

**This document is mandatory for all employees working under an employment contract for Doosan Škoda Power company.**

## **PURPOSE**

Doosan Škoda Power is a leading European producer and supplier of products and customer services in the power industry developed from over a century-old tradition of steam turbine production. The basis of successful bids is the company's own research and development activities, IT-assisted planning and designing, use of standardized design and project solutions, superior production and technology, assembly and commissioning, after sales service and consulting.

Doosan Škoda Power is committed to sustainability in all its operations. According to its sustainability policy and internal Code of Conduct, Doosan Škoda Power wants to actively engage with main shareholders to continuously improve its environmental, social and economic performance. All employees, goods and services providers for Doosan Škoda Power play an important role in Doosan Škoda Power efforts towards sustainability.

The purpose of this Code of Conduct is to define the basic sustainability requirements placed on Doosan Škoda Power. Doosan Škoda Power is committed to implement the principles of the Code of Conduct across its all business activities.

The Supplier Code of Conduct is based on the ten principles of the United Nations Global Compact. ([www.unglobalcompact.org](http://www.unglobalcompact.org)).

## **1. BUSINESS PRINCIPLES**

### **Legal compliance**

Doosan Škoda Power shall comply with all the applicable laws and regulations in all locations where it conducts business. If such laws do not exist, the principles of the Code of Conduct shall be used as guidelines.

In addition to complying with all applicable legal and regulatory requirements, Doosan Škoda Power is committed to act in accordance with high standards of business ethics.

Doosan Škoda Power adheres to safeguard the confidentiality of confidential information concerning Doosan Škoda Power business partners and customers, issue accurate and relevant information on Doosan Škoda Power business activities and compete fairly and ethically in all other respects as well.

### **Anti-Corruption conduct**

Doosan Škoda Power adheres to the highest standards of integrity in all business interactions. Any form of corruption or extortion or employees or organizations is prohibited.

## **2. HUMAN RIGHTS**

Doosan Škoda Power supports and respects internationally proclaimed human rights.

## **3. LABOUR STANDARDS**

### **Freedom of association**

Doosan Škoda Power recognizes and respects employees' freedom of association and their right to freely choose their representatives. Doosan Škoda Power also recognizes employees' right to collective bargaining.

**Forced labour**

Doosan Škoda Power does not use forced labor and employees are free to leave their employment after reasonable notice as required by national law or contract. Employees are not required to lodge deposits of money or identity papers with their employer.

**Employment conditions**

The employees of Doosan Škoda Power understand their employment conditions. Pay and terms are fair and reasonable and comply at a minimum with national laws or industry standards, whichever are higher. Working hours comply with national laws. Employees should have at least one day off per seven-day week.

**Child labour**

Doosan Škoda Power shall not, under any condition, employ children who are below the minimum legal age for employment. Minimum age is the age of completion of compulsory education, or not less than 15 years (or 14 years where the law of the country permits). Children over minimum age are not employed for any hazardous work or work that is inconsistent with the child's personal development.

**Non-discrimination**

Doosan Škoda Power shall treat their employees with respect and dignity. All kinds of discrimination based on partiality or prejudice is prohibited, such as discrimination based on race, colour, gender, sexual orientation, marital status, pregnancy, parental status, religion, etc. Threats of violence, corporal punishment, physical or verbal abuse or other unlawful harassment are strictly prohibited.

**Working conditions**

Doosan Škoda Power shall provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Appropriate health and safety information, training and equipment shall be provided to employees. Suppliers shall also comply with any additional safety requirements agreed in the contract documents. At a minimum, Doosan Škoda Power shall provide employees with drinking water, clean toilets, adequate ventilation, emergency exits, proper lighting and access to first aid supplies or other provisions for emergency care. Doosan Škoda Power suppliers shall comply with further safety requirements as agreed in the contract documents.

**Prevention of alcohol and drug use at work**

Alcohol, drugs and other intoxicating substances are not allowed at Doosan Škoda Power.

Employees are permitted to work at Doosan Škoda Power workplaces only if they are sober and drug-free.

Doosan Škoda Power has a policy and guidelines in order to take precautionary action of alcohol and drug abuse.

Occasional drug and alcohol tests can be performed on employees at Doosan Škoda Power workplaces, if those are allowed in national (or local) legislation.

**4. ENVIRONMENT**

Doosan Škoda Power shall consistently support a precautionary approach to environmental issues and also initiate employees to promote greater environmental responsibility.

Doosan Škoda Power always complies with and meets all applicable environmental laws and regulations. The management system of Doosan Škoda Power also helps to meet these requirements. Doosan Škoda Power also encourages its suppliers to the development and diffusion of environmentally friendly technologies.

Compliance with the above principles of the Code of Conduct at Doosan Škoda Power is also required from all suppliers of Doosan Škoda Power.

## **5. BASIC PRINCIPLES OF EMPLOYEE BEHAVIOUR**

### **Customer satisfaction**

The primary objective of Doosan Škoda Power and each of its employees is to ensure that our customer is satisfied. A customer-oriented behavior is one of the fundamental principles applied at Doosan Škoda Power company. Not only does it include our approach to business partners but also internal cooperation among the company staff. All employees of Doosan Škoda Power render top-quality performance and fully observe the legislation in force so that the trust and satisfaction of both the external and internal customer is as high as possible. All corporate departments shall regularly assess their customers' satisfaction and adopt improvement measures.

### **Loyalty to the company**

Employees accept and internalize corporate values and visions, promote them and set an example in following them. They act honestly within and outside the company so as not to damaged its reputation and observe rules of confidentiality and protection against unfair competition.

### **Conflict of Interests**

Employees avoid situations that might lead to a conflict between their personal interests and the company interests. They refrain from engaging in any activities that might be in conflict with the interests of Doosan Škoda Power. Employees are not allowed to:

- negatively influence negotiations or transactions between Doosan Škoda Power and third parties
- work for an entity whose business activities compete or might compete with those of Doosan Škoda Power
- work for an entity that is or may become a supplier of goods for Doosan Škoda Power
- when hiring a new person or deciding to promote an employee, give preference to their partner, relative or close friend

### **Gifts**

In connection with their working activities, employees are not allowed to accept any monetary or other gift of higher value. They are not allowed to give gifts or grant advantages to any entity cooperating with Doosan Škoda Power. This ban does not apply to petty or advertising gifts which may be granted upon the section director's consent.

### **Approach to work and personal development**

- Employees always come timely to work, observe and fully utilize their working hours.
- They keep their workplace clean and orderly.
- They observe work task deadlines, act independently and are able to cope with unexpected circumstances.
- They are accountable for their performance, work in a fast and reliable manner and deliver the required quality.
- They follow their superiors' orders and instructions and proceed in line with the applicable working and technology procedures.
- They approach work tasks proactively and responsibly.
- They work efficiently and come up with ideas how to improve working procedures and site conditions.
- They are willing to embrace changes arising from new working procedures.
- They pursue their professional development; seek opportunities for training and qualification improvement.

- Managers actively support their direct reports' development and contribute to implementing adaptation programs and career plans.

**Cooperation and communication**

Employees share all necessary information within and outside their department, willingly and promptly provide it to their superiors and team members. They share information with other team members, are willing to accept their opinions and accede to joint solutions. If necessary, they are willing to substitute others and, at the same time, make it possible for others to substitute them, if necessary. They are open and willing toward their managers and team members and maintain good relationships with them. They resolve conflicts peacefully, in an unemotional and tactful manner.

**Care for the environment, corporate assets and protect intellectual property**

The company employees protect corporate assets against damage or theft. They may not misuse corporate assets to their personal benefit. They protect the company's intellectual property and are obligated to maintain confidentiality in respect of all information about our corporation. They may only disclose information pertaining to their work performance that is officially meant for the public or that is generally known and accessible. When an employee acts on behalf of the company, they use the company's allocated resources (such as an assigned company email address). The company employees also respect third-party patents, copyright and intellectual property.

**Corporate image**

Every employee of Doosan Škoda Power is crucial for creating and maintaining its image. Their conduct, behaviour, appearance, communication, suitable apparel, orderly workplace, all that influences the overall impression that our company gives toward customers or the public.

**Telephone Conversations**

During telephone calls, our employees express themselves in a concise, intelligible and matter-of-fact manner. Their approach to our partners is positive, open and showing willingness. They limit their private telephone calls to the necessary minimum. If possible, they receive calls for their fellow workers from the same office who are currently absent from their workplace in order to prevent a possible non-delivery of any important information.

