

# Anti-Corruption Policy

RESCO spol. s r.o.

## Purpose and Scope

This Anti-Corruption Policy (hereinafter referred to as the “Policy”) sets out the principles and rules that RESCO spol. s r.o. (hereinafter referred to as the “Company”) follows in preventing and combating corruption and bribery.

The aim of this Policy is to express the Company’s clear commitment to conducting business honestly, transparently, and in compliance with all applicable laws. At the same time, this Policy helps prevent any corrupt behavior in the Company’s operations and protects both the Company and its employees from the risks associated with corruption (including legal consequences and reputational damage). The Policy also establishes procedures for preventing and addressing conflicts of interest to avoid situations that could compromise impartial decision-making within the Company.

This Policy applies to all parts and activities of the Company, regardless of whether they are carried out within the territory of the Slovak Republic or abroad. The Company complies with all relevant anti-corruption laws and regulations in the countries where it operates. If local laws are less strict than this Policy, the requirements of this Policy shall apply (provided the legal framework of the given

country allows it). Conversely, if the legal regulations in a particular country require stricter rules, stricter requirements shall be observed.

The Policy applies to all employees, members of management, and Company bodies, regardless of the nature of their employment relationship. We also expect our business partnerships – suppliers, consultants, contractors, and clients – to respect the fundamental principles of this Policy.

## Definitions

For the purposes of this Policy, the following terms are defined as:

- **Corruption:** Any abuse of entrusted power or position for the purpose of obtaining an undue advantage (financial or non-financial) for oneself or another person. Corrupt conduct includes bribery in any form – i.e., offering, promising, or giving a bribe, as well as soliciting or accepting a bribe. Corruption includes not only bribery in the private sector between business partners but also corruption in the public sector (in relation to officials and public figures).
- **Gift or Hospitality:** Any gift, token of appreciation, financial or non-financial benefit, provision of hospitality, entertainment, or other advantage given by one person (whether a representative of a business partner, customer, supplier, or an employee of the Company) to another in the context of a business or professional relationship. This includes, for example, promotional items, marketing materials, invitations to lunches or dinners, tickets to sports or cultural events, trips, accommodation, etc. Hospitality refers to the provision of ordinary meals, refreshments, or social activities in a reasonable manner.
- **Conflict of Interest:** A situation where an employee's personal interest (or that of close persons), particularly financial, property-related, professional, or familial, is or may be in conflict with the interests of the Company and may affect the impartial and objective performance of their work or

- decision-making. For example, a conflict of interest arises when an employee makes decisions on behalf of the Company regarding cooperation with a company in which they or a family member have financial stake or personal benefit.
- **Public Official:** Any person holding a public office or working in public administration. This includes employees of state authorities and offices, elected representatives (e.g., members of parliament, mayors), persons in high public positions (e.g., ministers and other top state officials), judges, prosecutors, members of armed forces, as well as members of statutory bodies of state-owned enterprises or public institutions. For the purposes of this Policy, public officials also include politically exposed persons and candidates for public office.
  - **Third Party:** Any external natural or legal person with whom the Company has a business relationship. Third parties primarily include the Company's business partners, such as suppliers, service providers, subcontractors, consultants, agents, intermediaries, distributors, or sales representatives. The term also includes customers (clients) and other entities with whom the Company cooperates in its business activities.
  - **Facilitation Payment:** An unofficial, usually small payment or other benefit given to a public official to expedite or secure the performance of a routine administrative action to which the payer has a legitimate entitlement. This includes, for example, a small bribe for expedited customs clearance, obtaining a permit, or receiving standard service from an authority. Facilitation payments are illegal and strictly prohibited by this Policy, just like any other form of bribery.

## Fundamental Principles of Anti-Corruption Conduct

At the Company, we apply a zero-tolerance policy toward corruption. All employees and persons acting on behalf of the Company must adhere to the following fundamental principles:

