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PREAMBLE

(A) This Code of Ethics, which is a binding guideline in the BR Group and its companies (hereinafter referred to as the holding), sets out the basic rules of conduct of employees, members of bodies, and other persons from the holding, both towards each other and towards third parties, i.e. suppliers, customers, stakeholders, and the general public.

(B) This Code of Ethics is intended to regulate internal and external relations so that the actions, behaviour, and conduct of employees, members of bodies, and persons acting on behalf of the holding are always legal, transparent, ethical, honest, and in accordance with socially accepted standards of behaviour, so that good behaviour and conscious responsibility are an essential part of the corporate culture.

(C) In addition to the Code of Ethics, there may be other, similar internal regulations within the holding which further specify or supplement the Code of Ethics.

(D) The Code of Ethics will be issued in the form of an internal regulation within the individual companies of the BR Group holding and all employees, members of bodies and persons acting on behalf of the holding will be obliged to comply with this Code of Ethics.

1. GENERAL RULES

Throughout our business operations, we consistently adhere to relevant legal requirements and uphold widely acknowledged moral and ethical principles. We are diligent in preventing any breaches of these standards. Whenever there is any ambiguity regarding legal compliance, we seek guidance from a supervisor or consult with the legal or HR teams at the BR Group or our own company.

We prioritise maintaining the esteemed reputation of the holding and avoid any actions that might damage it. We are devoted to acting reliably, fairly, and with integrity. Our commitment is to foster ethical behaviour and trustworthiness in all interactions that the BR Group and its companies have with external parties.

In choosing business partners, we adhere to competitive regulations and prioritise economic benefits for the holding. The companies within the BR Group are committed to prioritising one another as their primary customers and partners.

We expect the same level of integrity from our business partners that we practice ourselves. We hold our business partners to the same high standard of integrity that we ourselves. We maintain a strict zero-tolerance stance on any criminal activities. Furthermore, we are dedicated to fostering a culture of social responsibility, embracing continuous improvement in all aspects of our social responsibility initiatives.

2. SPECIFIC RULES

2.1. MUTUAL RESPECT, HONESTY, AND INTEGRITY

The dignity, human rights and privacy of the individual are very important to us and we respect them.

We respect physical, cultural, ethnic, and religious differences. We treat each other and third parties in accordance with the principles of equal treatment regardless of age, disability, race, ethnicity, nationality, sexual orientation, gender, religion, belief, worldview, or other differences.

In the workplace, behaviour must be respectful and not cause annoyance, risk to health, safety, or compromise the dignity of others. Behaviour in the workplace must not be a nuisance to others or endanger their health, safety or dignity. We do not tolerate violence, threats, intimidation, assaults of any kind, offensive remarks, degradation of human dignity, bullying, harassment or sexual harassment, abuse of position or other inappropriate workplace conduct.

We function as a team. Within the BR Group, there is a spirit of collaboration rather than competition, reflecting the cooperative nature of our workforce. Our interactions with colleagues are characterised by warmth and transparency. It is our practice to exchange pertinent information that can enhance the performance of others, always

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keeping the information confidential.

When offering critique of our colleagues, we do so in a constructive, fair manner, grounded in objective and factual evidence. We are mindful to safeguard the legitimate interests of our employer as we carry out our daily work responsibilities. We protect the tangible and intangible assets of the holding from deterioration, especially from damage, theft, waste or misuse.

We are loyal to the holding; we protect its good name.

The holding defends its employees when they have acted in the interests of the BR Group and the company and with the aim of fulfilling their work tasks.

We only give statements to the media if we are authorised to do so. We refer any media inquiries to the person in charge.

When communicating on social media from a private profile, we do not speak on behalf of the company and do not share internal information of the company or its business partners.

2.2. HEALTH PROTECTION

We are diligent in maintaining our own health as well as the health of those around us, using the required work equipment and complying with work safety regulations.

We abstain from the production, consumption, or handling of substances that could lead to addiction or intoxication, including alcohol, stimulants, drugs, or any similar substances, during our professional duties or while engaged in tasks for the company.

2.3. ENVIRONMENTAL PROTECTION

We protect natural resources and do not waste them. We behave sustainably and responsibly towards our environment and do not pollute it. We reduce energy consumption and waste production.

2.4. COMPETITION

We rigorously adhere to laws governing competition, which encompass both antitrust regulations and standards against unfair competition.

We exercise thoughtful consideration in all dealings, including verbal agreements or during negotiations with other parties, as these may carry legal obligations.

2.5. A CONFLICT OF INTEREST

All our decisions are guided by the interests of the company and the BR Group, and our aim is to prevent any conflicts of interest. We define a conflict of interest as any scenario where there is a concern that the personal interests of an individual representing the company or BR Group might conflict with the interests of the company or BR Group.

If an individual representing the company or BR Group has a personal relationship with someone else in the company, whose rights or obligations may be decided or co-determined by the person acting on behalf of the company, namely a relationship not stemming from their professional roles, especially familial ties or a partnership, it is mandatory for those individuals to promptly inform their direct supervisor about the existence of this relationship.

If there is a possibility of a conflict of interest, the individual in question typically refrains from making any related decisions. Instead, they delegate the decision-making to someone higher up in the hierarchy, an authoritative entity, or someone chosen by their superior.

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2.6. EXCHANGE OF GIFTS AND HOSPITALITY

Our policy prohibits the acceptance or offering of gifts or courtesies that fall outside standard business customs or that might create the appearance to others that an advantage could be sought or offered in return by our company or the external party. We limit our exchanges to corporate gifts of small nominal value, specifically not exceeding a value of CZK 1,000.

