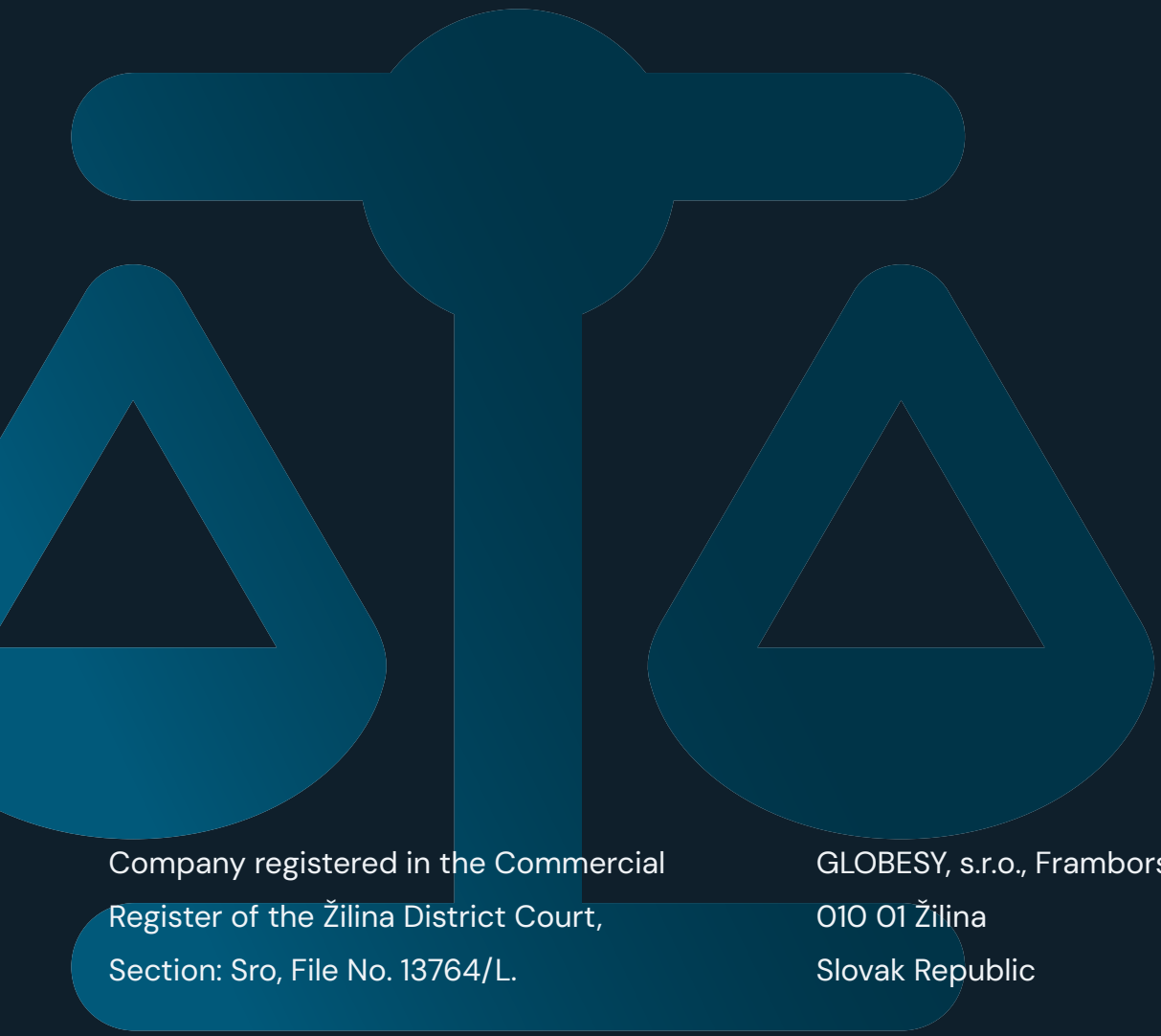
Code of Conduct

for GLOBESY, s.r.o
(hereinafter referred to as
“Code of Conduct”)

GLOBESY
human synergy

„Our core values include **professionalism, humanity, synergy, and being a trusted advisor**. We truly care about **creating synergy**, not only within the company but also in our dealings with our customers and suppliers.“



Company registered in the Commercial
Register of the Žilina District Court,
Section: Sro, File No. 13764/L.

