



Integrated Ethical Code of the Company

Q TECH s.r.o.

(Code of Conduct, ESG Compliance & Supplier
Policy)



Introduction and Character of Our Company



Q TECH s.r.o. is a family-owned engineering company built on the solid foundations of honest technical craftsmanship, personal responsibility and long-term trust. We specialise in custom engineering production, which includes technological processes of material cutting, precision machining, welding, surface finishing by painting, and final mechanical assembly. A significant part of our output goes to demanding foreign markets, where our customers require not only top quality, dimensional accuracy and compliance with standards, but also transparent, ethical and responsible conduct.

Character and Binding Nature of the Code

This integrated code is a comprehensive and directly binding internal regulation of the employer within the meaning of Section 305 of the Labour Code. It combines all key principles of ethical conduct, social responsibility, employee care and environmental protection (ESG areas) into a single document. The Code is binding for every member of our company regardless of job position – from CNC machine operators, welders, painters and assembly workers to technologists, quality inspectors and company management. Together we build the reputation of the Q TECH s.r.o. brand as a stable employer in the region and a reliable export partner.

1. Governance, Integrity and Business Ethics (Pillar G – Governance)

Long-term success in international engineering cannot be built on compromises in honesty. We run our business relationships and internal procedures strictly in accordance with the laws of the Czech Republic, European Union regulations and international standards.



Zero Tolerance for Corruption and Fair Competition

In our business we apply an absolute ban on any form of bribery, corruption, extortion and unfair competition. No employee or associate may, directly or through third parties, request, promise, offer, provide or accept any unauthorised payments, commissions or unethical favours in order to obtain a contract, facilitate a transaction or gain an unfair advantage. We likewise reject any cartel agreements, price arrangements with competitors or market sharing. We achieve success in tenders and contracts solely through the quality of our work, technical competence and a competitive price.

Rules for Gifts, Hospitality and Business Courtesies

In both international and domestic business it is common to show respect through a working meeting, hospitality or a small promotional item. However, such courtesies must never cross the line where they could create an impression of obligation or bias, or influence impartial professional decision-making. In our company it is permissible to accept and provide only ordinary gift items and reasonable hospitality up to a maximum value of **CZK 2,000 (or EUR 80)** per person and occasion. Any gift, hospitality or invitation exceeding this value must be **approved in writing in advance by the Managing Director of the company** before it is accepted or provided. Accepting or offering cash, gift vouchers or other financial equivalents is strictly prohibited in any amount and under all circumstances.

Prevention of Conflicts of Interest



In our work and decision-making we always give priority to the legitimate interests of Q TECH s.r.o. over private interests. Employees must avoid situations in which their personal, family or financial relationships could raise doubts about their objectivity – for example when awarding subcontracts or purchasing steel material, tools or external services. Employees are obliged to notify company management in writing in advance of any potential conflict of interest, including an intention to carry out gainful activity in the same or a related field or the involvement of family members in the supply chain, so that it can be assessed.

Protection of Technical Know-how, Intellectual Property and Data

The foundation of our competitiveness in custom manufacturing is our technological background and the trust of foreign customers who entrust us with their design solutions. All drawing documentation, 3D models, machining and welding procedures, calculation formulas, customer specifications and commercial contracts constitute strictly protected trade secrets and intellectual property. All employees are obliged to protect this information against theft, loss, unauthorised copying and disclosure to third parties, both during employment and after its termination. With the same care and respect, we protect the personal data of employees and business partners in line with GDPR standards, and we operate information technology so as to ensure its integrity and cybersecurity.

Open Communication and Reporting of Misconduct (Whistleblowing)

We support a corporate culture of openness in which any mistakes or problems are addressed promptly and objectively. No employee needs to fear repercussions if they report, in good faith, a violation of regulations, a safety incident or unethical behaviour. In accordance with the Whistleblower Protection Act, our company has established a secure internal reporting system with a designated competent person and a dedicated reporting channel, which guarantee complete confidentiality and protect the whistleblower from any retaliation. Further details and direct contacts are permanently available to employees on the notice board and in the internal system.

2. Safety, People and Working Conditions (Pillar S – Social)

Engineering production places high demands on precision, physical fitness and technological discipline. Our people are the most valuable asset the company has, and therefore we place the greatest emphasis on their health, safety and a dignified working environment.



Occupational Safety and Health Protection as an Absolute Priority

In operations such as handling heavy loads, welding, machining on CNC machines, applying coatings in the paint shop and assembling subassemblies, speed must never come at the expense of safety. No production deadline or customer requirement justifies a breach of safety regulations. The company permanently keeps production technologies in proper technical condition, invests in extraction equipment and crane technology, and provides regular professional and statutory training.

Occupational Safety: Employee Responsibilities

We require every employee to take a disciplined approach to their own safety and that of their colleagues. This includes the mandatory and correct use of assigned personal protective equipment (welding helmets, respirators in the paint shop, safety glasses, hearing protection, work clothing and safety footwear), compliance with technological procedures and keeping the workplace tidy. Employees have both the right and the duty to stop work immediately if equipment shows a defect that could pose an immediate danger to health or life. Any incident, defect or injury must be reported without delay to the foreman or the head of operations.

Alcohol and Addictive Substances

Throughout the company premises there is a strict ban on entering under the influence of alcohol, narcotic and psychotropic substances, and on consuming or distributing them during working hours. Company management carries out random preventive breath tests for alcohol and screening tests for addictive substances in order to protect all persons present. These checks are carried out by a contracted third party to rule out personal preferences and bias.

