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Preamble

The companies based in Uherský Brod (hereinafter referred to as the “Companies”) to which this Code of Ethics applies are organisationally part of REC Group s.r.o.

RPG Recycling, with its registered office at Vazová 2143, 688 01 Uherský Brod, Company Registration Number 29235171, is engaged in the collection and recycling of tires with the aim of producing rubber granulate, which is used in the production of rubber sheets, especially for industry and construction, but also in other segments such as sports and leisure, for example in the form of lower cushioning layers under sports fields. By-products from the processed tires are textile fiber and steel cord.

ASSCO, headquartered at Vazová 2492, 688 01 Uherský Brod, Company ID 41186745, specializes in the collection and recycling of EPDM rubber waste with the aim of producing EPDM rubber granulate, the primary use of which in the last decade has been to fill artificial sports turfs on football pitches. This trend is changing over time and rubber granulate is used in the same way as rubber granulate from ELT tires in the form of rubber sheets, especially for industry and construction. In addition to EPDM crumb, ASSCO also produces ELT tire tread, which is the top layer of the tire tread, which has a different composition compared to the entire tire and this material is valuable for improving the properties of rubber sheets for industry and construction.

GELPO with its registered office at Vazová 2143, 688 01 Uherský Brod, ID number 29370035, is a downstream processor of rubber granules, from which it produces a wide portfolio of rubber products. The most common applications of rubber products include the areas of industry, transport and construction thanks to the damping and insulating properties of rubber. Products made of recycled rubber can be found, for example, around tracks in the form of sidewalls, under the railway network in the form of anti-vibration plates, around highways in the form of rubber absorbers forming part of noise barriers. Rubber products have also found their place in other areas where the properties of this material are exploited - for example, wall coverings on shooting ranges, flooring in commercial spaces, garages, etc.

 MEMBERS OF REC Group	Code of Ethics ASSCO, s.r.o., GELPO, s.r.o., RPG Recycling, s.r.o., Egoé noba, s.r.o.
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Egoé noba with its registered office at Vazová 2143, 688 01 Uherský Brod, IČO 25270281, ensures that rubber absorbers made from old tires get back on the road, through a system of noise barriers, the basis of which is recycled rubber. These acoustic absorbers are then installed around roads and railways. The unique possibility of artistic processing also predetermines the walls for installation in urban environments.


Introduction

The aim of the Company is ethical and economic business activity. The Company issues this Code of Ethics for the purpose of developing fair business relations. The Company hereby undertakes to comply with ethical rules such as performing activities in accordance with applicable legal standards, environmental protection, employee protection, fair business conduct, transparent behavior, but also publicly commits to social responsibility. The Company's Code of Ethics is a strategic part of the Company's Compliance Management system, which is a company management system in the form of defined activities and established procedures. The aim of the Compliance Management system is primarily to prevent undesirable situations, phenomena and to detect behavior in violation of applicable legal regulations, which could subsequently lead to criminal liability of the Company as a legal entity. The Code of Ethics enshrines common principles and corporate values, gives employees instructions on how to make decisions in given situations and what to avoid. It should also be a guide for them in resolving controversial situations. The importance of the code of ethics lies in the definition of the fundamental values on which the company's philosophy is based. Our effort is to ensure an open, customer and business-oriented, safe, responsible and human approach. WE WANT TO BE A SUCCESSFUL AND SOCIALLY RESPONSIBLE COMPANY, therefore we do not tolerate any violation of the laws of the Czech Republic and ethical principles.

The goal is:

- to comply with the laws of the Czech Republic
- to treat our colleagues, suppliers, customers, business partners, as well as the general public affected by our activities with respect
- to act honestly and morally
- to protect the property, information, as well as the know-how of the Company and to be loyal to it

This Code of Ethics should serve all employees, management and owners as a guide and assistant in work activities and help to comply with the principles set out in the Code and apply them in practice. The Company's employees have a duty to follow and comply with the ethical principles defined in this Code.

	Code of Ethics
	ASSCO, s.r.o., GELPO, s.r.o., RPG Recycling, s.r.o., Egoé noba, s.r.o.

Obligation to comply with the Code of Ethics


The Code of Ethics is binding on all employees of the Company or persons in a similar position, executives and persons performing control activities. It also applies to persons who represent or act on behalf of the Company externally. If suppliers or subcontractors also undertake to comply with the Code of Ethics, they are obliged to comply with it in full. All employees of the Company, persons in a similar position, executives and persons performing control activities are obliged to familiarize themselves with this Code of Ethics, comply with its provisions, and in the event of any violation of the provisions of the Code of Ethics being discovered, to report it immediately. The method and form of reporting is described in the internal document “Principles for reporting illegal acts and complaints – WHISTLEBLOWING”)

Corporate values of the Company

The Company's values must be respected by all persons who are required to comply with the Code of Ethics. The Company's employees are expected to adhere to the Company's corporate values, and the Company's management is also expected to publicly support these values.

Our company philosophy is based on the following criteria:


1. Environmental responsibility, because it is important to improve environmental performance
2. Good interpersonal relations, because every opinion matters
3. Pride in our work, because it represents an approach to the management of secondary raw materials with the potential to save the environment
4. Continuous quality improvement, because the current joint work in the development of recycled products means the future success of the Company

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Ethical principles

Companies behave responsibly in economic, social and environmental areas.

