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As a family business, we are committed to legal and socially responsible management. Each Telegärtner Group company complies with the laws and regulations in force in the countries in which it operates and therefore adopts a legally compliant Code of Ethics.

All Telegärtner Group companies undertake to adopt a reasonable minimum of binding rules. The Code of Ethics may be supplemented by additional national and company-wide guidelines.

Telegärtner Group further undertakes to promote the content of this Code of Ethics regarding its suppliers and the added value of the chain, within their own areas of activity and capabilities.

The Code of Ethics and its implementation are communicated openly and in dialogue with employees, customers, suppliers and other stakeholders and parties.

1 Main principles

Telegärtner's success and reputation also depend on the right demeanour, actions and behaviour of each employee. Actual or potential failure to comply with applicable laws, regulations and internal company requirements may cause significant material and non-material damage to Telegärtner. Each employee is therefore guided to control their activities according to the following principles, in order to prevent Telegärtner from being perceived negatively.

This Code of Ethics is set as the guiding principle and benchmark for day-to-day work. Should these guidelines prove to be insufficient and do not take into account internal or external requirements, decisions should be based on personal integrity and common sense.

The following questions may help:

- Is the decision really in Telegärtner's interest?
- Is it a decision that does not take into account the personal or private interests of third parties?
- Is the activity (implementation of the decision) governed by a Code of Ethics?
- Would the decision or its implementation stand up in the event of a public inquiry or explanation?

If the answer to one of these questions is or could be "no", the intended action should be taken in consultation with management or senior management.


2 Company ownership, conflicts of interests and corruption

2.1 Management of Telegärtner assets

The company's assets, all materials and materials provided for the company's business must in principle be used only for the company's business and must be handled with care.

	Name and surname	Signature	Position	Date
Processed by:	Mgr. Dušan Kudrec		Director's assistant	12.01.2022
Approved by:	Vladimír Baran		Managing director	14.01.2022

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The Company's assets may not be sold, rented or used for any purpose outside the Company without express permission, regardless of their condition or value.

Unauthorized use of company property will be considered theft with legal consequences.

All employees undertake, within the scope of their duties, to protect the assets of Telegärtner Slovakia a.s. and act honestly and fairly when they treat him.

2.2 Conflict of interest

Conflict of interest is defined as circumstances that involve the risk that a professional decision or activity relating to the interests of Telegärtner Slovakia a.s. is adversely affected by the personal interests of the employee.

All employees must ensure that their personal interests do not conflict with the interests of Telegärtner Slovakia a.s ..

Telegärtner values the personal interests and private lives of its employees. However, the personal or financial interests of the employees must not affect the interests of Telegärtner.

For example, conflicts of interest may arise if employees:

- receive, offer or donate gifts and invitations,
- are members of the management of another company, work for another company or cooperate with competitors.

In these cases, proceed as follows:

1) Accepting invitations, gifts or other benefits:

Employees of Telegärtner Slovakia a.s. must not encourage, enforce or solicit, either for themselves or for others, gifts and other rewards or invitations, personal services or other services from business partners and customers.


Decline gifts or other rewards or invitations from business partners or customers if these could influence your decisions by their value or create the impression of influence. You can accept discounts and other benefits offered by business partners or customers only if they apply to all employees of Telegärtner Slovakia a.s ..

Promotional items and occasional gifts from business partners and customers may be accepted for reasonable value and in reasonable circumstances.

Accept invitations from business partners and customers for lunches, dinners and other events only if they are expressed without coercion, if they serve business matters, do not occur unreasonably often and hospitality is in line with the boundaries of normal cooperation and in relation to business matters.

The exact criteria for accepting gifts and invitations should be defined by each subsidiary, and communicated to each employee.

If you are unsure of the appropriateness of gifts, grants, or invitations, ask your supervisor for permission.

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2) *Giving invitations and gifts*

If you invite business partners and customers, adhere to reasonable limits appropriate to the circumstances. Invitations and gifts can only be made in the normal course of business. Avoid showing any intention to exercise your influence.

The criteria for giving gifts and benefits to business partners and customers should also be defined by subsidiaries and brought to the attention of employees.

3) *Seat in the management of other companies and ancillary activities*

Acceptance of membership in the board of directors, supervisory board or advisory board of another company is only permitted if it has been approved in advance by the advisory board of TG Holding GmbH / board of directors / management.

Ancillary activities must be notified to the responsible manager and human resources department before they are initiated and examined for any potential conflicts of interest. If such a conflict of interest exists, such activities may be prohibited if they are contrary to the legitimate interests of the company.

4) *Shares and participations in other companies*

As employees of Telegärtner Slovakia a.s. you can buy and own shares and stakes of business partners or competitors only if:

- it is done on a small scale and
- the possibility or appearance of a conflict of interest is excluded.


The rule cannot be circumvented by the shares being acquired or owned by third parties on behalf of the employee.

2.3 **Corruption**

The following principle applies to us: We do not bribe or accept bribes! We don't want to do business at all costs. We want to achieve orders in an honest and legitimate way. Telegärtner Slovakia a.s. does not tolerate the unethical or corrupt practices of its employees or business partners, and takes legal action in such cases.

In our dealings with individuals, domestic and foreign institutions, as well as public officials, we pay special attention to business ethics. Under no circumstances do we provide payments, contributions or other financial benefits to public officials, civil servants or employees of municipal and state companies in order to obtain a contract or benefit for Telegärtner Slovakia a.s. or for other persons. We follow this approach even if these benefits are expected or "normal" in such circumstances.

