



CONFLICT OF INTEREST POLICY

Glass System Technologies S.A.

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At Glass System Technologies S.A., trust and transparency are the cornerstones of responsible conduct. We believe that every employee, regardless of position, should make decisions free from external influences and private interests.

A conflict of interest may not only violate ethical principles but also negatively impact the company's reputation and undermine the trust of clients, partners, and colleagues. Therefore, this document defines what a conflict of interest is, how to identify it, how to avoid it, and how to report any potential undesirable situations. Our goal is not to limit employees' professional or private activities, but rather to ensure that such activities do not compromise integrity, conflict with the company's interests, or influence decisions made within the scope of their duties



§1. General Principles

1. A conflict of interest arises when a personal interest of an employee, associate, board member, or any other person acting on behalf of the Company may directly or indirectly affect the performance of their duties or decision-making.
2. The purpose of this section is to ensure:
 - a) transparency in professional decision-making;
 - b) avoidance of actions that may raise doubts about impartiality or loyalty;
 - c) protection of the Company's reputation and credibility.
3. Every employee is obliged to act in the best interests of the Company, excluding any personal, family, financial, or organizational influences that could lead to an abuse of trust.

§2. Examples of Conflict of Interest Situations

1. The most common cases of conflict of interest include, but are not limited to:
 - a) Undertaking employment (paid or unpaid) in a competing company or one with a similar business profile;
 - b) Participating in decision-making regarding a supplier or contractor with whom the employee has a family, social, or financial relationship;
 - c) Using Company resources (e.g., equipment, information, personnel) for private purposes or external activities;
 - d) Holding shares or equity interests in companies that are competitors or related to the Company's clients or contractors;
 - e) Making decisions or taking actions that could result in personal gain at the expense of the Company's interests.
2. A conflict of interest may also arise in situations that are potential or perceived as such by third parties, even if no actual influence has occurred.

§3. Obligation to Disclose and Procedure

1. Every employee or associate who finds themselves in a situation that may give rise to a conflict of interest is required to promptly report this fact to their immediate supervisor or the Management Board of the Company.
2. The report should be made in good faith and include:
 - a) a description of the situation;
 - b) identification of relationships or dependencies;
 - c) an assessment of the potential impact on professional duties.
3. Until a decision is made by the supervisor, the employee should refrain from taking any actions that may be related to the potential conflict.
4. Individuals who report a conflict of interest openly and in a timely manner will be treated with full respect, without the risk of negative consequences—provided there has been no breach of loyalty or concealment of facts.

§4. Preventive Measures

1. The Company undertakes actions to identify, prevent, and mitigate the risk of conflicts of interest, including:
 - a) developing and disseminating this Code;
 - b) periodic declarations of interests for individuals in decision-making positions;
 - c) monitoring decision-making processes in areas of particular risk (procurement, tenders, recruitment).
2. The Company does not allow situations where an individual related to a candidate, supplier, or contractor may independently make decisions affecting the outcome of the cooperation.
3. If an undisclosed or deliberately concealed conflict of interest is identified, the Company reserves the right to:
 - a) conduct an internal investigation;
 - b) apply disciplinary measures;
 - c) terminate cooperation or take legal action if the act constitutes a breach of trust or is detrimental to the Company.

