

CODE OF CONDUCT AND ETHICS

This Code of Conduct and Ethics represents the conclusion of the company internal rules summary, it complements our Articles and publicly declared approaches of the company owners and the management. We are fully aware of not living in a perfect world. All the more we feel the need to identify clear rules for all who are interested in any way in cooperation with the Portador Company.

All employees of the company are required to meet the under mentioned patterns and the same is expected from our stakeholders. The serious misconduct may be the reason of the termination of the employment or the cancellation of the mutual cooperation.

From its establishment the Portador Company is active in building the solid ethic basis resulting in its growth and development of the fair-play activities. The high performance and the engagement must be related to honest and open conduct. The purpose of the Code of Conduct and Ethics is to assure that its principles serve as the guide in solving the ethics problems. The Code itself can not solve any problem arising in the company life. It is only the part of the system supporting the culture of the ethic conduct where the key role is played by the personality and an exemplar conduct of the managers, regular employees and the business partners of the company. It provides the guideline for identification and solving the ethic problems and it explains how to report the violation of the ethic principles.

1. PROTECTION OF THE COMPANY REPUTATION AND PROPERTY, REGISTERED TRADE MARK

The reputation of Portador Company and the trust of all concerned

parties are the most important values disposed by us. To protect the company's reputation and to strengthen the employees and the cooperators relationships towards the company are the tasks for all of us.

All employees of the Portador Company are obliged to act in compliance with this Code of Conduct and Ethics and to meet the high moral standard of the business and the labor conducts. They should be aware their conducts always represent Portador and its commitment and for that reason within their private life and the extra-work time their activities have to meet the applicable legal order, binding force of the principles of right conduct and this Code of Conduct and Ethics

Portador is the registered trade mark. The utilization of the trade mark and the copyright is only possible based on prior written consent of the company owners and in compliance with logo manual of the company

Any employee is responsible for the correct utilization of the company's property and sources that have continuously to serve to the purposes of the employment. These assets are utilized within his scope of employment and in compliance with the rules and practice applicable within the company. The employee shall perform any measure preventing the damage, theft or unauthorized utilization by the third persons. The employee undertakes to protect Portador from the risk of the property defraudation or detournement by implementation of the inspections required within its responsibility. Any employee is mindful not to misuse his position or his authority for reaching the special rights or the benefits described hereunder.

2. SAFETY AND HEALTH

The Portador Company takes care about the high level of the employees' health and social care and prepares the conditions of safe working environment. The general principles of prevention and the basic conditions providing the safety and health protection at work and elimination of the risks and the factors determining the occurrence of the accidents at work, the diseases and other health injuries are projected in specific internal directives "Safety and health protection at work" and "Fire protection". The company provides the employees with these directives and prepares the continuous trainings regarding the required safety and health protection at work.

The care about the safety and health protection at work and improvement of the working conditions is part of the performance of the employment assignments. Within the employees' social care is utilized a social fund created by the company and from this we are then providing the means for the relaxation, sports and culture of the employees. The management personnel of the company at any control levels and in determined range are responsible for performance of their assignments.

3. RELATIONS WITHIN THE COMPANY

The Company Portador's employees are committed by the restriction and prevention of the discrimination, devaluation and persecution. Any employee is required to create the atmosphere of mutual respect and assurance as without these it is impossible to cooperate and to achieve the outstanding working results. The management of the company shall not tolerate any form of mistreatment or the persecution at any work place of the company and towards the employees, suppliers or other interested persons.

4. EMPLOYEES RELATIONS

The Portador Company as the employer is aware that its employees represent the highest value of the company. The company prepares the environment providing the conditions demanded for personal and professional development of its employees namely by the investment improving their capabilities, skills and knowledge. The same the company expects the high personal standards of its employees within the work performances, employee relations, and within the health safety protection. The relations toward the employees and the relations among the employees at all levels are based on the respect and the dignity of any human being and on complying with the basic human rights. Accordingly the employees are expected to meet the rules as follows

- Any discrimination of the employees due to the sex, race, sexual and religious orientations or the health state is restricted.
- The employee respects the human dignity. The sexual molestation and intimidating, degrading and abusive treatments are regarded as unacceptable conducts.
- In the workplace the employees are obliged to create the relations of cooperation, assurance and mutual support through mutually expressed respect and tolerance.
- Toward the superiors the employee shows the appropriate respect and he performs his assignments consistently and effectively.
- The superiors are approaching the subordinated with the respect and dignity and his working performance is accounted without prejudice and fairly.
- In case of occurrence of the conflict any employee is obliged to do his best in solving the conflict, where the solving of the conflict should happen within the company.
- Any violation of the work attitude by the employee or violation of the company ethic standards declared by this Code of Conduct and Ethics, the employee is obliged to report it to the first line supervisor of the employee breaking

the work attitude or the Code of Conduct and Ethics The competent person is obliged to deal with the reported case and to take the appropriate conclusions so that to protect all moral principles and the reputation of the company.

5. CUSTOMER AND SUPPLIER RELATIONS

We strive to be successful within the transparent market environment. We are not looking for the competitive benefits through the illegal practices.