**Dress Code**

With their appropriate apparel and representation, the company employees promote the overall image of Doosan Škoda Power. Shop-floor workers wear an internally prescribed protective working uniform bearing the corporate logo (working shoes, working overalls, T-shirts).

Informal dressing on Fridays. This is not an obligation but an option for each of the company employees. If an employee has no meeting or negotiations with an external partner scheduled for that day, he or she may choose a less formal clothing that must however always be decent and clean. Informal Fridays should not constitute a ground for refusing to meet with third parties.

**Obligations of Managers**

In respect of the corporate Code of Conduct, the obligations of Doosan Škoda Power management go beyond the requirements placed on other corporate staff. The company managers:

- make sure that the Code of Conduct is observed by means of holding meetings with their direct reports and regularly monitoring matters pertaining to the rules defined in the corporate Code of Conduct
- lead others by setting a personal example and act as role models for all employees
- when assessing and remunerating employees, take into consideration their observance of the Code of Conduct and their overall attitude to improving the company corporate culture
- if the rules defined in the Code of Conduct are not observed, they actively propose and implement corrective measures

## **Anti-Bribery Policy**

### **Article 1. Purpose**

The Code of Conduct prohibits bribery, and this Anti-Bribery Policy ("Policy") is intended to set forth specific anti-bribery rules.

### **Article 2. Definition of Public Official**

In this Policy, the term "public official" includes the following:

1. Anyone who is an officer or employee of the government or is appointed to exercise a public function;
2. A member of the National Assembly or a local legislative assembly;
3. An executive officer of a government-related enterprise;
4. A candidate for public office; and
5. Anyone who is considered as a "public official" or performs official functions for or on behalf of the government under relevant laws.

### **Article 3. Definition of Foreign Public Official**

In this Policy, the term "foreign public official" means the following:

1. Any person holding legislative, administrative, or judicial office in a foreign government (including governments at all levels, from central to local), whether appointed or elected.
2. Any person exercising a public function for a foreign country and falling under any of the following:
  - (1) Any person carrying out public affairs delegated by a foreign government;
  - (2) Any person holding office in a public organization or public agency established by any Act and subordinate statutes to carry out specific public affairs; or
  - (3) Any executive or employee of an enterprise in which a foreign government has invested in excess of 50 percent of its paid-in capital or over which a foreign government has de facto control with respect to all aspects of its management, such as decision-making on important business operations and the appointment and removal of executives; however, excluded herefrom is any enterprise engaging in a business in competition at arm's length with general private business entities without any privilege conferred thereon, such as discriminative subsidies.
3. Any person acting for a public international organization.

### **Article 4. Definition of Bribe**

1. In this Policy, the term "bribe" includes money, goods, pecuniary advantages, and any tangible or intangible benefits.
2. Examples of bribes include, but are not limited to, the following:
  - (1) Money, gift certificates, stocks, and bonds;

- (2) Trips, meals and drinks, sports (including golf), and entertainment (including deliberate losses at gambling games);
- (3) Travel and accommodation assistance;
- (4) Job placement assistance; and
- (5) Investment opportunities, including conferring an unfair advantage to obtain a newly built apartment unit whose value is expected to increase in the future.

#### **Article 5. Prohibition on Bribery**

1. Employees may not offer, give, or promise to give a bribe to public officials or foreign public officials in relation to any business operations (which include but are not limited to retaining or obtaining business opportunities, requesting favors, and relieving/evading disadvantageous measures).
2. When dealing with foreign public officials, employees must understand and follow this Policy, relevant national laws, and relevant local anti-corruption laws.

#### **Article 6. Prohibition on Bribery through Agents**

1. Employees may not promise, give, offer, or express their intent to give a bribe to a public official or a foreign public official in relation to any business operations through agents or consultants.
2. Employees may not appoint or hire an agent or consultant if employees suspect that such agent or consultant are highly likely to give a bribe to a public official or a foreign public official.

#### **Article 7. Employee's Duty and Responsibility to Comply with this Policy**

1. Employees are required to understand and comply with this Policy. An employee in violation of this Policy may be subject to Company's disciplinary actions as well as other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report the violation through the Company's whistleblowing system.

#### **Article 8. Questions**

1. Employees should consult with Compliance Auditor for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. Compliance Auditor is a person that is entitled by the Company's management to implement the Code of Conduct in the company, to answer the questions to the topic and ensure that employees are familiarized with the process.

## **Conflicts of Interest Policy**

### **Article 1. Purpose**

The Code of Conduct prohibits employees from improperly using the Company's nonpublic information or engaging in any activity where an employee's interests may conflict with those of the Company, including taking outside employment and competing with the Company. This Conflicts of Interest Policy ("Policy") is intended to set forth specific standards which employees should follow.

### **Article 2. Scope**

This Policy applies to all domestic and overseas officers and employees ("employees") of the Company. Third parties doing business with the Company are also encouraged to comply with this Policy.

### **Article 3. Non-Compete**

Employees shall not engage in the following activities:

1. Establishing and managing, directly or indirectly, a company or other entity; receiving wages or other pecuniary benefits from an entity or individual, i.e. performing gainful occupation in the field where the employee would be competing against the Company for its personal or third party's benefit.
2. Allowing the use of the employee's name or position at the Company for sales and marketing activities of any outside company or entity covered under Article 3-1.

### **Article 4. Use of Corporate Opportunity**

Employees shall not take advantage of any Corporate Opportunity for their personal or a third party's benefit where such opportunity may be beneficial to the Company at the moment or in the future. Corporate Opportunity includes the following:

1. A business offer which employees receive because of their work or positions at the Company;
2. A business offer from the Company's business partners or competitors;
3. A business opportunity which the employees become aware of while working at the Company or using the Company's information; and
4. A business opportunity which is closely related to the Company's current or future business.

### **Article 5. Selection of Business Partners**

1. Selection of business partners as well as decisions on whether to enter into a contract should be based on rational and objective business criteria, such as quality, price, and reliability. Such decisions shall not be based on employees' personal financial interests or personal relationships (such as nepotism and cronyism).
2. The selection of business partners shall always be transparent and it shall not be allowed to communicate the progress of the selection process to third parties during the selection procedure.
3. Employees shall not engage in any investment activities, such as trading securities or real estate, which may adversely influence their business decision, including selecting business partners, on behalf of the Company.



**Article 6. Prohibition on the Use of Nonpublic Information**

1. Employees may not use or disclose the Company's Nonpublic Information (information which (i) a reasonable investor would consider material in making his or her investment decisions and (ii) has not been disseminated to the public ) for personal or someone else's benefit. The use of the Company's Nonpublic Information includes (i) trading securities or real estate based on such information and (ii) engaging in other activities to obtain pecuniary advantage.
2. The Company's Nonpublic Information includes not only information relating to the Company's business but also information relating to other companies which the employees obtain in connection with the employees' work at the Company, including information related to affiliate companies (including subsidiaries), suppliers, subcontractors, and other business partners.
3. The Company's Nonpublic Information does not include publicly available information disclosed through reporting to the Financial Authorities or through newspapers and television, as recognized under the applicable laws.

**Article 7. Limitations on Outside Speaking Engagements and Publications**

1. Employees shall report to and discuss with their department managers or supervisors prior to giving speeches, presentations, or lectures; participating in decision-making; providing advisory support; or participating in debates in outside seminars, forums, presentations, trainings, and meetings ("Outside Speaking Engagements"). When reporting the Outside Speaking Engagements, the following information should be provided to the Company: the name of the person who requested such engagement, the reason for the engagement, location, time, and whether the employee will receive compensation.
2. Where department managers determine that the Outside Speaking Engagements may cause leakage of the Company's trade secrets and other confidential and proprietary information, undermine the Company's reputation, or interfere with work performance, department managers may impose restrictions on employees' Outside Speaking Engagements.
3. The amount of the compensation an employee may receive from the Outside Speaking Engagements may not exceed the amount socially acceptable and customarily paid by the sponsor of such speaking engagements.
4. If employees wish to publish a book or an article relating to their professional knowledge which they gained through their work at the Company, they shall first discuss with their department managers regarding the content and publication timing of such a book or article. Employees shall make good faith efforts to respond to the manager's feedback, including postponing the publication and making revisions to the content thereof.

