to follow it.

This Code of Ethics becomes effective on **25.10.2018**.

Ing. František Červenka, Board Member

Pavel Krajča, Board Member

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