Continental	Controlled documentation in	Page number:	1
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Directive No. 35

Site Security Policy

Version applicable to external organisations

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Τ/ 1			ONTENTS f the Standard4
2		•	/alidity4
		•	uments, Basic Concepts and Abbreviations4
	3.1		Related Documents4
	3.2		Basic Concepts and Abbreviations5
4	Act	ivity D	escription – Security Management6
	4.1		Basic Security Rules on the Premises6
	4.2		IK Management9
	4.3		Entry of persons10
		4.3.1	Employees of supplier companies- contractors
		4.3.2	Visits/Visitors
		4.3.3	List of Unwelcome Persons (Black List) with a ban on entering the company premises
	4.4		Entry/exit of motor vehicles to/from the company premises15
		4.4.1	Employees of supplier companies Entry/exit and parking of vehicles on the premises
	4.5		Gatehouses for entering the company premises18
		4.5.1	South gatehouse
		4.5.2	North gatehouse
		4.5.3	Main gatehouse
		4.5.4	Entrance for visitors – entrance hall of the administrative building AB 1
		4.5.5	Railway Siding gatehouse
		4.5.6	Unmanned gatehouse – turnstile at the TCP building19
		4.5.7	Púchov Distribution Centre gatehouse19
	4.6		Camera system operation19
		4.6.1	Camera system operation principles19
		4.6.2	Rules for the camera system operation
	4.7		Security zones in the company premises21
5		-	pilities21
6		-	d SEM records22
7	Cha	ange m	anagement22

Continental Tires Slovakia, s.r.o.	Directive No. 35	Pag	je number:	3
Continental Matador Truck Tires s.r.o.	Revision 13	Nur	nber of pages:	22
Attachments:				
1. Application to issue a	an IK to a person	9	1 November 202	3
4. Application to issue a	an IK to a motor vehicle	9	1 November 202	3
9. Incident report		1	15 November 20	16
11. List of the supplier's	tangible fixed assets (DHM and HIM)	0	1 July 2014	
12. List of fees and fines		2	1 November 202	3
13. List of responsible pe	ersons	5	1 November 202	3
a) Approvers of acc	cess rights to buildings			
b) Persons respons	sible for key management			
c) <u>Situation map of</u>	the company premises			
17. Conditions for inclusion	on in the List of Unwelcome Persons	0	15 May 2021	
18. Application for taking	photographs/video recording	0	15 May 2021	

Siovakia,		– –
	DirectiveNo.35	Page number:

4

1 Purpose of the Standard

This standard establishes basic security rules for the company premises in order to protect the company assets and persons present on the company premises.

2 Scope of Validity

The standard applies to all company employees, all employees of external organisations located and visitors present on the company premises or adjacent public spaces belonging to the company.

3 Basic Documents, Basic Concepts and Abbreviations

3.1 Related Documents

- Regulation of the European Parliament and of the Council No. 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation) or also "GDPR" and the Act No. 18/2018 Coll. on personal data protection
- 2) Act No. 473/2005 Coll. on private security
- 3) Act No. 311/2001 Coll. Labour Code
- 4) Group Security and Data Protection Legislation
 - 4.1. Event Security
 - 4.2. Information Security Framework
 - 4.3. Protection of Real Property
 - 4.4. Classification of Security Zones
 - 4.5. Continental ID Cards
 - 4.6. Security Incidents-Reporting and Investigation
 - 4.7. Data Protection Processes and Checklists (General) 011-Video Observation
- 5) RON No. 53 Rules for the Operation of External Organisations
- 6) RON No. 7 Electronic Property Pass
- 7) RON No. 38 Crisis Management
- 8) RON No. 42 Personal Data Protection
- 9) RON No. 64 Traffic and Operation Rules
- 10) Security Service Agreement No. 106410/2012
- 11) Securitas SK Directive for Security Service in the Púchov Premises
- 12) TOP Universal Key Management System
- 13) TOP F 20417 Security Pass System
- 14) TOP E 460112 Waste Management

3.2 Basic Concepts and Abbreviations

Company premises – includes all production, assembly and storage facilities, gatehouses, roads, internal lay-bys and parking areas, energy and technological equipment, office buildings and other facilities owned or managed by the company in Púchov. The company premises are bordered by a perimeter.

SBS - a private security service operating in the company

DPP - Directive No. 64: Traffic and Operating Rules of the Continental Púchov Premises

EZS – an electronic security system – that serves for audible (visual) warning of SBS employees about the violation of the secured area. EZS is connected to the central security desk of the premises, where all violations are recorded.

IK – an identification card of the company authorising the holder to whom it was issued to enter the Continental Púchov premises.

Interflex – Conti supplier of SW solutions for attendance and access system and visit management.

GDPR – Regulation of the European Parliament and of the Council No. 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation)

LuxDoor – a local SW application to control the entry of visitors to HV (main production) warehouse premises **Perimeter** – boundary of the internal company premises, consisting of fencing of the premises, a gatehouse and the outer walls of the buildings located on the line of the fencing of the premises.

RĽV – human relations management section, or personnel department of the company, i.e. human resources (HR)

Security manager – company protection manager

Company or Conti – includes the legal entities of the Continental Group:

- Continental Tires Slovakia (Continental)
- Continental Matador Truck Tires, s.r.o. (CMTT)

Students – students who undergo professional practice in the company as part of their practical training or who prepare for their diploma theses

Technical means with optical devices – electronic devices equipped with image documentation technology (video camera, camera, mobile phone with a camera, laptop/tablet/smartphone with a camera, and the like)

VMSI – INTERFLEX Visitor Management System

Gatehouse – a place designated for the registered entry/exit of persons and the registered entry/exit of motor vehicles to/from the company premises.

Employee – for the purposes of this Directive, an employee is considered a person in an employment relationship with the company, a person in a similar employment relationship (e.g. based on out-of-work agreements), a company managing director, a seconded employee and a dual education student.

Weapon – in accordance with Act No. 190/2003 Coll. on firearms and ammunition.

ZNO – List of unwelcome persons (hereinafter the "Black List") – persons included in the list are banned from entering the company premises for a specified period of time.

