

# Avenga Code of Conduct

29. April 2025

---

## Preamble

Qinshift Group and Avenga Group (i.e. any company which is controlled directly or indirectly by Avenga Capital a.s.) (the “**Company**”) along with its employees and designated representatives, is committed to fostering ethical conduct and upholding the highest standards of reliability, safety, and quality in its services. This commitment encompasses the development of high-quality solutions and tools, the cultivation of positive and inclusive relationships with business partners and clients, the maintenance of fair business practices, and the prevention of criminal activities. This Code of Conduct serves as a guiding framework for all employees and responsible persons, outlining the Company’s values and expectations in alignment with the principles set forth by the United Nations Universal Declaration of Human Rights and the UN Global Compact.

This Code of Conduct applies to all employees, contractors, vendors, trainees, shareholders, and third parties associated with the Company. By adopting and adhering to the Company Code of Conduct, all individuals acting on behalf of the Company or any of its affiliates affirm their respect for and commitment to widely accepted ethical principles, rules, and regulations. This Code of Conduct represents a formal acknowledgment and endorsement of these values and obligations by all persons associated with the Company.

The Company is committed to opposing all forms of war, aggression, and terrorism, and it believes in the power of peace, constructive dialogue, and non-violence. The Company recognizes that its actions influence not only its organization but also the communities it serves and the broader global environment. Through adherence to this Code of Conduct, the Company aims to foster ethical conduct, diversity, and inclusion, ensuring its practices contribute positively to sustainable development and social responsibility. Together, the Company and its employees can build a culture that embodies the Company’s dedication to human rights, ethical business practices, and a safe, respectful and inclusive workplace for all.

# Basic Provisions

The purpose of the Code of Conduct is to comply with generally accepted **ethical principles**, to develop positive and inclusive relationships between employees, customers and business partners and to refrain from any unlawful conduct, with an emphasis on eliminating or reducing the risk of criminal liability.

All employees and responsible persons of the Company shall, in their actions, place emphasis on the interests of customers and business partners and shall comply with the legal regulations; in particular, **any form of discrimination is prohibited**. Employees and officers of the Company are obliged to act in such a way as not to damage the good name and reputation of the Company.

It is the clear and obvious interest of the Company to **conduct its business in a lawful manner** with a high degree of respect for ethical standards and the rights of its customers and in no way to participate in or benefit from criminal activity or to cause property or non-property damage to others.

The Company is committed to integrating **sustainability and environmental awareness** into its business practices, decision-making processes and daily operations. As part of its core values, the Company seeks to minimize its ecological impact and contribute positively to sustainability efforts.

The Company expresses **zero tolerance for criminal activities** committed by employees or responsible persons; they must not engage in any conduct that would be associated with corruption, nor in any way promote, even passively, an environment of corruption. It is forbidden to offer or provide, directly or indirectly, any undue advantage to third parties for the purpose of influencing or rewarding the service rendered, or to accept such advantages, except for ordinary token gifts given or accepted as part of normal business practice.

In its activities, development and implementation of IT solutions and tools, the Company, as well as its individual employees and responsible persons, shall act with the highest standard of personal and professional attitude, in particular acting honestly, responsibly, with respect and in accordance with good manners. Employees and responsible persons are obliged to always act on behalf of the Company with **due care, professional diligence** and respect for the laws and internal regulations including this Code of Conduct. In the event of any ambiguity regarding the decisions issued, instructions given by the responsible persons or any ambiguity regarding the interpretation of legal or internal standards, employees and responsible persons are obliged to request all necessary information or professional opinions to proceed in order to minimize the risk of their own excess or violation of the binding rules, even in the form of negligence.

# Relationship with Stakeholders

## Relationship with the State and Civil Society

The Company shall keep all its official documents in accordance with the relevant legislation, taking particular care to properly protect its accounting documents.

The Company shall keep its accounts in such a way that they always contain true and accurate information about its business. The Company shall pay taxes properly and on time and shall avoid any actions that could be considered as tax evasion. The Company takes for granted the payment of other statutory obligations.

The Company totally rejects child and forced labour. Nor does it practice any form of exploitation or slavery or practices that would restrict the free movement of workers.

The Company actively cooperates with public authorities; it always provides them with relevant, complete and truthful information in a timely manner. The Company also voluntarily publishes information about its activities and its activities to an appropriate extent; it communicates openly and transparently with the public through designated persons.