GLOBESY, s.r.o., Framborská 58
010 01 Žilina
Slovak Republic

ADDRESS

Dear suppliers,

writing a code of conduct may be perceived as a mere formality. We do not see it that way. Since our beginnings, we have been doing all we can to make GLOBESY a symbol of IT driven by a sense of humanity. A world in which detached technology is balanced by the warmth of a human approach.

The principles of ethical behaviour are, therefore, one of the pillars of our identity, and we apply them not only in our relations with our customers and suppliers but also among our employees.

To further support, promote, and ensure compliance with business ethics, we present the **Code of Conduct for GLOBESY Suppliers**.

In the Code of Conduct, we commit to promote and respect the protection of internationally agreed human rights, to respect labour standards, to fight corruption, and to protect the environment. We also commit to treating our employees, customers, and partners with integrity and professionalism in all areas, thereby following the company's mission to be a **Trusted Advisor**.

We would like to encourage you to follow the principles of this Code and thus contribute to maintaining and enhancing an honest and responsible business environment.

GLOBESY requires that all suppliers, business partners, and other persons entering into any cooperation with GLOBESY, s.r.o. (hereinafter collectively referred to as "suppliers") conduct themselves in line with the general principles of the present Code of Conduct.

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STARTING POINTS OF THE CODE OF CONDUCT

The Code of Conduct of GLOBESY, s.r.o. is based, among other things, on the following sources:

- Constitution of the Slovak Republic – 460/1992 Coll.
- Commercial Code – 513/1991 Coll.
- Labour Code – 311/2001 Coll.
- Act on Illegal Work and Illegal Employment – 82/2005 Coll.
- Act on Equal Treatment in Some Areas and on Protection from Discrimination – 365/2004 Coll.
- Other labour legislation of the Slovak Republic
- Convention for the Protection of Human Rights and Fundamental Freedoms – 209/1992 Coll.
- Charter of Fundamental Rights of the European Union – Official Journal of the European Union 2016/C 202/02
- United Nations Global Compact – based on:
  - Universal Declaration of Human Rights of the United Nations
  - The Fundamental Principles and Rights of Workers of the International Labour Organisation
  - Declaration of the United Nations Conference on Environment and Development in Rio de Janeiro
  - United Nations Convention against Corruption
- United Nations Framework Convention on Climate Change – Official Journal of the European Union No. L 033
- CSRD Directive – EU 2022/2462 – Corporate Sustainability Reporting Directive
- Other international and national environmental legislation
- International Civil Law Convention on Corruption – No. 370/2003 Coll.
- International Criminal Law Convention on Corruption – No.375/2002 Coll.
- Act on Protection of Competition – No. 136/2001 Coll.
- Practical Guide of the Ministry of Justice of the Slovak Republic – Prevention of Corruption
- General Data Protection Regulation (GDPR) – Regulation (EU) 2016/679
- Act on Personal Data Protection – No. 18/2018 Coll.
- Other relevant legislation of the Slovak Republic and the EU

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PURPOSE OF THE CODE OF CONDUCT

Compliance with the Code of Conduct is a necessary prerequisite for mutual and transparent cooperation with GLOBESY.

It lays down the basic principles and rules of conduct of the supplier and their employees towards customers, business partners, co-workers, and the general public in fulfilling their contractual obligations towards GLOBESY.

It reinforces and promotes the ethical and moral values of employees in their mutual cooperation.

It also establishes GLOBESY's **stance and approach to the protection of human rights, the environment, and the fight against corruption**.

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APPLICATION OF THE CODE OF CONDUCT

The standards defined in this Code of Conduct **must be observed by both the supplier and their subcontractors** with whom the supplier cooperates in the provision of their services to GLOBESY.