- **Prohibition of Bribery and Corruption:** It is strictly prohibited to offer, promise, provide, solicit, or accept any bribes or other undue advantage. This prohibition applies to any form of corruption in business dealings as well as in relation to public officials. In other words, employees must not engage in bribery or be bribed in any way, whether directly or indirectly through a third party.
- **Compliance with the Law:** Employees must always act in accordance with all applicable legal regulations concerning the fight against corruption and bribery. Violating anti-corruption laws (e.g., offering a bribe to a public official) may result in criminal prosecution of the individual and sanctions against the Company. The Company strictly complies with the provisions of the Criminal Code of the Slovak Republic regarding corruption-related offenses and other relevant regulations.
- **Prohibition of Corruption via Third Parties:** The Company does not allow circumvention of this Policy by having corrupt practices carried out on its behalf by someone else. It is unacceptable to authorize a third party (e.g., a business agent, intermediary, or consultant) to perform an act that an employee would not be permitted to do themselves under this Policy or the law. Indirect corruption (via intermediaries) is just as prohibited as direct corruption.
- **Transparency and Proper Record-Keeping:** All business transactions and financial operations must be properly approved and truthfully and accurately recorded in the accounting system. The Company maintains transparent accounting to ensure there are no “off-the-books” funds or unrecorded resources that could be used for corrupt purposes. Falsifying or misrepresenting payment records is strictly prohibited. Financial expenditures must always be legitimate, documented, and in accordance with internal procedures and budgets.
- **Responsible Business Decisions:** All business decisions (e.g., supplier selection, contract conclusion with a client, procurement of services) must be based on objective criteria such as quality, price, reliability, and benefit to the Company. They must not be influenced by personal interests, preferences, or potential personal gain of the employee. Favoritism based

- on family or other personal relationships is unacceptable (see Conflict of Interest section).
- **Prohibition of Facilitation Payments:** The Company prohibits so-called small unofficial payments intended to expedite routine administrative actions. These facilitation payments are considered a form of corruption (bribery), and employees must not offer or make them, even if they are a common local practice. If such a payment is requested in a particular market, the employee must refuse and immediately inform Company management of the situation.
  - **Rejection and Reporting of Corrupt Offers:** If an employee is directly or indirectly offered a bribe or other improper advantage (or is asked to provide one), the employee is obliged to reject the offer and clearly state that such conduct is unacceptable. The incident must then be reported without undue delay to their supervisor or through the reporting mechanism (see Reporting Violations section). The principle applies that maintaining a business relationship or profit must never take precedence over ethical principles – it is better to lose a deal than to gain it through corruption.
  - **No Sanctions for Compliance with the Policy:** The Company guarantees that no employee will be penalized or disadvantaged for complying with this Policy and anti-corruption principles. For example, if refusing to bribe a customer or official results in the loss of a business opportunity or project delay, the employee will not face negative consequences. On the contrary, the Company supports and values ethical behavior even in situations where it may be economically disadvantageous. Compliance with the law and ethics takes precedence over short-term profits.

## Gifts and Hospitality

Providing and receiving gifts or business hospitality can be part of normal business relationships and social interaction with customers or partners. However, it is essential to ensure that no gift or token is misused as a hidden form of bribery or a tool to influence decisions. All gifts and hospitality provided or received by Company employees must be appropriate, transparent, and in line with the following rules:

- **Reasonable Value and Frequency:** Gifts or tokens must be of symbolic or low value, and hospitality must be appropriate to common business customs. This may include small promotional items with a logo, calendars, pens, diaries, or hospitality in the form of a standard business lunch or dinner. Such gifts and invitations should be occasional (e.g., during holidays, anniversaries, or project completion) and not too frequent toward the same person to avoid creating an unwanted sense of obligation.
- **Legitimate and Appropriate Purpose:** Every gift or hospitality must have a legitimate business purpose. This means it should serve to build good business relationships, express gratitude for cooperation, or promote the Company's name and products. Acceptable examples include tokens of courtesy or appreciation (flowers, a box of chocolates on a special occasion), product presentations (software samples, promotional items), or reasonable hospitality during a business meeting. Conversely, it is not permitted to give or accept anything intended as a motivational tool to gain an improper advantage in business negotiations.
- **Social Appropriateness and Compliance with Rules:** Gifts and hospitality must be socially acceptable and in line with professional ethics. They must not be inappropriate or offensive. It is also necessary to respect the rules of the other party – for example, if a client or supplier has a policy prohibiting gifts above a certain value, Company employees must take this into account and not offer anything that would put the partner in an uncomfortable position or in conflict with their rules.
- **No Expectation of Reciprocity:** A gift or invitation must not be tied to a condition or expectation of any return favor. Business hospitality or a small gift must be given selflessly – it must not be used to secure a deal, win a contract, gain an advantage in a competition, or obtain any specific benefit from the other party. Likewise, a Company employee must not feel that accepting a gift obliges them to “return the favor” beyond standard business practices.
- **Transparency and Disclosure:** All gifts and hospitality should be provided openly, not secretly. It is recommended that employees inform their direct supervisor about any gift or hospitality received or given, unless its value is

clearly negligible (symbolic). A transparent approach protects both the employee and the Company from suspicion of dishonest conduct. If an employee is unsure whether a particular gift or hospitality offer complies with this Policy, they should seek approval from their supervisor before accepting or offering it.

