

# THE CODE OF ETHICS IN THE COMPANY OF FOXCONN

**Valid from: 14th June 2019**

**Valid for: All employees of Foxconn Group in the Czech Republic** (i.e. all employees of Foxconn CZ s.r.o., Foxconn EMS s.r.o.; Foxconn Technology CZ s.r.o.; GLOBAL SERVICES SOLUTIONS s.r.o.; Vault DX s.r.o.; Foxconn Europe Digital Solutions s.r.o.).

The above mentioned companies are hereinafter called „our company“ or „the company of Foxconn“ in this document. Thus, where this designation is used, for a particular employee it means always the particular company of the Foxconn Group which is the employee’s direct employer and also any other company of Foxconn to whose benefit the employee carries out his/her work.

## I. CODE OF ETHICS

We aim to ensure continued customer trust in us and to enhance Foxconn’s image as a competitive company in the industry. At the same time we aspire to be a company where our employees are proud to work and will do their best for our customers, business partners and suppliers, as well as our company. Our reputation is not only based on the products and services we provide, but also on the way in which we do business and we gain trust by our honest and fair interactions not only with our business partners, but also with our employees.

In our daily work we are required to follow the professional standards and other legal norms, as well as internal policies of the company of Foxconn based on ethical and moral principles. That is why the Code of Ethics (hereinafter only “the Code”) has been created to provide clear standards and guidelines which Foxconn will support and will be guided by when carrying out its business. The Code will outline responsibilities and principles that are to be followed within the company of Foxconn. Therefore they are valid for all our employees and partners. The Code is based on our company values we share and should help us fulfil them in our everyday work.

---

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

We all are expected to accept the principles of the Code and our company values:

- to carry out all activities of Foxconn with respect to the environment,
- to provide a safe workplace, as well as to follow all valid Health & Safety regulations, to participate in safety trainings and exercises, and immediately report any unsafe situations,
- to show respect to our colleagues and business partners in word, attitude, and activities,
- to build good relationships with other employees, our customers and suppliers, as well as the local community,
- to act blamelessly and honestly,
- to work responsibly in order to deliver the best results for the success of our company,
- to ensure the highest ethical practices are applied in our business partnerships,
- to be reliable and always meet our commitments to others,
- to adhere to legal regulations that are related to our scope of business, as well as the principles of the RBA (Responsible Business Alliance) Code of Conduct.

We should always keep in mind our behaviour outside working hours, if it is contrary to the law, as it may harm our company and its reputation. Therefore, all our employees should comply with the valid legal regulations even outside working hours and especially avoid any deliberate form of a criminal act.

### Responsibility for our Code

The reputation of our company comes from the ethical and responsible behaviour of all employees, and from decisions made by each and every one of us every day. Foxconn upholds the highest standards of ethics to meet social responsibilities and to achieve sustainable development. The highest standards of integrity are expected in all our business interactions.

**All our decisions are to be governed by this Code, no matter which job or task we perform, the Code is valid for all employees of our company.** Therefore, every employee is required to be well acquainted with the rules included in the Code as well as the company values.

Although the Code lays down a number of rules and recommendations connected with principles of personal integrity and ethical behaviour in the work life, it will not cover all situations. This does not replace our own key personal responsibility, the necessity to use our own judgement and our duty to seek advice regarding suitable behaviour or procedure when necessary.

14. 6. 2019 – Version D

FOXCONN CZ s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

Foxconn European  
Manufacturing Services s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

Foxconn Technology  
CZ s.r.o.

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

GLOBAL SERVICES  
SOLUTIONS s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

## Be a good example

**All of us, especially leading employees, have to act irreproachably.** We expect our leaders to lead by good example and inspire other employees to accept the Code by means of:

- appreciation of integrity,
- supporting ethical decisions,
- creating an open workplace where team members can feel safe to raise doubts about following the rules and honesty of behaviour,
- looking for help when dealing with problems and passing them to higher levels, if they arise,
- putting our company values into practice (i.e. accountability, customer satisfaction, integrity, friendly approach, teamwork, proactivity).