When contacting the business partners all employees have to conduct fairly, to avoid the manipulative practices, keeping in secret the relevant information, abusing the confidential information or any unfair conduct.

The customers are provided by us with current, adequate, accurate and understandable information on our services. Any employee is obliged to approach his responsibilities in the way improving the value of the service provided to the clients. We share the principles of the ethic conduct, social engagement and the respect toward the environment with the contracting partners and we are motivating them in meeting the same standards like we do.

6. BUSINESS PARTNERS RELATIONS

In its business activities the Portador Company implements a fair, correct and responsible approach toward the suppliers. Through the principles of the mutual respect and assurance it creates the bilaterally profitable business relations based on the discretion, politeness and without any favoritism and discrimination.

Any employee of the company prepares 03 equal and transparent conditions to all of his business partners, he utilizes only the legitimate business methods and the information obtained from the suppliers is regarded by him confidential.

The Portador Company meets the agreed business conditions. If due to special circumstances the company can not perform the agreed conditions, as soon as possible it takes the initiative of negotiation with the business partner aiming to the alternative solution and to solving the occurred situation.

We do not tolerate any incorrect approach of our suppliers. The direct addressing of our customers by our suppliers we regard as the immediate reason for termination of our cooperation.

7. CORRUPTION

We are performing our business activities by fair and ethic way, without the bribe money or the corruption activities ensuring the unfair benefits. We never offer, ask even take the bribe money, illegal payments, premiums, provisions, gifts, presents or other valuable benefits in exchange for the business opportunities related to the business activity of our company which violate the applicable legal rules. Under any circumstance we are obliged to exercise expressly and decisively the approach of zero allowance toward the corruption and bribery activities.

The corruption agreements with the customers, suppliers, public officers or other third parties are strictly forbidden. In general the corruption means to gain or try to gain the personal profit or business benefit by utilization of unlawful means.

We do not tolerate the bribery of the customs officers, the false speed recorders utilized by our suppliers and related effort of bribery after the police discovers this fact.

Corruption includes:

- take the bribery
- give the bribery
- indirect corruption (taking the bribery or giving the bribery for the purpose to affect the performance of the other person competence)
- clientelism (favoritism of known or related groups)
- nepotism (favoritism of relatives), etc.

8. CONFLICT OF INTERESTS

The Portador Company wants to gain the confidence of its employees, clients, suppliers and other partners. The conflict of interests or apparent conflict of interests damages the reputation of our company. The employees are required to avoid the situations originating the conflicts of their own interests, the interests of their family members or the friends with the interests of Portador,

The conflict of the interests may have various forms. The possible conflicts of interests may come into existence if we ourselves, the member of our family or our friend:

- Are operating the activities competitive or apparently competitive in the interests of our company.
- Accept any personal or monetary benefit, are financially engaged in providing the service or are working for the supplier, customer or the competitor or the company striving to gain the business relation with the DeutchMann Company.
- Their decisions are affected or apparently influenced by personal or family interests or by the friendships.
- The property, information, sources and the means of the company are utilized for their personal benefit or for the benefit of others.
- They have another employment negatively influencing their labour performance or interfering in the Portador Company employees' competence.

As it is impossible to specify all the situations or the relations forming the current or potential conflict of interests any particular situation must be considered individually. With no delay it is necessary to report all circumstances possibly leading to the conflict of interests.

If the employee recognizes the conflict of interests he is obliged without undue delay and by provable way to inform his chief who then informs the management of the company which with regard to the circumstances of the respective occurrence makes a survey if it is the conflict of interests or not.

If the employee does not report the circumstances possibly leading to the occurrence of the conflict of interests this fact itself represents the violation of these rules. The announcement does not mean the violation of the rules and reversely it means the completion of the obligation.

9. GIFTS AND BONUSES

The employees may neither ask nor accept from the customers or the suppliers the services, gifts or the benefits influencing or apparently influencing the activity of the employee representing the company. The gifts and the benefits may be shared in the range not exceeding the common local politeness and satisfactory to the business practice and applicable laws.

Before the gift is offered or accepted it is necessary to consider if it is in compliance with our Code of Conduct and Ethics. Some forms of the conduct are always denied. For instance it is strictly denied to ask the gifts directly or indirectly. In addition we never may either offer or accept the gifts:

- being illegal,
- violating the rules of the acceptor's employer,
- being the monetary gift or the money equivalent to the gift (e.g. vouchers, bank checks, commissions. etc....),
- being of inadequate value, it means that its price is more than a token fee,
- being offered as the counter value („something for something“).
- being determined by the promise of further or wider cooperation

Unacceptable are the gifts offered to the public officers. 05 The acceptable gifts are the symbolic gifts enabling to develop good relations, appropriate to the circumstance.

