



Meopta

Code of Conduct

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A word from the Managing Director

Dear colleagues,

The document you are reading states clearly who we are and how we want to do business. Meopta has undergone many changes during its 90-year history – from manufacturing military optics, we have moved to cutting-edge technology for the semiconductor industry. But one thing has never changed: our commitment to precision, quality and honesty.

I'm pragmatic, and I know that values are more than just words on paper. We have to live them every day – in our decisions, in our treatment of customers, colleagues and partners. Our credibility and long-term success depend on them.

We are going through a great transformation. We will be a more resilient Meopta that will not be dependent on just one sector. We intend to grow in the defence industry, find new opportunities in healthcare, and remain a leader in semiconductor technology. We can do all this as a team that shares the same vision, and acts fairly and with respect toward people and the planet.

For this reason, we have created this Code of Ethics – a practical guide for situations where things aren't black and white. It sets boundaries that we will not cross, regardless of pressure from the circumstances or the temptation of quick profits. That is because we know that trust and integrity are the basis for sustainable growth.

We hope that you will read the Code carefully and behave according to its principles. When in doubt, or if you run into a problem, contact your supervisor or use internal reporting channels. Transparency and open communication are the basis for the environment we are building.

Meopta stands before a strategic path to growth. Let's walk it together, with the values our company has always stood for.

Jan Vymazal
CEO
Meopta s.r.o.



The Code and Our Principles of Conduct



Pillars of our Business



Values

At Meopta, we focus on cooperation, engagement, improvement, decency and respect in all relationships, and on a professional, precise approach to our work. These values state who we are, and we conduct ourselves accordingly in our everyday work throughout the company.



Code of Business Principles

The Code simply and clearly describes our approach to business and its ethical boundaries. We are publishing the Code in hopes that our business partners will set the bar equally high.



Ethical principles

The ethical principles clearly state what sort of behaviour we expect from our employees. We all adhere to them, without exception. We act transparently, which is why we also publish them externally, although they are for internal use.

Code of Business Principles (1 of 2)

At Meopta, we believe in responsible, sustainable growth. Our Code of Business Principles therefore defines clear rules for all employees. It puts our values into practice and states what we expect from each other.

Standard behaviour

We behave honestly, openly and with respect for human rights and the interests of our employees.

We also show the same respect toward those we collaborate with.

We strive for transparency, so that our partners understand what we do and why.

Compliance with the law

Meopta and all employees obey the laws and regulations of the countries in which we operate.

Employees

We build an environment based on respect, dignity and equal opportunity. We do not tolerate discrimination, bullying and harassment. All work is voluntary – we reject all forms of coerced, illegal or child labour. We ensure a safe work environment and support open dialogue between management and employees, including freedom of association.

We hire, evaluate and promote according to the qualifications and skills required for the relevant work. We ensure fair, transparent recruitment with no fees from the candidate. We pay remuneration on time and in accordance with the law.

We provide safe, reliable channels for reporting concerns and violation of rules. No one should face reprisals for reporting a problem in good faith.

Customers and users of our products

We deliver products and services that provide clear value, are safe for their intended use and match their description. We provide clear, accurate information, including proper labelling and responsible advertising.

Partners and other interested parties

We follow the principles of responsible corporate governance and act transparently. We provide timely, reliable information on our activities, structure and results to responsible people and authorities to the extent required by law.

Business partners

We strive to build mutually advantageous relations with suppliers, customers and partners. We expect them to comply with principles in accordance with our standards, especially when it comes to combating corruption, upholding fair competition, and protecting workers' rights. We select partners consistently and insist on truthful, credible communication.

Compliance – monitoring – reporting

Top management sets the direction and demands compliance with the Code. Leaders implement it in teams, set an example and address risks.

Every employee is obliged to learn the Code, abide by it and immediately report any real or potential violation directly to their supervisor, Legal and Compliance Department or through the ethics line. We keep the report confidential and we protect anyone who reports a problem in good faith against reprisals.

Code of Business Principles (2 of 2)

Innovation

We base our development on proven knowledge and maintain high product safety standards. We consider the needs of the customer and society.

Competition

We support fair business competition and abide by its rules. We refuse cartel agreements, manipulation of tenders and other unfair practices.

The environment

Meopta is committed to continuously reducing its activities' impact on the environment and to developing sustainable business practices in the long term.

We conserve resources, minimise waste and emissions, and adhere to ecological standards.

We reduce the energy demands of our operations, support recycling and the transition to more sustainable consumption and mobility.

In purchasing, we consider the carbon footprint, origin and method of production, and the potential

for reuse or recycling. Everyone is responsible for contributing to the company's ecologically sound operation.

Public activities

We represent the company's legitimate interests openly and in keeping with the law. We cooperate with authorities and other institutions in complying with the legislation.

Employees express their political opinions as private individuals, and the same applies to their contributions and comments of a political nature. Only a designated employee officially authorised by the company may provide statements and communicate with the media or the general public on behalf of Meopta. Other employees are not authorised to speak on behalf of the company to the media or the public.

