

Internal directive # 1

Codex of Ethics

Drawn up by: HR Department

Bardejov, March 2018

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2J Antennas USA, Corp



Company's directors' foreword

Our company undertakes to carry out its business activities in an ethical and legal way. Such behavior at all levels of our society is essential to our own success.

A good reputation is a valuable business deal. Each of us must strive for the highest degree of personal morality in order to protect this value, to show respect to his co-workers, as well as to customers, suppliers and all other partners of society. Ethical behavior forms the basis of trust needed for the long-term commercial success of our company. Our shared commitment to behave in an ethical and lawful way must be fulfilled without reservations.

Company ethics codex of business

The Codex of Ethics is a basic document for shaping the corporate culture of our company. It builds on our vision and values and aims to support our business strategy.

Our vision

Our vision is to be the most trustworthy and customer-oriented company that contributes to the positive development of its region and the quality of life in it.

Our company's mission

Our mission is:

- ➤ To be personally responsible for every requirement of our customers, understand their needs, fulfill our promises and continually improve our services in order to be perceived as an affordable, reliable and innovative partner of our customers,
- use our experience and knowledge in the field of development and sales of our products for the benefit of our customers,
- provide modern, high quality and environmentally friendly products to support the growth of business in our country and to improve the position of the Slovak Republic in the international environment.
- to motivate, develop and offer attractive opportunities to skilled and dedicated employees and reward job- serving staff.



Company's values

- We route to increasing the value of the company.
- We put customer needs first.
- We perceive innovation as a principle.
- Respect is the basis of the work of our big team.
- Integrity of words and deeds is making us responsible to ourselves and our environment.

The market is asking for quality and we can offer it

Preamble

The Company declares its commitment to build on its corporate values all activities and to respect the generally accepted business rules and principles.

Ethical conduct is crucial to the long-term functioning and economic interests of our company and is a manifestation of responsibility towards all subjects of employment and business relationships. Respecting ethics is also important for the cultivation of the economic system and for the benefit of society as a whole.

The good name of the company and the trust of all stakeholders are among the most important values that society has. Their protection is a priority task for the company and its members.

All employees of the company are obliged to act in accordance with this Codex of Ethics, to maintain a high moral standard in business and work behavior, to create a working environment of trust and respect.

1. Relationships in society

Respect for man – the basis of human relations in society

Relationships with employees and between employees, as well as between superiors and subordinates in the company are based on respect for each person's dignity and respect for fundamental human rights in the spirit of the UN Universal Declaration of Human Rights.



- Each employee is required to create an atmosphere of mutual respect, trust, cooperativity and teamwork without which excellent economic results cannot be achieved in the long term.
- Company will not tolerate any physical, mental or sexual harassment. Any form of abuse, humiliation, bullying and dishonor of human personality or discrimination is inadmissible in society.
- Every employee of the company is responsible for his/her actions, which is also reflected in the consistent fulfillment of his/her tasks. It should behave in such a way that it does not harm his/her co-workers in order to hinder their work and not hinder their initiative.
- The company builds its success on the professionalism of its employees, expects them to
 actively and purposefully conduct, search and exploit opportunities to improve work and
 performance. Anyone who thinks he can help make improvements in any area of society has
 the right to be heard and get feedback on their suggestions.

Decent work

- The company accepts employees and directs their careers based on their assumptions for the job, without any racial, religious or ethnic discrimination, regardless of skin color, gender, age, condition, sexual orientation.
- The company pays attention to the professional and personal development of its employees.
 It pledges to create the conditions for developing the knowledge, skills and capabilities of its employees, which correspond to the present and future needs of the company. We expect employees to actively use these options.
- The Company commits to a fair remuneration policy without any discrimination. The method
 of remuneration should reflect the individual results, activity and importance of the job
 position in relation to the economic results of the company.
- The company is committed to the process of dismissal, respecting objective criteria and basic ethical standards. The redundancy process must be legal, timely, transparent, based on basic psychological knowledge and must not hurt the dignity of a person.



- The company is committed to creating a hygienically safe, safe working environment. Employees are, however, obliged to respect all safety regulations and to ensure that they do not endanger themselves, co-workers, other persons and do not cause material damage.
- The Company is committed to a high level of social and health care for its employees.