Fair Treatment, Respect and Equal Opportunities

As a family company, we base workplace relationships on a human approach, mutual respect and decency. In our company we do not tolerate any form of discrimination based on age, sex, race, nationality, religion, health condition or family status. Any manifestations of bullying, humiliation, verbal or physical coercion, bossing or sexual harassment are considered a fundamental breach of work discipline. Remuneration, job placement and professional growth are governed solely by qualifications, reliability, quality of work delivered and work results.

Compliance with Labour Standards and Human Rights



We categorically reject any form of forced, involuntary or illegal labour and strictly observe the ban on employing children in any part of our operations. We consistently comply with the provisions of the Labour Code concerning shift length, meal and rest breaks, overtime limits, uninterrupted rest between shifts and entitlement to recuperative leave. We are aware of how demanding engineering work is and we support the work-life balance of our employees.

3. Environmental Responsibility (Pillar E – Environmental)

We recognise the environmental impacts of engineering technologies, such as the consumption of metals and energy, the operation of compressors and welding machines, the generation of chips and waste, and the handling of paints and thinners. Our goal is to act as a responsible steward, prevent unnecessary pollution and systematically reduce the ecological footprint of our production in Libina.



Monitoring and Management of Energy and Fuel Resources

The company systematically monitors and records its annual consumption of key inputs – electricity for running the company, technological drying and extraction, gases used in production processes, heating fuel and motor fuels (diesel and petrol) for the company vehicle and handling fleet. These overviews serve not only to meet the requirements of international customers within ESG reporting, but above all as a basis for identifying energy savings. Employees are guided towards economical behaviour: switching off machines and extraction during longer downtimes, turning off lights, optimal setting of the compressed-air distribution without air leaks, and sensible heat management in the halls.

Waste Management and Metal Recovery



The basic principle of our handling of material is waste minimisation already at the production preparation stage – by optimising cutting plans and economical cutting of steel material. The resulting technological metal waste (steel and stainless-steel chips, sheet offcuts, profile remnants) is consistently sorted by type and grade of material and handed over for recycling to steelworks. All employees are obliged to strictly separate all waste components at designated places on the premises – paper, cardboard, plastic packaging, foils, wooden transport pallets and mixed waste. Transport packaging and pallets are reused as long as their technical condition allows.

Safe Handling of Chemical Substances and Hazardous Waste

Activities associated with painting, degreasing, welding and the operation of CNC machine tools require the use of industrial chemicals – paints, thinners, degreasing baths, cooling emulsions, hydraulic oils and technical gases. All these chemical substances and mixtures are stored exclusively in their original, properly labelled containers and in secured areas equipped with certified spill containment trays, which prevent any leakage of substances into floors, soil, sewers or groundwater. Only trained employees equipped with appropriate protective equipment and familiar with the safety data sheets of the substances may handle chemicals.

Hazardous Waste



Hazardous waste (contaminated rags, paint booth filters, empty paint containers, spent cutting emulsions and oils) is collected in labelled collection containers and its disposal is arranged exclusively on a contractual basis through authorised specialised companies, with documentation of environmentally sound disposal.



4. Principles for Business Partners and Suppliers (Supplier Code of Conduct)

Our responsibility does not end with the products leaving the gate of our plant. If we want to deliver flawless and ethically sound engineering assemblies to our foreign and domestic customers, we must be certain that our supply chain upholds the same standards. For this reason we apply these rules also to our suppliers of steel material, fasteners, paints, tools, external subcontractors (such as hot-dip galvanising or heat treatment) and logistics services.

When selecting and evaluating business partners, we assess not only the purchase price and delivery times, but also their technical capability, reliability and compliance with legal and ethical standards. Q TECH s.r.o. expects and requires from all its suppliers and subcontractors:

Supplier Requirements: Ethics and People

Strict compliance with laws and ethics:

The partner acts in full compliance with the law, rejects any corrupt conduct and unfair practices, and respects the rules of fair economic competition.

Respect for human rights and ban on illegal labour:

The supplier strictly rejects any form of child, forced or illegal labour, observes statutory limits on working time and wages, and ensures fair and dignified treatment of its employees.

Health and safety:

The partner applies high occupational safety standards at its workplaces and provides its employees with the necessary protective equipment and safe technical facilities.

Supplier Requirements: Environment and Data

Compliance with environmental legislation:

The supplier duly complies with all environmental laws, handles waste and chemical substances in accordance with regulations, and strives for economical use of energy and materials.

Protection of confidentiality and intellectual property:

The supplier must strictly protect drawing and production data that our customers have provided to our company and that we share with partners within subcontracting, and must not use it for any purposes other than the agreed production purposes.

Condition of Business Cooperation

We consider compliance with these basic principles an essential prerequisite for starting and continuing business cooperation. Serious, deliberate or repeated breaches of these standards by a supplier constitute grounds for the immediate suspension of cooperation or termination of the contractual relationship.

5. Final Provisions, Validity and Familiarisation

This integrated Code of Ethics is the official management document of Q TECH s.r.o. and a cornerstone of our corporate identity. It is not a formal declaration, but a summary of the rules by which we organise our work, communicate with customers and build the long-term value of our family company.

Company management will ensure that every employee is demonstrably and fully familiarised with this Code upon joining the company, as well as all existing employees. The document is permanently accessible to all employees on the central notice board and in electronic form in the company's internal system.

Compliance with the Code and Regular Review

Compliance with the principles of this Code is an integral part of the performance of each employee's work duties within the meaning of labour-law regulations. Any knowing breach of the principles set out in this internal regulation will be assessed as a breach of work duties with corresponding consequences under the Labour Code, including the possibility of termination of employment or a claim for compensation of damage caused.

Company management carries out a regular review and evaluation of the functioning of this Code **at least once every 12 months** and, in the event of legislative changes or modifications of technological processes, will ensure its timely update.



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