The company's executive authority alone has the discretion to approve any larger contributions, encompassing those made for sponsorship purposes. Each substantial donation is meticulously recorded and, when relevant, subject to taxation.

2.7. ASSET PROTECTION

We conduct ourselves in a manner that safeguards against unlawful tampering with the assets of the holding, employees, or any third parties.

We are committed to preserving the property and proprietary rights of others. Adhering to intellectual property laws, we refrain from replicating or downloading data without proper authorisation.

2.8. DATA PROTECTION AND PERSONAL DATA

We handle the personal data of individuals we engage with carefully, in compliance with legal standards, and we take measures to prevent its misuse. We do not disclose personal information to unauthorised third parties. We ensure that such data is securely stored and capable of being destroyed when required. We collect personal data strictly for legitimate purposes and ensure that such collection is justifiable and necessary.

2.9. PRECISION IN DOCUMENTATION AND MANAGEMENT OF FINANCIAL DATA

We provide fair and truthful information in relation to investors, customers, business partners, the public, and governmental institutions.

Our accounting records reflect a true and fair view of our financial condition as per our knowledge and in compliance with relevant legislation. We always act in such a way as to avoid any misrepresentation of the company's financial position.

We fulfil our tax obligations and other legal financial liabilities diligently and punctually to the best of our knowledge. We do not participate in any activities that are aimed at tax evasion or avoidance of other legally mandated payments.

All financial transactions must receive proper authorisation and be carried out following the directives established by the company management. No records should be discarded without the consent of a senior staff member, and such consent will only be granted when the disposal aligns with the applicable laws and company policies.

3. OTHER RULES OF THE COMPANY

3.1. PREPARATION OF CONTRACTUAL DOCUMENTATION

Documentation for contracts is developed in compliance with the internal rules of the company, in consultation with the relevant departments of the company. The signing of contracts and any other formal obligations is restricted to individuals who have received clear authorisation. We strictly avoid making any agreements verbally.

3.2. TRADE SECRETS

We protect the trade secrets of our company, business partners, suppliers, and customers. We do not disclose



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confidential information or trade secrets to any third party during the term of the contractual relationship or after its termination, nor do we allow disclosure to any third party. We do not use confidential information for our personal benefit.

For the purposes of this Code of Ethics, all information relating to the holding, its business activities, customers, suppliers, collaborators, including employees or partners, which is subject to trade secrecy in accordance with Section 2985 of Act No. 89/2012 Coll., the Civil Code, as well as all information about the holding's know-how, i.e., in particular, its methods of operation, processes, equipment, information, knowledge, and data, shall be considered confidential.

4. TOOLS FOR PREVENTION AND MANAGEMENT

4.1. EMPLOYEE OBLIGATIONS

The employees of the holding are obliged to comply with the rules of the Code of Ethics and other internal regulations of the holding and generally to act in a manner that avoids any illegal conduct.

Serious violations of the BR Group's Code of Ethics provide just cause for disclosure through the company's designated whistleblowing channels. A serious violation is one that either greatly harms the holding or its staff, is carried out with deliberate intent or extreme carelessness, is perpetrated by an influential individual capable of swaying the holding's decisions or occurs on multiple occasions. Any holding employee or individual aware of such misconduct is entitled to report a severe ethical violation. Such reports can be submitted either in writing or orally via the BR Group's whistleblowing channels. An independent entity within the BR Group, selected by a person with the proper authority, will investigate any report of a substantial violation of the Code of Ethics. A report of a serious violation of the Code of Ethics is anonymous; the anonymity of the identity of the whistleblower is protected by law. The BR Group commits to protecting individuals who disclose serious ethical breaches from retribution.

To safeguard the holding's reputation, we address internal issues and misconduct primarily through our established internal management and oversight strategies.

4.2. THE RESPONSIBILITY OF THE COMPANY'S SENIOR STAFF MEMBERS AND STATUTORY BODY

The holding's senior staff members and statutory bodies ensure that all employees are properly acquainted with the Code of Ethics and other rules of the holding and carry out continuous checks on their compliance in accordance with the established rules.


In the event that a senior employee or member of the Board of Directors receives a complaint of a violation of the Code of Ethics, he or she is obliged to address it immediately in cooperation with the relevant managers.

The statutory bodies of the holding and its individual members are responsible for compliance with legal regulations and ethical standards. In this context they:

- set an example for the company's employees in actively following the rules of the Code of Ethics;
- take the necessary measures to strengthen the prevention of violations;
- specify internal regulations and instructions to employees and persons acting on behalf of the company;
- take measures against violations of the Code of Ethics.

5. VIOLATION OF THE RULES OF THE CODE OF ETHICS

The rules contained in this Code of Ethics and additional internal policies of the holding are mandatory for everyone within the organisation. Non-compliance can lead to legal action against both individuals and the corporate entity, as well as other adverse effects for the holding. Consequently, the holding has a zero-tolerance policy towards any breaches of these regulations.

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For the holding's employees, any violation of the Code of Ethics is regarded as a severe dereliction of their work-related duties. In the case of other individuals representing the holding, any infringement will result in the cessation of their collaboration with the holding.

Should there be any violation of the Code of Ethics or other lawless behaviour identified among the Holding's business associates, particularly its suppliers, the partnership will be discontinued promptly, and further measures will be pursued in line with the relevant laws.

Ing. Petr Mitura, DIRECTOR OF BR GROUP a.s.

