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<i>Scope of application</i>	all employees of RTI, a.s., subsidiary RTIW, s.r.o., other stakeholders (customers, suppliers)
<i>Confidentiality level</i>	internally without restriction
<i>Cancellations</i>	version 2 valid from 01.01.2023 is no longer valid

Approval procedure			
Position	Name	Signature	Date
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Distribution	In Paper form: IMS manager
	The electronic form of the internal norm is accessible to employees on the intranet - \\Fs2\RTI_IMS

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List of changes

No.	Description	Date	Name
1	Version 2: Change of scope for the entire RTI Group. Addition of rules prohibiting discrimination, unfair practices, sustainability of business relationships and environmental protection. Establishment of rules for the protection of human rights, whistleblowing, financial responsibility and conflict points. Changes in paragraph 4.13.	31.10.2022	Klucakova Magulová
2	Version 3: link to CSRD Sustainability Reporting Directive - ESG, addition of selected principles of ethical conduct and behaviour	31.1.2024	Klučáková

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1 Abbreviations and terms

1.1 Abbreviations and terms

Abbreviation	Meaning of the abbreviation
Company	RTI Group
IN	Internal norm
EU	European Union
ESG	global measurable criteria for assessing sustainability, linking environmental ('E'), social ('S') and corporate governance ('G')

1.2 Terms

Term	Definition
employee	a person listed in the organisational structure of the RTI Group, regardless of whether he or she is employed or works under an agreement for work performed outside the employment relationship, under a trade licence or other contract
employment relationship	employment as an employee, working under a contract for work outside the employment relationship, a trade licence or a mandate contract
payment for expedited processing	refers to the custom of paying a small sum of money to a public official to expedite a routine act of a government agency. It is an offer of a sum of money to the employee in charge of the permits to grant the permit without meeting a set deadline.
bribe	is offering even a small sum of money to the employee in charge of granting permits in order to make the employee change his mind and issue the permit despite the fact that all the necessary criteria are not met.

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sustainability report	A report published by an organisation on the economic, environmental and social impacts caused by its activities in order to present its values and governance model.
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2 Subject

The management of RTI Group companies firmly believes that human rights are rights and freedoms to which all human beings are entitled. It also believes that acceptance of and respect for internationally recognized human rights is an integral part of all business relationships. Code of Ethics is an important step for all stakeholders to establish long-term and sustainable relationships to promote business integrity towards external stakeholders (suppliers, customers, regulatory and other authorities).

3 Scope

The Code of Ethics is one of the basic documents of the RTI Group's corporate culture. Codex contains standards of behaviour that are binding on management, all employees and suppliers who have committed themselves to the Code of Ethics.

4 Responsibility

The Director of Systems and Security or his/her designee shall be responsible for the development of this internal norm.

All materials that contain confidential information and are in paper form must not be placed in the trash when disposed of, but all employees are required to shred them.

5 Code of Ethics



5.1 Confidential information

Employees have access to important information relating to the Company, its owners, customers, suppliers and other third parties. This information is confidential and may under no circumstances be disclosed to persons outside the RTI Group, and outside the customers and suppliers concerned (hereinafter referred to as business partners).

Business partners must not misuse confidential information for profit or spread false news to damage the name of the RTI Group.

For the duration of the employment or contractual relationship, employees or business partners are obliged to maintain confidentiality towards third parties with regard to all sensitive information, regardless of how they became aware of it. This information must not be misused in any way for their own benefit or for the benefit of third parties. The duty of confidentiality applies in particular, but not exclusively, to information relating to customers, upcoming orders and offers, business partners, products and prices, accounting and tax data and information relating to financial, commercial and technical data.

Employees or business partners may only disclose to third parties information that is officially designated for public disclosure or that is commonly available and known.

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5.2 Conflicts of interest

A conflict of interest is defined as the performance of a competing activity or other conduct that is contrary to the interests of the Company, including, but not limited to, the following conduct:

- adversely affecting negotiations or transactions between the RTI Group and third parties,
- Misuse of company assets for his/her own benefit, acting as a member of the board of directors, as an officer or in a direct employment relationship for any company whose business is identical or similar to that of the RTI Group. This activity may only be carried out by an employee with the prior written consent or on the basis of the authorisation of the Board of Directors of the a.s. or the Managing Director of the s.r.o.,
- providing advice or other assistance to a competing third party,
- Serving as a board member, officer or in a direct employment relationship for any RTI Group contractor. This activity may only be carried out by an employee with the prior written consent or on the basis of the authorisation of the Board of Directors of the a.s. or the Managing Director of the s.r.o.,
- Accepting and offering personal gifts, financial rewards or other considerations to influence business contracts and transactions above the value of EUR 100/year.
- Using one's position to influence or coerce another employee to do something that would result in the employee's personal gain.

5.3 Fraudulent and unfair practices

Employees shall not engage in any fraudulent or unfair activities, including those related to business partners, which are considered to be, but not limited to, the following:

- theft, fraud, embezzlement,
- false or excessive billing,
- the unauthorised or improper offer and acceptance of money, goods or services,
- a request for reimbursement of expenditure vouchers for amounts higher than those actually incurred.