**Article 8. Employee Responsibility to Comply with this Policy**

1. Each employee shall understand and comply with this Policy. Any employee in violation of this Policy may be subject to Company disciplinary action and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report the violation through the Company's whistleblowing system.

**Article 9. Questions**

1. Employees should consult with Compliance Auditor for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. Compliance Auditor is a person that is entitled by the Company's management to implement the Code of Conduct in the company, to answer the questions to the topic and ensure that employees are familiarized with the process.



## **Fair Competition Policy**

### **Article 1. Purpose**

The purpose of this Fair Competition Policy (the “Policy”) is to establish standards employees must follow to promote fair competition as required by the Company's Code of Conduct.

### **Article 2. Definitions**

The terms used in this Policy will have the meanings set forth below:

1. **Compliance Auditor** is a person that is entitled by the Company's management to implement the Code of Conduct in the company, to answer the questions to the topic and ensure that employees are familiarized with the process.
2. **Director of Legal and Commercial Department:** the executive officer in charge of monitoring, supervising, and training to ensure the Company's compliance with the applicable fair trade laws.
3. **Legal and Commercial Department:** The department that supports the duties of the Director of Legal and Commercial Department.

### **Article 3. Scope**

This Policy applies to all Company employees and is recommended that business partners and other third parties doing business with the Company comply with this Policy.

### **Article 4. Contact with Competitors' Employees**

1. Employees shall refrain from any contact with the employees of competitors, including through private gatherings, emails, phone calls, and mails, if not necessary for the purposes of the Company's business execution. In the event such contact cannot be avoided due to personal or other relationships, employees shall not exchange information or opinions on prices, conditions of transactions, future product development plans, marketing plans, and other sales policies.
2. In the event employees plan to attend formal events such as business association meetings where the employees of competitors will be present, employees shall refrain from the exchanging the information or opinions on prices, conditions of transactions, future product development plans, marketing plans, and other sales policies and obtain prior approval from Compliance Auditor.
3. Compliance Auditor shall consult the matters with the Director of Legal and Commercial Department or Legal and Commercial Department and refer to their opinion when making decisions on whether to approve.

### **Article 5. Sales and Marketing Activities**

When performing sales and marketing activities, employees shall comply with the following:

1. Employees shall not give or offer to give illegal rebates to customers purchasing goods or services.
2. Employees shall not make unsupported and damaging statements about competitors to attract customers. Nor shall employees provide customers with false information about competitors, including their business situation, product functions, and technology.
3. Employees shall not force employees of the Company, its affiliates, or business partners to purchase or use goods and services of the Company or its affiliates.

**Article 6. Employee Responsibility to Comply with this Policy**

1. Each employee is required to understand and comply with this Policy. Any employee in violation of this Policy may be subject to disciplinary actions and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report the violation through the Company's whistleblowing system.

**Article 7. Questions**

1. Employees should consult with Compliance Auditor any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. Compliance Auditor may consult with the Director of Legal and Commercial Department or Legal and Commercial Department and refer to their opinion when replying to inquiries.

## **Integrity Policy**

### **Article 1. Purpose**

The purpose of this Policy is to set forth specific rules to promote honest and transparent business operations as required by the Company's Code of Conduct.

### **Article 2. Definitions**

The terms used in this Policy shall have the meanings set forth below:

1. "Interested Persons" means individuals and entities who may be affected by work done and decisions made by the Company, which includes the following:
  - (1) Any individual or entity that may be, directly or indirectly, advantaged or disadvantaged by the Company's business operations and decisions.
  - (2) Any individual or entity that is doing or seeking to do or has potential of doing business with the Company.
2. "Interested Employees" means the Company's employees who receive work orders from other employees or who may be, directly or indirectly, advantaged or disadvantaged by their actions or decisions.
3. "Gifts" means money, services, goods, stocks, bonds, lodgings, memberships, event tickets or anything of value which is given or offered for free or at a discount.
4. "Entertainment" includes meals, travel, lodging, hospitality, golf outings, and other financial favors or services.
5. "Compliance Auditor" is a person that is entitled by the Company's management to implement the Code of Conduct in the company, to answer the questions to the topic and ensure that employees are familiarized with the process.

### **Article 3. Scope**

This Policy applies to all domestic and overseas directors, officers, and employees of the Company. Third parties working with the Company are also encouraged to comply with this Policy.

### **Article 4. Prohibition on Improper Use of One's Position and Making Improper Requests**

1. Employees should never use their Company position or authority to obtain any improper benefit, whether for themselves or for any other person.
2. Employees should not make improper requests which may interfere with other employees' fair work performance, whether for themselves or for any other person.

### **Article 5. Conflict of Interest**

1. In each of the following situations, an employee should consult with and seek guidance from his or her supervisor or the head of the department:
  - (1) When the employee's work is directly related to the financial interests of the employee, his or her family, and/or close relatives.
  - (2) When the Interested Person is a family member or a close relative.
  - (3) When the Interested Person is the employee's former employer or former CEO.
  - (4) In all other situations where the relationship between the employee and the Interested Person may affect the employee's proper job performance.

2. When the supervisor or the head of the department receives a consultation request pursuant to Article 5-1, he or she should take appropriate measures to ensure proper job performance.
3. Executive officers and team leaders should submit an annual report listing the names of the individuals and entities covered under Article 5-1 ("Conflict of Interest Report").

#### **Article 6. Prohibition on Making Improper Requests for Favorable Treatment in Personnel Matters**

1. Employees may not, directly or indirectly, request line managers or HR managers to make improper favorable decisions on their personnel matters, including promotion, relocation, evaluation, and compensation.
2. Employees may not use their positions to improperly interfere with personnel matters of other employees, including their promotion, relocation, evaluation, and compensation.

#### **Article 7. Prohibition on Gifts and/or Entertainment**

1. Employees should not receive Gifts and/or Entertainment from Interested Persons. However, this prohibition does not apply, if such Valuables are:
  - (1) Provided in connection with the lawful rights of the employees (for example, money given to repay an existing debt obligation toward such employees);
  - (2) Meals, lodging and transportation which are reasonable and uniformly provided to every participant of a business-related event;
  - (3) Souvenirs or promotional gifts distributed to the general public; or
  - (4) Commensurate with legitimate and generally accepted local customs.
2. Employees should never receive Gifts and/or Entertainment from Interested Employees. However, this prohibition does not apply, if such Gifts and/or Entertainment are:
  - (1) Allowed under Article 7-1; or
  - (2) Modest and customary gifts of nominal value.
3. The prohibitions of Articles 7-1 and 7-2 also apply to employees' family and close relatives.
4. If employees have any inquiries regarding whether they may attend a certain event or receive certain Gifts and/or Entertainment, they should consult Compliance Auditor through their supervisors. If employees receive unsolicited Gifts and/or Entertainment which are prohibited under this Policy, they should submit a written report to Compliance Auditor through their supervisors and discuss how to handle such Gifts and/or Entertainment.

#### **Article 8. Prohibition on Giving Gifts and/or Entertainment**

Employees may not offer or give Gifts and/or Entertainment to other employees, their families, or close relatives who are prohibited from receiving such Gifts and/or Entertainment under Articles 7-2 and 7-3.

#### **Article 9. Recommendation regarding Loans**

Employees are recommended not borrow money or receive loan guarantees from Interested Persons or Interested Employees.

#### **Article 10. Special Personal Events**

1. Employees may not inform Interested Persons of the Special Personal Events. "Special Personal Events" is defined as events of personal significance, such as marriage, the death of a family

member, or the birth of a child in the extend exceeding the necessary information required by the relevant legislation or the societal norms.

2. Employees may not receive monetary gifts for their Special Personal Events from Interested Persons.
3. Employees may not receive gifts from any other employee where such gifts may be deemed excessive by social standards.
4. Employees must report to their supervisor and discuss with Compliance Auditor, (i) when they receive monetary gifts for the Special Personal Events from Interested Persons or (ii) when they receive gifts for the Special Personal Events from other employees where such gifts may be deemed excessive by social standards.
5. Employees shall not give return gifts to other employees, unless they are uniformly distributed to every guest at the Special Personal Events and do not exceed customary and reasonable limits.

#### **Article 11. Employee's Duty and Responsibility to Comply with Policy**

1. Employees are required to understand and comply with this Policy. An employee in violation of this Policy may be subject to Company's disciplinary actions and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; where allowed, they may report the violation through the Company's whistleblowing system.