Every superior is responsible for his/her subordinate employees, therefore their mutual relationship should bring mutual respect and our superiors are expected to act and behave in such a way to be a good example for their subordinates.

## II. GUIDE FOR ETHICAL BEHAVIOUR

The consequences of illegal or unethical behaviour can lead to penalties for our company, we could lose business partners, or damage our company reputation.

Our aim is to create a company culture based on trust and personal responsibility. Despite this, some employees might encounter unethical or even illegal behaviour. Therefore, one of our tasks is to give them an opportunity to report these cases and inform the management of the company about any violation or suspected violation of the law, rules, guidelines, or the regulations stipulated by the Code. We maintain an **Open Door Policy** and stimulate clear, direct, open, honest and timely communication. We are ready to discuss opinions, ideas and beliefs without fear of retaliation.

**Do you have any concerns, questions or doubts?** Feel free to discuss them with your superior or manager. When it is not possible to raise or resolve the issue with them, contact the new team of Compliance & Development Office (hereinafter only “Compliance Office”) which was established by our company management for these purposes. All of them will be glad for your feedback and ready to help.

---

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

Where there is evidence of violations of this Code you will be required to, without delay, inform your superior, a member of management or Compliance Office. If necessary, you may do so anonymously through our website company where there is a section dedicated to inquiries of our employees and the public. The second tool for our employees to submit any concern/question online is the intranet or you can also use one of the special letterboxes for inquiries where you can raise your issue anonymously. Or you come to our Compliance Office where we will listen to you and ensure corrective actions if necessary.

### **What should you do if your superior asks you to do a task that you believe might violate this Code?**

Inform the manager of your department or cost centre openly and honestly. If you are not satisfied with their answer, please address a member of our higher management or Compliance Office.

### **How do you know when you should look for assistance?**

When considering how to act in a particular situation, use the answers to the following questions to help as a guide:

- Are you sure that this task is in accordance with our values, the Code and other regulations?
- Can this task be considered unethical or dishonest?
- Can the task harm the reputation of our company or our business relations? Can your actions put the company at any kind of risk? How would it look like in a news story in media? What the impact would be if the conduct or actions became public?
- Can it harm other people, our employees, our customers, or their reputation?
- What would the people who you respect think of such an action?
- Can you find another solution that would not be ethically questionable?
- How would you feel if you were treated like this?

---

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

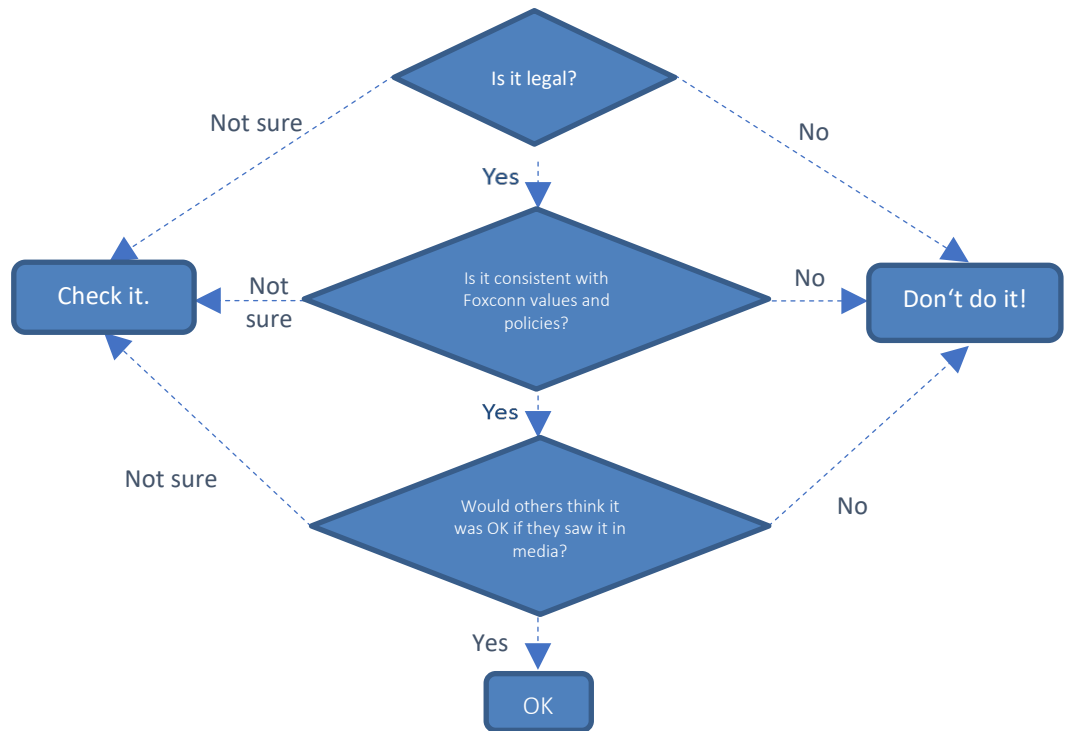
**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