The supplier is fully responsible for their subcontractors towards GLOBESY, and, therefore, the supplier is obliged to responsibly inform its subcontractors about this Code and to oblige them to comply with it in the performance of their duties towards GLOBESY.

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1. Compliance with Laws and Regulations

GLOBESY and its suppliers are **obliged**, regardless of the type and location of their activities, to comply with **all applicable laws and regulations**, be they European, international, or local legal standards.



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2. Acceptance of the Principles

GLOBESY is guided by principles that commit it to protecting human rights, creating good working conditions, promoting socially responsible business, combating corruption, and protecting the environment. These principles are fully in line with the principles of the **UN Global Compact:**

Our suppliers are also required to adhere to these principles, to act with integrity, to act without bias, to treat everyone with **dignity and respect**, to promote **diversity and equal opportunity**, and to **build an ethical and inclusive culture**.



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2.1. Human Rights

Principle 1: Promotion, respect for, and protection of human rights.

Principle 2: Vigilance and ensuring that we are not unwitting accomplices to human rights violations.

Human rights are inalienable to us. We must not forget that:

- Everyone has the right to life, liberty, and security.
- Everyone has the right to the preservation of human dignity, personal honour, reputation, and the protection of a good name.
- Everyone has the right to protection against unauthorised interference in private and family life.
- Everyone has the right to the protection of personal data concerning them.
- Everyone has the right to protection against the unauthorised collection, disclosure, or other misuse of personal data.
- No one may be made to do forced or compulsory labour.
- No one shall be subjected to cruel, inhuman, or degrading treatment or punishment.
- Everyone has the right to freedom of thought, conscience, religion, and expression.
- Everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and join trade unions for the protection of their interests.
- Everyone has the right to engage in work and to pursue a freely chosen or accepted occupation.
- Every worker has the right to working conditions which respect their health, safety, and dignity.
- Every worker has the right to limitation of maximum working hours, to daily and weekly rest periods, and to an annual period of paid leave.
- Everyone has the right to equal treatment and protection against discrimination.
- No one may be sexually or otherwise harassed, discriminated against, or incited to discrimination.

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2.1.1. Rules of Conduct in the Company's Working Environment

Employees, any interested persons or workers **must follow the basic rules of conduct** in the working environment:

- Employees shall perform their work in accordance with the Constitution of the Slovak Republic and other applicable laws and regulations, as well as in accordance with the provisions of this Code.
- Employees shall show respect to their supervisors, conscientiously, consistently and efficiently perform their assigned tasks, and be creative and innovative within the scope of their position.
- Supervisors shall treat subordinate employees with full respect and dignity, distribute work assignments reasonably and fairly, evaluate honestly, objectively and impartially, and not abuse the authority of the supervisor over subordinates.
- Employees shall work as a team, show respect and tolerance in their relations with each other, be willing to help other employees, create a good atmosphere, and avoid and not provoke conflicts.

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2.2. Human Labour

Principle 3: Respect for freedom of association and collective bargaining.

Principle 4: No tolerance of any form of forced labour.

Principle 5: Strict prohibition of child labour.

Principle 6: Discrimination of any kind is unacceptable.



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2.2.1. Prohibition of Harassment and Discrimination

- We are obliged to treat every employee with **respect and dignity** and not subject them to physical, sexual, psychological, verbal, or other harassment or abuse.
- We must not allow anyone to be discriminated against at work (whether in the recruitment process, in compensation, or in benefits, career development, appraisal, reprimand, dismissal, retirement, work duties, working hours, etc.) on the grounds of sex, race, age, marital status, colour, ethnic or social origin, genetic characteristics, language, religion or belief, political or other opinion, nationality or membership of a national minority, property, disability, sexual orientation, or any other ground.
- **We create a safe environment**, educate staff, encourage an open mind, and eliminate unconscious bias, especially in supervisors.



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2.2.2. Gender Equality

Equality between women and men must be ensured both in their employment and in their pay.