#### **Article 12. Questions**

Employees should consult with Compliance Auditor for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.

## **Safeguarding Company Assets Policy**

### **Article 1. Purpose**

The purpose of the Safeguarding Company Assets Policy ("Policy") is to establish the specific standards to safeguard the Company's assets as required by the Code of Conduct.

### **Article 2. Scope**

This Policy applies to all domestic and overseas employees of the Company.

### **Article 3. Basic Principles**

1. Employees shall protect the Company's assets and use them only as determined and only for the Company's business or other permitted purposes (i.e. for the personal use as well when expressly permitted by the Company).
2. Employees shall not use the Company's assets for their own unauthorized benefit nor for the benefit of third parties.
3. Using for private purposes possible under the following conditions:
  - Not during working time
  - Not using company's SW
  - Acceptance of monitoring all activities conducted on company's HW

### **Article 4. Proper Use of Company Funds**

1. Employees shall use Company funds for Company business purposes only and shall refrain from misappropriating funds, for example, by embezzling or submitting false documentation.
2. Employees shall use corporate credit cards only to the extent necessary to carry out their professional duties. Employees shall not use Company credit cards for the following purposes:
  - (a) Unauthorized withdrawals of cash;
  - (b) Misuse through questionable merchants; and
  - (c) Personal expenses.

### **Article 5. Protection of Tangible Assets**

1. Employees shall comply with safety and environmental standards to prevent harm to persons and problems such as soil contamination and factory and building depreciation. In addition, employees shall follow relevant user manuals to ensure the safety of employees and proper working condition of machines and equipment.
2. Employees may use computers, printers, fax machines and other office equipment only to the extent necessary and only for purposes related to their job duties. Employees may not install, use, or store software programs, copyrighted works or other materials protected under intellectual property laws, without obtaining proper licenses or complying with applicable license terms. In addition, employees shall not engage in any conduct that may negatively affect the Company's data system.
3. Employees shall use office supplies and goods only for the purpose of carrying out their professional duties and shall not take them for personal use without permission.

#### **Article 6. Protection of Intangible Assets and Informational Assets**

1. Employees shall not improperly disclose the Company's informational assets, including trade secrets, to third parties. In addition, employees shall not use the Company's informational assets for other personal benefit than as permitted by the Company.
2. Employees shall comply with the Company's standards relating to the protection of informational assets and shall prevent the improper disclosure of them.

#### **Article 7. Employee Responsibility to Comply with This Policy**

1. Each employee is required to understand and comply with this Policy. Any employee in violation of this Policy may be subject to Company disciplinary action and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report through the Company's whistleblowing system.

#### **Article 8. Questions**

1. Employees should consult with Compliance Auditor for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. Compliance Auditor is a person that is entitled by the Company's management to implement the Code of Conduct in the company, to answer the questions to the topic and ensure that employees are familiarized with the process.



## **Internet Use Policy**

### **Article 1. Purpose**

Under the Code of Conduct, protection of corporate assets is the responsibility of all employees. The purpose of the Internet Use Policy ("Policy") is to provide guidelines for the appropriate use of the Internet by employees.

### **Article 2. Definition**

The terms used in this Policy shall have the meanings set forth below:

1. "Company's Information System" includes hardware, software, and networks which are used to collect, produce, process, preserve, search, and communicate information and data, thereby supporting the Company's business.
2. "Company Equipment" means laptops, desktop computers, mobile devices, removable storage devices, and other electronic devices using the Company's Information System which employees use for business purposes.
3. "Compliance Auditor" is a person that is entitled by the Company's management to implement the Code of Conduct in the company, to answer the questions to the topic and ensure that employees are familiarized with the process.

### **Article 3. Scope**

This Policy applies to all domestic and overseas employees of the Company.

### **Article 4. Basic Principles**

1. When using the Company's Information System or the Company Equipment, employees may use the Internet only to the extent necessary and only for business purposes.
2. Nevertheless, brief Internet use as well as drafting and sending personal emails are allowed, so long as such activities (i) are deemed reasonable and not excessive by social standards, (ii) do not interfere with employee job performance, (iii) do not adversely affect the Company, and (iv) are not prohibited under Article 5, Company policies or applicable laws.

### **Article 5. Prohibited Acts**

When using the Internet, employees shall not engage in the following activities:

1. Disclosing the Company's confidential information, including trade secrets;
2. Accessing or attempting to access informational assets of the Company or third parties without authorization;
3. Posting or sending statements or materials that may damage the Company's reputation or image;
4. Engaging in activities which may be false or may defame another person;
5. Engaging in activities which may infringe upon another person's privacy or personal data protection rights;
6. Searching or accessing illegal or inappropriate websites which contain obscenities, violence, terrorism, unlawful activities, or discrimination based on race, gender or age, while using the Company's Information System or the Company Equipment;

7. Downloading, installing, using, uploading or transmitting software programs, copyrighted content, or other content protected under intellectual property laws, while using the Company's Information System or the Company Equipment, without obtaining proper licenses or complying with applicable license terms;
8. Engaging in any other activities which are unlawful or considered inappropriate by society.

#### **Article 6. Security**

1. Employees shall exercise due care and diligence in ensuring security and confidentiality when using the Company's Information System and the Company Equipment.
2. Employees shall take appropriate protective measures to prevent malware (such as viruses, worms and spyware) from infecting the Company's Information System and the Company Equipment.
3. Employees should only use the Company's Information System and the Company Equipment in compliance with the Company's policies. In addition, employees must comply with the Company's security standards, including protecting their passwords.

#### **Article 7. Employee Responsibility to Comply with This Policy**

1. Employees shall understand and comply with this Policy. Any employee in violation of this Policy may be subject to disciplinary action and other necessary sanctions in accordance with the Company Policy.
2. Employees who are aware of a violation of this Policy shall report it to the Company; where allowed, they may report through the Company's whistleblowing system.

#### **Article 8. Questions**

Employees should consult with Compliance Auditor for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.

## **Corporate Culture Policy**

### **Article 1. Purpose**

The Code of Conduct prohibits improper words and conduct, including discrimination, sexual harassment, and offensive remarks, and this Corporate Culture Policy (the "Policy") and more specifically also ZD2011\_1 Bullying and Harassment in the Work Place, Issue No. 3, is intended to set forth specific standards and guidelines.

### **Article 2. Scope**

1. This Policy applies to the interactions between the Company's employees. It also applies to the interactions between the Company's employees and the employees of the Company's business partners, including subcontractors and suppliers, with whom the employees may come into contact in the course of employment.
2. This Policy applies to all work-related activities and situations considered to be work-related.
3. This Policy applies to behavior at any event directly or indirectly related to Company, such as social events hosted or sponsored by the Company.
4. It is recommended that employees explain this Policy to the Company's business partners, including subcontractors, and encourage their compliance with this Policy.

### **Article 3. Prohibition of Sexual Harassment**

1. Employees must not (i) make another person feel humiliation or antipathy by verbal or physical behavior of a sexual nature or (ii) put another person at a disadvantage in any employment matters (including but not limited to employment, promotion, evaluation and compensation) on the grounds of not submitting to verbal or physical behaviors or demands of a sexual nature ("Sexual Harassment").
2. The determination as to whether a particular behavior constitutes Sexual Harassment will take account of the surrounding circumstances as a whole, including the following:
  - a) The victim's subjective impressions;
  - b) The expected feelings and perspectives of a reasonable, objective person in response to the behavior at issue; and
  - c) Whether the behavior at issue may create a hostile and threatening work environment, thereby decreasing work efficiency and productivity.

### **Article 4. Other Types of Prohibited Harassment**

1. Employees must not engage in harassment or any other behavior that could be mistaken as such, including the following behaviors ("Harassment"):
  - a) Any discrimination on an improper basis, including sex, religion, disability, age, social status, place of origin, nationality, ethnicity, physical condition, marital status, pregnancy, parental status, family status, race, color, ideology, political affiliation, sexual orientation, education or health status.
  - b) Abusive or offensive words and behaviors which may violate another person's dignity; or
  - c) Repeated and consistent ostracizing of an individual from normal work interactions or bullying of an individual or a small group of employees.
2. Constructive criticism as well as legitimate supervisory or coaching actions made in response to employees' performance deficiencies or other workplace issues do not constitute Harassment.

