
MCCARTER'S COMPANY CODE OF ETHICS

Motivation

Product Innovations

Objective

Team

Respect

Trust

Success

Future

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Dear colleagues, dear fellow workers,

One of the key factors of recognition and success is teamwork, communication, respect and identification with values that are reflected in the particular behaviour. Our Code of Ethics is not just for reading, first of all, it is designed for our everyday life. We are all part of a top work team, but none of our achievements would be worthwhile if we ourselves were not the ones our partners, customers, consumers or co-workers can fully trust. The mirror of our greatest achievement is the responsible approach to work, as we represent it ourselves daily by our actions, approach and decisions, not only at work but also in private life.

Each of us has the right to be treated with dignity and respect and the same is expected of each of us. Respect and responsible approach to their responsibilities.

***Each of us is an important piece of McCarter.** We want to offer working conditions where we can grow in personality and work. Our Company offers us the right to work where we can find our way to a successful future and satisfaction. But every right also entails responsibility and appropriate behaviour. With our Code of Ethics, we receive a document that will always support and help us to orient ourselves in view of expected behaviour and actions.*

Ethical behaviour is the foundation of trust in both business and society. We promote corporate culture based on the principles of trust, respect, openness, teamwork as well as sense of belonging and pride of employees of the Company. In order to ensure confidence, we need to act with integrity and fairness towards all parties concerned, both internal and external ones. Our efforts will be credible only if we ourselves abide by the laws, the rules, if we act responsibly, with integrity, with respect, honestly, fairly, reliably and responsibly.

Best regards



Ing. Radoslav Prepik
General Manager



CODE OF ETHICS

P - McCarter, a.s. - 01

Version: 01

Valid from: 10 January 2020

Valid for: the whole company

WHAT IS A CODE OF ETHICS?

The Code of Ethics aims to identify with the ethical values that define decent and fair behaviour of co-workers. Co-workers means all persons working in the McCarter Company.

The Code promotes ethical and professional behaviour to preserve McCarter's integrity and credibility, ensuring that our rights and those of our partners are respected. It also creates a fair and impartial working environment for our entire team. The ethical conduct is of key importance for the successful establishment of the Company in the market, its long-term functioning and economic interests.

Compliance with the Code is binding on all employees and co-workers. It is their responsibility to maintain and provide for the observance of the conduct described in the Code.

WHAT IS THE GOAL OF OUR WORK? HOW DO WE WANT TO WORK?

These seemingly clear questions cannot be answered simply.

Our answer to the first question is teamwork and corporate vision:

"We will be a leader and an innovator, not just a manufacturer. We will be one of those who gives directions and sets out trends in the market, a trendsetter. Our goal is to be the most respected company in the beverage industry in the region of Central and Eastern Europe."

The second question, "How do we want to work?", is exactly dealt with by this Code of Ethics, which builds heavily on the Company's corporate values:

- Teamwork
- Trust
- Innovation
- Entrepreneurial spirit
- Performance

These values describe what should characterize us in our negotiations with third parties, but especially with other colleagues in our Company. They are also the basis for our Code of Ethics.



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The Company's good reputation and trust in it by its employees, as well as all parties involved, are among the most important values of the Company that the Company governs and builds on them. As a general rule, we work to build trust in people. Trust is the basis of any cooperation. While trust building is a long-term and demanding process, we can lose it almost immediately.

Our Code of Ethics shows us how we can build and gain trust in our daily work. Misconduct may mean frivolous hazard with the trust of our partners, customers or public.

Ethical behaviour is the basis of trust and in business as well as in society itself. Our Code contains guidelines concerning the compliance with the law, human rights and ethics, along with our commitment to implement ethical and socially responsible business practices. For us, sustainability means a corporate commitment to the balanced integration of economic, environmental and social factors in our day-to-day business operations.

WHOM THE CODE OF ETHICS CONCERNS TO?

The Code of Ethics is binding on all McCarter employees: from members of statutory bodies and managers to employees. It also applies to persons whose job description is equivalent to the work performed by McCarter employees, such as, e.g. contractors. All employees of the Company are obliged to act in accordance with this Code of Ethics, to maintain high moral standards in their work and business conduct. In order to ensure trust in the company, employees should be honest and fair to all internal parties concerned as well as to external parties. Everyone is obliged to adhere to the Code, to act in accordance with its content and to be aware of the fact that its violation qualifies as a violation of the internal conditions of employment.

Ethically and legally correct behaviour is the individual responsibility of each person. The environment must support such behaviour in such a way that business results *shall not be* superior to the honest approach. In other words: we want to achieve our goals and behave in an exemplary and responsible way.

It is the duty of every manager to act as a role model for employees through his/her behaviour and conduct. Managers must also ensure that employees are aware of and adhere to the Code of Ethics.



