

Code of conduct

Socially responsible behavior is the basis of the business strategy of PAMET, spol. s r. o.

We do not tolerate bribery and corruption, we respect human rights, fair labor practices and ethical individual conduct. We maintain a safe workplace, promote environmental protection, apply fair sales and marketing practices, comply with the protection of confidential information, economic competition and intellectual property regulations and refrain from any illegal behavior.

1. Achieving full integrity

Commitment of PAMET to act honestly and fully in accordance with ethical principles leads the company to strictly adhere to the Code of Ethics and programs focusing on ethical conduct and observe regulations and maintain an ethical and compatible ecosystem.

For us at PAMET, it is important not only why we exist and what we do, but also how we do it and with whom we do business. In every aspect of our business, we strive to work with business partners who maintain the same high standards of integrity and compliance with applicable laws and regulations, as we ourselves do. Our collective long-term success depends on how consistently we all comply with laws, regulations, ethical principles and our own voluntary commitments. It also depends on how quickly we identify and mitigate risks.

2. Ethical behavior and human rights

At PAMET, we believe that everyone has a fundamental right to live and work in a safe, inclusive and clean environment where appropriate respect is shown.

Therefore, it is the policy of PAMET to work with business partners who observe the same guiding principles, have systems and processes in place to prevent, mitigate and take effective measures to prevent or remedy adverse human rights impacts of their activities, and who apply these requirements throughout their supply chain.

2.1. Zero tolerance of forced labor, child labor and human trafficking

At PAMET, all forms of child labor, forced or involuntary labor, human trafficking, servitude, and forced labor are strictly prohibited. That includes work or services which are required under threat of punishment and to which workers have not volunteered - all forms of slavery practices, such as demanding excessive fees and withholding identity documents, servitude, debt slavery, use of force or other forms of domination, oppression, economic or sexual exploitation or humiliation.

The minimum age for employment must be in accordance with national legislation and must not be lower than 15 years of age. Employees under the age of 18 use special protection and do not perform such kind of work that could endanger their safety, health or mental well-being, such as overtime or night shifts.

Pregnant women must not work at night, overtime or perform physically demanding tasks. Working in freezing temperatures and with dangerous substances is also not allowed.

2.2. Fair wages and employee benefits

PAMET complies with all applicable laws and regulations regarding wages, employee benefits and working hours, including overtime. There are no unauthorized deductions from wages and no financial burden is imposed on workers related to recruitment costs.

The same requirements apply to all rules relating to overtime and maximum working hours, rest periods, working hours, paid overtime, maternity/paternity leave, sick leave and parental leave.

2.3. Safety and health protection at work

PAMET maintains safe and healthy workplaces and adopts responsible occupational health and safety practices that meet legal standards to achieve zero safety incidents.

We provide workers with a suitable personal protective equipment (PPE) and regular training on safety and health at work free of charge.

We take measures to ensure that employees have easy access to clean toilets, drinking water and hygienic catering facilities. The same standards also apply to living quarters and other facilities provided to our employees.

We maintain an occupational health and safety management system and support the continuous improvement of working conditions and occupational health and safety (procedures for prevention, investigation, management and reporting of dangerous and risky working conditions).

All employees of our business partners who work on the premises of PAMET are required to comply with instructions of PAMET regarding health and safety when working on these premises. If they are unsure of these instructions or suspect that the condition is unsafe, they should notify the contact person at PAMET immediately.

2.4. Freedom of association

PAMET respects the right of workers to join unions. Establishing or joining a trade union must not be grounds for discrimination or retaliation. Unions should be able to operate freely in accordance with local laws. This includes the right to strike and the right to collective bargaining.

2.5. Prohibition of discrimination, harassment and bullying

Employees of PAMET must be treated fairly, with dignity and with respect. With a zero-tolerance policy for any discrimination, harassment and bullying in the workplace, they have equal opportunities in recruitment, education and career development.

2.6. Local communities and their right to land

PAMET takes into account the well-being of local communities and respects their rights. We respect the land rights of individuals, indigenous peoples and local communities in accordance with local laws and international standards, and do not engage in illegal displacement.

