

## SYNOT GROUP CODE OF ETHICS

### *Purpose and objective of the Code of Ethics*

- 1) This Code of Ethics of the SYNOT Group (hereinafter referred to as the "**Code of Ethics**") is issued as an internal regulation of individual companies of the SYNOT Group and forms part of the corporate culture of these companies and thus of the SYNOT Group as a whole.

This Code of Conduct is intended to prevent illegal activities, to exclude conduct that threatens the reputation, economic interests and profits of the SYNOT Group and to ensure the legal and ethical conduct of the SYNOT Group companies in all countries where the SYNOT Group operates through these companies.

The Code of Conduct is a binding set of values that govern the daily work activities and actions of employees and is intended to help employees recognize the line between ethical and unethical behaviour.

- 2) "**SYNOT Group**" for the purposes of this Code of Conduct means a group of companies and other legal entities subject to a single management exercised by a person who is registered in the register of beneficial owners.
- 3) The purpose of the Code of Ethics is to specify the key ethical values, principles and rules, which relate in particular to the professionalism, transparency, efficiency, cooperation and credibility of the SYNOT Group and its employees. Its aim is not to resolve all problematic situations of ethical behaviour, but to establish desirable patterns of behaviour of employees of individual companies that meet the highest ethical standards, according to which an employee can resolve situations within the scope of his/her responsibility.
- 4) The Code of Conduct governs the attitude of employees towards customers, clients, colleagues and other persons. However, the aim of the Code of Ethics is not primarily to repress employees, but to ensure their cooperation and co-responsibility in fulfilling the values defined in the Code of Ethics. An employee can never be punished for strict adherence to the Code of Conduct, even if such adherence results in a failure to close a deal.
- 5) The Code of Conduct is binding for all employees of SYNOT Group companies, i.e. both employees in employment and employees performing work on the basis of agreements outside the employment relationship. This Code of Conduct is also binding on all natural and legal persons cooperating under assignment and other similar contracts, provided that such contracts must include an undertaking by such cooperating persons to comply with the Code of Conduct and further provided that the obligations imposed by this Code of Conduct on employees shall apply mutatis mutandis to such cooperating persons.

## ***SYNOT Group values***

### ***Professionalism***

- 6) The SYNOT Group, its companies and individual employees perform their tasks in accordance with the constitutional order, laws and other legal regulations of the Czech Republic and the European Union, as well as with international treaties to which the Czech Republic is bound and with the laws and regulations in force in the territory where the SYNOT Group carries out its activities. In the event that an employee is asked to act in violation of the law, he/she shall refuse to do so and shall immediately report such request to his/her supervisor, who shall immediately take measures to exclude further attempts to engage in illegal activities, or to the competent person of the SYNOT Group in accordance with the procedure set forth in Act No. 171/2023 Coll., on the protection of whistleblowers (hereinafter referred to as the "**Competent Person**"). The employee shall also comply with the work rules and other internal regulations of the individual companies of the SYNOT Group. In the event that legislation or internal regulations provide for stricter rules than this Code of Conduct for the relevant case, the stricter regulation must always be complied with.
- 7) The SYNOT Group, its companies and individual employees act professionally (meaning in particular good, quality, pro-customer, competent conduct) regardless of the colour, gender, nationality, religion, ethnicity or other similar characteristics of the recipient of such conduct. Any form of discrimination or harassment is not permitted.
- 8) Employees shall act in accordance with good manners and public order in the performance of their work and shall refrain from any action that could harm the SYNOT Group in relation to the public, public institutions and business partners. In doing so, the employee contributes to the formation of the corporate culture, creates a positive image of the SYNOT Group, protects and strengthens its interests, good name and reputation.

### ***Transparency***

- 9) The employee provides comprehensive, clear, accurate and timely information to customers, co-workers and management.
- 10) The staff member shall convey the information in a factual, clear, concise and understandable manner and shall use logical and non-misleading arguments. The staff member shall not distort, withhold or conceal information and shall maintain appropriate documentation and records to substantiate and trace the necessary data for the conclusions and outputs implemented. The employee shall never manipulate data or misrepresent information and data in records. The manager communicates the necessary information to his/her subordinates so that they can perform their work effectively.

### ***Efficiency***

- 11) The employee informs his/her supervisor of unproductive and inefficient activities and makes suggestions for improvement. Draws the attention of the employee's supervisor, or other senior employee of the company, to deficiencies in internal regulations, guidelines and set processes.
- 12) The employee is responsible for the results of his/her work and actively participates in the evaluation of his/her performance. The employee accepts responsibility for his/her actions and bears the

consequences of his/her decisions. If he/she commits any misconduct, he/she shall endeavour to correct it quickly and effectively so as to avoid or mitigate its negative consequences. Where necessary, he shall inform his manager, in particular if the company has suffered or is threatened with damage or other harm as a result of the misconduct.