Bribery and corruption

We have zero tolerance for bribery or corruption. No one may offer, promise, give or accept anything of value to influence a business decision or gain an improper advantage – directly or indirectly.

Gifts and hospitality must be reasonable, legal, transparent and must never be used to influence decisions; the value of a gift must not exceed CZK 2,000. Gifts of cash are not permitted. All payments and transactions must be truthfully and completely recorded in the accounts. In an emergency situation involving a threat to health or safety, any "facilitating payment" must be reported immediately through the prescribed channels.

Conflicts of interest

Employees must avoid activities and financial offers that might be in conflict with the company's interest, or may appear to be. They do not exploit their position for personal gain, nor engage in side activities that could negatively affect their work performance or harm Meopta.

Data

We process personal data responsibly, safely and in accordance with the law. We respect the right to privacy and protect the confidential information of our employees, customers and partners.

Application of the Code (1 of 2)

Our values are the pillar of our success. Every day, we put them into practice and confirm our commitment to acting with honesty and respect. The trust our employees, customers and partners is based on our integrity – and we protect it by following clear rules.

Meopta specifies what it expects from all employees and other colleagues. In addition to the Code, we rely on current internal regulations.

From our business partners, we expect adherence to principles that match our own: fair, transparent behaviour, zero tolerance for bribery, and respect for legislation and human rights.

We take violations of the Code and guidelines very seriously, and breaches have consequences for everyone associated with the given incident.

This section therefore explains how to ensure that all our employees and those working with Meopta understand and comply with the Code. At the same time, it confirms everyone's personal responsibility to report suspected violations of the Code and

guidelines, and it describes how we resolve such situations.

Who is an employee?

In the Code, the word “employee” designates any person who performs work or other similar activities for Meopta, such as:

- full- or part-time workers,
- workers with a contract in the form of a work performance agreement (DPP) or a work activity agreement (DPČ),
- interns and apprentices,
- people from statutory bodies,
- people who work based on a contractual relationship (freelancers).

Applying the Code is teamwork. If the Code does not describe a specific case, use common sense, act with integrity, and always according to applicable law.

✓ How do we do it?

All employees must:

- Know and understand the Code's requirements and relevant internal guidelines.
- Adhere to the Code and relevant internal guidelines. If you're unsure about anything, ask your supervisor or another appropriate person for advice.
- Complete the required training according to internal guidelines and always keep your knowledge up to date.
- Immediately report any real or possible violation of the Code or internal guidelines on your part or on that of other employees or people acting on behalf of Meopta. Reporting also includes situations where a business partner's behaviour does not meet our standards.

Your immediate supervisor is usually the first and correct choice for reporting suspected violations of the Code. If this is not possible, go to:

- An appropriate person according to the Whistleblower Protection Guidelines. This

Application of the Code (2 of 2)

person must confirm receipt of your message within 7 days and assess the incident within 30 days (with the option of two 30-day extensions).

- The ethics line at eticka-linka.meopta.com/el.
- Email to whistleblowing@meopta.com.
- If anyone (including a supervisor) tells you not to submit the notification, report the matter immediately through the ethics line or directly to the appropriate person. Meopta protects the whistleblower and prohibits any reprisals.

Employees in management and other leadership positions are additionally required to:

- Set an example and actively support a culture of integrity on their team.
- Ensure that all team members (including newcomers) know the Code and the relevant internal guidelines, have completed the specified training, and know how and where to report concerns and violations of the Code.
- Offer guidance and support in applying the Code.

- When in doubt, contact the appropriate person or department.
- Ensure that the person reporting a violation of the Code or internal guidelines receives support and is not subject to reprisals.
- Take all reports seriously, act promptly, and handle information discreetly. Report the findings to the appropriate person as soon as possible and agree on further action.
- Cooperate in investigating the incident, provide the requested documentation, and respect the investigation process and deadlines.
- Take corrective and preventive measures (communication, training, modification of controls and procedures) if a violation of the Code or guidelines has occurred in an area under the purview of the given manager.
- Prevent colleagues from reporting or encourage them to ignore the problem.
- Engage in any form of reprisals against the whistleblower.
- Discuss reports and investigations with people not involved in the matter. There is a duty of confidentiality and ban on unauthorised data sharing.

✗ What we don't do

Employees must not:

- Ignore or avoid reporting a situation where they have reasonable suspicion that the Code or internal guidelines have been violated.

Combating Corruption



Avoiding Conflicts of Interest

A conflict of interest can severely damage Meopta operations and our employees. It happens when an employee's personal, financial or non-financial interests – real, perceived or potential – may or do influence their impartiality when performing work for Meopta.

This section tells how to prevent such situations and what to do if they happen.

