

# COMMITMENT TO ETHICAL CONDUCT

## Elevion Group Supplier Obligations

### I. INTRODUCTION

Elevion Group (i.e. Elevion Group B.V., companies directly or indirectly controlled by Elevion Group B.V., companies managed by Elevion Group B.V.) is an integrated group of companies active in Western, Central and South-eastern European countries.

Elevion Group is fully aware of its corporate social responsibility. In its business dealings Elevion Group adheres to high ethical standards including responsible behaviour toward its employees, society, and the environment as recorded in the Code of Ethics, which Elevion Group adapts as needed to reflect its observations and current best practices. In line with these values, Elevion Group also takes care to ensure that not only the individuals and companies working in Elevion Group, but also its partnering entities, abide by these ethical and legal standards.

The Elevion Group's Commitment to Ethical Conduct reflects the legislation, EU regulations, international treaties, and regulatory rules currently in force and effect, in addition to current recommendations and procedures from expert organizations and best practices in legal and ethical regulation.

### II. GOALS AND EXPECTATIONS

While working for Elevion Group, you are required to maintain the same level of integrity as Elevion Group requires of its own companies and their employees, including in relation to third parties. This document informs you of the Elevion Group's basic ethical principles and gives a list of the rules supporting those principles.

Elevion Group reserves the right to monitor and verify that the Supplier (business partner) is in compliance with the rules stipulated herein, in particular through a compliance questionnaire, assurances or external verification.

By entering into a contractual relationship, suppliers undertake to abide by this Commitment to Ethical Conduct and to provide Elevion Group with any and all cooperation necessary to verify the same.

### III. BASIC OBLIGATIONS

#### 1. Legality and ethics

- Abide by all legal regulations, EU regulations, international treaties and regulatory rules in force and effect.
- Duly fulfil your obligations toward contractual partners, the state or other public institutions, and always act honestly in business matters.
- Fulfill your duty to inform arising from valid and effective legal regulations in relation to public registers of legal entities and natural persons, ultimate beneficial owners, contracts register, public tenders, etc.
- Do not tolerate or support human rights violations, fraudulent behaviour, corruption, breach of the competition rules, discrimination and other unlawful or unethical conduct.
- Heed current recommendations and procedures from expert organizations and best practices in legal and ethical regulation.
- Take care to protect your business reputation.
- Take appropriate measures to prevent unlawful conduct by natural persons that could entail criminal liability on the part of the legal entity (compliance programme).

#### 2. Privacy, data, and digital systems protection

- Process personal data only for legitimate purposes arising from legislation in force and effect and contractual relationships or on the basis of consent from the data subject. Grant access to personal data only to persons who need it for legitimate purposes. Grant access to personal data only with the consent of the data subject if legal regulations require such consent.
- Take care to restrict unauthorised access to the personal data you process as well as to prevent accidental loss or destruction of said personal data.
- Abide by the rules for individual Elevion Group facilities and workplaces for handling Elevion Group data and digital systems.
- Protect Elevion Group digital systems to prevent theft or misuse.
- Report any shortcomings in the Elevion Group measures taken to protect data and digital systems.

#### 3. Intellectual property, internal and confidential information, and protection of the same (insider trading)

- Protect the intellectual property of Elevion Group companies and third parties, even after the contractual relationship no longer exists.
- Note that information, ideas, or inventions made or implemented in connection with your work for Elevion Group can under certain circumstances be the property of Elevion Group. Comply with the trade secrets of Elevion Group companies and third parties, even after the contractual relationship no longer exists.
- Do not disclose or release internal or confidential information or data on Elevion Group or other entities that Elevion Group is obliged to protect as confidential information without written consent from the relevant Elevion Group entity.
- Never buy, sell or advise anyone to buy or sell shares or other securities of an Elevion Group company or other company if you have access to insider information on the business activities of that company. Insider information (internal corporate information) means specific information about an Elevion Group company that is not public knowledge and that, if disclosed, would probably have a significant impact on the price of traded securities.

#### 4. Conflict of interest rules

- Avoid activities and relationships that could be in conflict with your obligations to complete tasks for Elevion Group or that could create the impression of such a conflict.
- Use the resources and means of Elevion Group exclusively for the purpose of completing tasks for Elevion Group.
- If you are a member of a governing body of a company outside Elevion Group and would be capable of influencing the business dealings and conduct between an Elevion Group company and this company, inform your direct contact at Elevion Group of this immediately.
- If you are in a possible conflict of interest, immediately report the situation in writing to your direct contact at Elevion Group.
- Never offer, promise, pay, approve, or accept any gift or other complimentary items with the goal of gaining or maintaining an unauthorised advantage or personal benefit.
- Never offer or accept any courtesy in business relations (such as a gift, hospitality, social event, or other benefit) if the circumstances could be perceived as corruption or a conflict of interest.

