



# CORPORATE CODE OF CONDUCT SLUŽBA NITRA, s.r.o.

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# Foreword

## Ladies and Gentlemen

As a company operating since 1955, we have a larger responsibility for our actions in all business-related areas and for the behavior of our employees wherever they have an impact.

Our commitments are documented here in this Corporate Code of Conduct to emphasize our responsibility respective of legal requirements and ethical issues.

It sets out in writing how we will behave in daily business. It means for us that compliance with the rule of law, the conduct of business responsibly and lawfully and fair financial relations will always be our core values.

We are convinced that the Corporate Code of Conduct is one of the keys to our company's success.

SLUŽBA NITRA, s.r.o. develops and produces automotive electronics, populated printed circuit boards and both interior and exterior lighting.

We recognize our responsibilities toward our customers, employees and owners, and therefore accept the following Code of Conduct as binding for all our activities.

In all activities, we respect ethical business principles, complying with legal and other regulations.

We always review any risks that emerge in order not to damage our interests and to minimize the risks for all stakeholders. Actions are taken by us to ensure that the actions of everyone working at SLUŽBA NITRA are in line with these accepted principles.

Everyone working at SLUŽBA NITRA, s.r.o. should not undermine confidence, while aiming to protect corporate interests. It has created in its business and labor contacts an environment of respect and decisiveness toward all stakeholders. Compliance with the principles described in the Corporate Code of Conduct can only come from good teamwork.

## Customer Relationships

As requested by customers and from its own belief that prescribed requirements are correct and proper, SLUŽBA NITRA, s.r.o. has a quality management system certified in compliance with the latest edition of IATF 16949.

Our processes are being developed to provide safe, premium quality products that operate flawlessly over the long term in conformity with customer standards.

Open and fair access to customers and meeting their expectations are a prerequisite for maintaining a successful and long term business relationship.

We act decently toward our customers, without prejudice and discrimination, respecting the confidentiality of mediated information. We communicate in the principle of mutual respect.

We provide true information about how products are to be used and respect warranties that have been agreed.

We communicate identified risks with customers.

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## Supplier Relationships

Služba Nitra, s.r.o. is as committed to our suppliers as we are to our customers.

Suppliers are obliged to have a certified management system at least in compliance with the requirements in the latest version of ISO 9001 and developed for certification in compliance with the latest edition of IATF 16949.

We develop relationships based on mutual respect and trust. We respect the confidential nature of data provided to us. We communicate in the principle of mutual respect. We do not abuse our commercial position.

Our suppliers are asked by us to supply premium quality products that are safe and operate flawlessly over the long term in conformity with customer standards.

Suppliers are committed to comply with requirements for soundly provided information and compliance with warranties, and they are reviewed by us regarding this commitment. The Supplier's Code of Conduct has been prepared by us, whereby our suppliers are committed to moral, ethical and legislative requirements.

## Creditor Relationships

Služba Nitra, s.r.o. provides its creditors with truthful information about its financial position and is committed to an effective assessment of the funds it receives.

Corporate employees are not permitted to receive any gifts or commissions from business partners to obtain an advantage in its standing among trade creditors.

## Competitor Relationships

Služba Nitra, s.r.o. respects legal standards that govern the principle of competitive relationships. It operates lawfully in accordance with rules on fair competition.

## Relationships with Public Authorities, the Region and Society

We comply with current legislation payments to the extent provided in our corporate charter.

We provide unbiased accounting information to national and local government authorities and information to media and the public about its activities and intentions.

Our financial transactions are transparent. We properly fulfill all our tax obligations.

Corporate economic growth is visible in transparent fundraising, with no prospects gained from direct or indirect contributions to political parties, candidates and groups.

Our sponsorships promote sports, health, school education, technical and infrastructural development.

## Our Relationship with the Environment

Služba Nitra, s.r.o. builds upon the concept of sustainable development in the environment and participates in environmental protection of the region.

Its environmentally-friendly message is also evidenced by the integrated environmental management system certified in compliance with the latest version of EN ISO 14001.

