

Code of Ethics at NMS, s.r.o.

Preamble

The company NMS, s.r.o. was established in 1999. We are a team of more than 150 experienced professionals who are among the top in their industry. In solving metrological tasks, we use many years of experience gained around the world. Thanks to the most modern mobile technologies, we create innovative systems for measuring 3D dimensions. We are always ready to address customer requirements, whether it is quality control, digitization, or dimensional measurement.

NMS s.r.o. declares a commitment our corporate values to all business activities, to act in the spirit of ethical principles and to respect generally accepted rules, laws, and business principles. At the same time, all subsidiaries undertake to conduct their business in an ethical and lawful manner, in accordance with the principles and vision of the parent company.

The Code of Ethics is a set of principles, standards and requirements that are binding on everyone who has decided to work in the company's corporate environment, accept values, adhere to established regulations and meet common goals.

This code was approved by the management of NMS s.r.o and its values are enforced by the entire company.

Purpose of the Code of Ethics

The Code of Conduct is based on the company's values and visions and states what the company expects from employees and what its commitments are to them. The Code of Ethics addresses various aspects of human behavior and sets out its general areas, not just in society.

Fairness, stability, security, trust, and reputation are the most important values of the company. Through personal morality, each of us participates in the creation, promotion, and protection of these values. He thus shows respect for his co-workers, superiors, subordinates, customers, suppliers, and all other partners of the company with whom he comes into contact.

The purpose of introducing a code of ethics into corporate life is to:

- bringing the corporate culture closer to new employees, the wider company, and the competition,
- acquainting new employees about rules, standards, and principles of conduct,
- representing the company brand and spreading the good name of the company in the business environment and the public.

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1. Compliance with Laws

As an international company with suppliers and customers all over the world, NMS, s.r.o. bound by international trade laws and sanctions and complies with applicable laws and other legal provisions of the countries in which it operates. NMS, s.r.o. in particular complies with all regulations of customs laws and trade embargoes. All employees involved in the export and import of goods are obliged to comply with the applicable economic sanctions, export and import regulations.

2. Integrity and Business Ethics

Bribery and corruption are detrimental to democratic institutions and good ones Corporate governance. They prevent investments and distort the international conditions of competition. In particular, the diversion of funds through corrupt practices undermines the drive of citizens to improve their economic, social and environmental well-being, and it also undermines poverty reduction efforts. Businesses have an important role to play in combating these practices. Honesty, integrity and transparency in both the public and private sectors are fundamental to combating bribery, taking bribes and extorting bribes.

2.1 Corruption, bribery, money laundering

Doing business with integrity also means that NMS, S.R.O. never directly or indirectly avails himself of bribery or offers, promises, grants or demands other unjustified advantages in order to obtain or keep an order or any other undue advantage.

It is noted that we may only give and receive gifts or hospitality of modest value that meet certain requirements. NMS, S.R.O. employees are prohibited from accepting payments or other inappropriate types of gratuities from third parties. While promotional items made by a permanent and clearly visible Designation of the advertiser or the manufacturer of the product are marked in Generally acceptable, cash, gift cards, or other cash equivalents will always be unacceptable.

Corruption and bribery within the meaning of the relevant UN convention are strictly rejected. Transparency, acting with integrity and responsible management and control in the company are promoted in a suitable manner.

NMS, S.R.O. undertakes to only work together in the course of combating money laundering with customers who have a good reputation and who carry out legitimate business with legitimate financing.

2.2 Fair competition

NMS, S.R.O. pursues clean and recognized business practices and fair competition. In competition, it is geared towards professional behavior and quality work. It maintains a partnership and trusting relationship with the supervisory authorities.

2.3 Conflicts of Interest

Managing directors and employees of NMS, S.R.O. must regulate their private and other external activities and financial interests in such a way that this does not conflict with the interests of NMS, S.R.O. stands. Our employees are obliged to make their business decisions in the best interests of the company and not on the basis of personal interests. Conflicts of interest arise when employees pursue their own activities or personal interests at the expense of the company's interests.