**The following forms of gifts and hospitality are strictly prohibited: cash gifts** (money, checks, cryptocurrencies) or **cash equivalents** (high-value gift cards, vouchers), **high-value gifts** (luxury electronics, expensive vacations, valuables), or any benefits given in exchange for a specific business advantage. **It is also unacceptable** to give or receive gifts or hospitality **during a decision-making** process in which the other party may have influence – for example, during an ongoing tender, procurement process, or contract negotiation. In such situations, even a small gift may be perceived as a bribe and must therefore be strictly refused. If an employee is offered a gift or hospitality that does not meet the above criteria of appropriateness, they are obliged to politely decline it, explaining that Company policy does not allow such acceptance. If a direct refusal could seriously damage the relationship (e.g., in cultures where refusing a gift may be seen as an insult), the employee may exceptionally accept the gift on behalf of the Company but must immediately inform management. Management will then decide on the next steps – often, the gift is donated to charity or shared collectively to avoid personal enrichment.

## Political Contributions and Political Activity

The Company does not provide financial or other contributions to political parties, movements, candidates for public office, or their campaigns. Company resources must not be used to support any political party or political initiative, whether directly or through third parties. This rule is intended to prevent any impression that the Company is buying influence from political figures or expects preferential treatment in exchange for sponsoring political activities.

**No exceptions** to this prohibition apply. If, in the future, the Company were to consider any contribution related to a public-interest political campaign (e.g., in support of a specific legislative change), such a step would have to be pre-approved by the

Company's top management and fully comply with the law – currently, however, the Company does not engage in such activities.

This Policy does not restrict employees' individual political activities in their free time and at their own expense. Employees have the right to engage in politics privately, contribute to political parties from their own funds, or participate in campaigns, but they must do so solely as private individuals. In such activities, they must not represent the Company or create the impression that their personal political views or contributions are endorsed by the Company. It is also prohibited to use Company funds, property, or equipment for personal political purposes.

## Sponsorship and Charitable Donations

The Company may, within its capabilities and corporate social responsibility strategy, support public-benefit projects, non-profit organizations, professional conferences, or other activities through sponsorship or charitable donations. Such support can contribute to a positive image of the Company and to the development of the communities in which we operate (e.g., supporting educational initiatives in IT, sponsoring professional seminars, donations for charitable purposes, etc.).

When providing sponsorships and donations, however, the Company proceeds with caution to avoid any confusion between legitimate support and corruption. No sponsorship or donation may serve as a pretext for influencing a business decision or obtaining an undue advantage. Therefore:

- **Each proposed sponsorship or charitable donation must have a clearly defined purpose and recipient.** The employee or department proposing the contribution must justify how the support aligns with the Company's values and strategy (e.g., support for education, innovation, communities) and why it is appropriate.
- **There must be no direct or indirect link between the contribution and obtaining a contract or advantage for the Company.** For example, if a software client requests that the Company donate to a certain "foundation" in exchange

for signing a contract, this would constitute an unacceptable form of bribery. All sponsorship and donation activities must be independent of business negotiations – i.e., the Company provides support for public benefit reasons, not to secure business.

- **The provision of sponsorship or charitable contribution must be approved by Company management** (e.g., the CEO) in accordance with internal expense approval rules. Each such payment must be properly contractually documented (donation agreement, sponsorship agreement, confirmation of receipt) and recorded with the necessary details.
- **Transparency:** The Company will provide information about its sponsorship and charitable activities to authorized entities (e.g., auditors or regulatory authorities) upon request. Where appropriate, the Company publicly communicates its support (e.g., by displaying the Company logo among event partners, issuing a press release about philanthropic activity, etc.) to ensure the intent and scope of the support are transparent.

By adhering to these principles, the Company ensures that its sponsorship and donation activities are carried out ethically and do not damage its reputation. If a potential sponsorship project raises concerns about a possible conflict of interest or corruption risk, the Company will prefer to decline the project.

## Relationships with Customers and Business Partners

The Company places great emphasis on selecting reliable and honest business partners. Corrupt behavior by suppliers, subcontractors, consultants, or other third parties we work with can cause significant reputational and legal issues for the Company. Therefore, we require our business partners to adhere to the same ethical standards that we uphold.