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In case of intentional violation of the set rules, we will take action under the relevant laws and regulations. In order to be aware of instances of such behaviour, we want to create the environment in which employees will be able to draw attention to misconduct without fear of negative consequences.

HOW TO ACT IN ACCORDANCE WITH THE CODE OF ETHICS - EMPLOYEE BASIC OBLIGATIONS

- read the Code of Ethics
- express your consent in writing, that you have read the Code of Ethics, you have understood it and you will act in accordance with it
- act in a manner that is ethical and in accordance with applicable laws, rules, regulations, values and goals of the Company
- collaborate in ethical investigations or during the audit for compliance with regulations

Our employees realize that the profit, growth and success of the Company are beneficial to every employee and therefore fully strive to achieve them. Every employee of our Company is a top expert in his/her position and wants to look for opportunities to innovate things, processes and his/her own performance.

EXPECTATIONS OF MANAGERS

- personally commit to values in every decision-making as well as in personal behaviour,
- to set an example in ethical behaviour and conduct which complies with the rules in order to develop and maintain a culture of ethical conduct,
- make every effort to ensure that the Code is known and that its requirements are disseminated and properly understood,
- continuously monitor compliance with ethical behaviour,
- pay attention to sexual harassment in the workplace and contact the human resources department immediately in case of first signs
- support employees who raise questions in good faith,
- ensure that employees who raise questions or talk about problems are never subjected to any form of repression,
- act in accordance with standards of ethical conduct when assessing the performance of their subordinate employees,
- immediately to report problems with failure to comply with the rules, requiring investigation

Every employee is acquainted with the Code of Ethics at the beginning of his/her employment. When supplementing, changing the Code of Ethics, employees will be notified by an e-mail, in writing and managers will be notified in person at a personal meeting with the Human Resources Department Director. The Code of Ethics is available in writing at any time upon request in the Human Resources Department, displayed on the notice boards: in Bratislava, at the Company lobby in Dunajská Streda, at the Finance Department, in the dining room, in the kitchen for production employees and on the board of the Logistics Department.

OUR VALUES

McCarter's values should be a motivation for each employee so that they can offer the best of their work:

- **Teamwork.** Team spirit and cooperation, pulling "one rope." Mutual respect, fairness, communication and teamwork are the foundation of our success.
- **Trust.** Trust is the basis of any cooperation.
- **Innovation.** New ideas to develop and strengthen our market position. Innovations are the engine of our Company and our success.
- **Entrepreneurial spirit.** Understanding and grasping the idea: "of ownership of the Company" because if I am productive, the Company will perform well and so will I.
- **Performance.** It is a key factor in our individual and group success and the centre of our requirements.

HUMAN RIGHTS

Other values to which we are committed are adherence to legislation, human rights and ethics, to conduct socially responsible business.

We commit ourselves to respect the human rights of each of the parties involved and, on the contrary, we ask that the parties with whom we cooperate to respect the human rights of others. These rights include civil, economic, political, social and cultural rights, in particular the following:

- the right to life,
- the right to human dignity,

- the freedom and security of persons,
- the right to justice and favourable working conditions,
- the right to a fair wage and a life with dignity,
- the right to an adequate standard of living,
- the exemption from all forms of forced or compulsory labour,
- the exemption from human labour,
- the exemption from discrimination,
- the freedom of opinion, religion,
- the right to rest and leisure,
- the right to form and join trade unions and the right to collective bargaining

SEXUAL HARASSMENT

Each employee is fully responsible for his/her actions and should therefore behave in such a way as to protect the legitimate interests of the Company and his/her colleagues and not to misuse or degrade the McCarter's reputation and public standing. On the outside, s/he tries to act positively, s/he does not degrade co-workers or partners - each employee behaves in accordance with good morals.

Relations within the Company are based on the *respect* and *dignity* of each person. Everyone who works for our Company is obliged to respect their colleagues, behave in accordance with the principles of mutual trust, ethics and cooperation and create the atmosphere of positive mutual communication. Every employee strives to create the positive atmosphere at their workplace and in their work environment.

At McCarter, a.s. we are committed to providing the working environment based on mutual trust in which everyone working for or with McCarter, a.s. is treated with dignity and respect. McCarter, a.s. shall not tolerate harassment or any other acts, actions or behaviour that is degrading, abusive, intimidating or hostile. Every employee or people in our supply chain and in our wider communities have the right to be treated politely and with respect. Sexual harassment and defamation or insulting are considered serious violations of human dignity.

WHAT TO DO:

- Always respect and preserve the dignity of others.



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- Build relationships in the workplace, in business spheres and in communities based on openness, trust, mutual recognition and support.
- Try to create and maintain pleasant and cooperative atmosphere in the workplace and in our business and social relationships.
- Follow community social standards as long as they do not violate our ethical principles.
- If you are concerned about someone's behaviour, do not hesitate to talk about it, explain him/her why you object and ask him/her to stop such behaviour.