Situations that may cause a conflict of interest must be reported, especially in cases where the employee:

- Has a personal interest in a competitor's company or other entity relevant to Meopta, such as:
 - › working or providing services to them.
 - › Owns a stake in it (other than through publicly traded pension and index funds or index-tracking funds) if that stake represents a significant ownership interest.
 - › Has any stake in an entity for which they themselves or their team collaborates, supervises or authorises activities.
- Allows their personal values, beliefs, interests, or political opinions to override the legal and ethical expectations of the company and affect their performance or impartiality at work.

✓ How do we do it?

Employees must:

- Ensure that potential business opportunities primarily benefit Meopta.
- Immediately report real, suspected or potential conflict of interest to their supervisor, Legal and Compliance Department, by emailing whistleblowing@meopta.com or through the ethics link at eticka-linka.meopta.com/el.
- Follow the Code if they wish to accept a position as a board member or similar position in another organisation, whether commercial, nonprofit, professional or public. This also applies to a newly-hired employee who already holds such a position and has not yet announced it.
- Announce in advance the intention to become a board member of a publicly traded company to the Legal and Compliance Department.
- Ensure that any external commitments:
 - › Do not reduce their work commitment or contribution to Meopta.
 - › Do not make sensitive business or other information accessible to competitors.

- › Do not establish any obligation or responsibility for Meopta.

The employee must always clearly inform the other party that they are dealing with them as a private individual who does not represent Meopta, and that Meopta does not profit from any rewards or benefits from this private activity.

✗ What we don't do

Employees must not:

- Accept voting or decision-making positions in cases where a conflict of interest exists or could arise, until the situation has been evaluated by the relevant department.
- Exploit business opportunities encountered while working for Meopta for their own personal benefit or the benefit of third parties.
- Abuse their position to promote their own interests.
- Hire, contract with, or engage with any person or organisation without ensuring that they do not have a conflict of interest with our company.

Preventing Bribery and Corruption

Meopta supports the worldwide effort to combat corruption. We do not tolerate any form of bribery or corruption – whether in dealings with public officials or in business relations between private entities. This section tells how to live up to these values.

✓ How do we do it?

Employees must:

- When dealing internally and with third parties, clearly and unambiguously declare that Meopta has zero tolerance for bribery and corruption and never (directly or indirectly) offer, provide, seek or accept any payment, gift or other advantage for improperly influencing a business decision.
- Immediately inform your supervisor or the Legal and Compliance Department if you become aware of a proposal, offer or execution of a payment or other transaction that may be in violation of the zero tolerance policy for bribery and corruption. You can also send an email to whistleblowing@meopta.com or contact the ethics line at eticka-linka.meopta.com/el.

- Follow the rules for selecting and cooperating with business partners, in keeping with the internal principles of responsible procurement and cooperation with third parties.
- Where possible, use electronic tools and official online platforms (such as for licences, purchasing, tax procedures, brand protection) or other methods that reduce the need for personal contact with public officials and thus the risk of bribery.
- Payment can be made in exceptional situations, such as when it is impossible to avoid an immediate threat to life, freedom or physical safety. In such a case, it is necessary to immediately and fully inform your superior and the Legal and Compliance Department so that the situation can be investigated, an accounting record made and the necessary measures taken.

✗ What we don't do

Employees must not – directly or indirectly through suppliers, agents, distributors, consultants, lawyers, intermediaries or others:

- Offer or provide bribes, undue advantages or so-called facilitating payments to public officials, other people or third parties with the aim (or even the appearance) of influencing decision-making.
- Request or accept bribes or undue advantages from third parties with the aim (or even the appearance) of influencing Meopta's decision-making toward those parties.

Gifts and Hospitality (1 of 2)

All of Meopta's relationships must reflect our commitment to doing business with honesty and integrity. Hospitality can play a positive role in building relationships with customers, suppliers and other partners. It is similarly appropriate to offer a suitable gift as part of a promotion event or when placing a product on the market, for example.

However, because accepting or providing gifts and hospitality can be abused or can lead to a real or perceived conflict of interest, this situation should occur only as an exception – in justified cases and proportionate to the purpose of the business collaboration.

This section defines the responsibilities of employees when it comes to gifts and hospitality, establishes cases when they cannot be accepted, and also explains when, on the contrary, they can be accepted or provided.

✓ How do we do it?

Employees must:

- Ensure that gifts and hospitality are never of excessive value, do not provide inappropriate advantages, and do not lead to a real or

perceived conflict of interest (see the principles [Avoiding conflicts of Interest](#) and [Preventing Bribery and Corruption](#)).

- Know and adhere to the financial limit of CZK 2,000 established for gifts and hospitality unless an exception is granted according to this Code.

Handling gifts

Employees must:

- Ensure that any gift offered or accepted does not exceed the CZK 2,000 limit, is a one-time or isolated event, and is always in keeping with the principles indicated under Conflict of Interest.
- Politely refuse an offered gift if its value exceeds the CZK 2,000 financial limit, and explain Meopta's rules. In cases where refusal might cause a severe social insult or a gift cannot be returned, it is necessary to:
 - › Get approval from your supervisor or the Legal and Compliance Department.
 - › Ensure that the gift is donated to charity (if its nature allows it).
- For promotional items bearing the Meopta logo, make sure that they are reasonable and justified in the given situation.