Ethics of communication, dissemination and protection of information

- The management of the company creates a space for free expression of the opinion of each employee without the risk of intimidation or sanctions.
- The management of the company commits itself to explain its goals and objectives as well as the importance of individual activities, promote active communication and actively empower employees to improve their work performance as well as the overall performance of the company. Particular attention is paid to the preparation of co-workers for changes in society.
- The company promotes cultured communication not only between employees but also between different departments of the company. The deliberate confidentiality of information that could contribute to improving the company's work is considered morally inadmissible.
- All employees of a company are required to protect information that belongs to the company or which relates to its business activities. Such information is considered confidential, can only be used for business purposes and never for personal purposes. Employees leaving the company must continue to protect information belonging to the company.

Protection of goodwill and company property

- Every employee of the company acts not only as a private person but also as a representative of the company. Therefore, the public should also take good care of the company and protect its interests.
- Every employee of the company is required to protect the intellectual and tangible property of the company. Telephones, fax, e-mail as well as all computer equipment, hardware, and software are used essentially for business purposes only, except in the necessary cases.



- The Company undertakes to respect copyright and requires the same attitude from its business
 partners as regards documents and material of the company. Only legally purchased software
 is allowed in the company.
- A company employee does not acquire, lease or lend the assets of a company without permission. Illegal appropriation of company assets or their use for personal or foreign use without explicit permission is considered to be as serious as direct aversion and may lead to breakage of the employment relationship. Paid working time of an employee is also considered to be the property of a company that should not be used for personal use without proper permission.

Conflict of interests

- Employees do no provide or accept any bribes. Everyone is required to comply with the relevant provisions of the Criminal code.
- Each employee of the company solves his/ her private interests in financial, business or other
 activities performed outside the company in such a way as to avoid actual or potential conflicts
 of interests. These activities must comply with Company's legal and internal regulations. In
 these activities the employee must not misuse his workplace resources, his position in
 Company or compromise the reputation of the Company.
- No employee of the company in a financial, business or other activity performed by him / her
 or his / her relatives outside the company makes use of the benefit or gain of information
 obtained in the course of his / her duties and responsibilities in the Company and which is not
 universally available.
- Employee of the Company may engage in business activities that are identical to the subject of the Company's business only with prior written consent.

Ethics of dispute resolutions

- Employees of the company should behave in a way that will prevent disputes. However, if a dispute or conflict occurs at the workplace, it is resolved in a polite, non-violent way through dialogue with the participation of all stakeholders.
- Participants in the conflict are making sure labor conflict do not spill into personal intolerance
- In the event of a major dispute in a company, the parties must show responsibility and take advantage of all bargaining options to ensure the smooth running of the company.



2. Relations with customers

- Honest and fair attitude towards customers, meeting their needs and interests is a prerequisite for a successful and lasting business relationship.
- Customer loyalty is discreet, polite, without any preference, prejudice or discrimination. The Company undertakes to use only legitimate business methods and considers the information obtained from the customer to be confidential.
- The company ensures that its products are of high quality, durable and safe quality, complying with established national and international standards.
- The Company, in accordance with valid legislation of the Slovak Republic, ensures the provision
 of the widest possible warranty and post-warranty service in order to maintain high customer
 satisfaction.
- The company provides on-time, complete, undistorted, true and comprehensible information about its products and services. It does not allow the propagation of misconduct, concealment, exaggeration in advertising and other public performances.

3. Relations with suppliers and creditors

- Relations with suppliers and creditors are based on mutual trust and respect. All information on the relationship of the company and its suppliers is considered confidential.
- The company doesn't misuse its market position and undertakes to create same business conditions for all its business partners while respecting customer's requirements.
- The Company commits itself to create safe working environment for its business partners and employees staying at the company's workplace. At the same time the company requires to comply with all safety regulations valid in the company.
- The company commits to comply with the agreed terms and conditions. If the company due
 to extraordinary circumstances cannot meet the agreed requirements, it enters the
 negotiation with its business partner as soon as possible, to find an alternative, mutually
 acceptable solution.
- The Company provides its creditors with reliable guarantees, true information about its economic situation and commits itself to effectively value the capital invested.



• Employees of the company are not allowed to accept any financial gifts or other commissions from business partners.