Continental Coordinator – Conti employee, who organises the preparation for the Contractor's entry into the premises and oversees the Contractor throughout the duration of their contractual relationship (under Directive 53).

Continental Tires Slovakia,			-
s.r.o.	DirectiveNo.35	Page number:	6
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

Contractor – any person, who performs manual work or service at the Continental premises on the basis of a contractual relationship between Continental and a supplier (including employees of sub-contractors)

4 Activity Description – Security Management

4.1 Basic Security Rules on the Premises

1) Important contacts

If a security incident is detected on the company premises and adjacent parking areas, such incident has to be reported immediately to the standing SBS service by using extension 3333 (+421 42461 3333).

Security incident examples:

- o theft, damage to company property or harm to an individual
- unauthorized entry to/exit from the company premises (unauthorized handling of IK, overcoming a turnstile or fencing of the premises)
- movement of an unauthorized person within the 1-2 security zone premises (main production, TCP,...)
- o violent behaviour, disturbances
- sabotage of infrastructure, machines or technological equipment within the company premises
- taking photographs and recording videos in the production areas and in the technological centre premises
- persons clearly under the influence of alcohol or other addictive substance, potentially causing public outrage
- o unauthorized removal of waste and returnable packaging
- 2) Purpose and method of entry. Entry into the company premises is only possible for the purpose of performing work (employees of the company, employees of contractors), or for business reasons (visits), through the gatehouses. Special events (excursions, open days), which are controlled in a special mode, form the only exception.
- 3) Entry identification card (IK). Entry into the company premises without an assigned IK is prohibited (unless this Directive provides otherwise). Permission for media representatives to enter the premises is subject to the approval of the company's managing director. Each person entering or leaving the company premises is required to:
 - Record each entry to and exit from the company premises using the IK card reader located on the turnstile, or in the gatehouse area, as well as at the entry to the buildings where the IK card reader is located, without prompting. IK must not be placed on the card reader if located in a backpack or bag to avoid damage to the card reader.
 - Carry IK in a protective case during the presence on the company premises. Present IK for inspection (by SBS or ESH employees, or the Security Manager) upon request.

Continental Tires Slovakia,	Directive No. 25	Dese number	7
S.r.O.	Directive No.35	Page number:	1
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

- Carry IK in a visible place when present in the security zone 2 and 3 areas (see Section 4.8).
- Protect IK from damage, loss or misuse. IK is resistant to water and dust, but less resistant to mechanical and thermal bending. IK must not be exposed to pressure, temperature higher than 60 °C, as well as to chemicals and strong electromagnetic field.
- IK is not transferable must not be used by another person!
- Report lost, stolen, forgotten or malfunctioning IK immediately to SBS staff (in person or by phone to <u>+421 42 461 3333</u>), who will ensure that the IK in question is blocked and a replacement IK is issued with the same scope of access rights as the original IK (replacement IK must be returned within 3 days of its issue).
- **Return IK** on the day that the employment relationship is terminated or on the day that the performance of work on the company premises is completed.
- 4) Compliance with Regulations and Instructions. In order to ensure security and order on the company premises, it is necessary to respect the instructions and orders of the Security Manager, SBS and ESH employees, as well as obligations arising from internal Conti regulations and generally binding regulations as well as local restrictions and orders.
- 5) The following is prohibited:
 - a) Alcohol and drugs entering the company premises under the influence of alcohol, narcotics and psychotropic substances, or keeping, distributing and using such substances on the company premises or consuming alcoholic beverages in adjacent public spaces privately owned by the company.
 - b) **Smoking** throughout the company premises, except for places where smoking is officially allowed.
 - c) **Weapons** entering the company premises with a weapon.
 - d) **IK abuse and unauthorised entry** in particular:
 - lending an IK to another person for the purpose of entering/exiting the company premises
 - entry or exit of other persons to or from the company premises, buildings or offices with a higher security level than allowed by the assigned IK or without placing the IK on the card reader,
 - entry into production premises that are not related to the worker's performance, without the consent of the relevant operation manager,
 - blocking of doors equipped with an IK card reader, preventing it from closing.
 - e) **Taking pictures and recording video** in the company premises using technical means with optical devices without approval.

Applications for taking pictures or recording video on the company premises are subject to approval by the relevant PLT Plant Manager or CMTT Plant or the TC Manager in the premises of the Technological Centre. The application form is given in Annex No. 19. Exception to this prohibition is given to the designated employees of SBS and the Fire Department within the scope of their work activities.

f) Approaching the fencing and moving on the roofs – moving unreasonably or staying in close proximity to the fencing of the company premises (1 meter) and on the roofs of buildings (risk of interference with EZS) or storing any objects in close proximity to the perimeter (min. 2 metres).

In cases when moving or working in close proximity to the fencing of the premises (1 meter), or on the roof of buildings, or in cases when storing material or objects within 2 meters is necessary, SBS staff has to be advised in advance (by phone on<u>042 461 3333, or by e-mail to securitas.veducizmeny@conti.sk</u>).

Continental Tires Slovakia,		. .	•
s.r.o.	Directive No.35	Page number:	8
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

- g) **Misusing emergency exists and facilities.** Unreasonable opening of emergency exits in the production premises, or using other emergency equipment and systems (fire detector, fire extinguisher, etc.)
- 7) Reporting damage to property. In case of any damage to the property of the company or harm to a private individual inside the premises, or in the adjacent parking areas, it is required that the person involved immediately informs the SBS staff of this fact (by phone on +042 /461 33 33 main gatehouse) and, if necessary, and remains at the place of the incident until arrival of the SBS staff. It is further required that the person involved subsequently completes an incident report (Annex No. 9). If any damage occurs in direct connection with the operation of a motor vehicle, the incident is further resolved as a traffic accident if one of the following conditions is met:
 - a) a person has been killed or injured,
 - b) dangerous or harmful substances leak into the air or soil,
 - c) the damage incurred appears to exceed EUR 3,990,
 - d) the driver of the vehicle causing the damage is clearly under the influence of alcohol or other addictive substance.

