

//ADASTRA

# Code of Conduct





## Adastra Your Data, AI & Digital Partner

Let Adastra help you along your Digital Transformation Journey with our award-winning Data and AI-Driven Enterprise solutions.

Adastra is an international consulting company that creates functional solutions in various sectors, facilitating the transition to the digital era. Since its inception in the year 2000, Adastra has focused on data processing, analysis and warehousing. Data remains at the core of the company's activities, which have gradually expanded to include the Internet of Things (IoT), Big Data, Artificial Intelligence, and mobile app development. Adastra's aim is to contribute to customers' businesses through smart data solutions.

## Law and the Code of Conduct

### Who does the Code of Conduct apply to?

- The Code of Conduct applies to all our customers, consultants, distributors, agents, partners that provide products or services to Adastra, or that are engaged or instructed to act for or on behalf of Adastra, suppliers (and sub-contractors if used while engaging with Adastra), and other representatives (“Business Partners”).

### Legal compliance

- Adastra always respects law and requires its Business Partners to be bound by the law as well. Compliance with all applicable laws and regulations must never be compromised.
- Adastra likewise requires all its Business Partners to operate in accordance with the principles in the Code of Conduct.
- The Code of Conduct does not replace legislation and if the two are in conflict, legislation takes precedence. If the Code of Conduct sets a higher standard than the existing legislation, the reverse applies.
- The Code of Conduct is valid in the English language. Where there are different language versions of this document, these shall be considered translations only.

## Human Rights and Labour Standards

### Workers' contracts, working hours and compensation

- Adastra expects its Business Partners to comply with local laws and regulations regarding workers' contracts, working hours, including overtime and overtime compensation.
- Salaries should be paid regularly and comply with the applicable local legislation and the local market situation.
- Workers should be entitled to a minimum of one day off in seven and to take time off for established national and local holidays.
- Workers should be granted the stipulated annual leave, sick leave and maternity/paternity leave without any negative repercussions.

## **Discrimination and Harassment / Diversity and gender balance**

- Adastra values and promotes diversity. This includes gender balance.
- Adastra gives priority to the underrepresented gender given equal qualifications and promotes diversity in the recruitment process.
- Adastra requires all its Business Partners to promote diversity and gender equality.

## **Discrimination, harassment and respect for others**

- Adastra expects its Business Partners to provide a work environment where everybody should be treated with respect and dignity and be given fair and equal opportunities for development.
- Adastra respects feelings and actions of others and does not tolerate any form of discrimination or harassment in the workplace.
- Business Partners of Adastra must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other potentially discriminatory reason.

## Social & ethical responsibility

The development of Adastra is based on a set of values and guidelines in favor of actions and behaviors respecting people (including in particular clients, employees and shareholders). These values and principles are part of a more general framework of fundamental principles including the Universal Declaration of Human Rights, International Labor Organization standards, OECD guidelines (particularly regarding efforts to fight corruption) and commitments.

Adastra complies with applicable national, European and international rules relating to ethical and responsible standards of behavior, including those dealing with human rights, work and health safety, sustainable development, or bribery. The guiding principles are included in the following documents, and their respective national legislations: a. The Universal Declaration of Human Rights; b. The OECD Convention on Bribery; c. the US Foreign Corrupt Practises Act; d. the 2010 UK Bribery Act e. The Convention on the Rights of the Child adopted by the United Nations General Assembly on 11/20/1989 resolution N° 44/25; f. The International Labour Organization (ILO): i. N° 29: Forced Labour Convention, ii. N° 105: Abolition of Forced Labour Convention, iii. N° 111: Discrimination (Employment and Occupation) Convention, iv. N° 182 Worst forms of child labour Convention, v. N° 138 Minimum Age Convention.



## **Addictive substances, guns, porn**

### **Alcohol and/or drug abuse, guns, porn**

- Adastra works proactively to remove any workplace hazards.
- Adastra has zero tolerance on drugs, alcohol, guns, and porn and does not allow individuals producing products or providing services for Adastra to be on company premises or to be affiliated with Adastra in any way.