The RTI Group does not tolerate any form of bribery and expects its suppliers not to accept or offer bribes of any kind.

No supplier will be penalised for refusing to pay a bribe, even if this would deprive RTI Group of a business opportunity.

Bribery is any offering or acceptance of a gift, loan, fee, compensation or anything of value from another person or entity, whether private or public, to influence or encourage an act or omission that would not normally be appropriate in the absence of bribery. In this sense, bribery includes any transfer of assets and is not limited to monetary transfers.


The prohibition on bribery applies to all countries in which suppliers do business with the RTI Group.

The prohibition of bribery applies without exception, including in cases where competitors or their suppliers resort to bribery, as well as in countries where bribery as such is not illegal or where bribery is a normal part of business practice.

5.4 Protection of company assets and intellectual property

Every employee is obliged to protect the Company's intellectual and tangible property. Telephones, faxes, electronic mail, the Internet, as well as all equipment, hardware and software, are to be used exclusively for work purposes.

It is forbidden to use the Internet for purposes other than work. Downloading programs, videos, images, music and other large files that are not necessary for work or educational purposes is prohibited. It is

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also forbidden to browse the Internet and to transmit information with inappropriate content (erotic sites, information that violates the law, information in violation of the Company's Code of Ethics, information that is harmful to the Company's interests, etc.). Data in electronic form, captured in writing or otherwise, may not be used, copied or transmitted by employees for any purpose other than work.

Mobile phones and landlines shall be used in accordance with IN RTI 39: Use of work equipment and facilities. Service motor vehicles are prohibited from being used for private driving not permitted by standard procedure.

An employee of the Company shall not appropriate, lend or borrow Company property without permission. Misappropriation of Company property or use of Company property for personal use or another's use without express permission shall be considered as serious as outright theft. An employee's paid work time is also considered Company property that should not be used for personal use.

5.5 Alcohol and drugs in the workplace

Consumption of alcohol, drugs or other intoxicating substances is prohibited on Company premises and prior to commencement of work.

The RTI Group expects its contractors to exercise due diligence and reasonable judgement in relation to the use of suitably qualified and trained personnel and to ensure that appropriate measures are taken to prevent the use and misuse of alcohol, drugs etc. by its personnel in the performance of services on behalf of RTI.

5.6 Discrimination and human rights protection



The RTI Group promotes practices that:

- prohibit discrimination or harassment on the basis of sex, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, colour, language, national or social origin, property, birth, disability, trade union membership or other status,
- prohibit forced or involuntary labour,
- not result in the withholding of employees' wages, benefits, property, or documents in order to continue employment,
- condemn human trafficking,
- support the exercise of employees' rights to adhere to policies or practices or to accommodate needs related to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, trade union membership, political opinion, or any other condition where to do so would result in discrimination,
- create a framework to exclude threats, abuse, exploitation or sexual coercion, including gestures and physical contact.

5.7 Competition and compliance with trade restrictions

In accordance with international and national legislation, this Code and the **RTI Group's** internal rules prohibit all unlawful pricing agreements and other unfair agreements on key requirements, rates, deductions, charges and conditions between competitors (cartel agreements) that could exclude, prevent, restrict or distort fair competition.

Accordingly, suppliers are required to make the same efforts to implement a compliance program to ensure that their employees do not accept or disclose to competitors, business partners, customers or

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suppliers, either orally or in writing, any information about pricing arrangements or other terms and conditions involving an unrelated third party.

Trading partners are obliged to respect and comply with current restrictions, sanctions and embargoes on imports and exports.

5.8 General behaviour

We make sure our communications are clear and consistent to maintain the trust of customers, investors and other stakeholders. RTI Group's statutory bodies coordinate the planned communication and marketing policies and make decisions based on objective criteria that do not conflict with the interests of stakeholders. The responsible managers control the bans, restrictions, and approvals by authorities or other measures imposed on international business relations.

The RTI Group expects its suppliers to be able to communicate appropriately with RTI and its customers in all situations.

Suppliers are further obliged to comply with specific requirements, rules and regulations set by RTI Group or its customers regarding the general conduct, handling, placement, loading, unloading and transportation of goods at customers' premises. However, suppliers are not required to comply with specific requirements that would conflict with transportation safety regulations or similar regulations in effect in the areas to or from which the transportation route travels.

Furthermore, contractors are expected to ensure that their equipment used in the provision of services is reliable, safe and of good quality, that it meets general and statutory maintenance standards and that it complies at all times with all safety regulations and measures.

5.9 Human and labour rights

The RTI Group does not employ children and recognizes international standards regarding the minimum age at which children can work, as well as that young people should work in different types of employment than adults.

Suppliers are expected to respect internationally proclaimed human rights, to provide equal opportunities to their employees and not to discriminate against them based on race, gender, religion, marital status, sexual orientation or forced labour, and to comply with international legislation on child labour. Suppliers are required to create a safe and healthy working environment for their employees that meets or exceeds all legal requirements as they may be amended from time to time.