In such a case, the driver of the vehicle or participant in the traffic accident is required to immediately report the traffic accident to the Slovak Police Force (158), wait on the spot until the arrival of the Slovak Police Force and proceed according to the instructions of the Slovak Police Force.

- 8) **Motor vehicle entry.** Only drivers of motor vehicles may enter or exit using the North and South gatehouses. Other passengers are required to get out of the vehicle and enter or leave the company premises through the turnstile. Exceptions to this rule are explicitly listed in the text of the directive.
- 9) Obligations of supplier's representative.
 - a) Informing their employees contractors. Ensure that the employees of their own company or subcontractors, who will perform work on the company premises, are informed about all the provisions set out in this Directive No. 35 and in Directive No. 53 (Rules for the Operation of External Organisations), and ensure their participation in the mandatory training of occupational health and safety and fire safety in Conti before entering the company premises.
 - b) **Entry permit.** Ensure that their employees and subcontractors are allowed to enter the Conti premises before performing the agreed work, in cooperation with the Conti contact person (who has ordered the agreed work). Prevent the use of an issued IK by workers other than those to whom it was issued.

In the case the contractor's IK or temporary IK is issued for their employees or employees of the subcontractor, pay an administration fee in cash upon receipt of the IK in accordance with the relevant list of fees and fines, set out in Annex No. 12.

Loss or damage to an IK generates a risk for the company associated with its possible misuse. In connection with these facts, the partner company undertakes to pay a contractual penalty in accordance with the relevant list of fees and fines, set out in Annex No. 12. The contractual penalty is to be paid in cash upon receipt of a new IK to the SBS administrative employee, who will issue a receipt.

- c) **Protection of property.** Ensure adequate protection of their movable and immovable assets, as well as movable and immovable assets provided by the company in accordance with the applicable contract, against damage or theft.
- d) **Contractor's identification.** During the work assignment on the company premises, provide work clothes for their employees, or employees of subcontractors, so that it is possible to visually identify the name of the supplier company (work clothes or work vest with the name (logo) of the company).

Continental Tires Slovakia,		_ .	•
s.r.o.	Directive No.35	Page number:	9
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

- e) Notification of staff changes or termination of work. Notify the termination of work assignment of an employee of the supplier company or subcontractor on the company premises immediately, but not later than within 3 calendar days, and return the relevant IK to the SBS admin employee (door No. 31 on the ground floor of building AB 2) not later than 7 days from the IK's expiry date. In case of failure to return the IK within the specified period, a sanction will be charged in accordance with the relevant list of fees and fines, set out in Annex No. 12.
- f) Other obligations for employees of supplier companies contractors. OSH – Before entering the company premises, the employees of supplier companies are required to complete an OSH and fire safety training and confirm its completion with their signature in accordance with Directive No. 53 (Rules for the Operation of External Organisations).
- g) **Identification.** During the performance of the agreed work, wear work clothes on the company premises with a visible name (logo) of the supplier company.

WARNING! For violating the company's regulations, an employee of the supplier company or a visitor may be banned from entering the company premises! It is especially important to prevent the misuse of IKs and unauthorised entry into the premises, to respect the ban on smoking outside the designated areas, to respect the prohibition of alcohol, narcotics and psychotropic substances, to respect the prohibition of taking pictures and recording video, to avoid theft, damage to property and violent, rude or aggressive behaviour.

4.2 IK Management

- 1) IKs are issued, managed, removed (immediately after the termination of employment), archived and disposed of by:
 - a) the RLV Department at CONTINENTAL for their employees,
 - b) the RLV CMTT Department for the CMTT employees,
 - c) the SBS admin for employees of the supplier companies (contractors) and visitors.
- 2) Interflex Access Management System. The Interflex access system is used to control and manage access of persons to the company premises and designated areas or buildings within the company premises. IK sensors are installed at all entrances/exits from the company premises, as well as designated entrances/exits from designated buildings.
- 3) **Authorizations in the Interflex System.** The following persons are authorized to set up access rights to the IK sensors located in the Conti premises:
 - a) Administrator of the Interflex Access Management System designated IT specialist, Security manager full scope of authorizations. The designated IT specialist sets up the access rights for persons or groups of persons, creates an "area profile" and sets the mode of individual IK sensors based on the Security manager's e-mail request.
 - b) Local SBS administrator sets up the access rights for employees of external companies (contractors) based on an approved request for access, or approved application for extension of access rights (Annex No. 1 and 4 of the Directive). The representative of an external company will submit a completed/signed application form (including the signature of the relevant Continental coordinator) in the office of the SBS administrators in written form or in digital form to the e-mail: daniela.machacova-Ext@conti.sk. Subsequently, the SBS administrator will enter the necessary documents/information for approving the application in the e-Sign application. In the case of the Gimax group employees, the designated employee of the Gimax personnel department can also enter the necessary information/documents for approving the application in the e-Sign application.

Continental Tires Slovakia, s.r.o.	DirectiveNo.35	Page number:	10
Continental Matador Truck Tires s.r.o.	Revision 13	Number of pages:	22

c) **Person responsible for an object/building** – designated person responsible for approving entries to an object/building (Interflex access system). List of responsible persons is given in Annex No. 13a.