The employee has to communicate any personal interest that might exist in connection with the performance of his official duties to his manager.

No employee may have private assignments carried out by companies with which he has business dealings in the course of his work for our company, if this could result in advantages for him. This

applies in particular if the employee has or can influence the commissioning of the company directly or indirectly.

Other points of conflict can arise from business relationships with or interests in a competitor or customer as well as secondary activities by employees that prevent them from performing their duties with us in a dutiful manner. It is important that all employees recognize and avoid any conflicts of interest that may arise in the course of their professional activity.

2.4 Secondary activities

This also applies to secondary activities that could represent a competitive situation for our company. The responsible manager must be informed about taking up a sideline job for a fee and requires prior written consent.

3. Communication and protection

As part of your job, you have access to many of the company's assets, both tangible and intangible. This includes our buildings, facilities, materials, income, technologies, information and our intellectual property. Although limited personal use of certain Company assets is permitted, you should use our assets primarily for business purposes. You are obliged to protect our assets from loss, damage, theft, unauthorized or improper use and waste.

NMS's intellectual property and confidential information are among our most valuable assets. We expect that you use good judgment in the use of these assets and take all necessary precautions to protect them from disclosure. By securing our intellectual property and confidential information, you are helping to protect our brand and maintain our good reputation.

3.1 Disclosure of information and confidential information

As an NMS employee, you may have access to material, non-public information about the company, our customers, or other companies with whom we do business. Material, non-public information can be positive or negative and affect virtually all aspects of the company's business, including information about the company's financial position, its strategic plans (including acquisitions) or other matters. All such information must always be kept confidential and must not be disclosed without the prior consent of the Legal Department.

Confidential information includes, on the one hand, information about NMS that is not publicly known or information provided by NMS and, on the other hand, information about or from customers or suppliers of NMS, which may only be passed on to persons with a legitimate interest in the information for the given purpose. All employees are obliged to comply with the provisions of the information security policy as well as the information classification and information security guidelines of NMS.

All information that has not been made available to the public is subject to a certain level of confidentiality, as specified in the NMS Information Classification and Information Security Policy, and may not be disclosed to third parties. This obligation of every employee to treat information about NMS confidentially remains in effect even after the employment relationship or engagement with NMS has ended.

3.2 Transparent disclosure of information

All documents and documents must be compiled (in particular for financial transactions), which are unchanged or protected and supervised.

3.3 Correct and complete financial documents

Our owners, employees, and the public rely on our financial information to make decisions about our business and investments. In addition, laws and regulations require that we keep accurate books and records.

Fraud occurs when information is intentionally hidden, changed, falsified or omitted for your own benefit, for the benefit of others or for the benefit of the company. Fraud, regardless of whether it is for your own benefit or for the benefit of the company, is unjust and can result in disciplinary action, up to and including termination of the employment relationship.

We all have a responsibility to watch for and report any signs of fraud. This also applies to situations that could allow fraud. Corporate fraud can degrade our assets and damage our productivity, brand image and work ethic.

3.4 Protection of information

The business and business information of the partner should be sensitive and vertically treated. In the framework of business activities, customers and suppliers have vertical or protected information for the use of or. reports NMS, S.R.O. Additional information on information. The extraordinary information is only available under the requirements of the Board of Directors, and the parties concerned have a summary. NMS, S.R.O. provide the obligation to provide vertical information for the purpose of the procedure.

3.5 Privacy and personal data

The company collects personal data from suppliers, customers, consumers, employees and other third parties in the course of its business activities. This data, either alone or in combination with other collected data, enables a specific person to be uniquely identified, for example by combining the name with the address or a national identification number. We are committed to the responsible handling of all personal data in accordance with all applicable data protection laws and regulations. We restrict access to personal data and protect this data from loss, misuse, unauthorized access or disclosure, alteration or destruction. The company respects employee privacy, but reserves the right to inspect its facilities and property as permitted by local law. This includes computers, phone connection data, lockers, emails, files, business documents and workspaces. Employees should not expect privacy when using the services and equipment provided by the company, except as required by applicable law. We also inform people about whom we collect personal data about the use of their personal data, insofar as this is required by applicable laws. Die unbefugte Erhebung, Verarbeitung und Weitergabe personenbezogener Daten von Mitarbeitern und Geschäftspartnern ist verboten.