4. Relations with competition

- The company respects laws and rules that regulate competitive relationships. The company's relations with competition are fair in accordance with good morals of competition.
- The Company does not attempt to obtain information about competitors' business in unfair and illegal ways (industrial spying, bribery, or any other unfair way).
- The company doesn't engage in any form of unfair competition.

5. Relationships with state authorities, regions and societies

- The company commits itself to behaving as a socially responsible citizen in relation to state
 and government authorities, local authorities, regions and the entire society and to provide
 them with true and timely information.
- The company fulfills the conditions of the founding charter, respects the law and acts according to valid legislation.
- The company pays taxes duly, does not escape tax evasion purposely and ensure transparency of all financial transactions. Complies with all legal provisions against money laundering.
- The company contributes to the economic growth and increase of the living standards of the region and whole society.
- The company supports sports and healthcare in the region and society as well as cultural, moral, educational, technical development through its sponsorship
- The company commits itself to spreading good reputation of the region and the country by its activities.
- The Company undertakes to provide the public with complete, understandable, regular and true information about its activities and intentions. It systematically develops friendly, highly professional and ethical relationships with the media.

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6. Relations to environment

- The company consciously follows the concept of sustainable development in the environmental field.
- The company, aware of the specific nature of production, places emphasis on its activities, products and services to protect the health and safety of manufacturers, consumers and the rest of the public.
- The company respects valid technological and environmental standards in all its activities and promotes the adoption of standards to reduce adverse environmental impacts.

7. International business relationships

- The company is responsible for international trade and investment. It complies with the legislation in force in the host country.
- The company contributes to the economic welfare and development of the host country, respects its traditions and culture.
- The Company adheres to the United Nations Universal Declaration of Human Rights in every foreign affiliate and applies uniform procedures and highly moral standards to countries with different business practices.

8. Ethical responsibility of management

- Company managers are the model of behavior and acting for other employees of the company.
 They do not dispose of their responsibility as resulting from their status. They observe the rules of management ethics and care for their professional honor.
- Company managers consider employees as co-workers and prepare suitable conditions for them so they can effectively use their potential and paid working time, to accept their responsibilities, and contribute creatively to the development of society. They create a positive working atmosphere.



- Managers of the company continuously develop relationships with internal and external groups on a partnership basis. By appropriate methods, they promote employee co-operation and loyalty to the company and their interest in prosperity.
- Company managers are committed to providing regular, comprehensible and true information
 to coworkers. At the same time, they verify whether the information provided has been useful
 to them. They openly talk about problems and find their creative solutions.
- Managers of the company are able to motivate people to fulfill the goals of the company, they
 can effectively lead and motivate them. Changes are taken as an opportunity to growth of
 society's prosperity.
- Company managers ensure the company's personnel security by preparing personnel compensation for important positions, the interchangeability of people, as well as expanding and retaining knowledge.
- Company managers are required to inform employees about the values and requirements set forth in this Ethic Codex and to train them to comply with it and are required to set themselves as an example in its observation. They are also obliged to create an environment that is socially just and in which dialogue can be developed so as not to violate this Codex.

9. Final provisions

- The Company's Codex of Ethics applies to all managers and employees of the Company as well
 as to other persons acting on behalf of the Company. Everyone is required to abide by the
 Codex, act in accordance with its provisions and promote it.
- All employees of the company must be aware that any breach of ethical standards stated in the Codex of Ethics will be assessed as a breach of work discipline.
- Employees are required to report violations of this Codex. Information is given to a direct supervisor, which is a typical procedure. However, if the employee feels that it is inappropriate in the given situation, he or she may submit it to another senior supervisor according to the organizational structure. Information may be given at any time by oral, written, electronic mail, by telephone.
- A senior supervisor is required to deal with information about breaches of the Codex of Ethics
 and to take a decision. If considered appropriate, he/she can contact her supervisor or the
 company.



- The identity of the persons reporting the suspected breach of the Codex of Ethics is kept secret, as far as possible. No reprisals will be directed against an employee who reports suspicion of breach of this Codex.
- Disciplinary proceedings or their absence do not exclude the conduct of law enforcement authorities in case there is a suspension of committing offense or crime.
- Comments on the content and structure of the Company Code of Ethics are being submitted to the HR Department of the Company.

in Bardejov, 26 th of March 2018	
Approved by:	
	Janette Jarvie managing director

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