Dealing with hospitality

Employees must ensure that they offer or accept hospitality only in cases when:

- It has a clear, justified business purpose.
- Its value does not exceed the financial limit of CZK 2,000.
- It is a one-time or exceptional event.
- It takes the form of a working lunch or dinner, participation in an organised team-building event, cultural or sporting event, award ceremony in the field, a tour of the facility, or other responsible activity.

In exceptional circumstances where employees seek to offer or accept hospitality above the financial limit of CZK 2,000, they must:

- Get approval from their supervisor or the Legal and Compliance Department.
- Ask the third party for confirmation that the offer or receipt of hospitality conforms to their internal rules.

Gifts and Hospitality (2 of 2)

If a third party offers an employee hospitality above the financial limit of CZK 2,000, or requests hospitality beyond this limit, with reference to this Code, the employee must refuse the offer/request.

- Offer or accept hospitality that is not in keeping with the principle [Respect, Dignity and Fair Treatment](#), or might offend local customs.

✗ What we don't do

Employees must not:

- Negotiate gifts or hospitality with public authorities or their family members.
- Offer or accept gifts, hospitality or other advantages with the purpose of influencing a business decision or establishing an obligation. The same applies if an independent observer might perceive the situation in that way.
- Offer or accept gifts in cash or its equivalent (such as lottery tickets, gift certificates, vouchers, loans, guarantees, shares or options).
- Offer or accept hospitality related to overnight stays or international travel without prior written approval from a supervisor or the Legal and Compliance Department.

Accurate Records, Reporting and Accounting (1 of 2)

Financial statements and other information that Meopta maintains internally or provides to partners, regulators and other interested parties must always be true, complete and accurate.

Our records are an important source of information for managing the company, as well as evidence of our actions, decisions and commitments. That's why we have procedures and processes in place to ensure that all transactions are properly approved and correctly recorded.

We consider failure to record transactions and falsification or distortion of information, or inducing others to engage in them, to be fraud. Such conduct may have legal consequences for both the employee and the company.

This section tells how employees should ensure accurate business records and financial information.

✓ How we do it?

Employees must:

- Record every transaction truthfully, completely and without unnecessary delay.
- Only make transactions (purchase, sale, transfer of assets) that have approved authorisation.
- Approve only authorised transactions and provide valid supporting documents.
- Immediately inform your supervisor and the Legal and Compliance Department if you become aware of possible fraud, attempted tax evasion, misrepresentation of accounting or other data, or if a so-called “facilitating payment” has been made to avert an imminent threat or as a result of an error in judgement. You can also send an email to whistleblowing@meopta.com or contact the ethics line at eticka-linka.meopta.com/el.
- Keep records according to internal rules, and for an even longer period than usual if required by law.
- Carefully preserve all documents that may be relevant to an ongoing audit, legal proceeding

or investigation, even if it exceeds the standard retention period.

- Cooperate fully and truthfully with internal and external auditors, tax authorities and regulators.
- Have all the relevant information needed for your work available.

Employees responsible for reporting

Employees responsible for reporting financial and other business information must:

- Comply with all the legal regulations applicable to financial statements, tax obligations and other operations.
- Comply with the relevant external reporting standards and regulations (national and international accounting standards, financial regulator rules, health and safety standards, and corporate governance codes).
- Follow Meopta's accounting and reporting methodologies, schedules, and definitions of required data.

Accurate Records, Reporting and Accounting (2 of 2)

Employees responsible for accounting

Employees involved in accounting must:

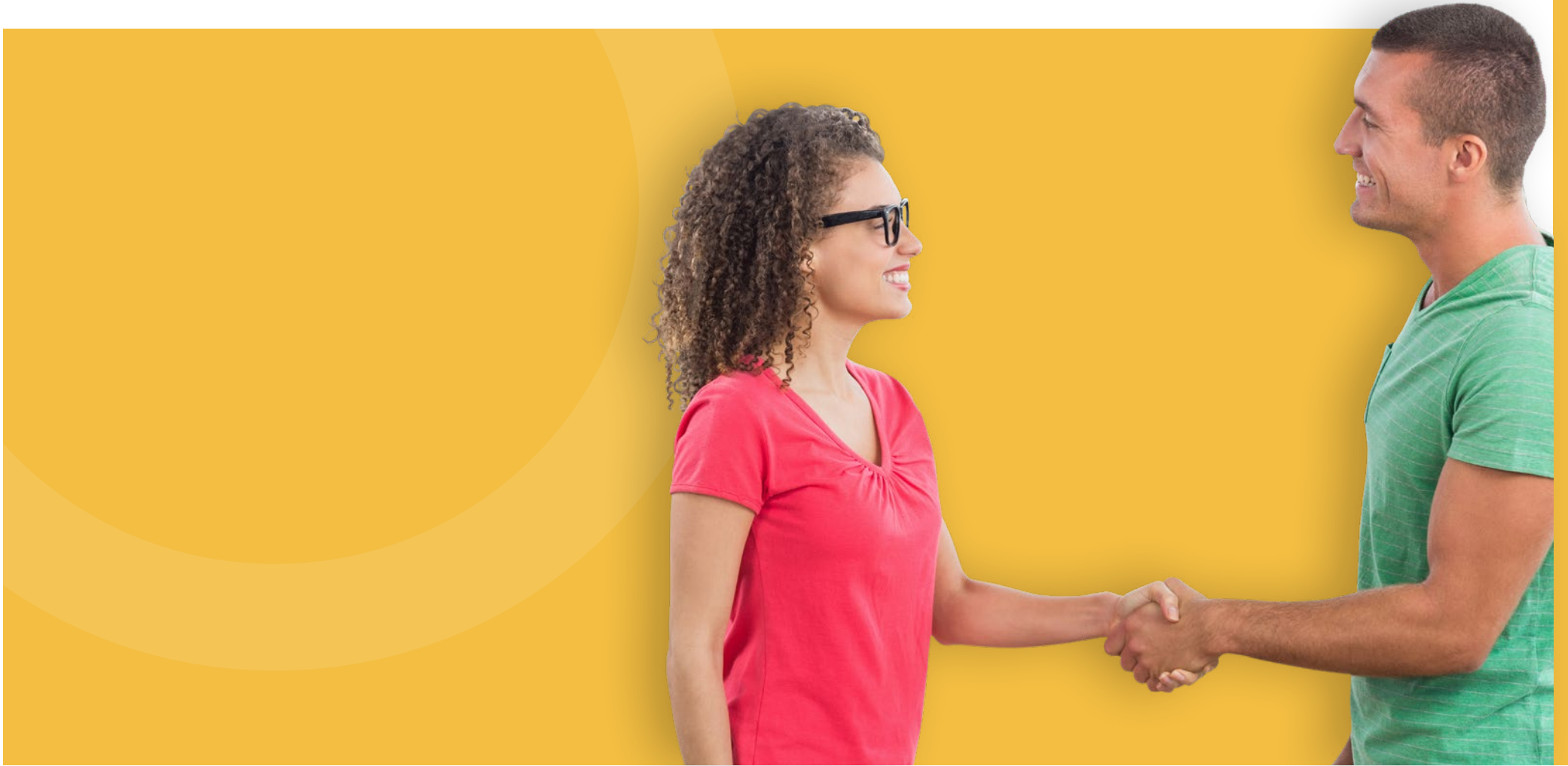
- Ensure that revenues, profits, assets, and liabilities are recorded in the correct period.
- Properly document the assumptions behind accounting entries – especially for adjustments, accounting closing entries, and contingent liabilities including taxes.
- Members of management ensure the accuracy of the submitted documents as part of the closing processes, in accordance with the instructions of the finance department.

✗ What we don't do

Employees must not:

- Artificially inflate or shift sales or profits between accounting periods.
- Create or maintain unreported or unrecorded accounts, funds, or assets.
- Conceal, alter, or falsify company records, accounting records, or documents.

Respect for People



Occupational Health and Safety (OHS)

At Meopta, we provide safe work conditions.

We comply with the applicable legal regulations to continuously improve in health and safety.

We all play a part in OHS. Managers are responsible for communicating and implementing health and safety rules to their teams and to third parties they manage.

This section defines the responsibility for health and safety.

✓ How we do it?

Employees must:

- Work safely and behave in a way that does not endanger themselves or others.
- Follow health and safety procedures and guidelines related to their work and areas in which they are trained.
- Support managers to ensure that everyone they work with (including suppliers and visitors) knows and follows the relevant health and safety procedures and guidelines.
- Only perform work for which they have been trained, have the necessary qualifications and medical fitness, and when adequately rested and focused.

- Know what to do in the event of an emergency at the workplace.
- Immediately report any injury, illness, dangerous condition, incident, or release of hazardous substances into the environment to Meopta management, so that corrective and preventive measures can be taken immediately.

Requirements for managers

Managers have overall operational responsibility for OSH in their workplace and are required to:

- Implement and maintain an appropriate health and safety management system for their teams. At the same time, they must identify the people responsible for supervising OHS principles. They must also provide a system for collecting employee suggestions, comments, and concerns.
- Identify hazardous situations and manage or reduce risks arising from routine and planned activities, operations and services.
- Regularly evaluate compliance of workplace operations with the applicable health and safety legislation and internal requirements, and take corrective measures.

- Set goals for improving OSH at both the workplace and role levels and continuously monitor achievement of these goals. At the same time, they must review the effectiveness and adequacy of the implemented system at least once a year.
- Report and investigate in a due and timely manner all incidents, accidents, and situations that may lead to accidents, ensure they are remedied and communicate the measures taken.
- Maintain, communicate and test emergency plans (for both workplaces and specific roles).
- Ensure that employees, suppliers and visitors have access to health and safety information and training relevant to their activities.