The principles in relation to third parties are as follows:

- **Careful Partner Selection:** Before entering into cooperation with a new supplier, service provider, agent, or other partner, the Company conducts appropriate due diligence. The goal is to ensure that the third party has a

- good reputation, no history of corruption, and has its own ethical conduct policies (e.g., a code of conduct, anti-corruption policy, or other measures). Due diligence may include requesting references, checking public registers, insolvency records, sanctions lists, or holding a meeting to discuss legal compliance expectations.
- **Contractual Commitments:** Where relevant, the Company includes anti-corruption clauses in contracts with third parties. For example, supplier contracts may include a clause stating that the supplier is familiar with the Company's anti-corruption principles and agrees not to offer or provide any undue advantage to our employees. Contracts may also include the Company's right to terminate cooperation (or withdraw from the contract) if corrupt behavior by the supplier or another contracting party is proven.
  - **Prohibition of Commissions and Bribes for Facilitation:** Company employees must not promise or pay any undue rewards to third parties to secure business. Commissions to agents, sales representatives, or intermediaries may only be paid for actual services rendered and must be reasonable (in line with market standards). If an intermediary demands an unusually high commission, this is a red flag – it may indicate an attempt to fund bribes. Likewise, it is strictly prohibited for a Company employee to accept any commission, gift, or reward from a third party in exchange for securing business with the Company. For example, a procurement officer must not request a “cut” from a supplier contract, and if such a bribe is offered, it must be refused and reported.
  - **Relationships with Related Persons:** If a Company employee has a personal or family relationship with someone working for a supplier, customer, or competitor, they must strictly follow the conflict-of-interest rules (see the relevant section of this Policy). Employees involved in supplier selection or business negotiations must act impartially. If personal ties could compromise this impartiality, the employee must disclose the relationship, and management will decide whether to remove them from the process to preserve objectivity.
  - **Increased Caution in High-Risk Areas:** The Company pays special attention to business transactions and partnerships in environments with elevated corruption risk. This includes operating in countries known for widespread

business corruption or situations where a partner has close ties to political or public figures. In such cases, the Company strengthens due diligence and approval processes (e.g., requests additional confirmation of ownership structure, background checks on key individuals, or imposes stricter payment terms). The goal is to minimize the risk of the Company being inadvertently involved in corrupt practices through a third party.

- **Ongoing Evaluation and Monitoring:** The Company monitors the behavior of its suppliers and partners during cooperation. If signs of irregular conduct appear (e.g., a partner insists on cash payments, refuses to provide necessary information, or is reported in the media for bribery), the Company will assess the situation and act. This may include a discussion with the partner, increased oversight of joint projects, or termination of cooperation if the partner fails to demonstrate corrective action or if continuing the relationship would seriously endanger the Company's reputation or legal compliance.

By following these principles, the Company ensures that its business relationships are not a channel for corrupt practices. The Company is prepared to suspend or terminate relationships with any third party found to be engaged in corrupt behavior and, where justified, will cooperate with law enforcement authorities in investigating such cases.

## Relationships with Public Officials and Government Institutions

Interactions with public officials (government employees, elected representatives, regulators, etc.) require the highest level of integrity and transparency. Corruption in the public sector is a criminal offense with severe penalties, and even the suspicion of improper influence over an official decision can seriously damage the Company's reputation. Therefore, especially strict rules apply when communicating and dealing with representatives of the state and public sector:

- **No Improper Influence:** Company employees must not directly or indirectly offer, promise, or provide any financial or non-financial advantage to public officials in order to influence their actions. This includes any “facilitation” or expediting payments. Such payments are illegal and explicitly prohibited by this Policy (see Definitions: Facilitation Payment). The only acceptable payments to public officials are official fees prescribed by law, paid through proper channels (e.g., revenue stamps, administrative fees paid to the institution’s account).
- **Gifts and Hospitality to Public Officials:** As a general rule, it is not permitted to give gifts to public officials or invite them to private events. Many laws and internal regulations of government institutions explicitly prohibit their employees from accepting any gifts or tokens from companies or citizens, precisely to prevent corruption. Company employees must respect these rules. The only exceptions may be official social events or protocol gestures within the scope of standard diplomacy (e.g., presenting a symbolic gift during an official delegation visit to the Company’s headquarters, such as a commemorative item with the Company logo). Even in such cases, the item must be of low value and not perceived as an attempt to influence (e.g., a commemorative plaque, book, or souvenir).
- **Transparent Communication:** If the Company needs to communicate with public authorities (e.g., applying for a software license, participating in public procurement, negotiating investment incentives, etc.), all communication must be truthful, accurate, and documented. It is prohibited to provide false or misleading information to public authorities. All documents submitted to authorities must be genuine and correct. During official proceedings, employees must act politely and professionally while strictly adhering to legal procedures.
- **Participation in Public Procurement:** If the Company participates in public procurement or a tender for a government contract, all employees involved must comply with the Public Procurement Act and related regulations. It is unacceptable to attempt informal contact with members of the evaluation committee or the contracting authority to influence the selection. All inquiries must be made through the official channels specified in the tender documentation. It is also prohibited to collude with