BEWARE OF:

- Do not scare or humiliate others physically or verbally.
- Never act so that you will insult or offend someone, do not behave adversely to someone.
- Never make inappropriate jokes or comments of a racial, ethnic, religious or sexual nature or those which impinge on disability or age.
- Do not distribute nor display offensive, aggressive or defamatory materials or images.
- Never sexually harass colleagues with unwanted sexual offers, sexual service requests, sexual references or gestures or behaviour that are sexually offensive in any other way.
- Never make false statements about others nor spread harmful defamation, defamatory or discriminatory information in any way.

INFORMATION AND DATA PROTECTION

All employees of our Company are obliged to protect information belonging to the Company or related to our business interests. The confidentiality of this information also applies to the period after the termination of employment of an employee in the McCarter Company.

Our Company respects the privacy of employees, customers and suppliers and therefore commits to protect their personal data. All personal data shall be processed in accordance with the Regulation (EU) of the European Parliament and of the Council on GDPR and with the Act No. 18/2018 on Personal Data Protection.

Our business activities have an impact on the environment. Therefore, we commit ourselves to improve our influence and environmental impact through preventive measures, applied technologies and means friendly to the environment. All our employees are obliged to work in accordance with good morals and with laws, regulations relating to environmental protection.

CODE OF ETHICS FOR OUR BUSINESS PARTNERS

At McCarter, a.s. we are determined to do business in the right way and we are committed to ethical behaviour and integrity. We expect the same commitment from our business partners.

The Code of Ethics for business partners contains standards of conduct that we consider extremely important in business relations. We strongly believe that our business partners will adhere to the Code of Ethics for business partners.

Our business partners include suppliers, service providers, consultants, other contractors of the McCarter, a.s. company. We expect them to adhere to standards of business ethics, in particular:

- ETHICAL VALUES - we expect our business partners to adhere to the Code of Ethics and the values described therein, in particular: responsibility, compliance with the laws, integrity, respect for others, honesty, fairness, reliability.
- HUMAN RIGHTS - business partners must respect the following human rights during their business activities, in particular: right to life and human dignity, personal freedom and security, right to the highest attainable standard of health, right to fair working conditions, right to a fair wage and decent life, right to an adequate standard of living, prohibition of all forms of forced, compulsory or child labour, freedom of opinion and religion, right to rest, right to leisure and right to regular paid leave.
- FAIR EMPLOYMENT PRACTICES - Company business partners must not tolerate any form of forced, compulsory or child labour. They also undertake to implement a fair employment and pay policy in accordance with applicable legislation.
- HEALTH PROTECTION, SAFETY AND ENVIRONMENTAL PROTECTION - business partners must as well as McCarter, a.s. comply with all relevant regulations on health, safety and environmental protection.
- EQUAL TREATMENT AND EQUAL OPPORTUNITIES - business partners must not discriminate against anyone on the basis of anything that is not related to job performance (gender, marital or parental status, age, ethnic origin, colour, religion and political beliefs, disability or sexual orientation).
- HARASSMENT AVOIDANCE - business partners must avoid behaviour that can be characterized as offensive, intimidating, degrading, harmful, sexually harassed or aggressive



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- COMMUNICATION - business partners are expected to adhere to the highest standards of behaviour in any oral and written communication based on mutual trust.
- PRODUCTS AND SERVICES - our suppliers must strive to deliver a quality, safe and reliable product or service. Suppliers must deliver the highest quality and maximum reliability that can be expected for a given type of product or service. At the same time, they undertake to deliver them on time, to provide every customer with true, reliable, accurate and comprehensive information and not to worsen the quality of its supplies intentionally or unintentionally.
- PERSONAL DATA PROTECTION - business partners of McCarter, a.s. must respect the privacy of people and respect the laws on the protection of personal data within the meaning of the Regulation (EU) of the European Parliament and of the Council on GDPR and with the Act No. 18/2018 on Personal Data Protection. Obtain and store only such personal information as is necessary for the performance of their activities and must provide them with appropriate security measures to protect the confidentiality of personal data, their integrity and availability.
- INFORMATION SECURITY - business partners must process information concerning other business partners as confidential, in accordance with the relevant provisions on confidentiality of information. Business partners shall take appropriate security measures to ensure the confidentiality, integrity and availability of information. Business partners must respect that valuable and confidential ideas, strategies and other types of business information that have been developed or developed by McCarter, a.s., they represent the Company property and in some cases are protected by intellectual property rights.
- PREVENTING CORRUPTION - business partners must operate without any form of corruption or bribery, including brokerage and fraud. This commitment also includes the rejection of an offer to gain any advantage and the rejection of any attempted corruption by or on behalf of their employees, organisations or intermediaries for the purpose of tampering or fraud.
- TRUE ACCOUNTING - business partners must not jeopardize the transparency of any financial statements and reports and must always act in accordance with legal and ethical accounting practices.