The following flowchart might help you to make the right decision:



**If you are not certain about the answer to any of the abovementioned questions, please find support and assistance of your superior or Compliance Office, so that you can make the right decision.**

Our company has made a commitment to ensure the confidentiality, anonymity and protection of direct and indirect employee whistle blowers who in good faith report problem issues, raises doubts about following this Code or looks for advice connected with business procedures, decisions or behaviour. Personal data or sensitive information provided by them is considered to be confidential. Any kind of retaliation towards an employee who reported a concern or a problem issue in good faith is in itself a violation of the Code.

### **III. OUR SUPPLIERS OR PARTNERS**

**All transactions with our current or potential suppliers or partners should follow the highest ethical standards and must be completely transparent. Thus, concluding any oral or secret agreements with companies instead of written agreements is not acceptable. The selection process of our contractual partners must be always carried out according to predetermined criteria and the winning bid should always be in**

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

**accordance with due diligence and best interests of the company. Any unjustified favouring of some contractual partners or their groundless exclusion is not acceptable.**

From our suppliers we expect the same standards of irreproachableness that we ourselves follow. Any unethical or illegal act of our supplier may harm the reputation of the company of Foxconn and damage its good name. Thus, all our suppliers are required to follow our Code of Ethics as a condition of doing business with us.

Please keep in mind that the direct superior must be always informed in advance and in a written form of any interaction (by telephone, e-mail etc.) or a meeting with a new or potential supplier which is not included in AVL (the list of approved vendors – valid only for SCM department), even if it is informal. The same applies to meetings with current vendors aiming at discussing activities not related to the current business with the vendor.

Any personal contacts with suppliers (or even potential suppliers) and company representatives outside the premises of Foxconn that could influence our business decision about the mutual cooperation are strictly prohibited, the same applies when going e.g. to restaurants with suppliers or potential suppliers and company representatives, or accepting invitations to company parties without any work duties.

At the same time any transactions with the current or potential suppliers or partners must be in accordance with points VII and VIII of this Code, as well as with the principles of the RBA Code of Conduct.

#### **IV. HUMAN RIGHTS**

Our values, this Code, our strategy to retain talented people and our employment policy work together and follow the principles included in the Declaration of Human Rights. We expect our employees, suppliers and partners to follow these principles. This Code is one of the tools that we use to minimize possible risks of human rights violations across the whole business.

##### **Regulations against discrimination:**

We all have the opportunity to reach our full potential and contribute to the success of the company of Foxconn. In order to do so, we cannot discriminate or treat other employees or job applicants dishonestly.

Your labour-law decisions concerning our employees (e.g. wages, promotions, rewards, and access to training) or job applicants in hiring must always be based on the work-related merits, qualifications and their performance regardless of qualities that are not

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

work-related, such as: race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, marital status, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status etc. In addition, our employees or job applicants should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

If a significant group of any established religion will ask for space for religious practices (physical space or time) to practice their religion, then the employer shall make steps in order to allow the employees to practice their religion. In such cases it is always necessary to consider business needs in order to ensure that such request does not negatively affect the business operation.