The Company does not provide any donations or undue benefits to political parties, political movements, political figures or other entities that are in close relationship with political parties.

The Company supports charitable activities to the best of its ability and capacity. It also supports charitable events or causes of general interest. The Company does not provide donations or other benefits to organisations established for profit or to organisations that do not act in accordance with the principles set out in this Code of Conduct or that pose a risk to the reputation of the Company in the event of a business relationship. Sponsorship agreements are always concluded in writing and under transparent conditions.

## Relationship with Customers

The Company's employees and responsible parties are committed to delivering high-quality, professional work that ensures customer satisfaction. The Company takes full responsibility for the quality of the services it provides.

The aim of the Company is always to meet customer requirements comprehensively. The Company offers services that are beneficial to its customers and strives to build long-term relationships with them. It communicates openly and responds flexibly to their needs and demands.

The Company shall operate in a manner that does not cause harm to its customers. In the event of any risk that may negatively impact the interests of customers, the Company will promptly inform them in an appropriate manner, ensuring they are fully aware of the potential risk.

When offering its services to customers, the Company, its employees and responsible persons shall provide true, unbiased and complete information in a clear and understandable manner. They shall also answer all customer queries in the equal manner. The Company does not engage in misleading advertising.

The Company shall comply with its obligations under the law and shall avoid entering into commitments that it will not be able to meet.

The Company undertakes not to disclose, unless otherwise provided by law, confidential information about its customers without their consent.

The Company regularly seeks customer feedback and prioritizes their satisfaction.

## Relationship with Business Partners

The Company, its employees and responsible persons shall act professionally and fairly with their business partners and build mutual trust.

The Company selects only reliable and quality suppliers. Their services are regularly evaluated.

The Company consistently fulfils the agreed contractual terms and conditions and avoids making commitments that it will not be able to keep.

The Company shall maintain business secrecy and respect the confidentiality of information about their business partners. The Company processes the personal data of its business partners in accordance with, and subject to, applicable data protection laws (such as the Regulation (EU) 2016/679, as amended (the “**GDPR**”), or other equivalent national laws and regulations).

The Company supports the consideration of social and environmental criteria in the selection of its suppliers; it also supports vulnerable suppliers within its supply chain in the context of improving their social and environmental performance.

## Relationship with Competitors, Competition and Public Procurement

The Company complies with the rules of fair competition and does not abuse its market position. The Company undertakes not to enter into any agreement that might restrict or distort competition.

When the Company applies for a public contract, it shall always submit a tender with true information. If any irregularities in the tendering procedure are detected, it shall report them to the competent authorities, in particular claims of granting an undue advantage to the person acting for the contracting authority.

The Company also does not damage or take advantage of the reputation of competitors and does not attempt to obtain information about competitors' business in illegal or non-transparent manner.

The principles of conduct of the Company's employees in the preparation of and participation in public procurement procedures are set out in the internal policies.

## Relationship to the Ultimate Shareholder

The Company acts in the interest for which it was established by its owner and regularly informs its owner about its strategy, current financial situation and results; it conscientiously applies the principles of honesty, accountability and transparency in its management.

## Employees of the Company

### General Rules and Employee Relations

**The management** is obliged to comply with the following rules with respect to their employees:

- Foster an inclusive work culture free from all forms of discrimination,
- Take responsibility for the general work environment in the Company and well-being of all employees,
- Fully respect the rights of their employees, including the confidentiality of messages carried, and recognize their privacy, personal values and needs,
- Fully respect the agreed working hours of employees,
- Treats all its employees equally regardless of race, nationality or membership of any minority group,
- Proactively make available all information that employees need to know or need to know to do their job,
- Actively promote regular training for their employees,
- Give employees the right to make suggestions for improvements or complaints,
- Allow staff to contact a legal aid body,
- Continuously provide an adequate and motivating working environment and maintain dignity,
- Voluntarily provide adequate space for their employees who want to actively participate in the development of the Company and are interested in participating in decision-making,
- Properly ensure the necessary health and safety at work,

- Follow local rules and legislation (labour law and collective bargaining agreements),
- Recruit new employees based on unmanipulated selection procedures; employees are recruited according to their qualifications, skills and abilities, respecting all ethical rules,
- Fairly reward their employees for the work they do and provide employee benefits to the best of their ability.