## Environment

### Environment and sustainability

- Adastra shall meet legal environmental requirements and expects its Business Partners to obtain, keep current, and comply with all required environmental permits and licenses needed for their operations.
- Adastra encourages the development of environmentally friendly technologies and recommends all its Business Partners with significant environmental impact to implement certifiable environmental management systems or similar systems that facilitate the Business Partners' work with the environment.
- Adastra continuously seeks ways to reduce the consumption of resources.
- Adastra expects its Business Partners to strive to reduce its consumption of resources, including energy, waste and water, prevent pollution, have noise levels at acceptable levels and improve the overall environmental impact of its operations and products along the value chain.
- Further, chemicals and hazardous materials shall be labelled properly and safely stored, and recycled, reused and disposed of correctly.



## Environment and sustainability

- Adastra strictly observe all relevant accident prevention and safety regulations.
- Adastra is following rules, allowances and other regulations in the area of environmental protection and is acquainting its employees and/or subcontractors with this.
- Adastra undertakes to act environment friendly in the greatest possible extent, especially regarding utilization of natural resources (energy, water, and other resources), raw material, and auxiliary material. Further it undertakes to use ecological materials, facilities, practices, and technologies. Adastra will avoid creation of waste (using wasteless technologies) and emissions, and will repeatedly use leftover materials or liquidate them in compliance with provisions on waste and on environmental protection (waste economy, recycling). Adastra also undertakes to prevent chemical agents leakage and consequent contamination of environment (into waters, air, ground).
- Adastra undertakes to comply with and to require its sub-contractors and any person under its control, to comply with all applicable legal rules of Slovak republic, European and international legal rules relating to ethical and responsible standards of behavior, including, without limitation, those dealing with environmental protection. These Rules include without limitation, the principles, provisions and undertakings contained in the instruments herein listed:
  - legal act no. 543/2002 Z.z. on protection of nature
  - legal act no. 261/2002 Z.z. on prevention of substantial industrial accidents
  - legal act no. 364/2004 Z.z. on water
  - legal act no. 223/2001 Z.z. on waste
  - legal act no. 529/2002 Z.z. on packings
  - The Directive 2002/96/CE WEE on waste from electric and electronic equipments (where the supply takes place in the European Union)
  - The Directive 2002/95/CE ROHS on restriction of hazardous materials (where the supply takes place in the European union)
  - Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency

## Business Ethics

### Competition and antitrust legislation

- Adastra is prepared to compete successfully in today's business environment and will always do so in compliance with applicable antitrust, competition and fair dealing laws.
- Adastra does not engage in unfair, misleading or inaccurate comparisons, anti-competitive agreements or arrangements and requires that its Business Partners do the same. Business Partners must avoid any kind of anti-competitive agreement or concerted practice, tacit or otherwise.

### Bribery and Fraud

- Adastra does not accept bribes, facilitation payments or extortion in any form, be it as a giver/initiator or as a receiver.
- Adastra does not accept fraud in any form and expects Business Partners to behave in the same way.
- Adastra's employees and agents and subcontractors shall not, offer, give or agree to give to any person, or accept or agree to accept from any person, whether for itself or on behalf of another, any gift, payment, consideration, financial or non-financial advantage or benefit of any kind, which constitutes an illegal or corrupt practice under any applicable law (including the 2010 UK Bribery Act and the US F.C.P.A).

## Confidentiality

### Confidential information

- Confidential information consists of any information that is not or not yet in the public domain.
- It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, databases, records, salary information and any non-published financial or other data.
- Adastra respects that third parties have a similar interest in protecting their confidential information. In case that third parties, such as suppliers or customers of Adastra share confidential information with Business Partners of Adastra, such information shall be treated with the same care as if it was confidential information of Adastra.

## Misrepresentation

### Authenticity

- Adastra always represents itself to its Business Partners and customers with authenticity. It has zero tolerance to misrepresentation in any form and expects its Business Partners to conduct themselves genuinely avoiding false perceptions.

### Integrity

- Adastra is committed to the quality of truthfulness guided by moral convictions.
- Adastra upholds moral uprightness and requires all its Business Partners to conform with values of true honesty and accuracy.