✗ What we don't do

Employees must not:

- Perform work (including driving a vehicle) under the influence of alcohol or drugs, or if they are taking medication that could jeopardise proper work performance.
- Continue work that may in any way threaten their health or safety.
- Rely on someone else to report a health or safety concern.

Respect, Dignity and Fair Treatment

Business only thrives in a company that respects and strengthens human rights. Meopta recognises the responsibility of businesses to behave in accordance with human rights and to contribute to positive impacts through their operations.

We ensure respect for human rights across our organisation and supply chains. We strive for an environment that supports diversity, is based on mutual trust, respects equal opportunity, and combats any form of discrimination.

This section tells how our employees and leaders contribute to such an environment.

✓ How we do it?

Employees must:

- Respect the dignity and human rights of colleagues and all other people they come into contact with at work.
- Treat all people fairly and equally and not discriminate against them based on their race, age, job role, gender, gender identity, skin colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political opinions. This includes decisions about hiring, redundancy, promotion, compensation and benefits, training, and retirement – these decisions must always be based on merit.

Managers must:

- Ensure that all work is done on freely agreed terms and according to legal regulations and Meopta's internal procedures.
- Ensure that employees obtain employment at Meopta without directly or indirectly paying recruitment costs. This principle also applies to agency or partner recruitment.
- Ensure fair remuneration for employees that meets the legal minimum or the usual industry standard. If a legally binding collective agreement applies in the workplace, we comply with its wage conditions. Wage deductions are governed by the legal regulations and internal rules.
- Respect the right of employees to establish and join trade unions or other representative bodies and conduct substantive dialogue with them in accordance with the law.
- Comply with legal requirements for short-term, temporary and agency workers.
- Maintain a clear, transparent system of communication between employees and management.
- Ensure that employees can report concerns or incidents – including situations where someone feels discriminated against or treated unfairly by employees, management, or business partners.

✗ What we don't do

Employees must not:

- Behave in an offensive manner and intimidate, bully or harass anyone – whether directly or indirectly (such as through sexually explicit or offensive jokes, sharing inappropriate material, misusing personal information, creating a hostile environment, isolating colleagues or spreading slander).
- Work beyond normal and legally permitted overtime. Overtime work is always voluntary.

Managers must not:

- Use (or allow the use of) forced, compulsory or trafficked labour. Meopta has zero tolerance for forced labour.
- Employ child labour (work done by people younger than 15).
- Assign juveniles to work that may endanger them psychologically, physically, socially or morally, or prevent them from attending school (including internships and short-term work experience programmes).

Work Culture at Meopta

Our work is not only based on results, but on how we achieve them. Meopta's work culture is based on respect, fairness and cooperation.

✓ How we do it



Our goal is for business hours to support both customer needs and effective collaboration within the team. Therefore, standard working hours are set between 8:00 a.m. and 4:00 p.m., ensuring availability for clients and colleagues. At the same time, we define a mandatory core period between 9:30 a.m. and 1:00 p.m., when the presence of all employees is necessary to enable mutual coordination and rapid response to customer requests. Outside of this core period, working hours can be partially adjusted to the nature of the work and personal needs, in agreement with the manager. The heads of individual departments are responsible for organising and managing working hours in their teams.



We act with integrity and take personal responsibility for our work and results.



We ensure that our communication is reliable and transparent. We respond to emails within 48 hours at the latest and, if necessary, we openly inform you about deadline changes to ensure the smooth completion of tasks together.



We communicate with respect both inside and outside the company, both verbally and nonverbally.



We work as a team, share information and risks transparently, and seek common solutions.



We behave and dress professionally. Production in clean Meopta work clothes, administration in business casual, and we observe casual Fridays.



We support an open-door culture: This means being available to colleagues and not being afraid to openly share our opinions.



We act responsibly and with initiative, as if Meopta were our own company.

Diversity and Inclusion



Diversity and Inclusion (1 of 3)

Foreword

At Meopta, we believe that **diversity is a source of innovation, growth and long-term success.**

This is not a one-time goal, but an ongoing commitment to creating an environment where everyone can freely express their uniqueness and contribute to the development of the company. This Code of Diversity and Inclusion proceeds from the principles of **fairness, openness and respect for difference**, which are the pillars of our corporate culture.

Fundamental principles

Our approaches to diversity and inclusion are based on these principles:

- **Respect for differences:** We value the uniqueness of every person – regardless of origin, gender, age, sexual orientation, faith, physical or mental abilities, life experiences, or way of thinking.
- **Equality and opportunity:** We strive for equal opportunity for all employees in professional development and career. Success is determined by abilities, results, and attitude, not personal characteristics.

- **Social responsibility:** Inclusion reaches beyond the boundaries of the company – it extends to relations with the communities where we operate. We therefore apply the principles of diversity in our social projects.

Ban on discrimination

At Meopta, we do not tolerate any form of direct or indirect discrimination. This principle applies to all phases of the employment relationship – from recruitment to development, training and evaluation.