4.3 Entry of persons

<u>Responsibilities for the issuance, activation, termination and archiving IK are listed in the table</u> <u>below</u>

	Responsibilities for the issuance and validity check of IK					
			Validity/Access check in SW	ו		
IK type	IK holders	Validity period	Interflex	Note	Responsibility	
Employee IK	Conti Puchov employee	throughout their employment	upon termination of employment or an organisational change	free of charge	RĽZ	
Contractor's IK	supplier company employees, if their work assignment in the company premises takes longer than 3 months	max. of 1 year	1x per year	issuance of IK – EUR 10, validity extension – EUR 3	SM	
Temporary IK	supplier company employees, if their work assignment in the company premises takes less than 3 months	max. of 3 months	after 3 months	A) simplified approval by the Conti Coordinator – entry to the premises only through turnstiles (EUR 3/IK), B) standard approval process – upon an application for access rights beyond the entry of persons into the company premises (EUR 5/IK)	SM	
	students (dualists, interns, graduates, etc.)	max. of 3 months	after 3 months	free of charge, if the entry is permitted for longer than 3 months, the IK has to be equipped with a photograph (employee IK or contractor's IK)	RĽZ	
	Employees working for Conti under a work agreement, Conti employees from other plants	max. of 3 months	after 3 months	free of charge, if the entry is permitted for longer than 3 months, the IK has to be equipped with a photograph (employee IK or contractor's IK)	RĽZ	
	Conti employees (at the start of employment, or due to the loss of IK)	max. of 6 weeks	after 6 weeks	free of charge, dealt with by HR	RĽZ	
Visitor's IK	Visitors	throughout their visit, for a max. of 7 days		free of charge, limited time of entry from 6 am to 6 pm for multi-day visitor's IK	SM	
Functional IK	Employees of supplier companies (long-term service contracts)	max. of 1 year	1x per year	"permanent" contractors, the main office is in the Conti premises, as a standard, IK can be used for payments in the canteen, or to entry a carpark	SM	

4.3.1 <u>Employees of supplier companies – contractors</u>

- 1) Any person who performs manual work or service on the company premises based on a contract between Continental and a supplier company (including their subcontractors) is considered a contractor. The only exception to this are truck drivers who ensure the dispatch of tyres and the import of raw materials to the company premises. These truck drivers enter the company premises as visitors with one-day entry permit.
- 2) Contractors are issued with IK based on an approved application. The application is submitted by a supplier company, with which Continental has concluded a contract. The form of the issued IK (temporary

Continental Tires Slovakia,		_	
S.r.O.	DirectiveNo.35	Page number:	11
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

IK or contractor's IK) depends on the planned duration of the contractor's employment within the company premises in accordance with the table given in point 4.3. of this Directive.

- 3) The cases when contractors may enter the company premises as visitors are given in point 4.3 of Directive 53.
 - a) **The procedure for issuing IK to contractors.** The application template is given in the annexes to this Directive.

Annex No. 1 – Template form for the entry of persons

Annex No. 4 – Template form for the entry of motor vehicles

- b) The representative of a supplier company shall submit a completed/signed application form in the office of the SBS administrators (AB 2 ground floor, office with door no. 31) either in written form or in digital form by sending it to the e-mail: <u>daniela.machacova-Ext@conti.sk</u>).
- c) Approval. An application in the e-Sign app shall be approved by the relevant manager of the department ordering the work of the supplier company (or an authorized representative) and the Security Manager or ESH Manager. In the case of an application for access to specific premises or buildings beyond the basic entry to the company premises through turnstiles, the application shall also be approved by designated persons responsible for individual buildings, each for their area of responsibility in accordance with Annex No. 13 and this Directive (entry consent + time profile of entry authorization).

Recommendation: The Continental Coordinator should communicate the application for extended access rights to specific buildings with the relevant person responsible for the building (by e-mail, Teams or phone) and discuss any diverse views on the required scope of access rights before the application is entered into the approval process via e-Sign.

- d) For short-term applications for entry (temporary IK for a maximum of 3 months) with a minimum range of access rights (entry of people through the gatehouse to the company premises), accelerated approval is also possible, where the application is approved by the relevant Conti Coordinator and Security Manager.
- e) **Duplicate of a lost or damaged IK**. To issue a new IK, completed application needs to be submitted to the SBS admin office on behalf of a supplier company. The application is subject to approval by the relevant Conti Coordinator and Security Manager.
- f) Issuing IK and granting permits. Based on an approved application via e-Sign, an SBS admin employee shall issue a new IK, extend the validity of an IK already issued, or extend the access rights for designated persons. In case of extending access rights for entry by motor vehicles, an SMS admin employee shall also issue a vehicle card to the applicant (according to Annex No. 7). The fee for issuing an IK is listed in Annex 12.

Issuance of IK to an applicant: is only possible subject to the applicant (contractor) completing the mandatory OSH and fire safety training.

4.3.2 <u>Visits/Visitors</u>

To control the entry of visitors to the premises of Conti Púchov, the company uses the SW app – Visitor management system supplied by Interflex (VMSI).

4.3.2.1 Interflex visitor management system

Every visitor entering the Conti premises must be registered with the VMSI.

1) Registration of visits

It takes place at the gatehouses (main gatehouse, North gatehouse and South gatehouse and EDC gatehouse) or at the Information office located on the AB1 ground floor by the SBS staff. A visitor's IK is issued during the registration to each visitor, which the visitor shall use to enter or exit the Conti premises using the designated turnstiles.

An SBS employee can only register visits found in the list of pre-registered visits. The following types of visit form the only exception:

- Delivery of raw materials, equipment and goods to the warehouse (central receipt, investment warehouse) based on a delivery note (buyer CMR, CMTT, CTS);
- Entry of RZS, fire brigade and Police of the SR vehicles (no visitor's IK is issued for these types of entry, but they are registered in the visitors book),
- > Unannounced entry of persons from public control authorities.

2) Pre-registration of visits

- It is used for scheduled visits.
- > Visits can be scheduled not earlier than 2 (two) weeks before the date of the visit.
- An applicant for pre-registration can only be a person with an authorisation assigned in the VMSI, i.e. selected Conti employees from individual departments and representatives of selected Conti partner companies.
- Inviting persons heads of departments and selected employees of specialised departments who initiate a visit and who have the right to cancel the pre-registration of a visit.
- The maximum duration of a visit is 7 days. The applicant is responsible for determining the duration of the visit only for the time necessary to meet the purpose of the visit. In the case of multi-day visits, the duration of visits on individual days is limited from 6:00 a.m. to 6:00 p.m.
- The entry of a visitor with a vehicle into the premises can only be planned in necessary cases there is a designated visitor parking area in front of AB1. In case of doubts or uncertainty, consult the need with your supervisor. More information on the conditions for visits entering the Conti premises using a motor vehicle is given in Section 4.4.
- If the visitor's company is not included in the list of companies, it is necessary to contact the SBS admin office (extension 3203, e-mail: securitas.ag@conti.sk), who will add the company to the list of companies.

