

As part of the rules of internal management, I issue this Directive of the CEO and Executive Director of the Company with effect from 1 January 2012, with reference to our corporate Profile and in accordance with the provisions of Act No. 418/2011 Coll., on Criminal Liability of Legal Entities and Proceedings Against Them, entitled

„CORPORATE CODE OF ETHICS“

valid for all Employees of GEMO OLOMOUC, spol. s r.o.

I. Purpose of the Code

The purpose of this Directive is to clearly and specifically define the principles of honest work of all Employees of our Company on all positions, stating that it is necessary to consistently adhere to all relevant provisions of the Labour Code, including the existing corporate Work Rules, and newly to observe all principles and laws arising for the Employer and the Employee from Act No. 418/2011 Coll., on Criminal Liability of Legal Entities and Proceedings Against Them.

In practice, this means that it is unacceptable in our Company to commit acts such as bribery, corruption, violation of the rules of competition and discrimination of any kind or degree. It is required to prefer equal treatment of all Employees as well as ethical and fair business practices, including environmental protection in the performance of our business activities, in particular in construction works. It is required to consistently ensure the safety and protection of Employees at all workplaces, especially during construction on construction sites.

Previously issued corporate directives for this area remain in force and unchanged.

II. Main principles of our business which must be adhered to without reservation

All Employees and/or persons working for our Company under agreements to perform work or agreements to complete a job are obliged to honour these major or fundamental principles of our business:

1. Strictly comply with all statutory regulations governing the performance of work, i.e. in particular the Labour Code, the Civil Code, the Commercial Code, the Criminal Code, the corporate Work Rules, as amended, as well as any other related regulations, including Act No. 418/2011 Coll.
2. Each of our activities must have a high standard of legality, morality and ethics.
3. We are obliged to duly and clearly reply to written questions of any third parties affected by our operations.

4. In the course of our operations, there is no place for negligence, malice, malpractice or any crime or offence.
5. In our Company, we do not tolerate any discrimination, unfair treatment or harassment at the workplace.
6. All Employees are obliged to observe the major principles not only in relation to one another but also outside our Company in the performance of their work duties. Employees should show respect and dignity and appreciate the work done by their colleagues.

III. Obligations of the Employer

In order to fulfil the major principles, the Employer undertakes to:

1. Provide the Employees with a healthy and safe working environment.
2. Provide the Employees with any necessary legal support and assistance, including regular medical examinations.
3. Provide all Employees with equal treatment and equal opportunities regardless of race, gender, nationality, colour or religion. We do not and will not use any forced labour or child labour at our workplaces.
4. Pay a monthly salary to all Employees in time for a duly performed work and provide any necessary, not only "statutory" trainings and seminars, and thus enable the Employees to continuously and constantly increase their qualifications and skills.
5. Support the activities of the employee council or unions if these are established.
6. In order for our Employees to be able to work properly, the Employer undertakes to provide them with appropriate tools and protective clothing, as well as any other necessary aids, including corporate vehicles and mobile phones, according to the job classification in the corporate structure.
7. Each Employee is obliged (without any further sanctions) to report to the Employer (verbally in a protocol and/or in writing) any act of another Employee which violates this Code or other corporate rules, as well as any actions that might constitute any crime.
8. Misclassification of employees as independent contractors is prohibited. For this purpose, a separate directive of the Company management will be issued by 31 March 2012.

IV. Obligations of each Employee

The obligations of the Employee are set out in detail in the corporate Work Rules, as well as in the Labour Code, as amended as of the date of effectiveness of this Directive. Beyond the obligations set out therein and for the purpose of this Code, all Employees are also required to:

1. Perform their tasks properly, to the best of their knowledge and conscience, and in a timely manner.
2. Respect their superiors and colleagues, work honestly and conscientiously.
3. With due care and diligence, properly and adequately use the work tools, aids and equipment (clothing), including motor vehicles, entrusted to them. Observe the statutory road traffic laws during their official or business trips.
4. Prevent occupational injuries, act prudently on construction sites and use the required protective equipment.
5. Act politely and professionally correctly in relation to our business partners, whether from the public sector or from the business sector, and to other subcontractors, and respect not only all the legal principles of this Code but also the principles of ethics and morality. This obligation pertains to all our Employees in all stages of our operations, i.e. in public or private procurement as well as subsequently in the implementation of works or construction and with respect to all activities performed during the warranty period.
6. Without undue delay, notify the Employer of any activities which might be contrary to the labour or criminal laws. This notification shall be given to the Employer in writing to the attention of the Assistant to the CEO, Bc. Iveta Koutná, to the address of the registered office, i.e. Dlouhá 22, 772 35 Olomouc, and/or electronically to gemo@gemo.cz or to koutna@gemo.cz or by phone 585 202 002, and subsequently filed to Bc. Koutná on the 3rd floor of the registered office of the Company, to the Legal Department of the Company also at its registered office, 2nd floor, door No. 195, or directly to the competent criminal justice authorities.
7. Act No. 418/2001 Coll., effective from 1 January 2012, forms Annex 1 to this Directive. The Code and the Annex can be found on our internal corporate website filesaver: /V/Vývěska/ Příkazy/Příkazy generálního ředitele/Příkaz č.03/2011. Each Employee is obliged to familiarise himself/herself with this Act. The corporate directors of individual departments of the Company will perform subsequent random checks. Employees are obliged to familiarise themselves with the basics of criminal liability of legal entities and to contact the Legal Department in the case of any uncertainties.



In the event any Employee fails to comply with this Code in the performance of his/her work and tasks for our Company and violates the Code in any way, such a violation (even if it is an isolated violation) will be considered by the Employer as a particularly serious breach of the work discipline with all the consequences set out in Act No. 262/2006 Coll., the Labour Code, as amended.

This Directive (Corporate Code of Ethics) in its entirety, including Annex 1, is valid and effective from 1 January 2012 also for our subsidiary, GEMO SLOVENSKO, spol. s r.o.

Directors of the individual departments are obliged to demonstrably familiarise all their subordinates with this document and its annex.

In Olomouc on 28 November 2011

On behalf of GEMO OLOMOUC spol. s r.o.

A handwritten signature in blue ink, appearing to read 'Uhýrek', written over a horizontal dotted line.

Jaromír Uhýrek

CEO and Executive Director of the Company