If the employee additionally detects that the gift is contrary to presented rules he informs his chief and returns the gift. If appropriate, it is required to send to the donor a letter explaining our company's principles regarding the gifts. In case of the questions or the doubt about the policy of acceptance and offer of the gifts it is possible to consult the chief or the management of the company

10. PROTECTION OF PERSONAL DATA AND PRIVACY

The Portador Company respects and protects the commanding personal data of all persons. The personal data are obtained exclusively with the consent of the aggrieved person for limited or stated purpose and are processed only in the range necessary for gaining the purpose of its processing in terms of internal methods and generally binding Slovak Republic legal enactments. The personal data are accessible only to the specially trained employees whose position requires knowing them.

The employees are not allowed to the conduct leading to illegal utilization of personal data and information regarding the privacy and including its utilization by any other unauthorized persons.

11. PROTECTION OF INFORMATION, CONFIDENTIALITY AND RETICENCE

The Portador Company emphasizes the protection and security of its own confidential information, business secret and the intellectual property.

It is our responsibility to secure that any confidential information gained in connection with our business activities are kept in strict secret, not misusing and trespassing or disclosing to the third parties. We know that this misuse or disclosure of confidential information may seriously endanger or harm the concernment of the Portador Company. Along with this we remind that in case of above mentioned activity the responsible person may face up the disciplinary measure including the termination of his/her employment.

Moreover our company respects the confidential information owned by the suppliers, clients and other engaged parties and they are only utilized in compliance with applicable legal rules or the contracting arrangements.

The intellectual property of the Portador Company as for instance the trademarks, internal guidelines, know-how, logotypes, the proposals, inventions or the strategies represent the property invaluable to the company that must be always protected. Any labour performed by the employees of the company and connected with their labour service belongs to the Portador Company. The obligation to protect the confidential information, business secret and the intellectual property continues even after the termination of the employment with the company

12. UNLAWFUL PRACTICE

At its activity the company meets the applicable laws and legal rules and its stakeholders

are required to perform their conducts the same. Moreover the employees of the company are strictly forbidden to encourage the suppliers or the clients of the company to violate the applicable laws and legal rules.

The company keeps confidential the information gained within the business relations, protects them toward the misuse and does not provide the third parties with it.

13. COMPLIANCE WITH THE CODE OF CONDUCT AND ETHICS

The Portador Company Code of Conduct and Ethics applies to all employees of the company.

Any employee is aware that the violation of the Code of Conduct and Ethics results in essential harming of the company's credibility. Any of the employees is required to be informed about this Code of Conduct and Ethics and they are expected to meet and apply its principles. With aim to ensure this obligation the Code of Conduct and Ethics is issued in form of the company internal directive and provided for information to any employee of the Portador Company. In the standard form with his signature any employee certifies his understanding and liability to apply all sections of this Code.

The managerial personnel are expected to be active in implementation and application of the Code of Conduct and Ethics. It is their responsibility that their subordinate employees are informed about the content of the Code of Conduct and Ethics so that their conducts will meet these principles in everyday work

In case of serious violation of the code principles the employment of the employee may be terminated. In case of other breaches the employee shall face up the disciplinary proceeding according to the internal rules of the company.

As the partners and the employees of the Portador Company are expected to meet this code and further to develop its principles this code is available on www.portador.eu

The rules of the code determine the conduct expected and required from our stakeholders too. At signing the general agreement with the suppliers also the Code of Conduct and Ethics is undersigned like the component of the general agreement.

The immediate termination of the cooperation may be the consequence of breach and violation of these principles.

14. REPORT OF NON COMPLIANCE WITH CODE OF CONDUCT AND ETHICS

Every one employee is obliged to report any found violation of the Code of Conduct and Ethics. It may be done verbally or ideal is when in writing through the ethic line office@portador.eu or writing the facts in the internal paper form. The violation of the Code of Conduct and Ethics is reported to the direct chief of the employee violating this Code of Conduct and Ethics and the same it is reported to the ethic employee.

Everybody who is receiving the report about the violation of the Code of Conduct and Ethics are obliged to warrant the anonymity of the reporting person. The anonymity may only be cancelled with the consent of the reporting person. No sanctions may be applied toward the employee reporting the violation of the Code of Conduct and Ethics. The exemption only represent the intentional and false reports about violation of the Code of Conduct and Ethics aiming to the harm of the respective person and when this conduct is regarding to be the violation of the Code of Conduct and Ethics.

Every one who receives the report about the violation of the Code of Conduct and Ethics is obliged to deal with this report and to take the solutions according to his competence.

To report the violation of the Code of Conduct and Ethics through the Ethic Line is also the competence of other subjects, for instance the customers, stakeholders, residents of the region...

The violation of the ethic principles and standards mentioned in the Code of Conduct and Ethics is sanctioned according to the importance of violation of this Code of Conduct and Ethics. The violations of the Code of Conduct and Ethics regarded as the violation of the work discipline are evaluated and sanctioned in terms of applicable rules and internal directives of the company.

Every one employee may contact the Ethic line and make the comments with regard to the Code of Conduct and Ethics. Any person may contact the ethic employee even in case when not sure if his actual or required activity is in compliance with the Code of Conduct and Ethics or if he has doubt about the understanding of the Code of Conduct and Ethics respective items.