

# CODE OF CONDUCT

company

## **Svoboda a syn, s.r.o.**

Company ID: 25548531, with its registered office at Jahodová 524/62, 620 00, Brno, Czech Republic

The company is registered in the Commercial Register maintained by the Regional Court in Brno, Section C,  
File 32482

### **Foreword:**

Dear Sir or Madam,

Svoboda a syn, s.r.o., (hereinafter referred to as the "Company") is a legal entity founded in 1998 operating in the fields of electronic and telecommunication equipment, design activities, construction, transport and others.

As the Company, we adopt this Code of Conduct (hereinafter referred to as the Code of Conduct), which is part of our corporate culture and the Company's business strategy. This Code of Conduct is based on the principle of respect for and adherence to human rights and dignity, as well as moral and ethical norms and standards. The Company acts in accordance with the principles set out in this Code of Conduct, as well as statutory and other subordinate regulations. We comply with the applicable laws, standards and practices of the specific countries where we conduct our business activities.

The Code of Conduct is binding for both the Company and all its employees, regardless of their job position, classification or contract duration. Managers are responsible and obliged to ensure compliance with this Code of Conduct by their subordinate employees. Failure to comply with this Code of Conduct is considered a breach of work discipline in accordance with Act No. 262/2006 Coll., the Labour Code, the consequences of which may be disciplinary measures, up to and including termination of employment. In some cases, there is also a risk of criminal or administrative sanctions.

This Code of Conduct also applies to all suppliers, subcontractors and service providers to ensure that the Company has control over compliance throughout the supply chain. For the reasons above, we have adopted this Code of Conduct with the content below.

Company Management

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## **I. CODE OF CONDUCT**

### **I. Health and Safety of the Working Environment and Environmental Protection**

#### ***Health and Safety***

One of the Company's priorities is to protect the health and safety of our employees in the workplace. A prerequisite is strict adherence to the laws and regulations in this area. In order to comply with these regulations, employees are regularly trained in health and safety regulations so that they can become familiar with them. The Company's efforts are aimed at ensuring that the Company, as an employer, creates a working environment that promotes safety, health and mental well-being, which is also necessary to perform work tasks without the risk of harm to health. All employees have a duty to ensure that their working environment is safe and healthy and are therefore required to comply with all relevant regulations in this area. In order to avoid potential risks, employees are obliged to report violations of health and safety regulations without delay, so that they can be remedied and undesirable consequences do not occur.

#### ***Environment***

The company is aware of the impact of its business activities on the environment. For this reason, employees are obliged to prevent harmful consequences on the environment when performing their work tasks. The company promotes responsible and economical use of natural resources among its employees. Any threats of damage or damage must be immediately reported by the employee to the responsible persons of the Company.

### **II. Respect for human rights, Non-discrimination and equality of opportunity. Right of association and right to collective bargaining**

#### ***Respect for human rights***

The Society is making an effort to respect and protect fundamental human rights and human dignity. All employees are obliged to ensure that these rights are respected. We are based on the Convention for the Protection of Human Rights and Fundamental Freedoms, § 34 of Act No. 89/2012 Coll., Civil Code, Article 9 para. 1 Law No. 2/1993 Coll., the Charter of Fundamental Rights and Freedoms and others. In particular, but not limited to, we prohibit and do not tolerate child labour, the work of persons under the age of 15 and respect the special needs of employees under the age of 18. Employees are given working hours that comply with legal regulations. We also reject and prohibit all forms of forced labour. No employee may be forced to work directly or indirectly, the company prohibits all forms of human trafficking and modern slavery. We employ only those people who have voluntarily decided to work for our Company.

#### ***Non-discrimination and equal opportunity***

The Company does not tolerate and prohibits, in accordance with Art. 3 para. 1 of Act No. 2/1993 Coll., the Charter of Fundamental Rights and Freedoms, discrimination on the basis of national or ethnic origin, marital status, appearance, sex, sexual orientation, religion, age or handicap. We also do not tolerate degrading treatment of employees, such as sexual harassment or workplace bullying. We employ people from different backgrounds with different experiences. Both managers and other employees are obliged to respect each other and to speak out and report any sign of discrimination.

### ***Right of association and right to collective bargaining***

Employees have the right to establish associations or organizations for the purpose of promoting and protecting the interests of employees. They may join and leave these associations and organizations, but membership to these associations must not negatively affect the performance of their employment.

## **III. Workplace Relationships and Personal Development, Collaboration, Conflict Resolution and Handling of Internal Information**

### ***Workplace Relationships and Personal Development***

Within the company, we make sure to create an environment in which employees are treated with dignity and respect. Each of the employees are obliged to respect their colleagues and their opinions. Within the framework of working relationships, employees are obliged to share experience and knowledge, and communicate openly and directly. The company is making an effort to develop employees and their professional and personal growth and increase their overall potential.

### ***Collaboration, conflict resolution and handling of internal information***

Employees are obliged to treat each other in a friendly and considerate manner. When performing their work tasks, employees are obliged to act in such a way that there is no concealment or distortion of information, or the interests of one or more employees are not prioritized over the interests of other employees or the Company. Employees are obliged to provide necessary cooperation when performing work tasks, to act actively, constructively and responsibly to achieve the interests of the Company.

## **IV. Protection of personal data**

The Company complies with the relevant provisions on the protection of personal data as well as the rules for protecting the personal data of employees, customers, investors or third parties in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.4.2016 (General Data Protection Regulation – GDPR). within the framework of standard business practices. Employees are obliged to report deficiencies in the protection of personal data to their superiors without delay.