#### **Article 5. Reporting of Harassment**

1. Employees who are aware of a violation of Articles 3 and 4 of this Policy shall report it to the Company; they may report the violation through the Company's whistleblowing system.
2. The Company may investigate and take appropriate action (including disciplinary action) in accordance with the relevant Company's regulation or policy when it becomes aware of incidents of Harassment, even if no formal report has been filed.

#### **Article 6. Questions**

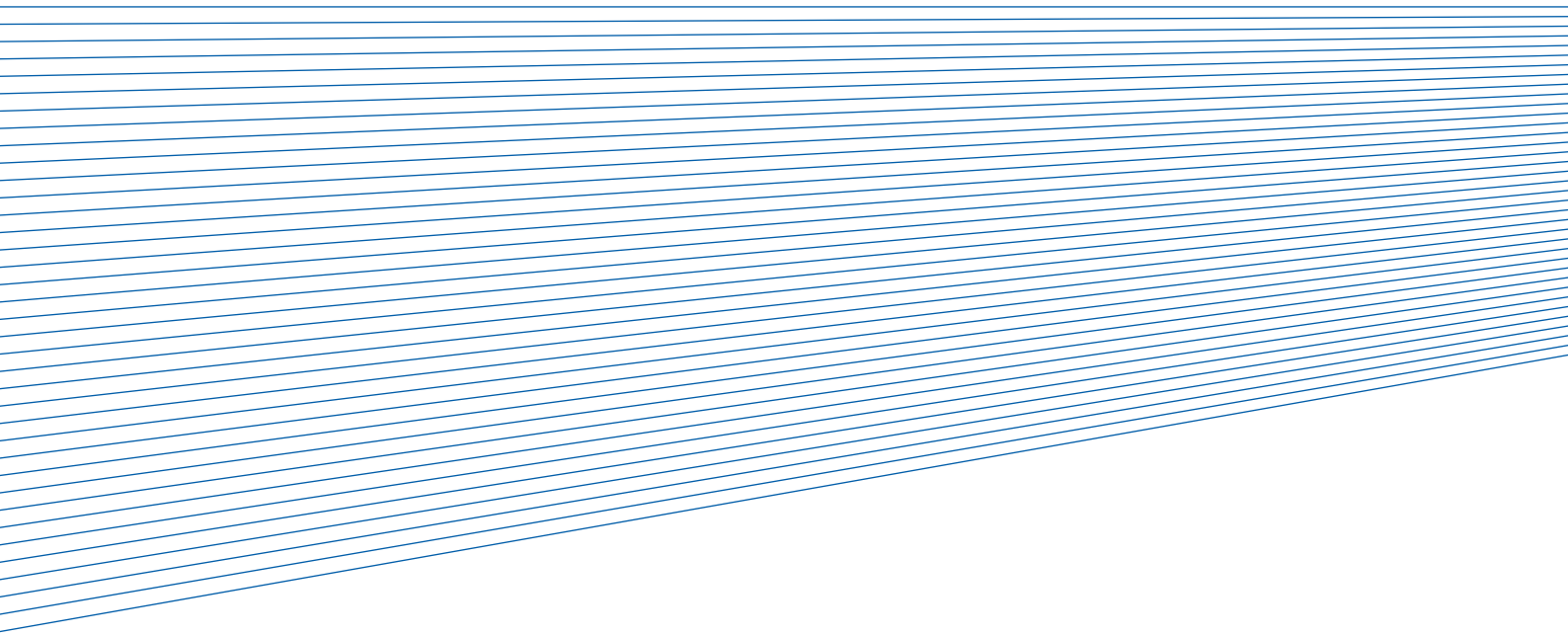
1. Employees should consult with Compliance Auditor for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. Compliance Auditor is a person that is entitled by the Company's management to implement the Code of Conduct in the company, to answer the questions to the topic and ensure that employees are familiarized with the process.

#### **Article 7. Final Provisions**

In case of specific inconsistencies with the ZD 2011/1 Bullying and Harassment in the Workplace, the content of ZD2011/1 is superior to the content of ZD2007/4 policy.