#### 5. Protection of persons and property

- Abide by the rules for individual Elevion Group facilities and workplaces for entering and exiting buildings and other premises, including visibly wearing the relevant ID card.
- Prevent unauthorised persons from accessing Elevion Group facilities.
- Protect Elevion Group property to prevent theft or misuse.
- When your task for or cooperation with Elevion Group ends, surrender without undue delay all Elevion Group property, including materials of a confidential or internal nature.
- Report any shortcomings in the Elevion Group measures taken to protect persons and property.

#### 6. Respect for human rights and employee protection

- Be polite and respectful to everyone and respect human rights in accordance with legislation, EU regulations and international treaties in force and effect.
- Never treat employees or colleagues differently because of their race, ethnic origin, nationality, gender, sexual orientation, age, medical condition, religious beliefs, faith, worldview, or other criteria prohibited by legislation in force and effect.
- Do not tolerate harassment of any kind, bullying, intimidation, discrimination, or an otherwise hostile environment at the workplace (ridicule, spreading malicious gossip, etc.) and inform your direct contact at Elevion Group of any breaches of this rule.
- Abide by all legal regulations in force and effect in employment law and fulfil your obligations with regard to health insurance and social security.
- Create and maintain a safe work environment and take steps to prevent occupational injuries, occupational diseases and other medical conditions that could pose a threat to employee's health.

#### 7. Environmental protection and sustainable development

- Abide by all legal regulations in force and effect in relation to protecting the environment and preventing environmental accident.
- Minimise the burden on the environment and consistently work to improve environmental protection.
- Support sustainable development in the light of current standards.

#### 8. Relations with suppliers (business partners) and customers

- Strive to ensure fair treatment of all business partners.
- Always act lawfully, deliberately, and honestly in all relations with suppliers.
- Because Elevion Group only works with trustworthy partners, choose for your own cooperation entities and representatives with a good reputation.
- Take care to maintain your good reputation and, to the extent possible, that of Elevion Group.

#### 9. Cooperation with public authorities, persons authorised to exercise public authority, and politically exposed persons

- In dealing with representatives of public authorities and other public institutions, as well as politically exposed persons, abide by the legal regulations in force and effect and act with the highest possible level of propriety and transparency, respecting the roles both parties play.
- Act transparently and in accordance with legal regulations in force and effect when cooperating with public authorities and other public institutions.
- Avoid conduct that could be seen as bribery, corruption or other dealings involving unacceptable benefits.

#### 10. Regulation of international trade

- If your activities for Elevion Group include international business activities, adhere to the legal regulations in force and effect regarding international trade.
- Do not take part in transactions that are in conflict with imposed international sanctions against states, individuals or other subjects, or are otherwise in conflict with the rules in force and effect regulating international trade.

#### 11. Prevention of money laundering and financing terrorism (AML)

- Comply with the legal regulations in force and effect prohibiting money laundering, prohibiting supporting and financing terrorism, and imposing the obligation to report cash or suspicious transactions (AML legislation).
- Do not permit payment in cash or using monetary instruments that are not connected to the customer or that have been detected as mechanisms serving to launder money.
- Abide by the "know your customer" rules and verify customers' trustworthiness pursuant to AML legislation.
- Abide by the legal regulations in force and effect regarding records of ultimate beneficial owners.

#### 12. Compliance with the competition rules and public contracts

- Avoid any contact with competitors that could give rise to suspicion that Elevion Group is taking part in prohibited agreements or arrangements distorting competition (especially on fixing prices, sharing markets/groups of customers/public contracts, or limiting production).
- When participating in public tenders, avoid coordination with other competitors that could constitute bid rigging.
- Avoid spreading false information about the competition, their products, or services.
- Never talk to a third party that can compete with Elevion Group companies regarding prices, costs, price margins or other topics subject to competition.
- Do not propose or enter into agreements with any competitor regarding conditions restricting competition. Refuse instructions or just non-binding recommendations by associations of which you are member to concert conditions of competition with other members of the association or other competitors.
- Never propose or enter into any contracts or informal agreements, written or oral, with customers (competitors) restricting the customer's freedom in competition, in particular regarding the price and territory for and on which the customer can re-sell or lease a product or service from Elevion Group.

#### 13. Obligation to cooperate

- Provide the necessary cooperation requested by Elevion Group to check adherence to this Commitment to Ethical Conduct.
- When filling in the compliance questionnaire, give truthful and current information and approach your direct contact at Elevion Group for any clarification you may need.

### IV. WHAT TO DO WHEN YOU HAVE CONCERNS

If you encounter a situation that seems to indicate serious misconduct, breach of legal regulations or rules of ethics:

- compile the information defining the suspected violation (who, what, when and where),
- report the suspected violation to your direct contact at Elevion Group or use the Elevion Group whistleblowing platform.

[www.nntb.cz/c/eleviongroup](http://www.nntb.cz/c/eleviongroup)

Should you have any questions or concerns regarding any of the rules, get in touch with your direct contact at Elevion Group.