3.6 Protection of intellectual property

NMS, S.R.O. Respects the copyrights, patents, trademarks and licenses of third parties, including those of our customers, competitors and suppliers, t. that is, NMS, S.R.O. uses his own ideas for his work and never copies the work of others without mentioning the author or obtaining a legal permit or license from him.

NMS, S.R.O. seeks to identify and prevent the risk of counterfeit parts entering the supply chain by implementing effective methods and processes. We expect our suppliers to perform and maintain these procedures.

Employees are strictly prohibited from copying software, authorizing copying, or using copied software without the express written consent of the copyright holder. The same goes for trademarks, logos and

Trademark. NMS, S.R.O. ensure that the terms of the contracts with the hardware suppliers are not violated. This applies in particular to patent rights, copyrights, trademarks and licenses.

3.7 Counterfeit parts

We implement and maintain methods and procedures to reduce the risk of counterfeit parts and materials being used in our products. We use effective procedures to detect counterfeit parts and materials, to inform the recipients of counterfeit products, if warranted, and to exclude them from the products to be delivered.

3.8 Reporting / protection against retaliation

In order to create awareness that points to abuse, we create a culture without fear of negative consequences for the individual. Employees are encouraged to seek advice and support without fear of retaliation or retaliation. Reports of violations of the Code of Conduct are treated as strictly confidential. Actions or retaliation against anyone who reports a suspected misconduct or violation are strictly prohibited. They are neither disadvantaged nor afraid of being fired.

3.9 Whistleblowing

In order to be comprehensible when it comes to error, gestures are a culture that frees up the negative consequences for individual purposes. Employees can also provide, if they are not interested in penalties or repressions and support. Amendments to the extensions against the Code of Conduct should be treated vertically. Measures or regulations are imposed on persons who have had their claims or losses in question. You will be able to use it, but you will have to ask a question.

Reporting misconduct takes courage. However, if you are aware of this and fail to report it, you are violating our Code and are not giving us an opportunity to resolve the matter or resolve the issue. If you feel uncomfortable talking to your manager, or if your manager is involved in the violation, you can contact any of the other resources listed. Please do not wait for the problem to get worse. Report this immediately.

Anonymous reports are accepted when permitted by local law. In some countries, local law restricts the types of concerns that can be reported through the employee hotline. After a report has been made, and unless otherwise required by law, the third party provider will refer your concerns to the company's compliance department for resolution. All reports are handled sensitively and promptly. Your confidentiality and anonymity will be preserved as much as possible in accordance with the applicable laws, regulations or ordinances.

3.10 Protection Protection from retaliation

In our work environment, all employees must feel free to report known or suspected misconduct or violations without fear of retaliation. Any action or retaliation against any person who, in good faith, reports an actual or suspected violation, or participates in an investigation, is strictly prohibited.

We take every single report seriously, respond promptly and, if necessary, conduct a comprehensive investigation. We are all expected to cooperate fully with an investigation when asked to do so. In these cases, we must always provide truthful and complete information.

“IN GOOD FAITH” means truthfully reporting any information about an issue that we believe violates our Code, corporate policy, or law. Even if we only suspect that wrongdoing is taking place or has taken place, we should bring it up. As long as the report has been made honestly, it is okay

if it turns out that we were wrong. Anyone who does not make a report in good faith will face disciplinary consequences.

4. Human resources development

We care about creating and maintaining job opportunities, thus contributing to economic growth, and raising the living standards of the whole society. We take steps to stabilize and professionalize our employees. We are aware of the importance of building a company brand and identifying employees with their employer. Therefore, we support their professional and personal development in all available forms.