Pregnant women and nursing mothers may not be discriminated either and they are protected by the Czech Labour Code (no night shifts etc.). Employer is obliged to ensure a suitable room to be used for breast feeding based on a particular request.

Our Compliance Team periodically reviews hiring practices, compensation records, employee evaluation and promotion documents to determine that there is no prohibited discrimination.

#### Regulations against harassment:

The company of Foxconn aims at ensuring a working environment in which there is no harassment of any kind or any other offensive or disrespectful behaviour. Our Code prohibits any harassment in the workplace, which includes unwelcome verbal, visual, physical or other behaviour of any kind that creates intimidating, offensive or unfriendly working environment.

#### Zero tolerance of violence:

Our company has a zero tolerance of violence in the workplace. Any activity that might cause individuals to feel any kind of threat or danger is not acceptable. This includes verbal attacks, threatening or other expressions of enmity, intimidation, aggression, or bullying.

**If you or anyone else is exposed to any kind of discrimination, harassment or violence, speak immediately to the management or Compliance Office and report it.**

#### Wages, no disciplinary deductions:

We apply the policy “Pay equals time worked” and our employees are always paid on time and no less than the agreed wage for all regular hours (incl. resigned employees). Any deductions from wages as a disciplinary measure are not permitted.

---

14. 6. 2019 – Version D

FOXCONN CZ s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

Foxconn European  
Manufacturing Services s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

Foxconn Technology  
CZ s.r.o.

Karlovo nám. 245  
284 01 Kutná Hora  
IČ: 27516032

GLOBAL SERVICES  
SOLUTIONS s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

### Voluntary work, no fees/penalties and free movement of employees:

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons must not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

Our direct and indirect employees must not be required to pay any fees, excessive fees, deposits or incur debt as part of their employment (paid either as one-time or installment payments, collected directly or through wage deductions). They work for us voluntarily including overtime and are free to leave work at any time or terminate their employment without any penalty (i.e. no threat of punishment, fines, violence, or withholding wages). When employment has been terminated voluntarily or involuntarily, worker will be paid appropriate amounts for all hours worked within the standard payment term (by the 15 day of the following month).

Our employees receive a reasonable amount of time off for sickness or maternity without job loss or financial penalty when supported with a medical certificate.

Rules for leaving the working place (e.g. due to the need to drink or use social facilities) are determined clearly at particular workplaces but usually in the production areas it is necessary to inform your superior first in order to ensure some replacement. If you are not sure what to do, ask your superior. If you do not get a clear answer from him/her, contact our Compliance Office.

Employer may not hold or store employees' government-issued identification or personal documents originals or otherwise destroy, conceal, confiscate, or deny access by employees to these documents (such as ID cards, passports, work permits, citizenship, residence, social/health insurance cards, birth certificates, bank documents etc.) unless such holdings are required by law.

## V. HEALTH AND SAFETY

Regardless of where you work or what you do for our company, you are expected to make sure that your work is done safely.

Always speak up and raise doubts if:

- you are asked to do a task that you consider to be dangerous,
- you are asked to do a task that you believe you haven't been trained for properly and that you might harm yourself or others,
- you see that someone else is doing a task which you think is not safe or that it is done by somebody who hasn't been properly trained to do the particular task.

---

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**



**Safety is the responsibility of every employee – it is necessary to insist on doing your work safely. In case of any doubt contact Compliance Office.**

## **VI. CONFLICT OF INTEREST**

A conflict of interest may arise when personal, social, financial or political affairs could or appear to influence your business decisions. It may exist in various forms and our Code of Ethics cannot describe all of them. It is up to you to rely on your own judgment, honesty and moral principles.

Your obligation to perform your activities in our company honestly and ethically includes also solving real or potential conflicts of interest. Sometimes preventing these conflicts is required and it is always required to publish completely real or potential conflicts of interest.