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2.2.3. Prohibition of Forced Labour and Child Labour

- Neither forced labour nor child labour shall be exploited or encouraged.
- The minimum age for employment must not be lower than the minimum age for completion of compulsory schooling – child labour is prohibited!
- There shall be no exploitation, threats, extortion or manipulation, nor shall there be withholding of wages or remuneration, nor shall there be confiscation or seizure of workers' personal property or documents.
- Under no circumstances shall an employer engage in or support human enslavement or trafficking.



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2.2.4. Prohibition of any Form of Complicity

- Complicity in the commission of a crime is **unacceptable and prohibited** regardless of the form in which it takes place, whether as direct complicity, beneficial complicity, or silent complicity.
- Supply chains and subcontracting arrangements must be carefully monitored.



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2.2.5. Working Environment and Working Conditions

- The working environment must comply with relevant legal requirements, be health and safety compliant, tolerate no threats, harassment, violence or discrimination, and promote social dialogue.
- Adolescents recruited shall be provided with working conditions appropriate to their age and shall be protected from economic exploitation or any work that could endanger their safety, health or physical, mental, moral or social development, or education.



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2.2.6. Working Hours and Remuneration

- An employee's working hours shall not exceed 48 hours per week or the maximum legal working hours in the relevant country.
- Remuneration shall be in accordance with the legislation and shall ensure a decent standard of living for the employee in the relevant country.
- Employees shall also be provided with all statutory benefits.



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2.2.7. Occupational Health and Safety

- Strict compliance with all applicable occupational health and safety legislation and standards is required.
- We place special emphasis on employee training and awareness raising.
- We assess risks and continuously take measures to prevent any occupational accidents and diseases.



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2.2.8. Freedom of Association and Collective Bargaining

We must not prevent employees from associating or joining trade unions, or prohibit them from collective bargaining. We respect employees' rights to freedom of association and collective bargaining.



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2.3. Environment

Principle 7: Promotion of preventive approaches to environmental challenges or problems.

Principle 8: Undertaking initiatives to promote greater environmental responsibility.

Principle 9: Encouraging the development and prioritisation of environmentally-friendly technologies.

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2.3.1. Personal Commitment

- Each of us has a responsibility to **protect the environment**, do our part in our work to contribute as much as possible to the restoration of a healthy environment, and minimise the negative impacts of our activities and lifestyles. Only by working together in synergy can we achieve positive change and halt the negative trends of today, which include climate change in particular.
- It is essential to comply with at least the basic principles of environmental care, for example:

Water

- Do not waste water; only let as much water out of the tap as you actually need.
- Use a dishwasher that you run only when it is full.

Plastics

- Minimise your use of plastics, e.g. polythene bags, plastic bags, disposable cups, cutlery, etc.
- Minimise your use of disposable food containers (takeaways); opt to consume food served directly on the plate or food brought from home in your own containers.
- Prefer clean drinking water from tap or water dispensers instead of plastic bottles.

Paper

- Minimise printing of documents, prioritise electronic form.
- If printing documents is essential, use duplex printing.

Air

- Use non-motorised transportation as much as possible (bicycle, walking, scooter).
- Optimise the use of vehicles – if more than one person is travelling in the same direction, they can carpool.

Electricity

- Use mainly daylight to illuminate your interior.
- Prefer energy-saving LED bulbs in your light fixtures.
- Remember to turn off lights in rooms where no one is present or use motion sensor lights, e.g. in toilets, corridors, and stairwells.

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2.3.1. Personal Commitment

Waste

- Encourage recycling and separate waste – paper, plastic, glass, beverage cartons, metal, electronics, and bio-waste.
- Aim to reduce bio-waste, do not waste food, as there are millions of people in the world who do not have any.
- Batteries and accumulators must not end up in municipal waste.
- Dispose of toners (refills for laser printers and photocopiers), cartridges (i.e. refills for inkjet printers), and large appliances by taking them to collection sites or boxes or by taking them back to the manufacturer or retailer or by taking them to the person responsible for waste disposal in your company.
- Do not litter outdoors or anywhere else. Litter belongs in bins and containers only.