3) Approval of visits

- Pre-registration of a visit issued by an applicant/ is automatically approved unless the manager at Conti, named as the inviting person, cancels the pre-registration of the visit.
- Conti managers can check the pre-registration of visits where they are specified as the inviting persons, via an info-mail automatically sent from the "<u>visitor.approval@conti.sk</u>" address, which contains basic information about the scheduled visit (person, company, date of the visit and reason for the visit).
- If the inviting person does not agree with the scheduled visit, he/she is required to cancel the pre-registration of the visit in the VMSI system (the link to the system is provided in the info-mail sent). If the inviting person cannot cancel the pre-registration of a visit due to technical or other reasons, he/she is required to notify the Security Manager of this as soon as possible.
- The applicant requesting the pre-registration of a visit is fully responsible for the information entered in the VMSI. The applicant is also responsible for compliance with the correct procedures for the preregistration of a visit to avoid multiple entry of the same visitor into the VMSI.

Continental Tires Slovakia,			
s.r.o.	Directive No.35	Page number:	13
Continental Matador Truck	Povision 12		
Tires s.r.o.	Revision 13	Number of pages:	22
		1-5-5	

It is specifically forbidden to enter a new visitor who is a person already included in the list of visitors but also placed on the Black List, and for whom no pre-registration can be made. In such cases (e.g. two different persons with the same name and surname), the applicant is required to contact the Security Manager and clarify whether it is a person included in the Black List.

4) Completion of a visit (deregistration)

- To leave the Conti premises, visitors may only use the turnstiles equipped with IK card collectors. Visitors shall insert their visitor's IK into the card collector every time they leave the Conti premises.
- In the case of multi-day entries, the number of visitor's entries and exits is not limited except for the last day of validity of the visitor's IK, when only one entry and exit is allowed. On that day, the card collector will retain the visitor's IK in the collection tray and automatically deregister the visit in the VMSI.
- In the event that the visitor completes the visit before the validity period of the visitor's IK expires, when leaving the Conti premises for the last time, the visitor shall hand over the IK to the SBS employee at the gatehouse, who will deregister the visitor in the VMSI.

4.3.2.2 Tyre warehouse (Púchov and Dubnica distribution centres)

1) Truck drivers – tyre dispatch

- All truck drivers entering the tyre warehouse because of delivery/dispatch of tyres are registered in the LuxDoor visitor system.
- During the registration of a driver in the LuxDoor system, an SBS employee (goods dispatcher) will thoroughly check the driver's two identity documents (citizen's ID card or passport and driver's license), as well as the documents concerning the vehicle and trailer (technical licence). During the first registration (new driver), an SBS employee will also take a photo of the driver's face (the photo of the driver attached to the driver data in the LuxDoor system) and present it to the driver for signing form information on personal data processing.
- If any discrepancy is found regarding the driver's identity documents or a mismatch of the vehicle/trailer license plate number, an SBS employee will proceed according to the procedure specified in Annex No. 14. An exception to this regime is only the shipment of tyres on the FCA parity, when it is possible to accept copies of the technical document from the trailer/semi-trailer and add the missing license plate of the vehicle in the SAP application directly when registering the driver at the SBS office.
- 2) Other visitors to the tyre warehouse will enter the warehouse premises in the standard visitor mode according to point 4.3.4.1. of this Directive.

An SBS employee at the gatehouse will register the visit in the Interflex system and inform the visited person about the visit by phone. The visited person will collect their visit from the warehouse gatekeeper and ensure that the visitor is accompanied during the entire stay of the visit in the warehouse premises.

4.3.3 List of Unwelcome Persons (Black List) with a ban on entering the company premises

- 1) <u>Reasons for inclusion in the Black List</u>
 - a) Gross violation of the rules governed by the relevant internal regulations (in particular Directive No. 53, Directive No. 35, DDP, etc.), or multiple less serious violations by an employee of a partner company or a visitor to the company (does not apply to Conti employees). Examples of violations together with the duration of the ban are given in Annex No. 17. In the case that a person is included

Continental Tires Slovakia,		- ·	
S.r.O.	DirectiveNo.35	Page number:	14
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

in the Black List, a "Sanction Notice" will be delivered to the contact person of the supplier company concerned.

- b) Objectively demonstrated failure to return an IK in accordance with this Directive or failure to pay the fee or penalty for the IK;
- c) Termination of the employment with an employee due to a serious violation of work discipline, or for another reason (or without stating the reason), if at the same time a serious violation of work discipline by the employee was detected in the period of approximately 2 months before the termination of the employment;
- d) Endangering or damaging the company's reputation;
- e) Identified unfair business practices of supplier companies (responsible persons management/managing directors will be included in the list).
- 2) <u>Principles for imposing a sanction of inclusion in the Black List:</u>
 - a) **Principle of proportionality** the duration of the entry ban is proportionate to the severity of the violation, or the seriousness of the threat to the economic interests of the company (especially detected unfair business practices, or damage to the reputation of the company).
 - b) **Principle of non-discrimination** the duration of the entry ban must not be based on the person's belonging to a particular ethnic group, nationality, sex, political or religious belief, etc.
 - c) "Rule of three" principle an entry ban imposed after multiple (at least three times) minor violations of internal regulations, unless stated otherwise.
 - d) **Individual assessment** of individual violation cases with the application of the entry ban sanction, taking into account the circumstances of each individual case.
 - e) **Possibility of appeal:** The final decision in disputable cases of imposing a sanction of the ban on a person entering the company premises is in the competence of the company's managing directors (always a different person from the one who imposed the sanction). The appeal has no suspensive effect.
 - f) Principle of transparency: the person and the partner company concerned are duly informed about the inclusion of the person concerned in the Black List, and the information for the persons concerned is also published at the main gatehouse.
 - g) Right to object: the person concerned (data subject) has the right to object to the processing of his or her personal data for reasons arising from his/her specific situation, according to Article 21 of the GDPR. Any objections filed shall be decided by the Conti Data Protection Coordinator.
- 3) The inclusion of a person in the Black List and the determination of its duration is in the competence of:
 - ESH manager in cases of violating Directive No. 53, DPP or other occupational health and safety and fire safety rules (except for Conti employees),
 - Security manager in cases of violating Directive No. 35 or DPP (except for Conti employees),
 - Company managing directors in cases of endangering or damaging the reputation of the company, unfair business practices, or inclusion in the Black List in connection with the termination of employment with a Conti employee,
 - In case of failure to return the visitor's IK when leaving the Conti premises, the person concerned will be automatically included in the Black List until the visitor's IK is returned, or the penalty is paid in accordance with Annex No. 12.
- 4) Exclusion of a person from the Black List:
 - Automatically, max. within 1 month after the expiry of the period specified for inclusion in the Black List, or