Some examples of conflict of interest are not acceptable because they are contrary to everyone's obligations to our company, e.g.:

- Working for or providing service to anybody who you deal with when working for our company;
- Any activity or work done by you for our competitors in parallel to your work in our company;
- Acting in favour of our suppliers or customers with the aim to prefer their interests to our company's interests;
- Accepting financial or other rewards and benefits or a promise of them for yourself or anybody else from business partners of our company with the exception of common gifts (mentioned hereinafter);
- Your participation in decision making in a matter which results in a personal benefit for you or a person close to you , e.g. investments in a supplier if you are involved in the selection process.

Conflicts of interest may also arise in cases when:

- You make work decisions that may be influenced or seem to be influenced by personal interests, family interests or a friendship,
- You or a person close to you invest or take part in business of companies that are suppliers or customers of our company – with the exception of publicly traded securities, where individual investors do not influence the decisions made, or when financial interests exist in one of the suppliers etc.,
- You or a person close to you use the property of our company, information or resources for personal gain or for the gain of others,
- You or a person close to you gain personal or financial profit by providing services to a supplier or our customer, or when you use your authority in the

---

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

company to the benefit of a supplier or a customer of the company,

- You or a person close to you get involved in activities that are contrary or might seem contrary to the interests of our company (e.g. providing services or advice to competitors or suppliers etc.),
- A person close to you has business meetings with you, your subordinates, or employees who work at your department.

In accordance with this Code persons close to you are especially but not only a husband, a wife, parents or step-parents, children and grandchildren, brothers, sisters, step-siblings, nephews, nieces, aunts, uncles, cousins, grandparents, great-grandchildren, a father-in-law, a mother-in-law, or other relatives in the direct or subsidiary lines. This term also includes close partners (regardless the fact whether officially registered pursuant to the law or not), your friends and other people you live or have a close or intimate relationship with, without regard to the fact whether you have a family relationship with them. In case of questions concerning the conflict of interest you are not responsible to know about all activities of your family members who do not live with you. With regard to your family members not living in your household and other close persons it is always necessary to care only about circumstances you are aware of.

Other terms of supplier, consumer, competitor, or customer in accordance with this Code describe also entities striving to become a supplier, consumer, competitor, or customer of our company.

**If you believe that you might have a possible or real conflict of interest concerning your work, come and inform our company immediately.** In many cases these conflicts can be solved by an open and honest discussion.

***Remember that having a conflict of interests does not necessarily mean a violation of the Code. However, it is a violation not to inform the company of such a conflict. Thus every employee is obliged to inform the direct superior and Chief Compliance & Development Officer provably in written about his/her potential conflict of interest.***

#### Other gainful activity:

The Code does not constrain the employees from legally acceptable activities outside our company, including other employment, provided the following conditions are met:

- the particular activity does not have a negative impact on the employee's work performance and will be done beyond the working hours,
- if the particular activity should be identical with the business activity of the employer or if it could in its nature pose a potential conflict of interests, as described above, the employee has to ask for a prior written permission of the employer.

14. 6. 2019 – Version D

FOXCONN CZ s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

Foxconn European  
Manufacturing Services s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

Foxconn Technology  
CZ s.r.o.

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

GLOBAL SERVICES  
SOLUTIONS s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

## VII. A) ACCEPTING OR OFFERING GIFTS

The exchange of small gifts and promotional items between business partners is a common habit in business but we need to ensure that giving or receiving these gifts does not impact or influence our business decisions. A gift is not always a thing, as it might also be a provision of a free or unusually advantageous service to you or persons close to you. Thus, our employees are obliged to refuse any gifts if their acceptance might be a reason for suspected improper influence or improper behaviour (an attempt to influence a business decision, a condition to get a contract, an obligation to deliver products/services to Foxconn, bribery etc.). Our employees are not allowed to accept gifts other than those that are an expression of politeness or courtesy according to business ethics.

Gifts, or any form of benefit, exceeding the value of 1000 CZK are considered to be improper and it is the duty of the employee to inform their direct superior and Chief Compliance & Development Officer about such a gift offer. Gifts valued at more than 1000 CZK may be accepted only based on the donor's consent for the purposes of the company prizes for the raffle. At the same time, any gifts not exceeding CZK 1,000 are considered inappropriate if they are provided to our employees by the same donor more than twice a year. Any offered or accepted gift (as well as any invitation to an event) must be reported in the open gift book published on our intranet. This book is accessible for everybody and it is administered by Compliance Office and monitored on a regular basis (min. twice per year).