## **Employees undertake to comply with the rules, according to which they:**

- Foster an inclusive work culture free from all forms of discrimination,
- Work conscientiously and properly to the best of their ability, knowledge and skills, working for the benefit of the Company within the framework of the employment contract, job description and the relevant internal regulations,
- Always act in accordance with the legitimate interests of the Company and do not damage the reputation of the Company by their behaviour,
- Conscientiously comply not only with applicable laws and regulations, but also with internal regulations,
- Are obliged to report to their supervisor any deficiencies and defects that are a risk to the Company,
- Properly manage the employer's funds, minimize the Company's costs, and protect the Company's assets from damage, loss, destruction and misuse,
- Avoid the possibility of conflicts between their own interests and the interests of the Company or its partners, in particular they must not use their position in the Company, information or business contacts acquired in the course of their work for the Company to enrich themselves or others, or perform work for suppliers and competitors, unless these are activities permitted in paragraph 3.1.4.3; in the event of a conflict, they must never give priority to their own or personal interests and inform their supervisor immediately,
- Take care of security protection when using IT systems and processing data; they are obliged to lock the work PC station when leaving the workplace, adhere to the Company's information security policies and procedures and report information security incidents through the corporate provided systems,
- Maintain absolute confidentiality of the know-how of the Company, respect the copyrights of others and protect other forms of intellectual property, even after termination of employment,
- Do not misuse confidential (internal, not available to the public) information or business contacts obtained in connection with their professional activities for their own or another person's benefit or for any purpose other than their official one; they shall handle such data with prudence and due care and adhere to the Company's data classification and handling policies,

- Under no circumstances offer, promise or provide gifts or other undue advantages to third parties or persons, unless they are promotional items provided with the knowledge of the management of the Company or are small gifts or treats in the context of normal business practices, and certainly not accept or request them,
- Without undue delay report suspected serious violations of the Code of Conduct, violations of criminal and other legal regulations through respective corporate channels,
- Make proper use of working hours to perform assigned tasks and approach their work conscientiously and creatively,
- On global forums and in cross-departmental communications, employees are expected to use the Company's official language, English, to promote clear, inclusive, and effective interactions.

Employees undertake to observe rules towards each other according to which:

- Treat their colleagues with respect, respect each other's rights and do not bother them with inadmissible proposals,
- Managers shall avoid any bullying of employees; this also applies to subordinates towards their supervisor,
- Managers trust their subordinates, set clear and achievable goals and encourage a sense of responsibility.
- Any type of violence, threats (whether implicit or explicit) and intimidation are not accepted nor tolerated in the Company. Weapons and hazardous equipment or materials, even if intended for sporting or leisure purposes, are never allowed on the Company's property or premises.

Employees are free and also entitled to:

- Make complaints, suggestions, proposals, and other submissions calling attention to unethical conduct or suggesting measures for improvement to their direct manager or to P&C,
- Request training to improve their skills or related to their job,
- Perform an ancillary activity without the prior consent of their manager only if it is a scientific, pedagogical, journalistic, literary or artistic activity, the management of their own property, the holding of an honorary position, or if this activity will not have a negative impact on the business policy of the Company or the performance of the tasks entrusted to the employee.



The rules for employees shall also apply appropriately to the Company's contractors.

## Avoidance of Child Labour and Forced Labour

The Company strictly prohibits child labour and any form of forced labour. The Company does not engage in or tolerate any form of exploitation, slavery, or practices that restrict the free movement of workers.

## Fair Wages and Working Hours

The Company is committed that all employees are compensated fairly and in accordance with applicable laws and industry standards:

- The Company is transparent about equal pay for equal work of equal value, regardless of age or gender.
- The Company recognizes the importance of maintaining reasonable working hours that comply with local labour laws and regulations. The Company is dedicated to preventing excessive work hours and ensuring that all employees have access to rest periods, holidays, and vacation time as mandated by law.
- Any concerns or violations related to fair wages or working hours should be promptly reported through the appropriate channels.

## Non-Discrimination and Harassment

The Company is firmly committed to fostering an inclusive and respectful workplace where all employees are treated with dignity, fairness, and equity. Discrimination of any kind — whether based on race, national origin, ethnicity, religion, gender, gender identity, sexual orientation, age, disability, socioeconomic status, or any characteristic that is protected by law — is strictly prohibited.

The Company expects all employees to contribute to a culture of equality and respect, free from any form of bias or prejudice. Any incidents of discrimination should be reported immediately through the appropriate reporting channels and will be thoroughly investigated.