3. Regulatory and technological compliance

PAMET offers its customers a high level of quality and reliability by producing top-quality products, using top-notch innovative technologies and complying with applicable standards and regulations. We believe that technology, quality and compliance with regulations go hand in hand.

Strict quality controls are applied at every stage of product development and production.

3.1. Product safety and quality

PAMET manufactures products ethically and in accordance with the law. We cooperate with business partners who focus equally strongly on the requirements arising from regulations and their compliance with them, safety and quality in their operations and in those of their suppliers.

3.2. Compliance with environmental regulations

PAMET is committed to sustainability and environmental protection and complies with environmental regulations. We use energy and natural resources efficiently, prevent pollution, protect resources and biodiversity, recycle, reduce waste and harmful emissions, and properly manage hazardous materials, prevent and avoid noise and chemical pollution, habitat contamination and soil erosion.

PAMET complies with the provisions of Regulation of the European Parliament No. 1907/2006. It controls the risks associated with the substances that are manufactured and placed on the market in the EU (Reach).

PAMET undertakes to limit the occurrence of Perfluoroalkyl chemical substances (PFAS), substances in supplied materials, components and surface treatments. The proposal aims to reduce emissions of PFAS, persistent molecules in the environment and make products and processes safer for people. The goal of PAMET, spol. s r. o. is to buy materials, components and cooperations without PFAS substances.

PAMET confirms compliance with Directive 2002/95/EC of the European Parliament and Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment, the "RoHS" (Restriction of Hazard Substance).

3.3. Support for responsible sourcing of mineral resources

PAMET is committed to the responsible sourcing of minerals, in particular tin, tantalum, tungsten and gold (3TG), cobalt and mica, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals. A key requirement is to ensure transparency of the origin of these raw materials in the supply chain. PAMET expects suppliers to apply appropriate due diligence processes, actively manage risks associated with conflict areas and take corrective action in case of identified non-compliances.

3.4. Biodiversity

PAMET has a responsibility to protect ecosystems, including key biodiversity areas, and to prevent illegal deforestation in accordance with international regulations, including International Union for Conservation of Nature (IUCN) resolutions and recommendations on biodiversity.

We respect land, forest and water rights and avoid forced evictions.

3.5. Import and export control

PAMET undertakes to comply with laws and regulations governing import, export and re-export of products, parts, components, technologies, technical data, services, etc.

PAMET complies with import and export control regulations, providing explicit, truthful and accurate information on origin, export classification and export restrictions on products, materials, services, software, etc.

3.6. Economic sanctions

PAMET is committed to strict compliance with economic sanction laws, regulations and programs, and seeks to do business with business partners that are equally committed and have mechanisms in place to comply with applicable economic sanctions.

To avoid the risk of violation of sanctions, PAMET will ensure that no order is in violation of applicable regulations on economic sanctions, whether they relate to natural persons, entities, end users, geographic locations, products or technologies.

We conduct proper due diligence and monitor our own stakeholders (including our customers, banks, logistics companies, suppliers, etc.)

PAMET complies with all applicable Czech and European legislation dealing with sanctions against Russia.

3.7. Regulations on the protection of personal data

Our priority is to respect and ensure proper protection of information of employees, customers, suppliers, etc. We adhere to the applicable data protection regulations and comply with the contractual terms and conditions relating to data protection.

4. Honest business

We conduct business with utmost honesty and in strict compliance with the law. This ensures a level playing field, fair trade and fair competition in a free market. PAMET adheres to ethical and legal standards.

4.1. Fair competition and antitrust laws

In order to ensure fair competition, PAMET will not tolerate any illegal conduct aimed at unfairly disadvantaging consumers, forcing competition out of the market, or forcing customers or suppliers to accept unfair business terms under any circumstances, no discrimination is allowed in the selection of suppliers.

We do not support exchange of information or illegal agreements with competitors, abuse of a dominant position or any inappropriate behavior that may have an impact on competition.

We never collude with competitors to form cartels, or agree on pricing, market sharing and bid manipulation, or exchange sensitive business information with competitors in an attempt to restrict competition.