All production-related environmental risks have been reviewed by us, with scheduled measuring and monitoring and complete reporting transmitted to national and local government authorities. We provide precisely verifiable information. Nothing is hidden by us. Služba Nitra, s.r.o. openly communicates to the public its meeting of environmental requirements.

## International Business Relationships

We comply with the legislation of the host country with respect to its traditions and cultures. We comply with the UN Universal Declaration of Human Rights. We do not procure supplies from countries where risks of exploitation of child or slave labor have been identified by us.

## Relationships within the Služba Nitra, s.r.o.

Interpersonal relationships among people working at all corporate levels and relationships between superiors and subordinates inside it are based on mutual respect of dignity and on respecting basic human rights to which Slovakia is bound.

Every employee respecting sound relationships between superiors and subordinates is an equal member of Služba Nitra, s.r.o. We create the conditions to provide maximum support for staff activities and to promote health initiatives for all our staff members.

All action should be taken for staff to be ensured safe and hygienically harmless working conditions that pose no threat to health. We will not permit any behavior by staff that endangers the health and life of anyone else or causes material damage.

Staff members are obliged to comply with confidentiality rules regarding information obtained in trade and labor relations, with selected information to be provided only to persons designated in documentation. Služba Nitra, s.r.o. uses only legally purchased hardware and software.

In every case, the use of corporate facilities and the purchase of both materials and of devices where no absolute need is identified is through official channels and by precisely designated managers.

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Služba Nitra, s.r.o. will act in accordance with fundamental human rights and guarantee them for all their employees, depending on applicable legislation.

#### **Child Labor**

Služba Nitra, s.r.o. will not tolerate child labor within its organizations. We act in compliance with current legislation and with ILO requirements and recommendations.

#### **Forced Labor**

No forced labor or human trafficking is either allowed or tolerated within Služba Nitra, s.r.o. or in connection with it. We engage with employees and protect them from any physical or verbal abuse (such as cruelty, harassment or discrimination, exploitation in any area and any violent gestures or behavior).

#### **Discrimination**

No one receives preference in employment decisions. People are hired to work at Služba Nitra, s.r.o. based on an assessment of their skills, with no racial, religious or ethnic discrimination and irrespective of color, gender, age, marital status and sexual orientation.

It does not tolerate physical, psychological or sexual harassment. No form of abuse, humiliation, bullying and discrimination is accepted at Služba Nitra, s.r.o.

#### **Working Hours and Compensation**

Služba Nitra, s.r.o. respects Slovakia's current labor law. It guarantees that all staff employed by it will be compensated in accordance with applicable legal minimum wage requirements and in compliance with working hours set by legislation.

We are building a fair remuneration policy. Remuneration should reflect individual results, personal commitment and the contribution brought by the job in conjunction with corporate earnings.

To support employee performance and initiative, skills, capacity and knowledge are developed among everyone working at Služba Nitra, s.r.o. through purposeful training and education. We are required to evaluate all incentives by staff members to receive education.

We appreciate any suggestions for improvement, with the person suggesting the improvement kept apprised of its evaluation. Staff can either put suggestions and contributions in publicly accessible boxes or communicate them easily to superiors. All superiors are required to handle such suggestions.

The process of dismissing staff for any reason is conducted entirely on legal and transparent procedures.

#### **Freedom of Association**

Služba Nitra, s.r.o. respects the rights of the people it employs and complies in full with the country's applicable legislative requirements and the agreement concluded with the Occupational Health Commission.



## Ensuring Confidentiality

Služba Nitra, s.r.o. is committed through written contracts to consider all performance related business and technical information as the trade secret of the customer or supplier with whom it has concluded the contract. The business relationship it has built with customers and suppliers will be only used by us in advertisements after they have given their written consent thereto.

Irrespective of whether a contract is concluded, the duty of confidentiality covers all information received at the tender stage and survives the expiry of any contract.

Služba Nitra, s.r.o. has a system for protecting personal data certified in compliance with the General Data Protection Regulation (GDPR) comprising a managed set of means, methods, measures and devices whose comprehensive nature prevents breaches of personal data and keeps the data from being disclosed or misused by unauthorized persons.

