



**STV**

INVEST




**Raiffeisen BANK**

# ETHICS AND ANTI-CORRUPTION **CODE**

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**STV INVEST a.s.**

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# Introduction



**David Hác, předseda správní rady**  
STV GROUP a.s.

Dear colleagues, you have just opened the „Ethics and Anti-Corruption Code of the STV INVEST a.s. Group”. The STV INVEST a.s. group is composed of the companies listed below; this Ethics and Anti-Corruption Code is binding on them, their employees and the other Affected Persons specified below:

- STV ARMS, spol. s r.o.
- STV Defence, s.r.o.
- STV GROUP a.s.
- STV MINING s.r.o.
- STV PRAHA, spol. s r.o.
- STV Polska Sp. z o. o.
- STV Service s.r.o.
- STV Technology, s.r.o.
- STV TRANS, s.r.o.
- Poličské strojírný a.s.
- DAPMON, s.r.o
- DEUS Automation a.s.
- FENIX Protector s.r.o.
- Na Brně 2133 s.r.o.
- NiuBritten s.r.o.
- Patriot Sport LLC.
- Posin, s.r.o.
- Tropner s.r.o.

**Hereinafter referred to as the „STV INVEST a.s. Group” or the „Group”.**


Our Ethics and Anti-Corruption Code is part of the internal regulations of STV INVEST a.s., and the board of STV INVEST a.s. obliges the aforementioned entities to adopt and comply with these principles.

The Ethics and Anti-Corruption Code is the document that has the highest legal force in our hierarchy of internal regulations. It is a document that sets out the basic moral principles, rules of conduct, our values and the respect we afford to all Affected Persons and associates of the individual companies, our business partners, customers, public authorities and the public.

# Introduction

Our Ethics and Anti-Corruption Code cannot cover all the rules and principles contained in the Ethics Programme of the STV INVEST a.s. Group, so the purpose of this Ethics and Anti-Corruption Code is to set out and publicly declare only the basic ethical and anti-corruption principles on which our Group's entire philosophy is based.

This Ethics and Anti-Corruption Code, which is part of the Ethics Programme of the STV INVEST a.s. Group, was discussed at a management meeting and approved by the board of STV INVEST a.s. on 11 July 2016. Amendment No. 1 was discussed and approved at a meeting of the management of the STV INVEST Group on 3 October 2022.

At its meeting on 3 October 2022, the board appointed the members of the Ethics and Anti-Corruption Commission, whose names are published at the website [www.stvgroup.cz](http://www.stvgroup.cz). 

# Definitions of basic terms



## 1

### **Affected Person**

Any person performing activities for any of the companies belonging to the STV INVEST a.s. Group under an employment relationship or a relationship similar to an employment relationship (i.e. an employee), as well as bodies and members of bodies of individual companies belonging to the STV INVEST a.s. Group, other persons in a managerial position who are authorised to represent any of the companies belonging to the STV INVEST a.s. Group, persons in a managerial position who perform management or control activities in any of the companies belonging to the STV INVEST a.s. Group, persons exercising decisive influence on the management of any of the companies belonging to the STV INVEST a.s. Group, persons who act on behalf of any of the companies belonging to the STV INVEST a.s. Group or who represent it on any legal basis.

### **Ethics and Anti-Corruption Commission**

The body authorised to handle compliance for the Group, i.e. the body conducting training, providing explanations and consultations in connection with the issue of ethical and legally compliant behaviour, the body authorised to receive and deal with Notifications, the body monitoring the functioning of the Ethics Programme of the STV INVEST a.s. Group, etc.

### **Ethics Programme of the STV INVEST a.s. Group**

A set of measures and tools designed to prevent illegal and/or unethical conduct by the Group, Affected Persons, suppliers, customers and other business partners.

# Definitions of basic terms

## — **Corrupt Behaviour**

This is, in particular, an act where a person in a position that enables him/her to offer or provide another person with an unjustified advantage promise, offers or provides such unjustified advantage, for which he/she receives an unjustified, most often personal, benefit. Corrupt Behaviour also includes behaviour where a person accepts or is promised an undue advantage, for example, in exchange for information, a service or other consideration to which the person providing the undue advantage would not otherwise be legally entitled. Corrupt Behaviour is also considered to be behaviour in which a person promises to provide an undue advantage or merely facilitates a request for an undue advantage.

## — **Money Laundering**

Actions taken in an attempt to hide income from illegal activities, to make it impossible to identify the sources of such income, its true owner, or to change the nature of such income so that it appears to be profits from legal activities.

## — **Notifications**

A finding, complaint or suggestion relating in particular to compliance with or violations of the Ethics and Anti-Corruption Code, other internal regulations of the Group and/or applicable legal regulations.

# Definitions of basic terms

## **Conflict of Interests**

Behaviour involving a conflict of personal interest with the interests of the STV INVEST a.s. Group.