All acts of harassment due to any discrimination are in conflict with this Code of Conduct and the Company's culture. The Company strives for an organisation completely free from any bullying or harassment of any kind.



## No Harsh or Inhumane Treatment

The Company strictly prohibits any form of harsh or inhumane treatment. All employees are entitled to work in an environment that respects their dignity and human rights.

## Professional Behaviour

Employees are dedicated to upholding the highest standards of integrity, honesty, and transparency in all professional interactions. This entails consistently acting ethically, communicating truthfully, and maintaining openness about all actions and decisions.

Respect and courtesy are fundamental to creating a positive and productive work environment. Every interaction with colleagues, clients, and business partners reflects commitment to these values. Employees should:

- Recognize and appreciate the diverse backgrounds, perspectives, and contributions of others. Avoid any behaviour that could be seen as discriminatory, harassing, or demeaning.
- Be polite, considerate, and professional in all communications and interactions. Listen actively and respond thoughtfully.
- Work cooperatively with others, valuing teamwork and collective success over individual achievement.
- Address conflicts professionally and seek resolution through open communication. Report any unethical behaviour or concerns promptly to the appropriate channels.
- Embrace and promote diversity, equity, and inclusion in the workplace. Respect and appreciate the unique contributions of every individual.

Employees are dedicated to honouring and upholding all agreements and contracts the Company enters into, whether with clients, partners, or colleagues. This commitment ensures that employees maintain reputation for reliability and trustworthiness.

The Company is dedicated to ensuring the health, safety, and well-being of all its employees, clients, and partners. The Company believes that a safe and healthy work environment is fundamental to fostering productivity, innovation, and overall job satisfaction. Prioritizing well-being and safety is a shared responsibility that requires vigilance, adherence to guidelines, and proactive measures. To maintain a safe and healthy work environment, it is crucial to adhere to the Company's health and safety guidelines:

- Employees should follow all safety protocols while at the office. This includes understanding emergency procedures, using safety equipment properly, and reporting any hazards or unsafe conditions to the appropriate personnel.

- Employees should ensure that remote work environment is safe and conducive to productivity. This includes setting up an ergonomic workspace, taking regular breaks, and staying connected with employee's team.
- When travelling for work, employees should adhere to all travel safety guidelines. This includes being aware of local health and safety regulations, taking necessary precautions, and ensuring that employees have access to support and resources.

## Travel and Representation Conduct

As a global company it is of utmost importance to apply the Code of Conduct also when travelling. When on business trips either with clients or within the Company, it is expected to adhere to the following travel code of conduct:

- Employees should act as ambassadors when traveling or attending events on behalf of the Company, maintaining professionalism and upholding the Company values. Exercise discretion and good judgment in all interactions.
- Employees should maintain proper etiquette when dining with colleagues, clients, or partners. Employees should be mindful of dietary restrictions and consume alcohol responsibly, adhering to the Company policies.
- Employees should follow travel expense policies, submit accurate reports with necessary receipts, and use the Company resources responsibly. Any lost or stolen Company property must be reported immediately.
- Employees should respect cultural differences, adapt behaviour to local customs, and demonstrate cultural awareness during travel.
- Employees should prioritize rest and maintain a healthy lifestyle while traveling. Adjust schedules as needed for time zone differences to maintain work performance.
- Employees should minimize environmental impact by following sustainable practices, such as reducing waste and choosing eco-friendly transportation.
- Employees should prioritize safety, follow local laws and the Company guidelines, and report any security concerns promptly.
- Employees should be familiar with emergency procedures and keep important contacts and documents accessible during travel.

Employees must conduct themselves professionally on internet and social media and avoid sharing confidential information, making inappropriate comments, or posting content that could harm the Company's reputation. Only authorized spokespeople are permitted to engage with the media or make statements on behalf of the Company. Personal opinions should be clearly distinguished from the Company's position, and any behaviour that may negatively impact the Company should be reported to Compliance and PR and Communication.

## Protection of Confidential and Proprietary Information

At the Company, safeguarding confidential information is essential to maintaining trust and integrity in all its business relationships.

All employees are responsible for ensuring the confidentiality of information they access or handle in their duties. All employees are obliged to follow the Company's artificial intelligence (AI) policy and safe usage of AI tools to protect confidential and proprietary information.