In employment relations, we comply with the Labor Code, as well as all other general binding legal norms. We hire and deploy employees without discrimination against individuals, while considering qualifications, expertise, experience, personal prerequisites, and loyalty.

4.1 Human rights

Companies should, within the framework of internationally recognized human rights, the international human rights obligations of the countries in which they operate, and relevant national laws and regulations:

... respect human rights, which means that they should avoid violating the human rights of others and face negative effects on the human rights in which they are involved.

... prevent, in the context of their own activities, causing or contributing to negative effects on human rights and address those effects when they occur.

... endeavor to find ways and means to prevent or mitigate negative effects on human rights that are directly related to their business, products or services by virtue of a business relationship, even if they do not contribute to these effects.

NMS, S.R.O. is committed to promoting human rights. It upholds human rights in accordance with the UN Charter of Human Rights, in particular the following:

4.2 Privacy

NMS, S.R.O. is subject to various ordinances on data protection and general data protection law and observes these in particular when collecting, storing, processing, transmitting and passing on personal information.

4.3 Harassment and extortion

Protection of employees from corporal punishment and from physical, sexual, psychological or verbal harassment or abuse, regardless of whether they come from colleagues, superiors or business partners.

4.4 Freedom of Expression

Protection and granting of the right to freedom of expression and expression.

5. Working Conditions

NMS, S.R.O. undertakes, within the framework of the applicable laws and regulations as well as the existing employer-employee relationships and employment practices, as well as the applicable international labor standards:

Respect the right of employed workers to form or join trade unions and representative bodies of their choice, to appoint unions and representative bodies of their choice to be represented in collective bargaining.

To contribute to the effective abolition of child labor and to take prompt and effective action to ensure the prohibition and elimination of the worst forms of child labor.

To contribute to the elimination of all forms of forced or compulsory labor and to take reasonable steps to ensure that forced or compulsory labor does not exist in their business.

As part of its activities by the principle of equal opportunities and treatment in the Employment to be directed and towards their workforce in relation to employment or Profession to refrain from any discrimination on grounds of race, skin color, gender, religion, political opinion, descent or social origin or any other status, unless the policy of the state concerned expressly provides for a selection of workers according to certain criteria with the aim of achieving a larger workforce Achieving equity or selection is related to inherent job requirements.

To take appropriate measures to ensure health and safety in the workplace as part of their activities.

5.1 Prohibition of child labor

NMS, S.R.O. rejects all child labor and the exploitation of children. We take measures to protect children and young people and adhere to the recommendation on the minimum age for the employment of children, according to which the age should not be less than the age at which compulsory schooling ends, and in any case not under 15 years. NMS, S.R.O. will never knowingly do business with customers, suppliers or other business partners who violate this policy.

5.2 Forced labor and human trafficking

Forced labor of all kinds and human trafficking are carried out by NMS, S.R.O. not tolerated under any circumstances. All work must be voluntary and without the threat of coercion.

5.3 Remuneration

Compliance with labor standards with regard to remuneration, in particular with regard to the level of remuneration, is carried out in accordance with the applicable laws and regulations. All legally required benefits are granted to employees. Deductions from wages as punitive measures are not permitted. We ensure that employees receive clear, detailed and regular written information on the composition of their pay.

5.4 Employee Rights

Respecting the right of employees to freedom of association, assembly and association, insofar as this is legally permissible and possible.

5.5 Working hours

NMS, S.R.O. is aware of its responsibility for compliance with the Occupational Safety and Health Act and complies with the labor standards with regard to the maximum permitted working hours. The fundamental rights of Employees are guaranteed to limit the maximum working hours and daily and weekly rest periods by measuring daily working hours through an objective, reliable and accessible system that measures the daily working hours of each employee and the working hours beyond that (i.e. overtime) overtime as well as Sundays and public holidays are recorded.

