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	Company Policy		
	DOCUMENT CODE	REVISION	EFFECTIVE DATE
	SM-04	01	16. 6. 2026

COMPANY POLICY

Anti-Corruption Policy

1. Purpose and scope

This policy expresses the unequivocal position of VECO s.r.o. on corruption and lays down the rules by which all employees, the managing director and persons acting on behalf of the company are bound. VECO applies zero tolerance towards corruption in any form. It expects the same approach from its business partners — suppliers, customers and intermediaries.

2. What we consider corruption

Corruption means the abuse of an entrusted position to obtain or grant an undue advantage — in particular offering, promising, providing, requesting or accepting a bribe, whether monetary or non-monetary, in exchange for favourable treatment. Corrupt conduct is punishable under the Slovak Criminal Code and may have criminal-law consequences for individuals and for the company.

3. Binding rules

- Prohibition of bribery. No one in the company may, directly or indirectly, including through a third party, offer, promise, provide, demand or accept a bribe.
- Prohibition of facilitation (expediting) payments. The company does not make small unofficial payments to speed up routine official or business procedures.
- Gifts and hospitality. Only a gift or hospitality that is reasonable, occasional, transparent and cannot influence business decisions may be accepted or provided. Cash is never accepted or provided. Gifts exceeding the indicative value of €50 are not accepted without the knowledge of the managing director, and they are recorded.
- Conflict of interest. Everyone shall report any situation in which their personal interest (for example, a family or friendship relationship with a supplier or customer) could influence their work-related decision-making.
- Dealings with public officials and authorities. When in contact with public authorities, we proceed with heightened caution and provide no benefits.

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- Selection of business partners. We select suppliers and customers on the basis of objective criteria such as quality, price and reliability, not on the basis of personal benefits.

4. Record-keeping and transparency

The company keeps complete, truthful and accurate accounting and business records. No transaction is concealed, distorted or recorded in a misleading manner.

5. Reporting suspicions

Any suspicion of corrupt conduct may be reported following the procedure set out in the directive "Reporting of Anti-Social Activity". A whistleblower acting in good faith is protected against any retaliatory measure.

6. Consequences of a breach

A breach of this policy is a serious breach of work duties and may lead to employment-law consequences up to and including termination of cooperation, or to a report to the law enforcement authorities.

7. Management commitment

The management of VECO subscribes to these principles, leads by example and creates an environment in which rejecting corruption is a matter of course.

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Reporting of Anti-Social Activity

1. Purpose

This directive makes it possible to safely report unlawful, unethical or otherwise anti-social conduct at VECO s.r.o. and guarantees protection to persons who submit such a report in good faith.

2. Legal framework and note on scope

The directive is based on Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity, as amended (amendment No. 189/2023 Coll.).

Note: Under the Act, the obligation to establish an internal reporting system and to designate a "responsible person" applies to an employer with at least 50 employees and to certain other categories of entities. VECO s.r.o. does not reach that number of employees and therefore introduces the internal reporting system voluntarily — in the spirit of the said Act and as part of its ethical commitment.

3. What can be reported

In particular, the following may be reported: corruption and bribery, fraud and embezzlement, breaches of legislation, threats to quality or safety, breaches of the code of ethics or the anti-corruption policy, and other anti-social conduct.

4. How to submit a report

- By e-mail to **oznameni@veco.sk**, which is accessible only to the designated person.
- In writing, in hard copy, in a sealed envelope marked "Report — for the attention of the designated person only".
- In person to the designated person, by prior arrangement.

A report may also be anonymous. If the whistleblower provides contact details, this makes it possible to confirm receipt of the report and to inform them of the outcome. Designated person (recipient of reports): Tereza Sedláčková.

The Act allows the receipt and investigation of reports to be carried out, under a contract, by an external person who is not an employee of the company (for example, an external advisor). This option strengthens the independence of the assessment, and the company is considering it as a suitable solution given its size.

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5. External and official route

A whistleblower may always turn directly to the Whistleblower Protection Office, the public prosecutor's office or the law enforcement authorities. We recommend this route in particular where the report concerns the designated person or members of the company's management.

6. Handling of reports

- A received report is recorded separately from other mail.
- If the whistleblower has provided a contact, the designated person confirms receipt of the report to them within 7 days at the latest.
- The report is investigated, and the whistleblower is informed in writing of the outcome and of any measures taken within 90 days at the latest from confirmation of receipt (or within 90 days from the expiry of 7 days from receipt, if receipt was not confirmed).

7. Protection of the whistleblower

No retaliatory measure may be taken against a whistleblower who submitted a report in good faith — in particular dismissal, a reduction in remuneration, transfer to other work or any form of bullying. The identity of the whistleblower is confidential and is disclosed only in cases stipulated by law.

8. Confidentiality and personal data

The content of the report and the personal data of all persons concerned are handled confidentially and in accordance with personal data protection regulations.

9. Records

Records of received reports and their handling are retained for the period stipulated by law.

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Employee Code of Ethics

This code summarises the values and rules of conduct that VECO s.r.o. expects of each of its employees and members of management. It is based on the conviction that the long-term success of a trading company rests on trust — the trust of customers, suppliers and colleagues in one another.

1. Our values

Integrity, responsibility, reliability and respect. These values are reflected in day-to-day conduct and in decision-making at all levels of the company.

2. Honest dealings with customers and suppliers

We act honestly and transparently. We do not provide misleading information about material, its quality, parameters or origin. We deliver on what we have promised. We build business relationships on long-term trust, not on one-off advantage.

3. Rejection of corruption

We reject corruption, bribes and impermissible gifts in any form. Detailed rules on gifts, hospitality and conflicts of interest are set out in the Anti-Corruption Policy, which is an integral part of this code.

4. Conflict of interest

We avoid situations in which personal interest could influence work-related decision-making. If such a situation arises or threatens to arise, we report it in good time to our superior or the managing director.

5. Confidentiality and protection of information

We protect the company's trade secrets, information of customers and suppliers, and personal data. We handle personal data in accordance with applicable personal data protection regulations (GDPR). We do not share access credentials or information in the ERP system with unauthorised persons.

6. Protection of company property

We use company property, both tangible (inventory, equipment, premises) and intangible (data, the ERP system, know-how), responsibly and only for work purposes.

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7. Respect and equal treatment

We treat colleagues, customers and suppliers with respect. We do not tolerate discrimination, harassment or degrading conduct in any form.

8. Quality and safety

We accept responsibility for the quality of the material we supply and comply with the rules of the quality management system. We comply with occupational health and safety regulations.

9. Environmental responsibility

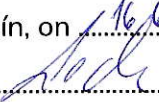
Trade in recycled materials is part of our identity. We support the responsible and sustainable use of resources and behave in an environmentally friendly manner in our activities.

10. Reporting breaches

A breach of this code or of legislation may be reported following the procedure set out in the directive "Reporting of Anti-Social Activity". A whistleblower acting in good faith is protected against retaliatory measures.

11. Binding nature

This code is binding on all employees of the company. Familiarisation with the code is recorded and forms part of the induction training of new employees.

In Trenčín, on 16.6.2026


Tereza Sedláčková

Managing Director of VECO s.r.o.