The RTI Group calls on its suppliers to respect the rights of their employees to freely associate, join trade unions or works councils and engage in collective bargaining in accordance with national laws and international conventions. Finally, contractors are expected to comply with relevant laws, regulations and industry standards on working hours and minimum wages.

Employees have the right to complain to the employer about violations of the principle of equal treatment, non-compliance with the terms of the Labour Code and safety in the field of Occupational Health and Safety and SRB; the employer is obliged to respond to the complaint without undue delay, to remedy, to refrain from such conduct and to eliminate its consequences. To obtain feedback from employees in the above areas, employees may at any time submit a complaint.

Complaints and suggestions shall be made by employees via e-mail:

podnetyzamestnancov@railtrans.eu or

use the physical mailbox, which is located on the 4th floor, in the Company's offices at Kukurična 1, Bratislava.

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5.10 Financial responsibility

The RTI Group builds the trust of the general public, its shareholders and business partners through sound accounting and reporting. Any irregularities can have serious consequences, which is why we strictly adhere to the legal provisions regarding proper accounting and financial reporting. Transparency and fairness are our top priorities. We publish regular financial statements in a timely manner in accordance with national and international accounting regulations.

We carefully verify the identity of business partners and other third parties with whom we wish to do business. Our stated goal is to do business only with business partners who operate in compliance with the law and use legally sourced resources. We promptly allocate incoming payments to the relevant services and account for them accordingly. We ensure transparent and open cash flows.

5.11 Environmental friendliness and sustainability

The RTI Group manages all known risks, detrimental effects, threats to safety, health, the environment and property of customers or third parties that are related to the services provided or rail freight transport. Top management promotes compliance with legal and other regulations and takes measures to minimize negative impacts on all components of the environment and climate change.

Suppliers more broadly are expected to comply with all relevant national and international environmental laws and regulations, and Suppliers are further encouraged to continuously monitor and apply methods and technologies that minimise negative environmental impacts.

Based on the application of the EU Sustainability Reporting Regulation - ESG, we require internally as well as suppliers to comply with the reporting principles of accessibility, reliability, timeliness, accuracy, balance, clarity, completeness, materiality and comparability.

The RTI Group is committed to engaging stakeholders in identifying, understanding and responding to sustainability issues and concerns, and to reporting, explaining and holding stakeholders accountable for decisions, actions and outcomes

5.12 Conflicting items



Suppliers must comply with all relevant legislation and requirements regarding the prohibition or restriction of the use of specific substances - hazardous substances and chemicals of concern, in particular those that appear on the list of substances of very high concern in the context of REACH. These need to be identified and managed to ensure their safe use, recycling or reuse and disposal. We require all our suppliers to supply electrical and electronic equipment in accordance with the relevant EU regulation.

Suppliers are obliged to monitor sources of conflict minerals and promote transparency within their supply chain, take appropriate measures to this end and ultimately exclude the use of scarce resources or resources from high-risk areas of the world

5.13 Whistleblowing system

The RTI Group Code of Ethics unites our core ethical values. Together, we protect our company by speaking up when something is wrong. If an employee suspects or has knowledge of antisocial activity or other than serious antisocial activity, the employee shall report anonymously or non-anonymously as follows:

a) in writing - by letter to the responsible person at AZC Services, a.s., ORBIS Building, Rajská 7, 811 08 Bratislava, with the marking DO NOT OPEN - ANTI-SOCIAL ACTIVITY on the envelope. The envelope marked in this way will be handed over by the Registry into the hands of the employee who is authorised to carry out the activities of the authorised person.

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b) by electronic mail to podnet@azcgroup.eu

The above e-mail box has been set up exclusively for reporting notifications and is accessible 24 hours a day.

For a detailed description on whistleblowing and collusion, see PI 15.

Complaints can be submitted by business partners via an external reporting channel: compliance@railtrans.eu.

The purpose of the whistleblowing system is to protect our company, whistleblowers, and all persons who contribute to the investigation of violations. The whistleblower system also protects the interests of the persons concerned. For them, there is a presumption of innocence until a violation is proven. As a result, investigations are only initiated if there are reasonable grounds to suspect a serious infringement. Any deliberate use of the information system will not be tolerated.

5.14 Privacy Policy

We apply all applicable data protection principles in accordance with legal requirements. All data protection rules must be complied with by business partners and personal data of individuals must be processed in the specified ways.

6 Control

Violation of the provisions of the Code of Ethics will be considered a serious breach of work discipline and may lead to termination of employment or cancellation of the contract or agreement at the discretion of the Chief Executive Officer or Managing Director.

Any non-compliance with the Code of Ethics is taken very seriously and business partners are expected to take steps to remedy the breach and eliminate its consequences and to take appropriate measures to prevent recurrence in the future.

In the event of serious or repeated violations, the company reserves the right to immediately terminate the business relationship with the supplier without liability for any damages.

7 Records and related documentation

Identification number	Name of IN, name of documents
IN RTI 30	Working Regulations
IN RTI 39	Use of work equipment and facilities
PI 15	Whistleblowing

8 Annex

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