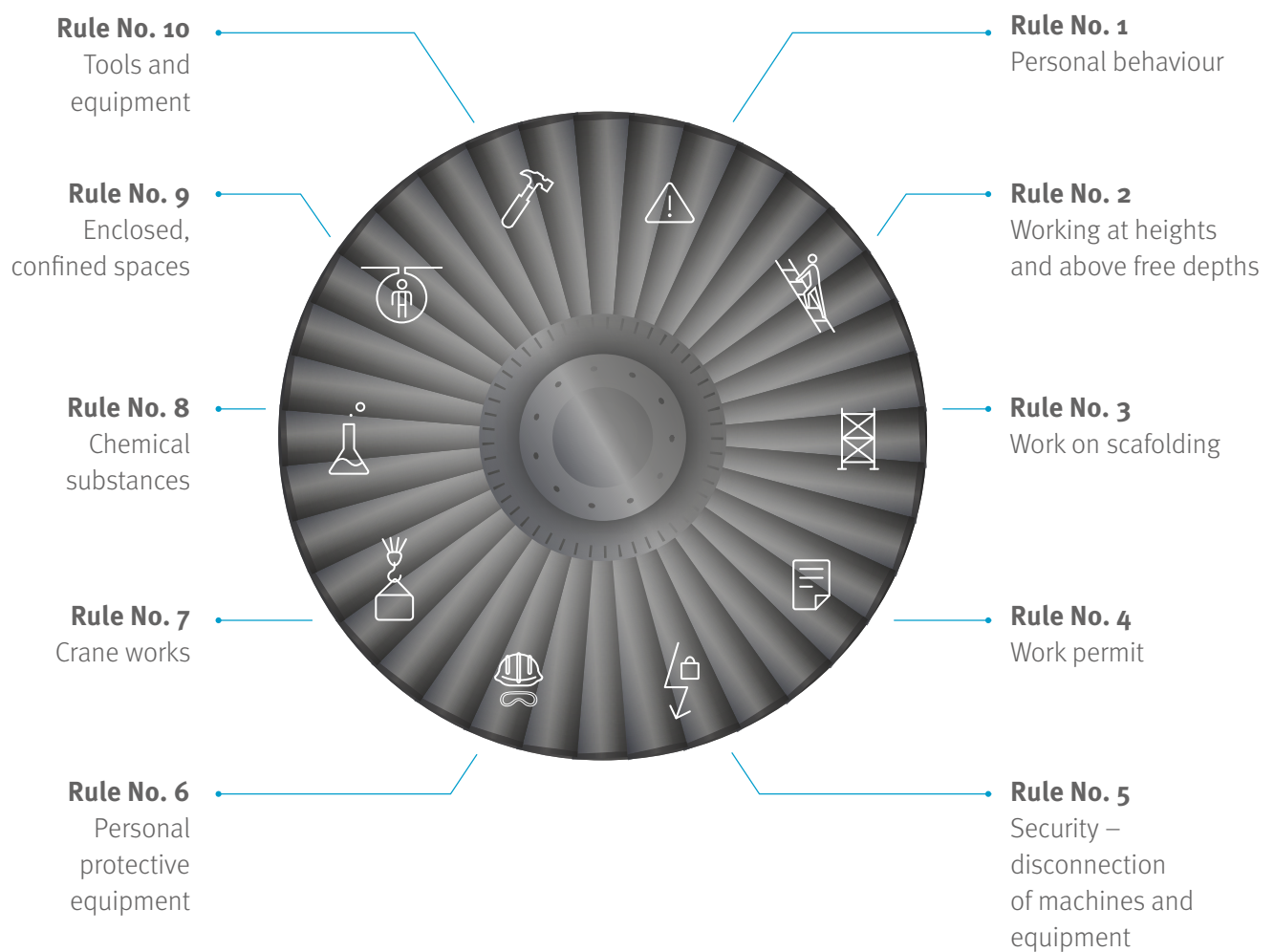
# Golden Rules of OHS



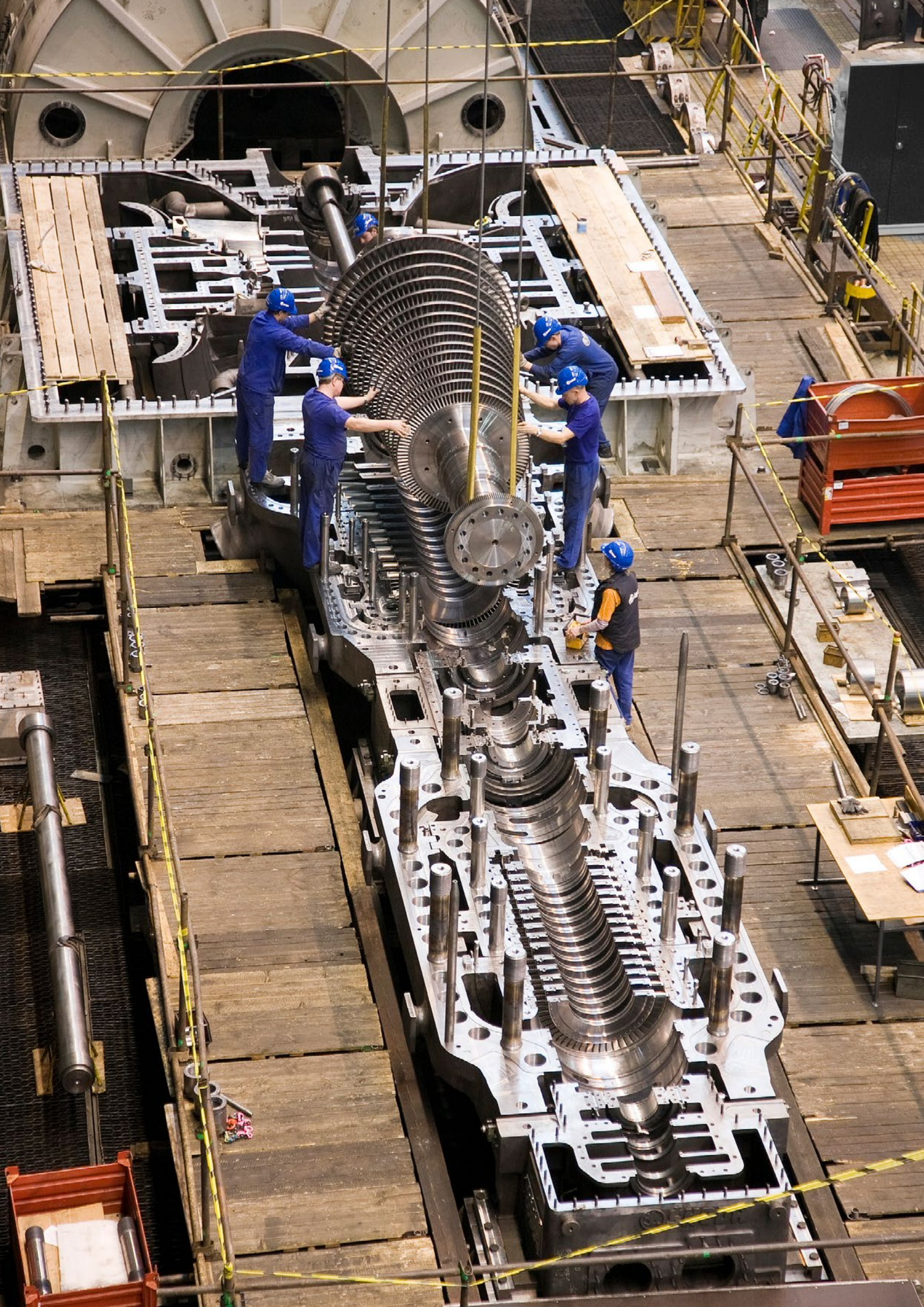




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# Golden Safety Rules



These GOLDEN SAFETY RULES are based on the best practices, legal requirements and global procedures and knowledge gained by our Company. These rules have been put together with the objective of regulating day-to-day behaviour and all activities performed by our employees, contractors and visitors.

The Golden Safety Rules represent key safety procedures used in our Company. These rules contain compulsory requirements related to our behaviour in order to prevent accidents. These rules are immutable, non-negotiable and must be respected by all employees, contractors and visitors at all workplaces of the Doosan Škoda Power Company.

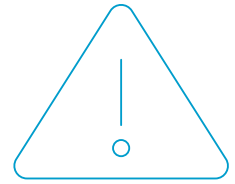
By complying with the Golden Safety Rules, you choose to protect yourself and others.

**Golden Safety Rules: your safety is in your hands!**

**Safety first.**

# Rule No. 1

## Personal Behaviour



Care about your own health and safety as well as the health and safety of other persons who are affected by your actions.

Use protective devices and equipment and do not put them out of operation. In addition to that, use prescribed personal protective equipment appropriate to the nature and type of work.

Use only the designated areas, paths and roads, entrances and exits when moving around the workplace.

Follow the instructions, bans and orders stipulated by the relevant safety signs and notices.

Follow the defined working procedures, use the given working equipment, means of transport, personal protective equipment and devices and do not change them or put them out of operation without good reason.

Do not consume alcoholic beverages or other addictive substances in the employer's workplaces or outside these workplaces during working hours; do not enter the employer's workplaces under their influence and do not smoke in workplaces or in other areas.

### During manual handling:

- Do not exceed the defined health limits.
- Apply the correct lifting technique.
- If possible, use mechanical aids.

Keep your workplace tidy.

Make sure that cables are safely placed and stored during and after their use.

Operate devices/equipment only if you are properly trained and authorized to do so.

When moving around manufacturing premises use only the designated corridors.

If you discover that there is something wrong with your equipment, machines or workplace, cease your work and ask for help..

When working in production, maintenance and logistic areas, do not wear rings, bracelets, wrist watches, necklaces or other accessories that could get caught in the moving parts of machines and/or devices.

If you have long hair (longer than neck-length) you must pin it up.

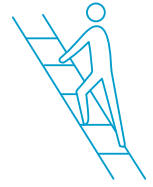
When walking up or down stairs hold onto the handrail whenever possible.

All dangerous incidents and injuries must always be reported.

Safe behaviour is the basis of the safety management system and the main means of avoiding all accidents.

# Rule No. 2

## Working at heights and above free depths

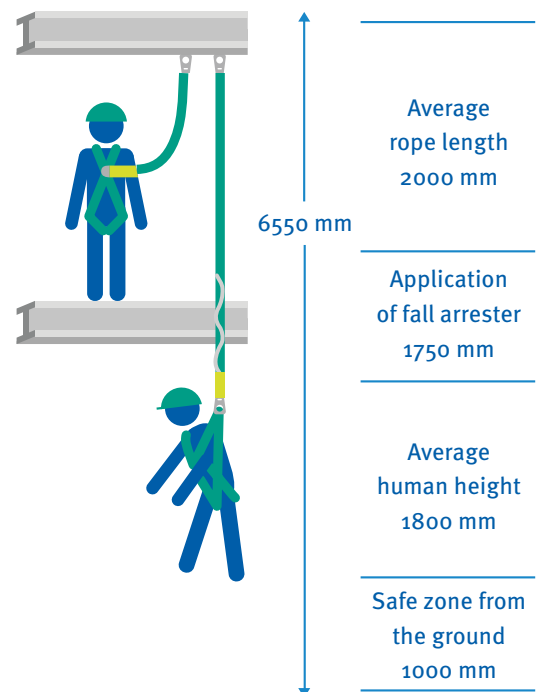


Employees must be protected from falling by collective or personal means regardless of the height in all workplaces and on roads/paths above water or other substances that pose a health risk and from a height of 1.5 m for other workplaces and roads/paths.

Fall protection is primarily ensured by means of collective protection (handrails, fencing, covers, temporary building structures). In order to ensure safety at heights and above free depths with a fall hazard (where collective protection is not used), always use personal fall protection equipment.

If you work in a fall hazard area with no collective protection such as handrails, fencing, side nets or other mechanical barriers, you must always:

- Be trained for work at heights and use personal fall protective equipment correctly.
- Know what personal fall protective equipment must be used and how to prevent a possible fall.
- Before using the PPE for work at heights make sure that the equipment is complete, not defective and in good working order.
- You must be acquainted with the pre-defined anchorage points. These anchorage points must be specified by a technological procedure or an employee checking work at heights



- You must have permission to work at heights outside the protective environment, which includes approved scaffolding, stairs, safety barriers and working platforms.
- It is always necessary to secure areas where there is the risk of persons or objects falling.
- Materials, tools and working aids kept or stored at heights must be secured to prevent them from falling, slipping or dropping down at all times.