## **Senior Employee**

A person who is authorised at each level of management to determine and assign work tasks to subordinate employees, to organise, direct and control their work and to give them binding instructions to this end.

## **Labour Code**

Act No. 262/2006 Coll., the Labour Code, as amended.

## **Personal Data Processing Act**

Act No. 110/2019 Coll., on personal data processing, as amended.

# Philosophy of the STV INVEST a.s. Group



## 2

The STV INVEST a.s. Group employs more than 700 employees and it is important to us that employees and other Affected Persons always act in accordance with applicable legal regulations, internal regulations and with a high level of respect for ethical and moral values. The STV INVEST a.s. Group takes great care to comply with the principles of occupational health and safety, environmental protection, safe handling of personal data, as well as the protection of company and third-party property.

Last but not least, the STV INVEST a.s. Group provides all Affected Persons with full facilities in which they can conscientiously perform their work (activities), and also takes care to respect basic human decency and dignity, and act with esteem not only for themselves, but also for others.

The environment at the STV INVEST a.s. Group is built on three basic pillars, which are prevention, detection and response. The first pillar, representing prevention, operates in the sense of taking relevant measures to avoid or reduce the risk of a breach of compliance rules. The second pillar, the detection pillar, helps us to identify potential breaches of compliance rules, particularly through Notifications and their investigation. The last pillar, the response pillar, aims to ensure an effective response by the STV INVEST a.s. Group to misconduct identified, both in relation to the Group and its operations, and in relation to individuals (e.g. in the form of employment sanctions, compensation for damages, or reporting misconduct identified to the relevant law enforcement authorities).

This transparent environment, in which the Group operates, helps us to minimise legal, criminal and other risks. Any violation of legal norms is unacceptable to us and it is always welcome if an employee or other Affected Person brings any such suspicious behaviour to the attention of a Senior Employee or reports such suspicions to the Ethics and Anti-Corruption Commission.

We act with a high degree of respect for moral and ethical values not only in dealings with all Affected Persons, but also in dealings with our business partners, customers and public authorities. In our business activities, we always and strictly comply with applicable legal regulations, contractual obligations and internal regulations of the STV INVEST a.s. Group.



# Familiarisation of Affected persons with Ethics and Anti-Corruption Code



## 3

The STV INVEST a.s. Group will ensure that all Affected Persons are familiarised with this Ethics and Anti-Corruption Code in detail and demonstrably.

Senior Employees are required to ensure compliance with the Ethics and Anti-Corruption Code and to conduct ongoing monitoring of subordinate employees with respect to compliance with the Ethics and Anti-Corruption Code.

A Senior Employee is responsible for familiarising subordinate employees with the Ethics and Anti-Corruption Code. Such familiarisation must be provable by an affidavit of the relevant employee, and these affidavits will be archived by the individual companies in the STV INVEST a.s. Group in accordance with the archiving rules of the STV INVEST a.s. Group, i.e. the Filing and Shredding Rules in accordance with Management Directive RS-04/06, Update No. 4.

Employees and other Affected Persons in the STV INVEST a.s. Group are regularly trained on the principles and measures arising from this Ethics and Anti-Corruption Code and are familiarised with ways to prevent and avoid illegal conduct in companies throughout the STV INVEST a.s. Group.

This Ethics and Anti-Corruption Code, as well as other regulations constituting the Ethics Programme of the STV INVEST a.s. Group, are available to all employees of the STV INVEST a.s. Group on the Internet, at the website [www.stvgroup.cz](http://www.stvgroup.cz).

# Duties of Affected persons



## 4

In the performance of tasks, an Affected Person shall act only within the scope of the authority entrusted to him/her, in accordance with his/her position or job description, and shall be obliged to comply with generally binding legal regulations, internal regulations of the STV INVEST a.s. Group and, where applicable, instructions of Senior Employees.

In the event that an employee violates any of the standards of the Ethics and Anti-Corruption Code, such violation will be considered a breach of employment duties and will be sanctioned in accordance with the relevant provisions of the Labour Code and the STV INVEST a.s. Group work rules.

Furthermore, violation of the rules of behaviour set out in this Ethics and Anti-Corruption Code by members of the bodies of companies belonging to the STV INVEST a.s. Group will be considered a gross breach of the duties of members of such bodies.

As STV INVEST a.s. prides itself on its reputation and representation to the public, we ensure that Affected Persons observe ethical and moral principles even outside their working hours, performance of their duties or activities for the Group, and do not unnecessarily expose themselves or the Group to potential liability arising from the law or cause damage to the Group's good reputation.

# ETHICS CODE

# 5



## 5.1



## Basic principles of the Ethics Code

The STV INVEST a.s. Group observes generally applicable ethical and moral principles in all circumstances and always respects human dignity. We always act in accordance with the legal order of the Czech Republic and always put our business interests above our personal interests. We expect all Affected Persons to accept this policy and to contribute to its proper observance.