We are responsible for creating organizational structures that ensure compliance with the Working Hours Act by providing our employees with comprehensive information on the rules of the Working Hours Act and asking them to document their daily working hours and breaks. In addition, we take action and monitor implementation in relation to

- Consideration of the Working Hours Act in personnel deployment planning
- Ensure that the working hours are documented in accordance with the Working Hours Act
- Implementation of control mechanisms: spot checks and regular reports
- Standardized processes for identified / threatened violations

5.6 Safety and health protection

Health and safety at work is one of the highest priorities of our company. We strive to create a hygienically harmless, safe work environment and eliminate, as far as possible, risk factors that endanger the health of employees. Even outside the workplace, we care about the high level of social and health care of our employees.

We create internal company rules with the laws in force in Slovakia, and we apply them at workplaces as a matter of priority to protect the safety and health of each employee. Every employee is acquainted with the safety system of our company, and thus becomes responsible (for himself and other co-workers) for knowledge and compliance with all applicable safety and health regulations.

Employees may not bring, store and consume alcoholic beverages and other narcotic and psychotropic substances on the company's premises during working hours and outside the premises and may not enter work under their influence.

5.7 Interpersonal relationships in the workplace

We require all employees to treat each other with respect, dignity, tolerance and the principles of team spirit. Employees are aware that they are one team and share the same goals of the company, so they are willing to cooperate with each other, help each other and learn about important facts. The employee may not initiate or engage in any form of threat, intimidation, hostility or insult based on race, color, religion, gender, nationality, age, status, handicap or political opinion. Sexual harassment in the form of any sexual attempts at rapprochement is expressly prohibited in the workplace.

The superior employee treats his subordinates with respect, reverence, any form of discrimination, humiliation or abuse is excluded. He approaches conflict situations operatively, as an impartial arbitrator, thus fine-tuning the social climate in the workplace.

6. Protection of the good name and property of the company

Each employee represents not only himself but also our company to the public. We therefore expect him to behave in such a way that he does not damage the good name and interests of the company.

Every employee is obliged to protect the intellectual property and tangible assets of the company. Misuse of information, damage or theft of company property is considered a gross violation of work discipline.

7. Relations with customers and suppliers

In the company, we build long-term relationships with customers and suppliers, based on mutual trust, honesty, and openness. We respect the culture and traditions of suppliers and customers, regardless of their origin. We undertake to abide by the agreed terms and conditions. We pay attention to the regular analysis of the needs, requirements and wishes of customers and meet their quality, delivery dates and the price of the products offered and related services. We make sure that our products are of high quality and safe, and that they comply with national and international standards. We provide the customer with true and understandable information about our products and services. We support efforts for continuous innovation of the offered products, production technologies and their sale.

7.1 Market behavior in market competition

NMS, s.r.o and its employees are unconditionally bound by the principle of fair market competition and comply with the legal rules against the restriction of competition in the individual countries in which NMS, s.r.o operates.

As the legal assessment depends on individual laws and circumstances and may prove problematic in individual cases, it is necessary to inform and involve the finance department in case of ambiguity. Nevertheless, rules of conduct are defined which typically constitute an infringement of the competition rules:

7.2 Relations with competitors

Agreements with competing firms and coordinated practices aimed at preventing or restricting competition are prohibited. These include agreements on prices, offers, conditions of sale, production, or sales quotas, as well as the distribution of customers, regions, markets or production programs. Not only formal agreements are prohibited, but also coordinated behavior, for example in the form of informal talks or so-called informal gentlemen's agreements aimed at restricting or influencing market competition. In the treatment of our competitors, we must strictly ensure that we do not provide or accept information from which conclusions can be drawn about current or intended conduct on the market by the information provider. The relevant legal department needs to be involved before such activities take place with competitors that involve the exchange of information. Information on current or future prices, margins, costs, market shares, internal statistics, terms of sale and specific customer / buyer information may not be provided to competitors, resp. receive from or exchange with competitors.