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2.3.2. Preventive Approach, Risk Management

- We must systematically employ risk assessment, risk management, and risk communication.
- Where there are threats of serious or irreversible harm, the lack of full scientific certainty must not be used as a reason to postpone cost-effective measures to prevent environmental degradation.
- Where there is a reasonable suspicion of harm, decision-makers must apply precautionary measures and consider the degree of uncertainty arising from the scientific assessment.
- Deciding on an “acceptable” level of risk must involve not only scientific and technological assessment and economic cost-benefit analysis but also policy considerations such as public acceptability.

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2.3.3. Sustainable Development Promotion

Sustainable development is one that meets the needs of the present generation without compromising the ability of future generations to meet their own needs.

To achieve sustainable development, it is essential to reconcile three key elements: economic growth, social inclusion, and environmental protection.

Environmentally-friendly technologies, as defined in Agenda 21 of the Rio Declaration, should protect the environment, pollute less, use all resources in a more sustainable way, recycle more of their waste and products, and manage their residual waste in a more acceptable way than the technologies they have replaced. They include a variety of cleaner production processes and pollution prevention technologies, as well as end-of-line and monitoring technologies. In addition, they include know-how, processes, goods and services and equipment, as well as organisational and management practices.

- Together, we support sustainable development and strive to participate in the achievement of the UN Sustainable Development Goals.
- We only work with suppliers who comply with the relevant laws in their location, share our values and are committed to building increasingly sustainable practices, products, and solutions.
- We strive to deliver meaningful innovations and create continuous improvement programmes.
- Employees support the development and deployment of environmentally-friendly technologies.

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2.3.4. Environmental Responsibility

- Our company's vision, policies, and strategies embrace and promote sustainable development – economic prosperity, environmental quality, and social justice.
- We monitor and evaluate progress in incorporating sustainability principles into business practices, e.g. through environmental management systems.
- We ensure transparency and impartial dialogue with the parties involved.
- GLOBESY, s.r.o. holds the ISO 14001 environmental management system certificate, with recertification every three years.
- We also encourage our suppliers to be committed and certified in areas of environmental management.
- Companies covered by the Corporate Sustainability Reporting Directive (CSRD) are required to report sustainability information.

  The CSRD integrates measures to achieve the objectives of the European Green Deal and the Sustainable Finance Action Plan. It introduces a system for assessing the impact of environmental, social, and corporate governance on a company's economic activities.

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2.4. Fight against Corruption

Principle 10: We do not tolerate corruption; it is unacceptable in all its forms.



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2.4.1. No Corruption is Tolerated

- We conduct ourselves with integrity at all times and build trust in all working and business relationships.
- We do not tolerate any form of corruption, in any degree, from the slightest influence peddling, bribery, to institutionalised bribery.
- We prevent corruption and proactively develop anti-corruption policies to prevent corruption in anyenvironment and interaction, in particular:

- We create and foster an anti-corruption environment.
    - For example, we eliminate redundant formal procedures in our business and promote transparency and open communication at all levels of the organisation.
- We raise employee awareness and strengthen their integrity!
    - For example, we organise training on integrity principles, ethical conduct, conflict of interest, corruption prevention, and zero tolerance for corruption.

Note: Integrity is a key ethical value that relates to honesty, truthfulness, and consistency of character. Integrity represents honest and ethical behaviour, whether or not it is observed by others.

- We encourage whistleblowing on corruption and unethical behaviour in the organisation.
    - We provide whistleblowers with the assurance that they will be protected, kept anonymous, and that reporting will not cause them personal hardship or negative repercussions at work or among colleagues.
- We pay adequate attention to the actions of our employees and those of our business partners and suppliers.