There is also a certified Trusted Information Security Assessment Exchange (TISAX), information security for the automotive sector that creates a framework to ensure expectations about corporate information security policies are met.

They are applied by Služba Nitra, s.r.o. as a managed transformation of laws, regulations, ordinances and rules to secure, distribute and control access to information in order to safeguard confidential data, with it, its suppliers and its customers having agreed to these policies.

Confidentiality agreements have been concluded with every staff member, who are made aware of these agreements both while they are employed at Služba Nitra, s.r.o. and after their employment here ends.

Staff members are obliged to comply with confidentiality rules regarding information obtained in trade and labor relations, with selected information to be provided only to persons designated in documentation. Služba Nitra, s.r.o. uses only legally purchased hardware and software.

## Anti-terrorism Requirements

Both Služba Nitra, s.r.o. and the people employed by it undertake to ensure nobody has any direct or indirect association with terrorist activities at any level:

- Direct or indirect terrorist activities
- Action against common and social rights
- National or international terrorism
- Political terrorist activities

## Protecting Služba Nitra's Reputation and Property

Every employee is expected to provide in public truthful information about Služba Nitra, s.r.o.

Everyone employed by it not only acts for it as a private person but as a corporate representative, too. Employees are aware about having their conduct in relation to corporate activities create a positive perception of the Služba Nitra, s.r.o. and of co-workers and protect its interests.

Every employee is expected to organize their personal financial, business and other activities conducted outside Služba Nitra, s.r.o. so as to avoid violating legal and other standards.

Officially issued "Work Rules" exactly define the scope of authority and duties of each employee. Every person working at Služba Nitra, s.r.o. is required to be familiar with these work rules. Superiors must act in conjunction with the actions of subordinates only within the meaning of "Work Rules" and are not allowed to discriminate among staff members.

All corporate activities are handled mainly by labor resolution teams composed of representatives from different departments. Input and output in adversary proceedings are fully utilized. We value the opinions and initiatives of each member of the team, endeavoring at the most to avoid unwanted litigation. We are convinced that disputes deplete the potential of staff working at Služba Nitra, s.r.o. and ultimately bring only losses, something we do not wish.

## Management Responsibility

Managers should act in such a way as to set examples for their co-workers.

We expect managers to understand the corporate business strategy and customer expectations, addressing bottlenecks without losing their professional composure.

Managers are committed to understanding and fulfilling organizational tasks, creating pride in the "corporate brand". Within the scope of their responsibilities and powers, they pave the way for established tasks to be fulfilled. They encourage positive dialogue between co-workers and for them to take initiatives, while explaining corporate goals using substantive reasoning. They look to others working at Služba Nitra, s.r.o. to see whether they have the personality-related potential to become leaders and then suggest them for promotion.

The qualifications of every manager are permanently maintained and they have to be evaluated by the managers themselves. If necessary, managers have to receive education to the expected level. They lead and motivate subordinates toward fulfilling scheduled tasks, evaluating economically all inputs. Nevertheless, a human approach toward subordinates and empathic behavior is expected. Corporate values are created by our staff. The departure of anyone working at any level creates a potential loss for Služba Nitra, s.r.o.

## Targets for Promoting the Corporate Code of Conduct

Objectives are aimed at meeting the expectations below:

- Keeping Služba Nitra's good reputation
- Long-term customer satisfaction
- Employee satisfaction
- Owner satisfaction
- Products of maximum achievable quality with maximum product efficiency.
- Ability to transform rapidly and effectively if Služba Nitra s.r.o. is unable to achieve planned results for any reason.

## Scope of the Code at Služba Nitra, s.r.o.

This Code of Conduct applies to all corporate managers and employees as well as anyone employed as an agency worker.

Anyone employed by Služba Nitra, s.r.o. as well as agency workers fulfilling corporate tasks are required to comply with the Code and to act in accordance with its provisions.

Send any comments to [sluzba@sluzbanitra.sk](mailto:sluzba@sluzbanitra.sk)

Nitra, 10.12.2020

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Line	Reason for	Date	Edited by	Approved by
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