other bidders to divide contracts or manipulate the competition (so-called bid rigging) – such conduct is not only against this Policy but also illegal.

- **Hiring Former Public Officials:** If the Company intends to hire a person who recently held (or currently holds) a public office, it must proceed with caution and assess whether such a step could be perceived as a reward for previous decisions made in favor of the Company. In the case of high-ranking public officials (e.g., a former IT regulator), the Company will consider an appropriate “cooling-off” period or other measures to avoid any suspicion of a conflict of interest. This rule protects the integrity of both the Company and the individual.

Any employee who interacts with public officials (e.g., in the context of permits, inspections, certifications, tax matters, tenders, etc.) is responsible for strictly following these rules. In case of any doubts or pressure from a public official (e.g., a suggestion that “things could be expedited” for a reward), the employee must immediately inform Company management and reject any improper proposals. The Company fully supports its employees in refusing corruption in public administration and would rather face administrative delays than allow bribery.

## Management Responsibility and Compliance Oversight

The Company’s leadership (executives and directors) bears primary responsibility for implementing and enforcing this Anti-Corruption Policy in practice. Managers at all levels are expected to lead by example – making transparent decisions, not circumventing rules, and fostering a culture of integrity. They are also responsible for ensuring that their subordinates understand the content of this Policy and comply with it in their daily work.

Executives and directors must ensure that the Company has appropriate organizational conditions and allocated resources to effectively apply the Policy. This includes, for example:

- **Internal Controls:** Such as payment approvals, monitoring of marketing and hospitality expenses, and periodic reviews of accounting entries – aimed at detecting unusual transactions or red flags for corruption in a timely manner.
- **Audit and Monitoring:** Management may assign an internal auditor or another independent person to regularly assess the effectiveness of anti-corruption measures. Identified weaknesses or risks will be addressed through corrective actions.
- **Clear Responsibilities:** Designation of a person responsible for ethics and compliance (Legal Counsel). This person provides guidance to employees regarding the Policy and the Code of Ethics.
- **Whistleblower Support:** Management regularly evaluates the effectiveness of reporting mechanisms, ensures that reports are properly investigated, and monitors that whistleblowers do not suffer retaliation. Once a year, management may review statistics on submitted reports (if any) and inform internal oversight bodies (if applicable) about the state of ethical culture within the company.

If a violation of the Policy occurs, Company leadership must act promptly. Investigations of serious allegations (e.g., that an employee accepted a bribe) should be documented, including findings and recommendations. If the violation is confirmed, management will decide on appropriate disciplinary action and measures to prevent recurrence (e.g., stricter controls, team retraining). The person who submitted the report (if not anonymous) should also be informed of the outcome and actions taken, in accordance with legal deadlines and rules.

## Training and Communication

To ensure that the principles of this Policy are truly understood and followed, the Company places strong emphasis on employee training and awareness:

- **Familiarization with the Policy:** Every new employee is introduced to the Policy and the principles of ethical conduct upon joining the Company. The Policy is made available in written or electronic form (e.g., in the employee's handbook or on the internal portal), and the employee confirms that they understand its content and will comply with it. This familiarization may take the form of a dedicated training session, a presentation, or at least individual review of the document with feedback.
- **Regular Training:** The Company conducts online training for all employees at least once a year on topics such as anti-corruption, conflict of interest, and business ethics. The goal is to reinforce the main principles of the Policy, inform about any legislative changes, and discuss real-life ethical dilemmas. The training also includes guidance on how to recognize signs of corruption and how to respond appropriately.
- **Recordkeeping:** Appropriate records are kept of completed training or familiarization with the Policy (e.g., attendance sheets, confirmations in the electronic system) so the Company can demonstrate that employees have been informed. This also helps identify those who missed the training and arrange a makeup session.