## **V. Confidentiality, Protection of the Company's reputation and handling of the Company's assets**

### ***Confidentiality***

Employees are required to protect all confidential information such as know-how, trade secrets, business plans, projects and other information and not share it with anyone. The same applies to other information that the Company, customers and business partners are obliged to keep secret. This obligation continues even after the employment relationship is terminated.

### ***Protection of the Company's reputation***

Employees are obliged to act and behave with the knowledge that they represent the Company in non-work activities. Any conduct that may damage or disparage the Company's reputation, including the disclosure of information that may damage the Company from a business, professional or marketing point of view, must be avoided.

### ***Handling of company assets***

The company's assets include both tangible assets (e.g. vehicles, work aids, etc.) and intangible assets (e.g. know-how, trade secrets, etc.). Property must be handled to protect it from damage, loss, theft, or misuse. It must be handled conscientiously and in accordance with the purpose. Neither the Company's property nor its services may be used privately in an unauthorized manner. Property must not be illegally left to a third party and may not be used for personal gain.

### **VI. Conflict of Interest**

Employees shall avoid situations in which their personal or financial interests would come into conflict of interest with the Company. It is forbidden to participate in the business of competitors, suppliers or customers, or to enter into private relationships with them, if this could lead to a conflict of interest. In the event that such a conflict of interest could occur, the employee is obliged to inform the employee's superior without delay. Secondary activities, outside the employment relationship, with the Company must also be reported and the Company must be asked for permission.

### **VII. Corruption and Bribery. Money Laundering. Gifts and Sponsorship**

#### ***Corruption and bribery***

Corruption and bribery are financial contributions or financial advantages given or received for the purpose of influencing decision-making. It is forbidden for employee or person authorized by the Company to provide, directly or indirectly, any unauthorized benefits in any form to business partners, their employees or other persons, or attempt to do so. This also applies if it could give rise to the impression that such conduct will unduly affect the commercial decision. Likewise, it is prohibited to make any payments or benefits to officials, public officials, government officials, foreign government officials, or public sector workers for the purpose of accelerating their performance or obtaining their services. It is forbidden to give gifts, hospitality, or invitations to events that are excessively generous or do not correspond to custom. It is also not permissible to use other persons (such as advisors, intermediaries, sponsors, representatives, or other intermediaries) to circumvent these prohibitions.

#### ***Money laundering***

The Company is not involved in active or passive money laundering. The Company and its employees must take caution if there are signs of insufficient integrity of the natural or legal persons with whom the Company enters into a contract.

#### ***Donations & Sponsorships***

Gifts and corporate hospitality cannot influence or imply that they influence our business decisions or those of our business partners. The Company does not make any direct or indirect donations to political organizations, parties or individual politicians. Sponsorship activities do not serve either individuals or personal interests of individual officials or employees, they are intended for recipients in the cultural, social, health, science, research, education and training, ecology, humanitarian, charitable, sports, physical education and many other areas.

### **VIII. Tax liability, documentation of business transactions and record-keeping**

#### ***Tax Liability***

The Company undertakes to comply with all tax regulations, to refrain from concealing relevant information, unlawful tax evasion, or obtaining undue tax advantages. Both the Company and the employees undertake to

cooperate with the tax authorities and provide them with tax-related information required in accordance with the law. The Company does not accept orders from third parties in the event that an incorrect invoice should be issued for them, or no invoice at all.

### ***Documenting business transactions and keeping records***

The Company documents business transactions in a proper and complete manner in accordance with the law and other relevant legislation. Financial reports and all records correspond to reality. The company keeps records in such a way that they comply with the law and the principles of accounting. The company also maintains records related to safety and health, human resources, and training.

### **IX. Compliance with competition rules**

The Company or its employees undertake to act honestly and openly in the context of competition, and must not accept illegal practices or practices that restrict or manipulate competition. In particular, but not exclusively, agreements or concentrations of competitors, unfair competition, abuse of a dominant position on the market and other conduct that may cause a restriction, distortion or alteration of free competition are prohibited. For example, it is forbidden to agree on pricing, dividing areas or regions, distributing customers, negotiating offers or any unethical conduct that would affect the outcome of competition.

## **B/ APPLICATION OF THE CODE OF ETHICS**

This Code of Conduct is binding for all employees of the Company. If an employee finds that there has been a violation or has questions about a particular matter, they can contact their supervisor. All reports are treated confidentially and investigated carefully. This Code of Conduct is an internal document of the Company. Other possible directives or internal rules supplement this Code of Conduct. All employees must familiarize themselves with this Code of Conduct, follow it and familiarize their subordinates with it.

## **C/ REPORTING SUGGESTIONS**

In the event of a violation of this Code of Conduct by employees, it is possible to contact:

- Direct supervisors
- Managing Director of the Company
- By email: [udani@sasbrno.cz](mailto:udani@sasbrno.cz)

All reports and information will be carefully reviewed. In the case of reporting, the employee does not have to worry about negative consequences, any reports and data about the whistleblower will be treated as confidential information, if their identity is known, no form of retaliation or revenge will be tolerated for reporting illegal or unethical behavior. The whistleblower will be informed of the outcome of the complaint's investigation, if possible. All whistleblowers who make their reports in good faith are protected from possible negative consequences by the Company.

Approved by the Company's statutory on 1.3.2024 and published on 8.3.2024.