If an employee is offered a visit to an entertainment event (e.g. sports or cultural event etc.), the employee is always required to inform his/her direct superior about this offer who must approve it in advance or explain the reason why the attendance is not acceptable. The potential attendance should serve a clear business purpose and then any travel costs must be paid by our company.

The company employees are not allowed to offer gifts other than those that are an expression of politeness or courtesy according to business ethics. Possible gifts should not exceed the price of 1000 CZK and they cannot be given more than twice a year.

## VII. B) BRIBERY AND CORRUPTION

**Your work decisions must not be influenced by corruption.**

**Any bribes and corrupt dealings that lead to obtaining undue or improper advantage with our customers, suppliers or other third parties are inconsistent with our company policy and therefore they are strictly prohibited. "Corruption" in general means gaining**

14. 6. 2019 – Version D

FOXCONN CZ s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

Foxconn European  
Manufacturing Services s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

Foxconn Technology  
CZ s.r.o.

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

GLOBAL SERVICES  
SOLUTIONS s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

or attempts at gaining personal or business advantages for ourselves or others by dishonest or illegal means. Corruption may mean payments or exchange for anything valuable and includes the following acts:

- bribery,
- blackmail,
- embezzlement (covering promising, offering, giving or accepting any bribes),
- provision or acceptance of any undue or improper advantage (provision, goods, services, discounts on goods/services, information, or other advantages or benefits).

Corrupt activities, such as promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage, are a violation of this Code and may also be a serious violation of criminal and civil laws concerning bribery and corruption.

Our new employees must not be required to pay employers' or any agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by them, such fees shall be repaid to the employees within 90 days of discovery.

**If you find out any potential or real corrupt behaviour or agreement, it is your duty to report this to the management of the company by means of our Compliance Office.**

Furthermore, our company guarantees no demotion or any other adverse consequences in case you refuse to participate in bribery/corruption or if you have declared conflicts of interest, even if this action may result in the enterprise losing business.

## VIII. INFORMATION

In the course of your employment you may get certain information about the company, its structure, strategies, business activities, products, services, financial situation, performance, technical capabilities, methods, procedures or processes (incl. occupational health and safety or environmental practices), customers, suppliers, business partners, employees, or third parties which is considered to be confidential. You should always take all possible measures to protect any confidential information connected with our company. You are not authorized to disclose or forward any information outside the company, not even to your family members, unless this disclosure is authorized and unless it is in accordance with your written confidentiality agreement. Moreover, this information may be disclosed only in accordance with applicable regulations and prevailing industry practices.

---

14. 6. 2019 – Version D

FOXCONN CZ s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

Foxconn European  
Manufacturing Services s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

Foxconn Technology  
CZ s.r.o.

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

GLOBAL SERVICES  
SOLUTIONS s.r.o.

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

We have also committed to protect the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers, and our employees. Thus, we must comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared including the requirement of the EU General Data Protection Regulation.

Any falsification of records or misrepresentation of conditions or practices in the business and our supply chain, as well as any misreporting of business activities is not acceptable. Our company strictly follows standards of fair business, advertising and competition. We are active in a highly competitive market but we do not criticize or make denigrating remarks about our competitors. We should avoid situations which lead to obtaining information about our competition improperly or which could be interpreted in such a way. When we recruit candidates from our competition, we do not ask for confidential information about their previous employer and we do not use confidential information that they may possess.

Any information/interview requests from the media concerning the employer are not to be answered by employees, but must be always passed to Chief Compliance & Development Officer. All information or press releases must be approved before being published by our Executive Head.

## **IX. INTELLECTUAL PROPERTY**

Intellectual property rights must always be respected. Any transfer of technology and know-how must be done in a manner that protects intellectual property rights and customer and supplier information must always be safeguarded. Any loss or disclosure of our company's / employees' / partners' intellectual property is unacceptable.