Continental Tires Slovakia,			
s.r.o.	Directive No.35	Page number:	15
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

- before the expiry of the period of inclusion in the Black List by a decision of the company's managing director, or
- before the expiry of the period specified for inclusion in the Black List on the basis of an opposition of the person concerned (data subject) in accordance with Article 21 of the GDPR, or on the basis of another request from the person concerned (data subject), or
- > automatically after payment of the fee for the failure to return the visitor's IK.
- 5) <u>A person included into the Black List is banned from entering the company premises.</u> Such person cannot be issued a temporary IK, contractor's IK or visitor's IK (a person has the "black list-yes" status in VMSI).
- 6) Organisational measures for working with the Black List:
 - The Black List is managed by the Security Manager in a limited version as a shared directory (O:), with access only on the basis of a permit (data range: identification of the person, duration of the ban, who granted the ban). Only the Security Manager has access to the complete Black List (it also contains the reason for inclusion, documents for violating security regulations).
 - SBS admin staff (for issuing temporary, contractor's and visitor's IK), the ESH manager, company managing directors and SBS staff at the gatehouses also have access rights to view the Black List shared directory.

4.4 Entry/exit of motor vehicles to/from the company premises

All drivers are required to register their own material/tools/equipment that they bring in a motor vehicle using the designated form (Annex No. 11 – List of DHM and HIM) upon entering the company premises and submit these forms to an SBS employee for inspection at the gatehouse upon entry and exit.

4.4.1 Employees of supplier companies Entry/exit and parking of vehicles on the premises

4.4.1.1 Basic rules

- 1) The following is prohibited:
 - a) Entry of private vehicles belonging to private individuals.
 - b) Entry of passenger taxi services except for TOP management visitors.
 - c) Parking of vehicles that are not intended for transport of persons and that are not classified as passenger vehicles in passenger car parks.
 - d) Parking in parking spaces reserved for the company management.
 - e) Parking of trucks, semi-trailers or trailers on the company premises during Saturdays, Sundays and public holidays and on working days from 10 pm to 6 am without the consent of the Security Manager or the Site Protection Chief (VOO).
- 2) The mode of entry of courier vehicles is regulated by a separate document that couriers familiarize themselves with when first entering the company premises.
- 3) Registration entry. Drivers of motor vehicles are required to register at the entrance by stopping at the gatehouse and by submitting documents that authorize the entry of a motor vehicle to the company premises. In the case of delivering their own tools/equipment, drivers are required to indicate these in the form List of the supplier's tangible fixed assets (DHM and HIM) (Annex No. 11) An SBS employee will check the completed document and confirm its accuracy by his/her signature and an imprint of the "Passed through the gatehouse" stamp.

Continental Tires Slovakia, s.r.o.	DirectiveNo.35	Page number:	16
Continental Matador Truck Tires s.r.o.	Revision 13	Number of pages:	22

- 4) Property pass. Drivers of an external company who take their own material/tools/equipment or the property of Continental from the company premises are required to fill in an electronic pass in accordance with Directive No. 7. (Electronic pass for property). The pass shall be checked and confirmed by an SBS employee at the gatehouse.
- 5) **Check on exit.** When leaving the company premises, drivers are required to open the luggage compartment or loading space of their vehicle without being prompted and wait for a visual inspection to be performed by an SBS employee, or on request, also open other parts of the vehicle and tolerate their inspection.
- 6) Weighing of vehicles. All motor vehicles that carry out waste collection and trucks delivering raw materials according to the specification determined by the ESH manager or the purchasing division manager are subject to the weighing regime at the entry to and exit from the company premises. At the request of an SBS employee, each driver is obliged to weigh their motor vehicle.
- 7) Road traffic rules. Drivers are required to follow the road traffic rules (vertical and horizontal traffic signs) on roads within the company premises. Violation of road traffic rules will be subject to a fine imposed in accordance with Directive No. 53 (Rules for the Operation of External Organisations). In case of repeated (double and multiple) violations of road traffic rules, the driver concerned will be revoked the permit to enter the company premises with a motor vehicle.
- 8) **Traffic and operating rules of the premises.** Other rules for the movement of vehicles on the company premises are governed in the regulation "Traffic and operating rules of the Continental Púchov premises for suppliers and visits", which are available at each entrance to the company.

4.4.1.2 Long-term entry of vehicles belonging to employees of partner companies

- 1) Employees of supplier companies are allowed to enter the company premises with their motor vehicles on the basis of an application approved (Annex No. 4) by extending the access rights on IK card readers located on the roads at the North gatehouse and the South gatehouse.
- 2) If the application is approved, a vehicle card (Annex No. 7) is issued, which must be visibly placed behind the windscreen of the motor vehicle at all times during the presence of the vehicle on the company premises.
- 3) A permit to enter with a motor vehicle is charged in accordance with Annex No. 12.
- 4) Rules for the approval of entry by a motor vehicle. The entry of a motor vehicle to the company premises is subject to a contract between the company and a supplier company, if the contract implementation period is longer than 1 month. Accepted reasons for the approval of entry by a motor vehicle:
 - a) Inspection activity of a manager/supplier company coordinator, whose permanent or frequent (min. twice a week) presence is required on the company premises (taking into account the number of employees, the scope of work and the frequency of activities).
 - b) Operative transport of material for the implementation of an order.
 - c) Operative use of construction vehicles for a period longer than 30 days.
 - d) Technological vehicles of partner companies, which are located on the company premises and have to drive through the gatehouses due to their work duties.
 - e) Selected technological or service vehicles of a partner company, which frequently enter the company premises in order to perform the agreed work.