Employees are obliged to follow security requirements of their previous employer and not misuse any business secrecy or other confidential data within their current role. At the same time, after the termination of the relationship with the Company, employees are not allowed to use any know-how and confidential information within their activity for another employer.

## Intellectual Property

The Company respects and protects the copyrights, licenses or information of others and protects other forms of intellectual property. Before disclosing any Company's intellectual property, employees are required to ensure that the counterparty is bound by a duty of confidentiality.

The Company protects confidential information that is not accessible to the public and that relates to its business and the development of electronic solutions and tools.

## Personal Data Protection

At the Company, the protection of personal data is fundamental to maintain trust and ensuring compliance with legal obligations. The Company is committed to protect the privacy and personal data of its employees, clients and partners. Protecting personal data is crucial to maintaining trust and upholding the integrity of the Company's business.

All employees must handle personal data with integrity, responsibility and utmost care, safeguarding it from unauthorized access, disclosure, or misuse. Personal data must only be collected, processed, and stored for legitimate business purposes, in the Company's infrastructure, in full compliance with applicable data protection laws and the Company's internal personal data protection policy.

Access to personal data is strictly limited to authorized personnel, and employees are required to ensure appropriate security measures are in place to prevent data breaches. Any suspected or actual

data breaches must be reported immediately to the Data Protection Officer and Chief Compliance Officer to ensure timely investigation and corrective action.

## Criminal Liability

National legislation on corporate criminal liability provides, inter alia, that companies can be prosecuted for the actions of their employees and responsible persons.

The Company shall be criminally liable if an offence is committed by an employee in the performance of their duties or by a responsible person in its interest or in the course of its business, if such offence is attributable to them.

A criminal offence may be attributed to a company if it was committed by the conduct of a responsible person. A criminal offence may also be imputed to the Company if it is committed by an employee:

- On the basis of a decision, approval or instruction by the responsible person,
- Because the person responsible has failed to take such measures as should have been carried out in accordance with relevant national legislation or may fairly be required to do so, in particular by failing to exercise the necessary or compulsory control over the activities of employees or other persons under their authority or by failing to take the necessary measures to prevent or avert the consequences of the offence committed.

National legislation on corporate criminal liability usually does not regulate the specific measures to be taken by the Company. Failure to take measures carries the risk of criminal liability of the Company. For this reason, all employees and all responsible persons are obliged to study the internal policy on criminal liability properly and demonstrably.

Every employee and every responsible person are obliged to familiarize themselves with the risks listed in the internal policy on criminal liability. If, nevertheless, such an employee or responsible person commits a criminal offence in the course of their duties or in the interest of the Company or in the course of its business, this is an act of excess in which the Company is in no way involved.

In case of doubt regarding an instruction or decision of their supervisor, employees are entitled to assess the compliance of such decision or instruction with the law, the Code of Conduct or other internal standards of the Company. In case of suspicion that the employees may commit a criminal offence by such action, they are entitled to request the instruction or decision in writing.

Responsible persons and senior employees of the Company are obliged to review and verify the existence of appropriate and effective measures designed to avoid the risk of criminal liability of the Company. Employees and officers are required to report risks of criminal liability of the Company to a person selected for this purpose.

Responsible persons and senior employees of the Company are obliged to acquaint their subordinate employees with the legal regulations relating to their activities and to warn them of the risks arising from their employment.

The Company regularly conducts internal audits. Management emphasizes the processes of internal regulations on criminal liability regarding the improvement, corrective actions and preventive actions.

The Company conducts regular training on the risks arising from corporate criminal liability for the Company. Each employee is familiarised with these risks on commencement of employment and at regular intervals thereafter (at least once a year). This training must be demonstrable.

## Social & Environment Initiatives

### Relation to the Environment

The Company employees shall behave in such a way to prevent or limit environmental impact.

Employees and responsible people are aware of the environmental impact of their behaviour. They sort and deposit waste in marked containers, prevent the generation of all types of waste, prevent the release and spread of hazardous substances, observe the principles of hygiene and occupational safety, conserve office supplies, print only in the quantities required and reduce water and energy consumption within their means.

### Social Initiatives and Volunteerism

The Company recognizes the importance of contributing to the communities in which it operates. Employees are encouraged to actively participate in social initiatives and volunteerism, both within the Company's organized efforts and through personal involvement in causes that align with our values.

Employees should engage in socially responsible activities that promote positive change, reflect our commitment to ethical business practices, and support the development of local and global communities. The Company believes that volunteer work not only strengthens communities but also fosters a collaborative and compassionate work environment.