7.3 Customer relations

Relations with our customers, suppliers, as well as patent or license holders are also subject to a few fair market legislations. According to these rules, no employee may restrict the customers of NMS, s.r.o in their free choice regarding pricing or supplier relationships with their business partners (in terms of territorial, personal, or material). Exclusivity agreements and non-compete obligations are also prohibited.

8. Conflict of interests

During working hours, all employees are engaged exclusively in activities that result from the scope of their work - from the employment contract, job description or agreement on work performed outside the employment relationship.

The employee must refrain from any action that could lead to a conflict of interest between the employee and the company.

An employee may carry out business activities that are identical to the subject of the company's activities, only with the prior written consent of the management of NMS s.r.o.

9. Resources and Environmental protection

In all activities, we respect the applicable technological and environmental standards and take care to protect the environment. We require all employees to comply with applicable environmental protection regulations related to their job classification. In the environmental field, we assist in the region's environmental protection and creation programs.

NMS, S.R.O. fulfills the binding local regulations and standards for environmental protection and EU environmental regulations as part of its business activities and acts in an environmentally conscious manner at all locations, in particular with regard to

- Emissions to air and water
- Disposal of waste
- Use and disposal of chemicals
- hazardous substances

We also use natural resources responsibly through energy and material efficiency, careful water handling, minimal consumption of products and avoidance of unnecessary waste. NMS, S.R.O. supports the principle of precaution by avoiding materials and methods that pollute the environment and pose health risks, provided that suitable alternatives are available.

We follow all of the company's EHS laws, regulations, guidelines, and standards. Our Environment, Health and Safety (EHS) performance takes a leading role in the planning of our business and operations. We strive to ensure that our dealers, suppliers and contractors always carry out their activities safely and responsibly, and we support them in this through training and education. We support ecological sustainability by avoiding environmental pollution, reducing waste, promoting recycling, saving energy and introducing energy-saving product innovations for friction management and drive technology. They are looking for ways to reduce energy consumption across the company, for example by recycling materials such as scrap metal, paper waste from our offices, aluminum cans, wooden pallets and plastic bottles.

9.1 Dealing with air emissions

General emissions from operational processes (air and noise emissions) and Greenhouse gas emissions are routinely monitored, checked and, if necessary, treated before they are released. We make it our business to monitor our exhaust gas cleaning systems and are encouraged to find economical solutions to minimize any emissions.

9.2 Handling of waste and hazardous substances

We take a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Unnecessary waste is avoided through a conscious and efficient use of resources. Differentiated waste management is a matter of course for us. Chemicals or other materials involved in their

Releases into the environment are identified and handled in such a way that safety is guaranteed when handling, transporting, storing, using, recycling or reusing these substances and when disposing of them.

9.3 Dealing with energy consumption / efficiency

By using the latest technologies, energy consumption and emissions are to be steadily reduced and environmental pollution minimized. The energy consumption is monitored and documented. We strive to find economical solutions to improve energy efficiency and minimize energy consumption.

Final provisions

This code is binding on all employees of the company. Violation of individual provisions of the Code of Ethics is considered a violation of work discipline and is assessed and sanctioned in accordance with the company's internal regulations, as well as generally binding legal norms of the Slovak Republic.

An employee of the company is obliged to report the violation of the Code of Ethics to his / her immediate superior or the company's management. The notification may be made orally, in writing, by telephone or by email. The relevant superior is obliged to assess the content of such a notification and forward it to the company's management. Intentional misrepresentation of a violation of the Code of Ethics with the intent to harm a person is considered a violation of the Code of Ethics.

The Code of Ethics complements and expands the rules, principles and standards of conduct defined by certain internal regulations and documents of the company. It sets boundaries that we should not cross, defines boundaries and principles of conduct, with an emphasis on values recognized by society, inward relations, but also on the external environment.

Date: 12/01/2022



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Dr. Ing. Igor Lengyel
Company President