These rights must be also respected when storing internal data (documents, photographs etc.) on public internet storage servers. If you have to use them, please always make sure that the document is protected with a password and remove it as soon as possible.

## **X. FRAUD**

Abusing the resources of the company and committing fraud means deliberately hiding, changing, forging, or exchanging information for your own personal gain or for the gain of others. **You are supposed to report any suspicions to your direct superior or Chief Compliance & Development Officer. Avoid any situation that appears fraudulent.**

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

**Never spend company financial resources without proper authorization and do not make agreements in the name of the company unless you have the authorization to do so.**

## **XI. COMPANY PROPERTY**

We use various tools and equipment (PCs, notebooks, mobile telephones, etc.) that have been provided to us in order to perform our daily activities. Due to the high cost it is necessary to ensure that they are used effectively. Using them for any purpose other than the company goals requires your direct superior's approval. At the same time our employees must not damage them deliberately.

Moreover, it is forbidden to install any illegal software on Foxconn computers or make illegal copies for your own usage, the company or customers.

## **XII. ANTIMONOPOLY LEGISLATION**

Antimonopoly legislation prevents companies from concluding contracts/agreements that limit free competition in an unacceptable way or obstruct the free market mechanism. That is why all our employees are always obliged to strictly adhere to the rules related to the right of economic competition. Any collusion with other companies on determining prices of products or other factors that could reduce competition in a way (e.g. agree pricing with our competitor or agree with a supplier not to supply to competitors, sell products/services below cost, develop/implement activities aiming at eliminating competition or keeping new parties from entering the market) is not acceptable. It is also unacceptable to agree with business partners and third parties on not competing, submitting fictitious offers in public tenders or dividing markets or production programmes. The rules of economic competition also apply to all our communication, thus please be aware that all our e-mails, reports, memo's etc. can be potentially used as evidence in a court of law to prove our intention to limit the competition.

## **XIII. RESPONSIBLE SOURCING OF MINERALS**

Our company reasonably assures that the tantalum, tin, tungsten and gold in the products we may manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in any country, especially in the Democratic Republic of the Congo or an adjoining country. We exercise due

---

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlovo nám. 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**

diligence on the source and chain of custody of these minerals and make our due diligence measures available to customers upon customer request.

#### **XIV. AUDITS AND INVESTIGATIONS**

In the course of your employment you may be asked to participate in an audit or internal investigation carried out by our internal or external auditors. If this should happen, you are expected to cooperate properly and communicate honestly.

#### **XV. INVESTIGATING CODE VIOLATIONS**

Our employees are able to raise any concerns or report any ethical misconduct of other people confidentially and anonymously to our Compliance Office without fear of retaliation. Any reports connected with a suspected violation of the Code will be seriously and immediately investigated. Such violations are monitored by the senior management of our company through the formation of a steering board, named SER & Ethics Committee. We guarantee to protect the informer's identity as part of the allegation investigation process if it is needed or required by him/her.

If it is found out that the allegation or accusation is false and that it was reported on purpose as a weapon against another employee, then this misuse shall be considered as a violation of this Code.

#### **XVI. DISCIPLINARY MEASURES**

Respecting the Code of Ethics and following all our internal regulations and laws related to performing your work is the condition of employment in our company. Violations of the Code may result in disciplinary measures that may lead to the termination of the employment relationship depending on the nature and seriousness of the violation. All cases will be reviewed and concluded by our Compliance Office and the SER & Ethics Committee.

Thus done in Pardubice on 14<sup>th</sup> June 2019.

---

14. 6. 2019 – Version D

**FOXCONN CZ s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25938002

**Foxconn European  
Manufacturing Services s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 25965361

**Foxconn Technology  
CZ s.r.o.**

Karlov 245  
284 01 Kutná Hora  
IČ: 27516032

**GLOBAL SERVICES  
SOLUTIONS s.r.o.**

U Zámečku 27  
530 03 Pardubice  
IČ: 27524850

[www.foxconn.cz](http://www.foxconn.cz)

**FOXCONN**