Similarly, we refrain from using payments to influence certain transactions with private companies. In our business negotiations, we always ensure that we avoid even the impression that we are influencing our business partners and customers.

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3 Business integrity

3.1 Data protection and privacy

Personal data of employees, customers and business partners is collected, processed, stored and distributed in accordance with legislation and company regulations. Compliance with data protection legislation is an important indicator of the reliability of Telegärtner Slovakia a.s ..

Trade secrets entrusted to employees in the ordinary course of business or otherwise must be treated confidentially and not disclosed to unauthorized third parties. Discretion must be maintained if activities and processes within the company are not to be made public.

This includes information on:

- financial results and changes in dividends,
- mergers or acquisitions,
- technical innovations and order-related situations,
- significant changes in the organization's management or business.

This unpublishable information must be treated as confidential, not used or disclosed without permission, including to family members and friends.

4 Social responsibility and environmental protection

4.1 Social responsibility

We believe that social responsibility is a key factor for the long-term success of our company and thus an indispensable part of our corporate governance. Our business practices are in line with the principles of sustainable development.

Growth and job stability are important factors in the success of Telegärtner Slovakia a.s ..

Telegärtner Slovakia a.s. respects human rights and condemns all forms of child labour and forced labor.

In Telegärtner Slovakia a.s. reflects the diversity of society, languages, cultures and lifestyles. We respect and support this diversity, as it guarantees closer relationships with the community and our customers, as well as new ideas.


We do not tolerate discrimination against people, especially because of their race, religion, sexual orientation, nationality, origin, political activity, or because of their age, gender, or disability.

4.2 Environmental protection

We are committed to the principles of a sustainable economy and environmental protection. We support appropriate measures to address potential environmental impacts.

4.3 Consumer interests

As far as the interests of consumers are concerned, Telegärtner Slovakia a.s. complies with consumer protection regulations as well as relevant areas of sales, marketing and information procedures..

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5 Quality

Quality is one of the strategic interests of the Telegärtner Group. Telegärtner Group companies are obliged to treat their customers fairly and honestly. We believe that customer satisfaction is the key to the longevity of the group. The employees and companies of the group focus primarily on the quality of contacts, strive for continuous improvement of the quality of products and services, while paying attention to the protection of health and safety when using the products offered. The technologies and processes used meet the requirements for quality, safety and the environment in accordance with contractual provisions and legal regulations.

These requirements are also taken into account in the selection of suppliers, contractors and subcontractors.

Thanks to the independent certification of our quality, safety and environmental management systems, customers' confidence in our ability to meet their obligations is growing.

Employees are obliged to contribute to the gradual improvement of internal risk management systems and to participate in the identification of the primary causes of their malfunction.

All employees of Telegärtner Slovakia a.s. undertake not to knowingly conceal disagreements if they become aware of them, resp. if an error occurs in their work. At the same time, Telegärtner Slovakia a.s. undertakes that if an employee reports such an error, the company will not penalize or discriminate against him in any way.

6 Compliance with the Code of Ethics in Telegärtner Slovakia a.s.

Telegärtner Slovakia a.s. expects managers and employees to adhere to this Code of Ethics. All employees must be familiar with the content of these guidelines, know them and act in accordance with them. Because these guidelines are the basis of our daily work.

The company's management must ensure that all employees are aware of and adhere to the Code of Ethics. The company's management is the first point of contact in case of questions and supports employees in proceedings in accordance with the law.


If questions arise regarding the Code of Ethics, members of management are assisted by a human resources department that provides support.

Violation of these instructions or other rules and regulations Telegärtner Slovakia a.s. may have labour law consequences, while respecting the principle of proportionality.

Since Telegärtner Slovakia a.s. expects its partners, together with its employees, to adhere to this code and to further develop its principles, this code will be made available on the website: www.telegaertner.sk

7 Reporting non-compliance with the Code of Ethics

The company's employees are obliged to report any breach or suspected breach of the Code of Ethics to the company's management, which is responsible for examination of the report and taking all necessary steps to clarify the case.

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Notifications of violations or suspected violations of the Code of Ethics (by both the employee and the external partner) can be submitted through communication channels established by the company.

Notifications can be delivered to:

- in the form of a letter to the address:
Telegärtner Slovakia a.s., Code of Ethics, Budovateľská 38, 080 01 Prešov, Slovak Republic,
- by e-mail at: dusan.kudrec@telegaertner.sk
- by means of a notice submitted using the mailbox at the company's premises (the notice must be marked "Code of Ethics"),
- personally and discussed with the company's management..

An employee who reports a suspected violation of this Code will not be penalized and disadvantaged in any way.

The company Telegärtner Slovakia a.s. undertakes to maintain confidentiality in connection with the identity of the individual who provided the notification and, until the notification is clarified, also in connection with the identity of the person against whom the notification is directed (except in cases provided by generally binding legal regulations of the Slovak Republic). At the same time, it takes measures to protect these persons from possible discrimination or other forms of negative consequences associated with reporting a violation, resp. suspected violations of the Code of Ethics.

Any manifestly false statement made with the intent to harm another employee will be considered a violation of the Code of Ethics.

The responsible employee submits to the management of Telegärtner Slovakia a.s. reports on complaints, infringements and the action taken as a result.

At the same time, the responsible manager provides advice to employees in cases that the Code of Ethics does not describe in sufficient detail. Employees can use all communication channels for announcements when asking questions or asking for explanations. They may also seek clarification and advice from their immediate supervisor.

The culture of Telegärtner Slovakia a.s. it is based on the principles of trust and mutual respect, not on regulations and control. Any behaviour that could lead to a breach of trust and mutual respect will be rigorously assessed and implicated.