Any behaviour based on prejudice against race, gender, age, health status, religion, sexual orientation, marital status, or other personal characteristics is unacceptable.

Inclusion and accessibility

Our goal is a work environment open to all – one that encourages the active participation of every individual.

We remove barriers that prevent people with disabilities from participating in work life and use technological and organisational tools (such as flexible work arrangements) to ensure a level playing field.

We support an open culture of dialogue where everyone can express themselves without fear and with respect.

Equality of men and women

Gender equality is one of the pillars of our corporate culture.

We strive for balanced representation of women and men at all levels of the organisation and actively support development of female talent.

We implement measures to reduce gender inequality – including flexible work conditions, mentoring programs for women, and promoting equality in leadership.

Preventing and addressing harassment

Any form of bullying, harassment or intimidation is unacceptable.

We strive for a safe, respectful work environment where everyone feels protected.

Diversity and Inclusion (2 of 3)

We have preventive measures and confidential channels in place for reporting inappropriate behaviour. Each report is treated with respect, confidentiality and with no reprisals against the reporting party.

Education and development

We believe that education is the key to developing an inclusive culture.

That's why we offer regular training on diversity, equality and prevention of prejudice.

The goal is to raise awareness of unconscious stereotypes and promote behaviours that strengthen respect and collaboration in teams.

Responsibility and transparency

Each of us is responsible for adhering to the principles of diversity and inclusion.

We regularly evaluate progress through internal surveys and analyses and share the results openly within the company and with our partners.

Transparency helps us learn, improve, and build trust.

Partners and suppliers

Our diversity and inclusion policies also apply to our business partners and suppliers.

We expect them to share our values and take their own measures to promote equality and fairness.

When selecting partners, we prioritise those who support inclusive, sustainable practices throughout the supply chain.

Our vision is for Meopta to be a company where everyone feels respected, valued and can fully develop their potential.

To us, diversity means strength – the strength to create a fair, innovative, sustainable environment that leads to a better view of the world.

✓ How we do it?

- Everyone has the right to **fair treatment** without regard to personal characteristics.
- We make decisions based on **results, capabilities and attitude** – not on prejudice.

- We ensure equal conditions in recruitment, evaluation and development.
- We actively create a **respectful environment**, where everyone feels safe.
- We remove barriers that prevent participation by people with disabilities.
- We offer **flexible work arrangements** and technical solutions to support access.
- We listen, engage in dialogue, and create a space where everyone can express themselves freely.
- We regularly train employees in diversity, inclusion and fair behaviour.
- We bring up the topic of **unconscious prejudices** and teach how to prevent them.
- Everyone is responsible for adhering to the principles of this Code.
- We track progress through internal surveys and cultural assessments.
- We **regularly and openly** provide information on the results.

Diversity and Inclusion (3 of 3)

✗ What we don't do

- We do not tolerate any form of **discrimination, bullying or harassment**.
- No one may be disadvantaged due to age, gender, origin, religion, health status, orientation or family situation.
- We do not accept stereotypes or prejudices against women or men.
- We do not limit career development based on parenting or family care.
- Ignoring discrimination is a **violation of our principles**. We do not overlook the needs of colleagues who require **specific support**.
- We do not tolerate an environment where people are afraid to express their opinions.
- We don't hide problems or failures.
- We don't leave the responsibility to management alone – it is down to all of us.

Protecting Information (GDPR)



Protecting Meopta's Information (GDPR)

Information is one of our most valuable corporate assets, so we protect it, just as we protect the information entrusted to us by others. Protection applies to all formats – from paper documents to emails to data in systems and applications. We all share responsibility for protecting information.

This section explains the basic rules for handling information and how to report possible breaches.

✓ How we do it?

Employees must:

- Maintain the confidentiality of Meopta and third-party information and protect trade secrets and intellectual property. Only share such information with people who have a legitimate and justified need to know.
- Act in accordance with the law and internal regulations, especially when working with the personal data of employees, customers and partners. They must also comply with the principles of secure processing and personal data protection (including GDPR requirements).

- Use company resources (systems, equipment, data) responsibly and carefully and protect them from unauthorised access, loss or misuse.
- Immediately report any suspected data breach or other relevant incident to your supervisor, Legal and Compliance Department, by email to whistleblowing@meopta.com or through the ethics link at eticka-linka.meopta.com/el.
- Seek advice from your manager or the Legal and Compliance Department if you are unsure of how to handle Meopta information.

✗ What we don't do

Employees must not:

- Externally, make Meopta information available to third parties without proper authorisation or in violation of the obligation to confidentiality and protection of private information.
- Use inside information for personal gain or for any other than a legitimate business purpose.
- Handle personal data in a manner that does not comply with the legal regulations and internal rules.

Protecting Personal Data and Privacy

We respect the privacy of all people – employees, customers and business partners – and protect their personal data. We collect and process personal data in accordance with our values and applicable legal regulations, in particular the GDPR and the Act on the Processing of Personal Data.