Employees may participate in:

- Company-Supported Initiatives that the Company may organize or support social initiatives, ranging from environmental sustainability projects to educational and technological outreach.
- Volunteer activities outside the organization. Employees are expected then to uphold the same ethical standards and professionalism they demonstrate in the workplace. Employees

should ensure that their volunteer efforts do not conflict with their work responsibilities or the Company policies.

## Sustainability

Company's business is fundamentally anchored in the principles of sustainability, aiming to ensure that its operations safeguard the environment for future generations. Additionally, Creating Shared Value extends beyond mere compliance and sustainability.

The Company adopts a long-term perspective and adheres to robust business principles that not only generates value for its shareholders but also benefits society at large. This value is realized through the creation of employment opportunities, contribution to public services via taxation, and the overall stimulation of economic activity.

## ESG Reporting

The Company is committed to transparent ESG (Environmental, Social, and Governance) reporting, ensuring clear communication of our performance to stakeholders:

- The Company tracks and report on its environmental impact, including energy use, emissions, and waste management, with the goal of minimizing the ecological footprint.
- The Company provides updates on our social initiatives, focusing on employee well-being, diversity, community involvement, and labour practices.
- The Company's governance reporting covers corporate governance practices, including board composition, risk management, strategic objectives and decarbonisation plan management and compliance with legal and ethical standards.
- The Company regularly updates stakeholders to engage with them to address concerns and gather feedback.
- The Company is committed to continuously improving its ESG practices and reporting, adapting to evolving standards and stakeholder expectations.

## Use of the Company Resources

The Company resources, including financial assets, physical equipment, technology, and intellectual property, are provided to support the Company's operations and objectives.

Employees are entrusted with these resources and are responsible for using them efficiently and appropriately.

## Gifts and Hospitality Rules

### General Information

The purpose of these rules is to ensure the integrity of business practices by maintaining transparency and avoiding actions that may appear unethical or could create obligations.

Gifts and hospitality should not be used to gain unfair advantages or improperly influence business decisions.

These rules apply to all employees, officers, and representatives of the Company, including interactions with public officials, private companies, and third-party entities.

Employees must comply with these guidelines, the Gifts and Hospitality Policy rules in the Compliance Policy in both professional and personal capacities when representing the Company. In case of donations provided on behalf of the Company, the Charitable Donations Policy must be followed. Each recipient of a charitable support must be a subject of a prior background check.

### Definition of Gifts and Hospitality

Gifts include physical items, services, or permissions given as a token of appreciation or business courtesy (e.g., promotional items, tokens).

Hospitality includes meals, events, entertainment, and travel provided in a business context (e.g., working lunches, corporate hospitality).

### Standards for Acceptable Gifts and Hospitality

Acceptable: Modest, transparent, and business-related items or gestures that adhere to local laws and customs.

Prohibited: Lavish or secretive gifts aimed at influencing business decisions are prohibited. Employees should not solicit gifts from business partners.



Caution Required: Gifts or hospitality involving public officials must be handled in accordance with the Company's general compliance policy.

## Annual Review and Approval

The Compliance Director reviews gifts and hospitality annually to ensure compliance.

The statistics are reported to the Board of Directors.

## Zero Tolerance for Corruption

The Company maintains a zero-tolerance policy on corruption and bribery. All forms of bribery, whether direct or indirect, including offering, giving, receiving, or soliciting anything of value to improperly influence business decisions or actions, are strictly prohibited. Employees must not offer or accept undue advantages beyond modest promotional items under appropriate circumstances, as defined by the Company's anti-corruption and anti-bribery policy.

All employees, contractors and business partners of the Company must comply with all applicable global anti-corruption laws and any relevant local regulations in the jurisdictions where the Company operates.

Employees are required to report any suspected or actual instances of corruption immediately. The Company provides secure and confidential channels for whistleblowing to ensure that reports can be made without fear of retaliation.

Any violation of this zero-tolerance policy on corruption and bribery will result in disciplinary action, including potential termination of employment contract, and, where applicable, referral to law enforcement authorities for further legal action.

## Political Donations Rules

Political donations are strictly prohibited.

Political donations include financial support, goods, or services provided to political parties or candidates, either directly or indirectly.

The Company does not provide financial or material support to political parties, movements, or candidates, ensuring neutrality and avoiding conflicts of interest.