## ***Collaboration***

- 13) The employee shall take care of his/her health, hygiene and neatness so as not to endanger or harass co-workers, customers, other business partners or other persons he/she meets in the course of his/her work. He/she takes care of his/her working environment, maintaining order and cleanliness, both in his/her workplace and in common areas.
- 14) In the performance of his/her work, the employee contributes to the protection of the environment and the promotion of sustainable development.

## ***Credibility and anti-corruption behaviour***

- 15) Employees of the Company shall not use improper or unethical means in their competitive behaviour, which shall be understood to mean, in particular, behaviour contrary to the good morals of competition.
- 16) An employee shall not seek personal undue income or other advantage or benefit in the performance of his/her work, nor shall he/she improperly influence the recruitment, promotion or remuneration of employees for this purpose.
- 17) The employee's conduct prevents situations in which he or she would be exposed to a possible conflict between his or her private interest and his or her job title. A staff member's private interest includes any advantage to himself, his family and other relatives, friends and legal or natural persons with whom he has had or has a business or political relationship.

If an employee's private interest comes into conflict with the interests of the Company or the values of the SYNOT Group, he/she must immediately notify his/her manager and proceed only in accordance with the instructions of the manager.

If an interest arising out of a public office held by an employee comes into conflict with the interests of the Company, the employee shall immediately notify his or her supervisor and request that another employee be assigned to deal with the conflict.

- 18) The staff member shall act so as not to place himself in a position in the performance of the tasks entrusted to him in which he is personally obliged or feels obliged to return a service or favour rendered to him. He shall avoid relationships of interdependence and undue influence from others (clientelism, nepotism) which could compromise his impartiality in the performance of his duties.
- 19) In the performance of his/her work, an employee shall not accept or demand, promise or promise himself/herself any undue advantage consisting of direct financial enrichment or other advantage to be given to the employee or another person (hereinafter referred to as "**Bribe**"). Furthermore, the Employee shall not allow himself to be influenced by the Bribe in any way in connection with the performance of his work.

If it is a small token of appreciation usually given, e.g. as a thank you for a job well done by a customer or other business partner, the employee may accept the token only if it does not influence the decision

or performance of his/her tasks, provided that he/she informs his/her supervisor without delay. Gifts received by the Company's employees in the course of their duties shall be deemed to be accepted by the Company. Any gifts that exceed the threshold of the above-mentioned minor attention in value and/or frequency must be politely declined by the employee.

- 20) The employee actively works to reduce the risk of a climate of corruption. He/she shall without undue delay alert his/her supervisor or another senior employee of the Company to potential risks. The Employee shall immediately report any corrupt conduct or suspected corrupt conduct of which the Employee becomes aware to his/her supervisor or, if applicable, to another senior employee of the SYNOT Group or to the Competent Person and, after prior agreement with such senior employee, to the law enforcement authority, if applicable. In addition, the employee must immediately report to the senior employee the offer or receipt of an undue advantage or any pressure exerted.
- 21) The SYNOT Group provides transparent and earmarked monetary and other donations to support public benefit projects. However, the SYNOT Group does not make contributions to persons that could damage its reputation or contributions that would conceal the real reason for the payment.

## ***Enforcement of the Code of Ethics***

- 22) Respecting the values, principles and rules set out in the Code of Ethics is a matter of professional honour for the employee, therefore he/she is obliged to observe and actively support them and thus contribute to the creation of an anti-corruption environment. Managers are required to continuously monitor employee compliance with the Code of Ethics and respond to any employee suggestions regarding the Code of Ethics and bring serious matters to the attention of the Company's management.
- 23) Employees monitor the application of the Code of Ethics in practice (individual breaches, complaints of unethical behaviour, conduct and performance of employees, outcomes of evaluations) and propose any changes to the Code of Ethics to senior employees or the Competent Person.
- 24) If an employee becomes aware of a serious violation of the Code of Conduct, he/she shall immediately report this fact to his/her supervisor or the Competent Person. If in doubt about compliance with the Code of Conduct, the employee must discuss this with his or her supervisor.
- 25) Violation of the Code of Ethics is a violation of obligations arising from legal regulations related to work performed by the employee and, depending on its severity, has consequences under the Labour Code and the Labour Code.

## ***Final provisions***

This Code of Ethics has been approved by the Boards of Directors and Managing Directors of the individual companies within the SYNOT Group and has been published and becomes effective on 1 August 2023.

Producer: legal department of SYNOT Group