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2.4.2. Anti-Corruption Policy for Employees

- Employees must be aware of the importance of their attitudes and statements to public opinion. Their behaviour contributes to the creation and consolidation of the reputation of the employer and the local authorities, in particular by setting a positive personal example in their attitudes towards public affairs and public officials.
- Employees, any interested persons or workers must follow the anti-corruption policies:

  - They shall not misuse their employment, position, profession, or office for their own benefit or for the benefit of another person.
  - They shall not offer, give, or accept bribes or any undue advantage, either directly or indirectly (through third parties); nor encourage others to do so.
  - They shall not solicit or accept gifts, favours or other benefits which could genuinely, or even apparently, influence the decision in a matter or impair impartiality or judgement in a decision, impair professionalism, or which could be considered remuneration for the work which is their duty. Nor shall they induce third parties to provide gifts which might interfere with the proper performance of their duties.
  - They shall not avoid and deal appropriately with situations in which their own interests might conflict with their work duties, commitments, or responsibilities.
  - They shall deal with situations where corrupt conduct is identified or suspected, in accordance with the law, with the employer's designated person or directly with the competent law enforcement authorities.

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2.4.3. Avoidance of Conflicts of Interest

- In all our business relationships, we are obliged to avoid conflicts of interest or any situation that could give the appearance of one.
- Our suppliers are obliged to inform us of any situation that could lead to a conflict of interest, or that creates a conflict of interest.
- Employees, any interested persons or workers must not initiate or encourage these actions:

  - Inappropriately influence any employment process, in particular recruitment of new employees, promotion of employees, remuneration of employees (e.g. favouring family members, friends), etc.
  - Favour suppliers, business partners, and customers with whom they have a friendly or family relationship.
  - Influence and manipulate public or commercial competition in favour of oneself or one's family.
  - Harm their employer in a competitive environment by their actions for their own benefit.
  - Use GLOBESY's corporate property and facilities, including email accounts and the GLOBESY brand name, for personal gain.



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2.4.4. Receipt of Gifts and Hospitality

- Gifts and hospitality may only be accepted if they do not pose any risk of undue influence and are appropriate, e.g. as a common business courtesy and as a thank you for previous cooperation – Christmas and New Year gifts, promotional marketing items, etc.
- We ask our suppliers not to provide or accept any offers, gifts, or hospitality that are intended to influence the recipient's decisions. Before offering or accepting any such offer or gift, our suppliers must verify that they are not in violation of the recipient's internal policies or applicable laws and regulations.
- Offering gifts and hospitality to government officials and political parties requires particular care. Some countries have specific restrictions on the value and nature of gifts and hospitality that can be accepted by their officials. Even small gifts of food or hospitality could be seen as attempts to improperly influence decision-making.
- Gifts and hospitality are given with no expectation of return, or reciprocity.
- Gifts in the form of cash, vouchers, stocks, bonds, commissions, or other monetary values are not acceptable under any circumstances.



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2.4.5. Fair Competition

- We must not engage in any activity that restricts, distorts, or prevents competition. We observe all rules of lawful competition in our activities and business endeavours.

  - We must not enter into agreements that restrict competition.
  - We must not abuse any dominant market position.
  - We must not create illegal business mergers that could significantly affect competition.

- Do not engage in any negotiations with competitors that may constitute illegal anti-competitive behaviour, e.g. on the following topics: pricing policy, launching a new product or service on the market, sharing or dividing markets, refusing to supply customers, coordinated access to suppliers, distributors, or customers.
- We must not attempt to obtain advantages through fraudulent behaviour and improper means or allow others to obtain them in this way, e.g. information about competitors through friends.
- Company employees must not act (or encourage others to act) in breach of their duties or seek to obtain undue advantage for the company.

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2.4.6. Prohibition of Dishonest Schemes

- All business practices must be transparent.
- It is prohibited to declare false or fictitious statements or to receive and make unreported payments.
- Company employees and contractors must not falsify, conceal, or destroy financial or other records to avoid investigation or discovery during legal proceedings.
- Company employees must not issue or participate in the issuance of false documents concealing improper payments or illegal, unethical conduct. Such conduct may qualify as a criminal offence.

In support of the fight against corruption, GLOBESY, s.r.o. shall report any identified and verifiable suspicion of corruption to the relevant government authorities. It commits itself to act with integrity and in accordance with the fair functioning of the market economy. Its behaviour will in no way jeopardise the general trust in public institutions, the undermining of which threatens the foundations of democracy.