The Anti-Corruption Policy is not a confidential internal document – on the contrary, the Company communicates it externally as part of its commitment to ethical business conduct.

- **Internal Communication:** The Policy is permanently accessible to all employees (e.g., on the intranet or in a shared folder with internal guidelines). Management regularly emphasizes the importance of ethical behavior, whether in meetings, email announcements, or employee newsletters. When the Policy is updated, employees are promptly informed of changes. Discussion of ethical principles is encouraged – employees are welcome to ask questions and suggest improvements to processes.
- **External Communication:** The current version of the Policy is also published on the Company's website or made available to business partners and the public in a more appropriate way. This demonstrates the Company's

transparency and clearly communicates its “zero tolerance” stance on corruption to all stakeholders – customers, suppliers, shareholders, and the public.

The Company believes that open communication and ongoing education foster a corporate culture in which corruption and unethical practices are unacceptable. Employees are more likely to embrace the principles of the Policy when they understand their purpose and see that management is genuinely committed to upholding them.

## Reporting Violations and Enforcing the Policy

The Anti-Corruption Policy is binding for all employees and representatives of the Company, and its intentional violation will be considered a serious disciplinary offense. The specific consequences of non-compliance with the Policy are as follows:

- **Disciplinary Measures for Employees:** If an employee violates this Policy or related legal regulations (e.g., engages in bribery, conceals a conflict of interest, knowingly fails to report a corruption offer, misuses Company assets for personal gain, etc.), the Company will hold them disciplinarily accountable. Specific measures depend on the severity of the offense and the circumstances, but may include a written warning, formal reprimand, reduction of variable pay or bonuses, temporary suspension, reassignment, or in the most serious cases, immediate termination of employment (dismissal or immediate termination in accordance with the Labor Code). Sanctions will always be imposed in accordance with internal regulations and legal procedures, including the employees’ right to respond and defend themselves.
- **Criminal and Civil Consequences:** Some forms of corrupt behavior constitute criminal offenses. The Company is prepared to cooperate with law enforcement authorities in investigating any such case. An employee who commits a corruption-related crime may face criminal prosecution, which can result in conviction (including possible imprisonment, fines, and

- disqualification from professional activity). In addition, the Company reserves the right to pursue civil claims for damages if the employee's conduct caused harm (e.g., reimbursement of a fine imposed on the Company or compensation for reputational damage, if quantifiable).
- **Actions Against Third Parties:** If a business partner, supplier, or other third party violates anti-corruption principles, the Company will respond decisively. Contracts typically include the right to terminate cooperation or withdraw from the agreement in the event of the partner's involvement in corruption or other serious unethical conduct. This right will be exercised if necessary. Furthermore, the Company may report the case to the relevant authorities (e.g., the police, if a crime is involved) and cooperate in the investigation. The Company will also review its internal processes to detect similar failures earlier in the future (e.g., by tightening supplier selection criteria or monitoring performance more closely).
  - **Reputational Damage:** Corrupt conduct can lead not only to individual sanctions but also to significant harm to the Company's reputation. If a corruption case involving the Company becomes public, management will take steps to communicate the situation (crisis communication) and restore its reputation. It will also analyze the root causes of the failure and implement changes to rebuild public and partner trust. However, prevention is the best approach – which is why the Company emphasizes avoiding such situations altogether.

Every employee should understand that violating anti-corruption rules is never worth it. The short-term gain from unethical conduct cannot outweigh the serious consequences – loss of employment, income, professional reputation, or even personal criminal liability. The Company believes that responsible employees will not expose themselves to such risks and will always choose the honest path.

## Final Provisions

This Anti-Corruption Policy enters into force on the date of its approval by the relevant body of the Company. The Policy has been discussed and approved by the Company's top management, which hereby declares its full support for its provisions.

The Policy is binding for all employees, members of management, and Company bodies. If necessary, the Policy will be updated to always reflect current legal requirements and best practices in anti-corruption measures. Employees will be appropriately informed of any changes or amendments to the Policy.

The original version of this Policy is kept by the Company's management. An electronic version is available on the Company's intranet, and a public version is accessible on the Company's website. Every employee has the right and obligation to consult with the current version of the Policy at any time and to follow it.

The application of the Anti-Corruption Policy in everyday practice is an integral part of the Company's corporate culture and value framework. Through joint efforts, both management and employees will ensure that the name of our Company continues to be associated with honesty, professionalism, and trustworthiness. The Company firmly believes that long-term business success can only be built on a foundation of integrity and ethical conduct.