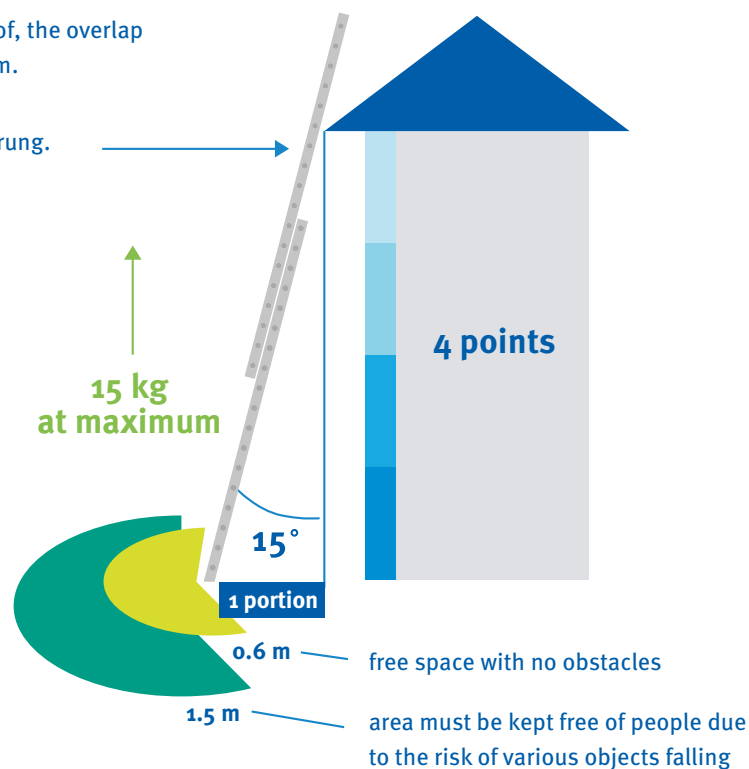
### When working on ladders:

- When working on ladders conduct only simple operations where you must be able to hold onto the ladder and have at least 3 limbs in permanent contact with the ladder.
- When working on ladders do not use electric or pneumatic tools and chain saws. For these purposes use mobile platforms, lifts or mobile or temporary structures and scaffolding. The yellow area must stay entirely free; the dangerous green area is always extended according to the height of work and the risk of objects falling to one third of the height. Pedestrians and other persons must not move around in this area.
- If you work on a ladder and stand with your feet at a height exceeding 5 m, you must be protected with personal fall protective equipment.

In order to climb over to the roof, the overlap must be either 3 rungs or 110cm.

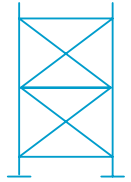
Step over to the roof from this rung.

A load weight of up to 15kg can be carried up.



# Rule No. 3

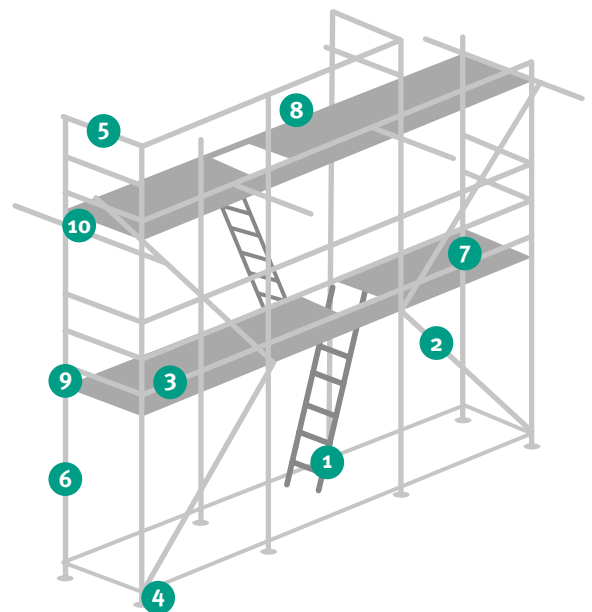
## Work on scaffolding



### When using scaffolding you must:

- Check the scaffolding before using it.
- Do not use unlabelled scaffolding.
- Do not modify the scaffolding in any way.
- Scaffolding must always be built on a sufficiently load-bearing base and to prevent it from slipping. It must create a spatially solid unit and be sufficiently firm and resistant to external forces.
- Check that there are upper and middle guard rails, stop boards and floor boards.
- Check that floor boards are fitted in such a way that their parts do not move and there are no dangerous gaps.
- Check that moving structures are secured against spontaneous movement.
- Use ladders to climb the scaffolding.
- Make sure you know the permissible safe workload at all levels of the scaffolding. Never overload the scaffolding above the limits stipulated by the manufacturer or contractor.
- Defects observed during inspections of the scaffolding must be immediately rectified by qualified employees.

1. Access path
2. Diagonal bar
3. Toe board
4. Adjustable footing
5. Top rail
6. Standard
7. Scaffold boards
8. Mid rail
9. Front toe board
10. Transom





# Rule No. 4

## Work Permit



The work permit is an official documented management procedure the basic objective of which is to:

- identify all hazards and assess the resulting risks before starting work,
- confirm that all measures are introduced in such a way that work-related risks are acceptable or residual risks are decreased to the lowest reasonably achievable level,
- fulfil the requirements of other regulations, including the duty to inform employees.

Work permits are issued for risk activities that can significantly influence safety in the workplace, e.g. welding, grinding, cutting with an angle grinder, work at heights with no collective protection, work in enclosed spaces, work with hazardous chemical substances etc.

Work permits stipulate how to behave correctly in order to maintain health and safety.

### **Before starting work you must always:**

- Be sufficiently medically fit (have a valid medical exam).
- Understand the work permit and follow the defined safety measures.
- Verify that the work permit is valid.
- Verify with an employee responsible for the given work that it is safe to start the work.
- Stop working if conditions defined in the work permit change.
- Leave the workplace in a safe condition after finishing work.

# Rule No. 5

## Securing – disconnecting machines and equipment



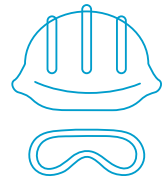
- Work with mobile or rotary machines or work in their vicinity can represent a threat to your safety. Protective safety equipment must operate correctly in order to ensure your safety. These include covers, stopper/multiple protection systems, disconnection or securing devices, warning devices, alarms etc.
- Disconnection and securing can save you from several risks, such as mobile machines, electricity, high-pressure liquids, hot/toxic materials/chemicals, gasses.
- Before starting any work on a device, make sure that it is secured/disconnected. Devices must be secured/disconnected so that only you can activate them after performing the required operations.

### You must always:

- Understand different methods of securing that can protect you from an injury.
- Check with a person responsible for the given work that the device has been secured.
- Check with a person responsible for the given work, such as installation, dismantling or maintenance, that it is safe to start work.

# Rule No. 6

## Personal Protective Equipment



All employees and employees of external organizations (contractors) are obliged to use the defined personal protective equipment (hereinafter referred to as PPE) in accordance with the workplace/activity risks before entering a workplace. Signs specifying the minimum equipment are displayed at the entrances to these workplaces.

Contractors are obliged to provide personal protective equipment, breathing protective equipment, personal protective equipment for work at heights or above free depths etc. in accordance with the assessed risks.

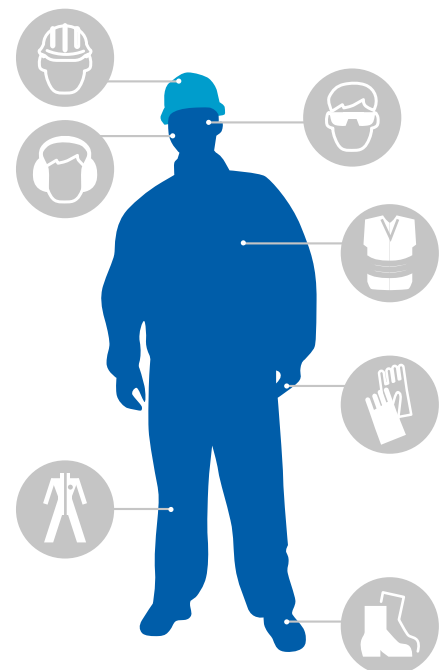
Contractors are also obliged to ensure they are used and conduct the defined inspections according to instructions manuals.