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3. Confidentiality and Data Protection

GLOBESY is committed to processing and protecting sensitive data about its business partners and customers, whether of a confidential or personal nature, in accordance with applicable legislation, GLOBESY's internal policies, and any contractual obligations.

Confidential data - refers to data and information within the meaning of trade secrets, telecommunication secrets, the Classified Information Protection Act, and also data designated as confidential by its owner.

Personal data - refers to data within the meaning of the EU Regulation (GDPR) and the Personal Data Protection Act.



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3.1. Data Security

- Suppliers are obliged to protect personal and confidential data, in accordance with legislation relating to the protection of personal data and information, from unauthorised access, destruction, misuse, alteration, and disclosure by using appropriate and adequate technical and organisational security measures.
- The supplier is also obliged to comply with and be in compliance with the processing contract insofar as such a contract relating to the personal data processing has been concluded between GLOBESY and the supplier.
- Data may only be processed for specified purposes. The purpose and means of processing are always determined by the data controller.
- It is forbidden to use the data outside the specified scope and to disclose it to third parties without the prior written consent of GLOBESY or the controller of the relevant data.
- Employees shall treat the data obtained in the course of their duties with due diligence and responsibility, provide appropriate protection, and comply with the security procedures and measures of which they have been made aware. The burden of proof for the provision of security and data protection awareness to employees, as well as for compliance with the processor's contract, shall be borne by the employer.
- Suppliers are obliged to immediately report to GLOBESY every personal data breach and every security incident, as well as identified vulnerabilities that relate to the processing of personal data for GLOBESY and its customers.

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3.1.1. Personal Data Processing only by Authorised Persons

- Personal and confidential data shall only be handled by **authorised persons** who have been expressly authorised to process personal data, e.g. by an employer, by an authorisation based on a processing contract, etc.
- Authorised persons may only carry out authorised processing operations with personal data and only on the basis of written instructions from the employer or the controller.
- Authorised persons are obliged to comply with the internal rules and directives of the controller governing the protection of information and the security of information systems when working on the controller's premises and facilities.
- Authorised persons are obliged to **immediately report** to GLOBESY a **breach of data protection**, including accidental access to personal data, regardless of who caused the breach.



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3.1.2. It is Expressly Prohibited

- To process the data provided and/or obtained through work activities for purposes other than those specified in advance.
- To process personal data without written instructions from the controller or processor.
- To process personal data for longer than is necessary to achieve the lawful purpose of data processing.
- To carry out processing operations other than those required and intended, e.g. arbitrarily rectify, erase, or restrict the processing of personal data.
- To make arbitrary backups and copies of personal data without the knowledge and without the consent or instruction of the controller/processor. If backups are necessary, they must be encrypted.
- To transfer any data to a third party or outside the EU and EEA or to an international organisation without the prior written consent of the data controller.
- To create malicious code and/or use harmful computer programmes (malware).
- To provide login credentials (access) to an unauthorised person to access the information systems of the data controller.
- To create duplicates or copies of means of access.

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3.1.3. Security Incidents Management

- **Employees are required to comply with all established security measures** for the protection of personal data and the security of the employer's IS.
- Employees are also required to strictly follow the employer's health and safety and fire protection procedures for accidents, malfunctions, and other emergencies.
- Employees are required to immediately report any security incident or identified information system vulnerability to the employer and take prompt corrective action in accordance with the employer's security procedures.
- The employer is obliged to keep a record of security incidents and the solutions applied, as well as to take additional measures to prevent security incidents.



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3.2. Confidentiality

- Every employee is obliged to **maintain the confidentiality, secrecy, and commercial and telecommunications secrecy** of all business data and information with which they have become acquainted in the course of their employment and work activities.
- The confidentiality obligation shall continue indefinitely, i.e. even after termination of employment.
- If the employee is entitled to access classified information on the basis of a security clearance under Act No. 215/2004 Coll. on the Protection of Classified Information, they shall be obliged to comply with this Act and with all the obligations of an authorised person under Section 37 of this Act. GLOBESY employees are also obliged to comply with the GLOBESY Directive on the Protection of Classified Information.