5) **Duration of entry permit:**

a) Maximum for the validity of the motor vehicle driver's IK.

Continental Tires Slovakia,	Directive No.35	Daga numbari	17
S.r.o.	Directive No. 35	Page number:	17
Continental Matador Truck	Devision 40		
Tires s.r.o.	Revision 13	Number of pages:	22

b) In the event of an obvious discrepancy between the reality and the accepted reason for granting a permit for entry of a motor vehicle, the company may unilaterally terminate the approved permit for entry of the motor vehicle. Data from the installed vehicle licence plate reading system will be used to objectively determine the movement of a motor vehicle.

4.4.1.3 Short-term entry of vehicles

- 1) The planning and approval of vehicle entries is carried out in the VMSI software application same as the entry of persons (Section 4.3.3).
- 2) It is expressly forbidden to use the entry of vehicles to the company premises for the purpose of transporting contractors to their place of work.
- 3) Short-term permit for the entry of a vehicle shall also be used for visitors of the company management entering the company premises by using a motor vehicle.
- 4) The entry permit approver is responsible for checking the legitimacy of entry of a motor vehicle into the company premises.

4.4.1.4 Special entry regime

- 1) Delivery of material and raw material to the company premises is governed by the regime approved by the purchasing division manager.
- 2) Delivery of goods on a delivery note pre-registration of the driver (courier) in the VMSI is not required if Continental is the recipient of the goods and the goods are delivered to the Central Reception, or to the company investment warehouse. An SBS employee will register a one-time visit on the basis of a delivery note. Before entering the company premises, drivers (couriers) are required to become familiar with the OSH and fire safety rules in accordance with Directive 53 and the Security Manager's Instruction – the entry and exit regime of couriers to and from the company premises and to confirm this with their signature.
- 3) Entry of technological vehicles of selected service companies (removal of communal waste, telecommunication services). The manager of the Support Services department will provide the Security Manager with an approved list of drivers and vehicles of the given service company valid for the relevant calendar year. Attached to the list will be a written confirmation of the drivers about their familiarization with the OSH and fire safety rules in accordance with Directive No. 53 (Rules for the Operation of External Organisations). Drivers and vehicles given in the list will be allowed a one-time entry to the company premises after an identity check and registration of the visit by the SBS staff at the gatehouse.
- 4) Operative use of construction vehicles in maior investments. The manager of the investment department of the company will request the Security manager in writing to apply this special entry regime, while the request will state the name of the partner company, the name of the responsible person of the partner company (construction manager), the location of construction / investment work on the company premises and the time during which the special entry mode will be applied. The responsible person of the partner company is then authorized to contact the SBS office at the South gatehouse by phone (phone No. 042 461 2982 - recorded phone), where they will state the name of the driver and the license plate number of the vehicle that is to enter the company premises and the planned frequency of vehicle entrances/exits to and from the premises. Drivers and vehicles given in the phone call will be allowed entry to the company premises after an identity check and registration of the visit by the SBS staff at the gatehouse. Before entering the company premises, drivers (couriers) are required to become familiar with the OSH and fire safety rules in accordance with Directive 53 (Rules for the operation of external companies) and to confirm this with their signature.

Continental Tires Slovakia, s.r.o.	Directive No.35	Page number:	18
Continental Matador Truck Tires s.r.o.	Revision 13	Number of pages:	22

5) Entry for SBS staff and vehicles, who provide subsidies or protect ATMs on the company premises. The manager of the Finance department will provide the Security Manager with an approved list of drivers and vehicles of the given security service company valid for the relevant calendar year. Attached to the list will be a written confirmation of the drivers about their familiarization with the OSH and fire safety rules in accordance with Directive No. 53 (Rules for the Operation of External Organisations). Drivers and vehicles given in the list will be allowed a one-time entry to the company premises after an identity check and registration of the visit by the SBS staff at the gatehouse.

4.5 Gatehouses for entering the company premises

The following gatehouses can be used to enter or exit the company premises:

4.5.1 South gatehouse

- 1) The South gatehouse (coordinates N49.10147, E18.32143) serves for the passage of trucks and construction machinery into the company premises and also for the entry of persons. In special cases and outside of the operating hours of the North gatehouse (on working days from 10 pm to 6 am, on weekends and public holidays) it is also used for the passage of passenger vehicles and vans.
- 2) Operating time: 24 hours a day, 7 days a week.

4.5.2 North gatehouse

- 1) The North gatehouse (coordinates N49.10562, E18.31898) serves for the passage of passenger vehicles, light trucks and specialised vehicles (firefighting equipment, rescue service, etc.) to and from the company premises.
- 2) Operating time: on working days from 5.45 am to 9.45 pm.
- 3) The North gatehouse is not intended for the passage of persons and serves for the passage of motor vehicles with a driver. Passengers are required to get out of the motor vehicle and enter or exit the company premises through the main gatehouse, or through the entrance for visitors.

4.5.3 Main gatehouse

- 1) The main gatehouse (coordinates N49.10576, E18.31759) serves for the entry/exit of company employees and employees of partner companies into and from the company premises and for the entry of visitors after 2.30 pm.
- 2) Operating time: 24 hours a day, 7 days a week.

4.5.4 Entrance for visitors – entrance hall of the administrative building AB 1

- 1) The entrance hall of the administrative building (coordinates N49.10574, E18.31767) serves for the entry and exit of visitors on working days from 6 am to 2.30 pm.
- 2) Entry through the Information office is designated for visits only. The procedure for entry:
 - a) The Conti employee, who ensures the entry of a visit, is responsible for entering data on the scheduled visit to the SW app Visitor management system supplied by Interflex (VMSI).