This section describes how to handle personal data in everyday practice.

✓ How we do it?

Employees must:

- Collect only necessary, relevant personal data and use it solely for the purpose for which we collected it.
- Be transparent and clearly inform data subjects about why and how we process their personal data, including the storage period and their rights.
- Process personal data on an appropriate legal basis and obtain the consent of the data subject, where legislation imposes this obligation.
- Keep data up to date and correct it upon request of the person concerned.

- Protect personal data from unauthorised access, loss or misuse.
- Act ethically and be mindful of how unauthorised access to or loss of personal data can endanger the individual concerned.
- Seek advice from your manager or the Legal and Compliance Department if you are unsure of how to handle personal data.

✗ What we don't do

Employees must not:

- Retain personal data for longer than necessary to fulfil the purpose or for a longer period than required by law.
- Use personal data for purposes other than those originally intended.

External Relations



Fair Competition (1 of 2)

Investigations by competition authorities can result in high fines and costs, claims for compensation from customers and competitors, and damage to reputation and business relationships. In some cases, individuals may also face criminal prosecution.

Competition laws prohibit:

- negotiating cartel agreements,
- sharing commercially sensitive information among competitors unless approved by the Legal and Compliance Department,
- companies from imposing or negotiating certain restrictions with distributors or customers,
- abuse a dominant position in the market.

This section explains the rules that employees must follow to maintain fair competition.

Cooperation with competition authorities

We cooperate with competition authorities in accordance with the applicable laws while protecting the legitimate interests of our company. All contacts with these authorities (including any negotiations

with the courts) are coordinated by the Legal and Compliance Department.

✓ How we do it?

Management, supported by the Legal and Compliance Department, ensure that employees, suppliers and other relevant people understand their obligations under competition law, have the necessary materials at their disposal and receive relevant training.

Employees must:

- Comply with competition law in all categories and in all markets where they operate and complete all relevant training.
- Before attending industry association meetings, meet all requirements outlined in the company's membership standards for those associations. This also applies to less formal meetings with competitors (such as social events and award ceremonies).
- When contacting competitors, object to topics that are not acceptable in the context of competition and leave if the discussion continues.

- Any discussion on a topic that is not permissible in the context of economic competition will be reported immediately to the Legal and Compliance Department.
- Consult the Legal and Compliance Department whenever they need help interpreting competition rules or have doubts about interpretation.
- Consult the Legal and Compliance Department before exchanging any information with competitors.
- Consult the Legal and Compliance Department before negotiating joint purchasing, manufacturing, development, or standardization with competitors.
- Always consult the Legal and Compliance Department before imposing restrictions on a customer or distributor's business activities.
- Consult the Legal and Compliance Department in cases where the company has a strong market position and business practices could be considered by a third party (including competition authorities) to be a violation of fair competition.

Fair Competition (2 of 2)

- Clearly state the sources of information about competition in documents and all communications so that their legitimacy is undisputed.

✘ What we don't do

Cartel agreements cannot be entered into in any country, even in one where competition law does not exist.

Employees must not:

- Without the consent of the Legal and Compliance Department, directly or indirectly discuss or share information with competitors about:
 - › prices and conditions of sale of products or services,
 - › prices and business conditions toward suppliers,
 - › possible coordination or division of offers or price proposals,
 - › restrictions on production or sales,
 - › division or allocation of geographic markets, customers or product lines.
- Boycott or refuse to work with certain competitors, customers or suppliers without consulting the Legal and Compliance Department.
- Without consulting the Legal and Compliance Department, restrict the business activities of a customer or distributor (such as by setting a resale price, limiting the territory or sales channels for its operations, or restricting the sale of competing products).
- Act in such a way that, when the company has a strong position on the market, they unfairly exploit customers or prevent competitors from entering the market or remaining on it (such as by selling below cost, offering conditional discounts or exclusive contracts).

Political Activity and Political Donations

Meopta does not support or contribute to the activities of any political parties or candidates.

Employees may only provide support and contributions to political groups as private individuals.

This section explains how employees should act in relation to political entities.

✓ How we do it?

Employees must:

- Ensure that all political contributions and support are clearly personal and cannot be perceived as connected with Meopta.
- Ensure that their personal political involvement does not affect their performance and impartiality at work (see the section [Conflict of Interest](#)).
- Before participating in advisory groups established by the government, obtain approval for such participation from your superior.

We will only grant approval to participate in a similar group if the advisory group publicly announces that:

- its activities are not of a partisan nature,

- its work relates to areas that support Meopta's vision and values,
- it includes representatives from a wide range of organisations, such as well-known competitive companies, national charities, non-political think tanks, research institutions, academia and similar entities.

✗ What we don't do

Employees must not:

- Create a conflict of interest through participation in social or economic advisory groups.
- Use company funds, time, or equipment for their political activities.
- Speak on behalf of Meopta on political matters without the express consent of management.
- Coerce or influence colleagues in their political decisions and preferences.

A Better View of the World



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