### Minimum equipment requirements for work at Doosan Škoda Power Company workplaces

- protective clothing with the visible company name
- protective footwear

### For work assessed as posing a risk, other requirements include:

- protective glasses
- safety helmet
- breathing protection
- hearing protection
- work gloves suited to the purpose of use (handling of chemical substances, manual handling of materials etc.)
- fall arrest equipment
- high-visibility vest with the company name



# Rule No. 7

## Crane works



A suspended load is an object that is temporarily lifted up and suspended above the ground. It is not safe to work or move under a suspended load because the load may fall on you. It is also important to observe a safe distance from the load depending on its weight and shape.

### **It is necessary that you:**

- Never enter the area and stay under a suspended load.
- Never cross a barrier delimiting the area with a suspended load without permission.
- Follow the instructions of the person responsible for lifting operations.
- Before starting lifting operations use only verified equipment that you visually inspect for damage before use.
- When lifting larger loads use a guide rope or other enabling you to get out of reach of a suspended load and safely direct the suspended load.

# Rule No. 8

## Chemical substances



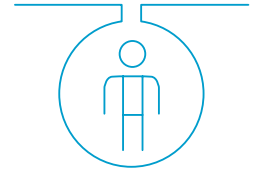
If it is necessary to work with chemical substances, ensure they have been assessed and approved. Assessment and approval are required when handling, storing and transferring hazardous substances. This provides protection from contact with chemicals that can cause serious harm or damage the environment.

### **In order to ensure safety, it is always required to:**

- Be acquainted with the dangerous properties of those chemicals you intend to use.
- Use personal protective equipment defined in safety sheets.
- Chemical substances and mixtures must always be stored in labelled and closed containers.
- Observe the ban on using containers from beverages, food and cosmetic products as alternative containers for chemical substances (e.g. oil, emulsion, paint, solvent etc.).
- When handling chemical substances and mixtures, you must not eat, drink or smoke.
- When storing chemical substances and mixtures, it is necessary to store acid and alkaline substances separately.
- Chemical substances and mixtures can be stored up to a maximum height of 1.8m.
- You must observe the storage conditions and instructions (temperature, pressure, closed/open warehouses etc.) defined on labels or in safety sheets.
- Chemical substances and mixtures must be stored in places designated for such purpose and in collection tanks.
- You must always eliminate sources of ignition (sparks, smoking, safety matches, naked flame, hot surfaces) when working with flammable and highly flammable substances.
- Flammable liquids must be used in well aired rooms.
- You must know the location of the nearest emergency kits in the event of a possible chemical leakage.
- In the event of an emergency, you must stop the device, prevent further leakages and report the emergency in accordance with the Notification Plan.

# Rule No. 9

## Enclosed, confined spaces



Enclosed spaces such as a boiler, a tank or pipeline can contain poisonous air, explosive gas or other hazards (e.g. lack of oxygen, objects that can fall on you or from which you can fall).

Safety is ensured by an approved and controlled entrance.

### Before entering closed spaces:

- Check with a person responsible for a given work that air tests have been carried out and that it is safe to initiate the work.
- Supervision through a so-called observer must be established.
- A method of communication among employees and an observer in enclosed spaces must be determined.
- Emergency measures must be in place to save people in enclosed spaces.
- Sufficient lighting and ventilation must be ensured.

### During the work:

- Sufficient equipment, including personal protective equipment, must be ensured.
- The atmosphere in confined spaces must be monitored using calibrated devices detecting the presence of gasses and oxygen levels..
- Communicate regularly with an observer = inspection of the communication system.
- Follow the defined work/rest regimes.
- Leave enclosed spaces immediately if you feel unwell and report the matter to a responsible person.

# Rule No. 10

## Tools and equipment



- All tools and equipment must be in good condition and must correspond to the nature of the work they are intended for.
- Tools and equipment must be visually inspected before their use to reveal any damage.
- With power tools, ensure that burrs and sharp edges are regularly removed and take wear and tear into consideration.
- If a tool/equipment is damaged during the work, ensure have it replaced immediately
- Electric tools may be used only after they have been carefully tested and their insulation checked.
- Do not work with electric tools until you are fully familiar with their operation.
- Electric tools must be switched off and fully stopped before they are put down.
- Do not remove any protective covers from the tools/equipment and do not try to adjust the tools/equipment in any way.



# Summary



I go to work “in good shape and fit for work” and I respect all the OHS, FP and E regulations.



I use fall protection and prevention all the time and in all cases where required by the Company standards.



I always inspect scaffolding before using it; I never use unlabelled scaffolding.



Before starting any work, I always check that I have all the necessary valid permissions.



I do not switch off safety devices and when working with the devices I follow the procedures to lock/disconnect them.



I respect all the occupational health and safety rules, standards and signals and I use the required PPE.



Whenever I handle a suspended load, I follow all the rules related to that work. I never stand under a suspended load or in its vicinity.



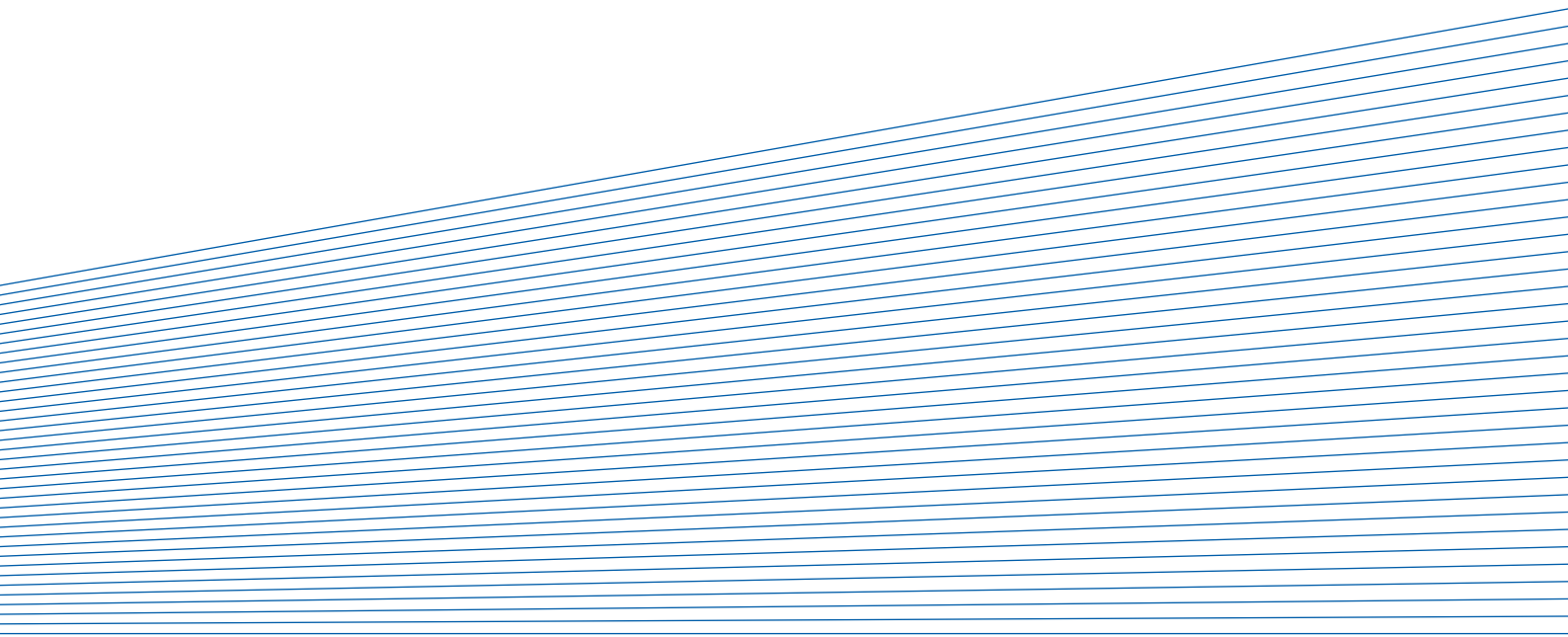
I work only with those chemical substances that have been assessed and approved for use. When working with chemical substances I use the required PPE and I have means for collecting leakages of chemical substances within easy reach.



When entering and working in confined spaces, I follow the rules for entering the confined spaces. I respect the rules valid for entering and working in spaces with a gas hazard.



When working with tools I always make sure that I have the right tools that are in good technical condition. I check that electric tools are properly certified.





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