1. We comply with legal regulations	All actions of the Company are conducted in accordance with legal regulations. The Company's employees must comply with applicable laws, decrees and regulations. If an employee is unaware of the legal regulation on the basis of which a decision is to be made, he is obliged to ask his superior for advice or explanation.
2. We comply with internal company documents	All employees must know and comply with internal documents that govern their work activities.
3. We do not tolerate corrupt practices	Managers have a key role and responsibility for creating documentation, its implementation and ensuring that all employees understand their obligations imposed by the documentation. We actively oppose all forms of corrupt behavior. Any behavior that would lead to a promise of a bribe with the intention of influencing the actions or decisions of the other party, or a request for a bribe with the intention of influencing one's own decision, is inadmissible. The amount of the bribe in such a case is not decisive. A bribe is any property advantage to which the recipient is not entitled.
4. Sponsorship	The Company financially participates in the areas of healthcare, education, science and research. They also try to financially or by providing services support local non-profit organizations, civic associations, youth organizations and other interest groups. The Company provides sponsorship gifts and contributions only on the basis of written communication. The Companies ensure that these sponsorship gifts or contributions are transparent and traceable.
5. Competition and Conflict of Interest	We support free competition in all business relationships. We do not conclude any agreements with business partners on prices or market sharing that would restrict free competition. We obtain information about competitors only in a legal manner and use freely available sources. We do not share any sensitive data with competitors and do not harm competitors with misleading information about their products or services. Employees avoid conflicts of interest or the interests of another employee with their superior. In cooperation with business partners, we adhere to principles that exclude conflicts of interest and do not involve family members in supplier-customer relationships.
6. Employee Care	The aim is to build good interpersonal relationships within the Company, to create a motivating environment and conditions for fulfilling the Company's goals.

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	<p>The Company strives for equal status for women and men regardless of their job position.</p> <p>Employees are remunerated exclusively for the work performed. If an employee is interested in improving their skills or qualifications for the performance of their work, they are always allowed to do so.</p> <p>The Company values employees who come up with new ideas and innovations. They try to support these employees.</p> <p>The protection of employees and their health at work is the main priority of the Company. The Company bears full responsibility for ensuring this safety. It pays attention to prevention and seeks to prevent the occurrence of occupational accidents and diseases by searching for potential risks.</p>
7. We respect freedom of association and the right to collective bargaining	All workers, without distinction, have the right to join or establish a trade union and to bargain collectively. Employee representatives are not discriminated against and are allowed to perform their representative functions in the workplace.
8. Human rights	We do not tolerate any form of discrimination based on gender, age, religion, race or colour, political opinion, health/disability, national or minority status, marital status or sexual orientation. Employment decisions must be based solely on the requirements of the position and qualifications. The human rights and freedoms of employees are fully respected. We do not tolerate any form of sexual harassment, abuse, intimidation or defamation.
9. We reject the use of child labor and modern slavery	We reject any use of child labor, forced labor, or any other form of modern slavery or human trafficking, not only within our company but also within our supply chain. We are committed to respecting the minimum age for employment, ensuring that all work is voluntary and that employees are free to terminate their employment. We expect the same intolerance of child labor and modern slavery from our business partners
10. Fair dealing	<p>Employees of the Company are required to act honestly in their business dealings. Employees are required to maintain a high level of professional conduct and ethics, regardless of their level of management or position within the Company. Employees generally have the following responsibilities when conducting business on behalf of the Company:</p> <ul style="list-style-type: none"> - Act in a representative manner and contribute to building the Company's good name - Wear appropriate clothing that is appropriate to the job and does not detract from the seriousness of the business - Not to damage the company's reputation - Use company logos and signs in accordance with internal procedures so that they are not used in a dishonest manner <p>We build relationships with business partners and the public based on trust and an honest approach. We approach all business</p>

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	partners transparently and respect the confidentiality of information, trade secrets and business know-how
11. Cooperation with state and local government authorities	The Company always provides maximum cooperation to state authorities as well as other supervisory bodies.
12. We protect the environment for future generations	All employees of the Company are expected to take an active approach and personal responsibility in protecting the environment. The Company complies with all applicable legislative regulations in waste management. It supports new projects and ideas for the new use of waste materials. The philosophy of our company is based on the processing of secondary raw materials, which is a fundamental building block for environmental protection. Throughout the entire production cycle, we take care to minimize the impact of our activities on the environment and strive for sustainable development and optimization of the use of natural resources. Through educational and entertaining events, we motivate the public to cooperate in protecting the environment.
13. We pay attention to energy efficiency and save natural resources	Processing secondary raw materials is not our only contribution to improving the environment. We continuously monitor and evaluate energy, fuel and water consumption, introduce new technologies to reduce their consumption and increase the share of renewable resources not only in production operations but also in ensuring the operation of buildings.
14. Employee obligations	Employees must refrain from activities that could jeopardize the company's good name. They must take care of the company's property with the care of a good steward.
15. Confidentiality and personal data protection	We use appropriate technical and organizational means to protect all data about the company, customers, business partners and employees against unauthorized access, misuse, theft, damage. We strive to ensure privacy and prevent the misuse of personal data. When protecting data, we comply with relevant regulations and internal procedures and only provide data to authorized persons.
16. Customer health and safety	The products we produce from secondary raw materials meet the hygiene criteria for the intended uses given in the technical data sheet. In case of any doubts, customers have the opportunity to contact their sales manager or call: +420 731 155 421

Checking compliance with the Code of Ethics

The Companies continuously monitor compliance with the above-described rules of conduct. In the event of a violation of the rules of this Code of Ethics, the Companies will take immediate action, conduct an investigation and ensure appropriate measures.