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4. Protection of the Company's Reputation

Reputation is a core intangible asset and a valuable business value of GLOBESY, for which we are all jointly and equally responsible.

Employees not only represent themselves but also act as representatives of the company through their behaviour, actions, presentation, and appearance. For this reason:

- Every employee **shall be mindful of GLOBESY's reputation and protect its interests**. They shall, therefore, behave in such a way as never to damage GLOBESY's reputation.
- **Suppliers and their employees are also obliged to take care of GLOBESY's reputation** and to behave and present themselves and us in such a way as to promote GLOBESY's good reputation.



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4.1. Building Good Relations

The company GLOBESY builds its business relationships on mutual trust, respect, transparency, and a professional approach. It expects the same approach from its suppliers in all business activities.



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4.1.1. Business Relations with Suppliers and Customers

- In our business activities, we adopt an **honest, fair, and responsible** approach towards our suppliers and customers.
- Through the principles of mutual respect and trust, we create mutually beneficial business relations based on discretion and courtesy without any favouritism or discrimination.
- Satisfying the needs and interests of the customer is a prerequisite for a successful and lasting business relationship.
- We create equal and transparent conditions for all our business partners, use only legitimate business methods and treat information from suppliers and customers as confidential.
- We create a safe working environment for business partners and their employees who carry out activities on our premises.
- We comply with the agreed terms and conditions. In the event that, due to extraordinary circumstances, we cannot meet the agreed terms and conditions, we will initiate negotiations with the business partner as soon as possible in order to seek an alternative solution.

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5. Code of Conduct Compliance

Compliance with this Code of Ethics is a fundamental prerequisite for cooperation with suppliers. GLOBESY supports compliance with the Code through mechanisms for reporting identified non-compliance and submitting concerns, by conducting appropriate controls and audits of suppliers, and by taking appropriate corrective measures where violations are identified.



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5.1. Non-Compliance Notifications and Enquiries

If you have any questions, suspect a violation of this Code of Conduct, or have any enquiries, please contact GLOBESY, s.r.o. at contact@globesy.sk or by mail at Framborská 58, 010 01 Žilina.



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5.2. Supplier Audit

- GLOBESY reserves the right to control the implementation of the provisions of the Code of Conduct by the supplier and to subject the supplier to an audit, either directly or through an external company or organisation acting on behalf of GLOBESY.
- Suppliers are obliged to provide all necessary information upon request.
- In the event that it is suspected that suppliers doing business on behalf of the company have violated this Code of Conduct, an investigation will be carried out as part of an internal process.



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5.3. Procedure in Case of the Code of Conduct Violation

Violations of individual points of the GLOBESY Code of Conduct may be classified as:

- Minor breach of the Code of Conduct
- Serious breach of the Code of Conduct
- Unlawful conduct

Minor and serious breaches of the Code of Conduct will be dealt with at the level of GLOBESY's management by way of warning and correction, i.e. if the supplier or any of its own (sub-) suppliers fails to comply with the requirements set out in this Code of Conduct, the supplier must take appropriate measures to remedy such misconduct and prevent its recurrence in the future.

GLOBESY reserves the right to terminate the business relationship with any supplier who persistently deviates from this Code of Conduct or violates it in a serious manner.

In the event of discovery of illegal behaviour by a supplier, GLOBESY shall proceed in accordance with the applicable criminal law of the Slovak Republic.

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Conclusion

GLOBESY strives to achieve the highest ethical standards in order to be a truly trustworthy employer and partner for its employees and business partners.

However, success can only be achieved through joint synergy, so let's help each other and behave ethically towards one another.

This Code of Conduct for GLOBESY, s.r.o. Suppliers shall enter into force on 01.10.2026.

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Prehľad verzií dokumentu

Verzia 1.0 účinnosť od 01.01.2023

Verzia 2.0 účinnosť od 01.01.2025

Verzia 3.0 účinnosť od 01.10.2026

Document owner: Head of Sales and Marketing Department

Document approved by: Ing. Martin Valúch, GLOBESY, s.r.o. Managing Director

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