The Company supports charitable causes that align with the Company values, ensuring all sponsorship agreements are transparent and properly documented.

Employees are free to engage in political activities personally, provided these activities do not imply the Company's endorsement or involvement.

# Anti-Bribery, Corruption, and Conflict of Interest Rules

These rules apply to all employees, managers, directors, and third-party representatives, aligned with local and international anti-corruption laws.

Bribery, in any form, is strictly prohibited, including offering or providing anything of value to influence business decisions.

Facilitation payments, which expedite routine government actions, are also forbidden.

## Conflict of Interest Reporting:

- Employees must prioritize the Company's interests over personal gain and disclose any potential conflicts to their supervisors.
- Employees with conflicts of interest cannot participate in related decisions, and these situations must be documented.

All contractors, agents, and consultants working for the Company must adhere to anti-bribery standards pursuant to the Company's anti-bribery policy.

Employees are required to complete anti-bribery training. Specialized training is provided to those in high-risk positions.

Regular audits ensure anti-bribery policies are followed, with controls in place to mitigate corruption risks.

The Company's management is responsible for setting a tone of integrity, ensuring transparency, and updating anti-bribery measures as needed.

Any suspected violations must be reported confidentially, and corrective actions will follow, including disciplinary measures or legal proceedings.

Managers are responsible for testing control mechanisms and listing high-risk activities to prevent exposure to corruption.

# Procedures for Receiving Submissions and Expressing Concerns

## Whistleblower Protection:

- Individuals reporting concerns in good faith are protected from retaliation, harassment, and legal consequences.
- The Company ensures that whistleblowers' identities remain confidential where possible.

Employees must report suspected violations of laws or the Company policies. Failure to report could result in disciplinary actions. Nevertheless, employees must not knowingly make false or inaccurate reports, use them to harass or intimidate any person or to obtain personal advantage. Making knowingly false reports may be sanctioned.

- Reports can be made through written, e-mail, phone, or in-person submissions. Default whistleblowing lines are on a Group level. Every employee is entitled to submit their concerns via Compliance and Whistleblowing mailboxes. Relevant contact details can be found in the training presentations, on Compliance Intranet Site and in the Compliance Policy.
- All reports will be acknowledged within seven days and investigated within thirty days. In complex cases, this period may be extended up to thirty days, but not more than twice.

If internal mechanisms fail or retaliation is feared, whistleblowers may escalate concerns to external regulators, including KKCG and other relevant authorities.

Retaliation against whistleblowers is strictly prohibited, with severe disciplinary actions for those who engage in such conduct.

Investigations revealing misconduct will lead to immediate corrective actions, including disciplinary or legal actions.

All reports and investigations are handled with strict confidentiality, in compliance with the Company's data privacy policies.

The Company accepts anonymous reports, ensuring diligent investigation regardless of whether the reporter discloses their identity.

# Products and Services

## High-Quality Products and Services

The Company is committed to delivering products and services of the highest quality. Company's goal is to exceed customer expectations and uphold the highest standards in every aspect of its operations.

## Innovation

The Company is dedicated to fostering a culture of innovation that drives its business forward. The Company encourages employees to think creatively, challenge conventional methods, and contribute to the development of new ideas, products, and solutions.

Employees are encouraged to explore new approaches and solutions that can enhance the Company's products, services, and processes. This involves not only thinking outside the box but also engaging in continuous learning and staying abreast of industry trends and technological advancements.

## Final Provisions

The Company employees and responsible persons undertake to adhere to all ethical principles outlined in this Code of Conduct in the performance of their duties and work.

Employees and responsible persons must be properly and demonstrably trained on the standards contained in this Code of Conduct, as well as on the risks of incurring, preventing, and avoiding criminal liability.

Any violation of the standards set forth in the Code of Conduct by employees or responsible persons will be considered a breach of work duties and will be subject to penalties in accordance with the relevant provisions of the relevant national legislation on labour law (e.g. the Czech Labour Code etc.) and in certain cases, depending on the severeness of any breach of this Code of Conduct, it may lead to termination of employment. Compensation for any damages will be addressed in line with the applicable provisions of the relevant Labour Code or the relevant Civil Code.

The Company recognizes that the Code of Conduct must be continuously updated, developed, and supplemented.

The Code of Conduct is based on the KKCG Group Code of Conduct, Compliance Policy as well as the KKCG ESG Group policy.