Continental Tires Slovakia,			
s.r.o.	Directive No.35	Page number:	19
Continental Matador Truck	Paviaian 12		
Tires s.r.o.	Revision 13	Number of pages:	22

- b) An SBS employee at the Information office will search for the visitor in the list of pre-registered visitors, verify their identity, register the visitors in the VSI and issue a visitor's IK to them.
- c) In the case of organizing excursions to the company premises, the responsible department manager organizing the excursion sends a request for approval of the excursion to the RLZ Director. The request must include a list of names of persons with the time and place of the excursion and the person responsible for accompanying the excursion during the stay on the company premises. The responsible department manager will then submit the approved request to the SBS employee at the Information office.
- d) Visitors may use their designated Visitor's car park for the duration of their visit.

4.5.5 Railway Siding gatehouse

1) The Railway Siding gatehouse (coordinates N 49.10501, E18.32347) serves for the entry and exit of railway vehicles to/from the company premises. The gatehouse is operated in the so-called unmanned service mode with a remote control of the gate movement. ZSSK Cargo employees will inform the SBS shift leader in advance about any scheduled entry of railway vehicles in order to open the gate on the railway siding. During the shifting operation, the gate of the railway siding will stay open. After the shifting is completed, ZSSK Cargo employees will immediately inform the SBS shift leader with a request to close the gate. Upon request, the ZSSK Cargo employees are required to cooperate with the SBS staff in the inspection of railway vehicles. Operating time: 24 hours a day, 7 days a week.

4.5.6 <u>Unmanned gatehouse – turnstile at the TCP building</u>

 Unmanned gatehouse – turnstile at the TCP building (coordinates 49°06'24.6"N 18°18'53.7"E) serves for the entry and exit of defined groups of Conti employees. It is forbidden to use the unmanned gatehouse for entry/exit to/from the Conti premises with material/equipment that passes through the gatehouse in the pass mode according to RON No. 7 – Electronic property pass. Operating time: Monday to Friday from 5.30 am to 6.00 pm.

4.5.7 <u>Púchov Distribution Centre gatehouse</u>

- 1) The Púchov Distribution Centre gatehouse (coordinates 49°05'54.0 "N 18°19'10.5" E) serves for the entry/exit of the company employees, employees of the provider of warehousing and forwarding service provider and visitors to the tyre warehouse.
- 2) Operating time: 24 hours a day, 7 days a week.

4.6 Camera system operation

4.6.1 <u>Camera system operation principles</u>

- 1) Camera systems may only be used in accordance with the following standards:
 - a) GDPR and Act No. 18/2018 Coll. on personal data protection, as amended,
 - b) Guideline issued by the European Data Protection Board No. 3/2019 on the processing of personal data by means of camera devices dated 29 January 2020,

Continental Tires Slovakia,			~~
S.r.O.	DirectiveNo.35	Page number:	20
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

c) Act No. 311/2001 Coll. Labour Code, as amended (especially Article 13 (4) of the Labour Code),

4.6.2 Rules for the camera system operation

- 1) Only the Security Manager and the ESH Manager may provide camera recordings to third parties (in accordance with Directive No. 42, Annex 8). Any such provision of a camera recording must be documented in the form of a completed and signed protocol specified in Annex No. 16 to this Directive.
- 2) External companies operating for a long time in the Conti premises may operate their own camera systems in their leased premises under the following conditions:
 - a) monitoring is carried out in accordance with applicable legislation on personal data protection and the Labour Code.
 - b) Only the leased premises can be recorded/monitored, other premises only with the consent of the Security Manager.
 - c) The period of the camera system operation is limited to the duration of the lease agreement, or another contract, on the basis of which the external companies use the Conti premises.

Continental Tires Slovakia,		_	
s.r.o.	Directive No.35	Page number:	21
Continental Matador Truck	Devision 12		
Tires s.r.o.	Revision 13	Number of pages:	22

4.7 <u>Security zones in the company premises</u>

The zoning of the company premises serves for the needs of managing the entrances to individual buildings on the company premises and managing the appropriate level of security of buildings on the company premises in accordance with Continental standards.

Zone	Building/room	Building number	Security zone specification
Zone 0	Canteens and cafeterias	1, 7, 20	Public area – free entry for Conti employees, employees of partner companies and visitors after entering the company premises
	Production premises PLT*	1, 2, 4, 6, 8	Non-public zone – entry only for a defined
	Production premises CVT*	4, 7	group of company employees and employees of partner companies, or visitors
	Continental – administrative premises	20, 25	with assigned right of entry; entry into the zone is controlled using an IK card reader.
Zone 1	CMTT – administrative premises	7, 30	*entry into the zone is not controlled by an IK
Zone i	Conveyor belt production	6, 8	card reader
	Power engineering	5, 35	- employees of partner companies must be visibly identified by their company logo.
	Mixing plant *	4, 6, 10	- visitors must carry a visible visitor card and
	Firefighters building *	23	must be accompanied by an authorised
	EDC tire warehouse	person	person.
	TC1 building	22	
	TC2 building	27	Protected zone, (entry only for a defined group of company employees and employees
	TC4 building	26	of suppliers, or visitors with assigned access
	TC5 building	24	rights; entry into the zone is controlled by an
Zone 2	TC6 building	21	IK card reader).
	TC7 building	19	Employees of partner companies must be visibly identified by their company logo.
	TC8 building	29	Visitors must carry a visible visitor's card and
	CMTT server room (1st floor)	7	must be accompanied by an authorised person.
	CMR server room (1st floor)	2]
Zone 3			Highly protected zone – entry only for Conti employees; entry to the zone is controlled using an IK card reader; the area is monitored by a camera and connected to EZS

5 Responsibilities

- 1) The Security Manager and all company managers are responsible for following, complying with and checking the provisions of this Directive.
- 2) The Board of Directors is responsible for resolving disputes and interpreting this Directive.

6 Quality and SEM records

3) Quality records are not related to the Directive

7 Change management

Result of	Revision	Validity period	Prepared by	Reason
review	number			
Revision	12	1 September 2023	Kalmová	Change of the company name
Revision	13	1 November 2023	Ing. Motúz	Update