# International Organization for Standardization Certificates

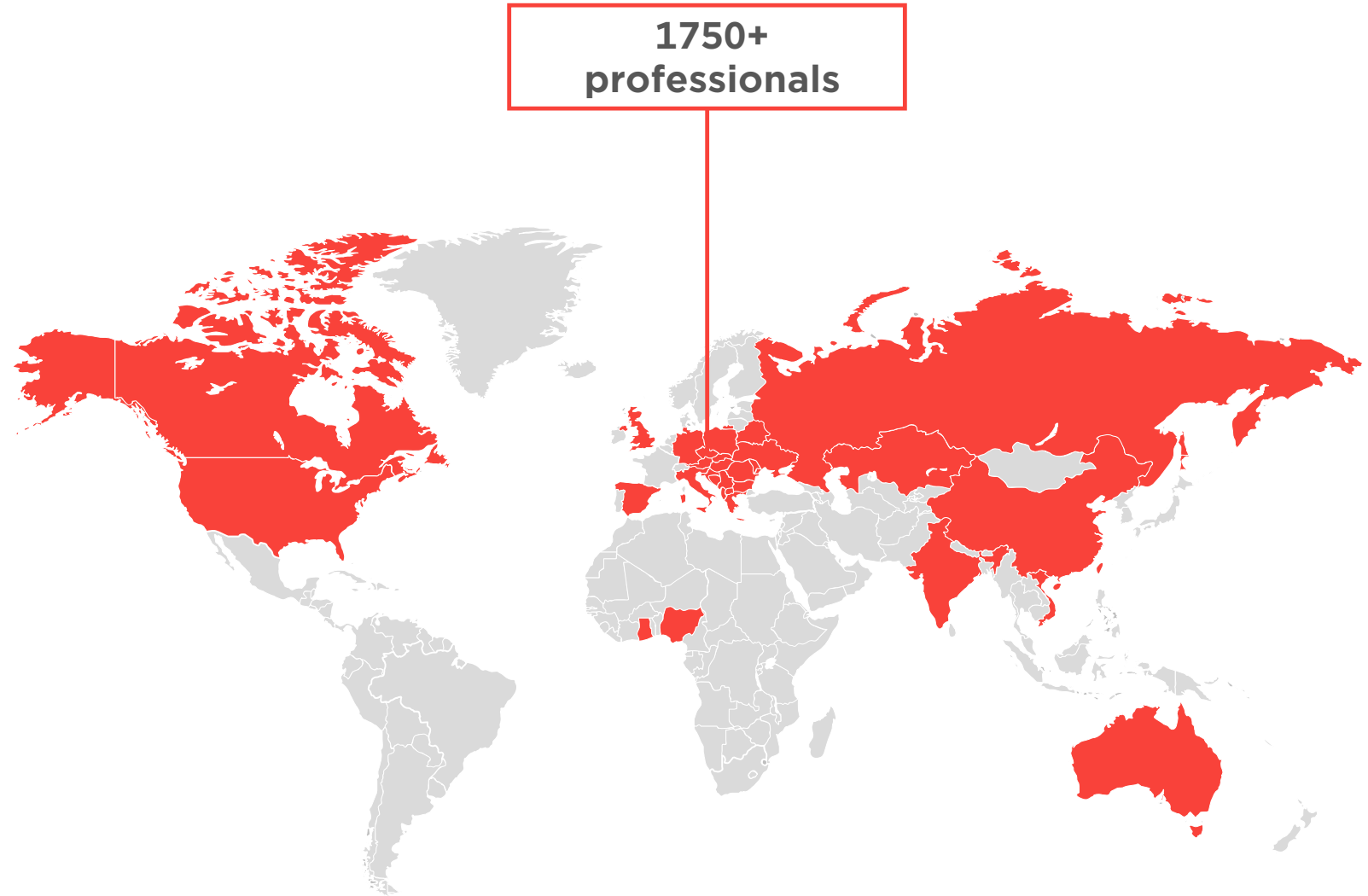
**ISO9001:2015**

**ISO27001:2013**

**ISO50001:2011**

## Projects in 46 countries

Albania, Australia, Austria, Belarus, Bosnia and Herzegovina, Brazil, Bulgaria, Canada, Croatia, Czech Republic, Germany, Ghana, Great Britain, Greece, Hungary, China, India, Italy, Jordan, Kazakhstan, Kosovo, Lithuania, Malta, Montenegro, Nigeria, Poland, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Turkey, Ukraine, USA, Vietnam





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**THANK YOU  
FOR YOUR ATENTION**

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