4.2. Fight against bribery and corruption

Interactions with third parties is completely free of corruption or bribery. PAMET employees and business partners are prohibited from directly or indirectly promising, giving, demanding or receiving anything of value from any third party, including officials and authorities, customers and suppliers, in order to obtain a contract, influence a relationship or secure an unfair or improper advantage. Abuse of influence, gifts in cash or their equivalents, as well as rewards for speeding up processing or bribes or other benefits provided to officials for performing a routine act of a public authority are also prohibited.

4.3. Fight against money laundering and criminal activity

PAMET does not carry out activities that could directly or indirectly contribute to the financing of armed groups.

In addition, money laundering (i.e., the legalization of the proceeds of crime) is illegal and is often associated with criminal and terrorist activity.

Business partners should carefully monitor payments, invoices and other transactions to better prevent money laundering and criminal activity.

4.4. Conflict of interest

PAMET is not influenced by personal or family interests, nor should the decision-maker benefit personally from them, i.e. there is no conflict of interest.

4.5. Protection of property, confidential information and data

PAMET takes confidentiality and protection of its assets (especially intellectual property, trade secrets, know-how, patents and trademarks, non-public business and strategic information...), as well as protection of business data, very seriously.

PAMET wants to work with business partners who comply with and are committed to complying with intellectual property and non-personal data protection laws.

PAMET does not use tangible property and intellectual property of the company, its confidential information, data, proprietary technology, documentation or other materials without a written consent. It is forbidden to

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write or speak publicly about PAMET and its projects or customers or on its or their behalf, whether in traditional media, social networks or any other public forum.

Our company, PAMET, has adopted preventive and mitigating measures such as training, physical, electronic, digital and cyber security measures, IT charters, audits and controls.

A comprehensive cyber security measurement is in place to protect critical systems and sensitive information from digital attacks. A comprehensive cyber security strategy controlled by best practices and modern key technologies such as automation, digitization, advanced analytics, artificial intelligence (AI) and machine learning are prerequisites for ensuring adequate information security by effectively preventing, detecting and responding to attacks.

PAMET has established a solid and reliable AI governance framework consisting of processes, methods, controls and support tools to ensure greater trust and transparency throughout the AI life-cycle. To ensure the traceability of the system operation, the function of automatic logging of events is implemented during the entire life cycle.

5. Ensuring compliance and continuous improvement

PAMET emphasizes building relationships based on trust, close cooperation with business partners and joint efforts to ensure that the activity is carried out in full compliance with ethical principles and to ensure more effective compliance through transparency, prevention and continuous improvement.

PAMET is responsible for:

- ensuring that the Code is passed on, familiarized with and its essence understood. We are responsible for compliance within the framework of our activity and supply chain (i.e. PAMET must introduce the Code to its employees and suppliers entrusted with performance of an activity, order or task related to PAMET),
- creating and maintaining a culture of integrity and compliance in its organizations,
- implementing programs and measures necessary to comply with this Code.

We reserve the right to conduct random or periodic inspections, compliance audits and share improvement plans with our business partners as appropriate. To this end, we require our business partners to fully, truthfully and transparently respond to our questions regarding their compliance with this Code upon request. Violations of this Code and applicable laws and failure to take the required preventive and corrective measures have serious consequences. PAMET shall suspend or terminate without hesitation (in whole or in part)

cooperation with business partners who do not comply with the rules and requirements set out in this Code, or whose due diligence results are unsatisfactory, or require the implementation of a corrective action plan.

6. Reporting problems - whistle blowing

PAMET encourages its employees and business partners with any concerns regarding compliance with regulations and other matters regarding PAMET to reach out for assistance. This is especially true when they witness suspicious behavior or suspect that a certain activity may be in violation of this Code or other applicable regulations.

They can also report the matter through our confidential whistle blower hot-line available at <https://app.whispero.eu/f/8r9h1je9oz2vmmq4>.

Business partners can be confident that any concerns they have will be considered, promptly reviewed and, where appropriate, investigated. It is a violation of this Code to retaliate against a person who has reported a problem in good faith.



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Ing. Tomáš Vavřík, MBA
Director