### 5.1.1



### Compliance with legal regulations

The STV INVEST a.s. Group adopts a zero-tolerance approach to the commission of any criminal activities or other civil wrongs. In the performance of all its activities, it always acts in accordance with the legal order of the Czech Republic, the legal regulations of the European Union, international treaties and the Group's internal regulations, both in relation to business partners, customers, public authorities, its employees and other Affected Persons, as well as in relation to the public.

Emphasis is placed on compliance with all applicable legal regulations, particularly in the areas of labour and competition law, corruption, occupational health and safety and the environment.

As the STV INVEST a.s. Group operates transnational business relations, it is always governed by the laws of the individual countries in which it operates or carries out its activities, or on whose territory the activities and actions of the Group, or its individual companies, may have an impact and influence.

## 5.1.2

### Compliance with internal regulations

All Affected Persons in the Group are obliged to adopt and comply with the Group's internal regulations in all their activities related to the activities of the STV INVEST a.s. Group.

If an employee is in doubt as to the correct interpretation or application of a particular standard of one of our internal regulations, he/she must consult with his or her Senior Employee, who has the primary responsibility for ensuring that employees under his/her supervision understand all duties under the Group's internal regulations.

Any Affected Person may contact a member of the Ethics and Anti-Corruption Commission in connection with this.

## 5.1.3

### Zero tolerance of discrimination

The atmosphere and corporate culture prevailing in the STV INVEST a.s. Group is very important to us, so we strive to create a dignified environment for all employees and other Affected Persons, which is based on regular information, fair and timely remuneration, improvements in qualifications, ensuring safety and hygiene conditions in the performance of work, the duties related to a position or any activity performed for the Group.

The STV INVEST a.s. Group respects Affected Persons, listens to their needs and ensures mutual trust and respect, and therefore does not tolerate any form of discrimination based on gender, age, nationality, religion, political opinion, sexual orientation, social status or health status.

At the same time, we do not accept any form of disadvantage or discrimination against Affected Person who have raised a concern about a possible violation of legal or internal regulations, or who have reported such concern or made a suggestion for improvement in activities and procedures within the Group.

The recruitment and remuneration process are always based on expertise and performance. Men and women are always on an equal footing in terms of remuneration.

The STV INVEST a.s. Group also does not tolerate any kind of rude and disrespectful treatment, slander, sexual harassment, forced or illegal labour.

## 5.1.4

### **Protection of personal data**

In the processing of personal data, we always use technical and organisational means to protect all data about companies belonging to the Group, business partners, our employees and other Affected Persons from misuse, theft or damage.

When processing all personal data, we always comply with the Personal Data Processing Act.

## 5.1.5

### **Protection of Group trade secrets and intellectual property**

All Affected Persons are obliged to maintain confidentiality about business information entrusted to them or of which they become aware in the course of or in connection with their work for the Group. This includes information about the Group's organisation and assets, business contacts, technical procedures and business plans, accounting data, pricing strategies, etc. This information is considered a trade secret of the Group, is non-public and the Affected Persons are obliged to keep it confidential even after the termination of their employment or other contractual relationship with the Group.

## 5.1.6

### **Environmental protection**

All Affected Persons, not only in the performance of their activities, always behave with the utmost respect and caution in order to protect the environment as much as possible, minimise the impact of their activities on the environment and always carry out their activities in accordance with environmental legislation, in particular ISO 14001, legislative requirements covering water and waste management and legislative requirements covering air protection.

5.1.7



## Occupational health and safety

Our main priority is to protect the life and health of our employees and other Affected Persons in the performance of their activities, so we create the best possible conditions for this purpose, actively educate all Affected Persons in this area and comply with all legal regulations relating to occupational health and safety.

In order to maintain occupational safety, any consumption of alcohol or addictive or narcotic substances is strictly prohibited. Failure to comply with this policy will be severely sanctioned in accordance with the relevant provisions of the Labour Code and the internal regulations of the STV INVEST a.s. Group, which are regularly updated and revised, and the Group arranges regular training sessions to ensure knowledge of the rules and safety regulations relating to occupational health and safety.

5.1.8



## Loyalty

We build long-term and strong relationships with all Affected Persons based on mutual trust, belonging and honesty. However, we require that all Affected Persons protect the Group's good name and legitimate interests and we also ensure that all Affected Persons act in such a way as to avoid detriment or damage to the assets of the Group, its member companies or third parties.

5.1.9



## Basic Rules for dealing with customers, suppliers and other business partners

Our relationships with customers, suppliers and other business partners are always based on an honest and professional approach. We always act in such a way as not to damage the good name and reputation of the STV INVEST a.s. Group.

We always try to create an atmosphere of trust and fairness when dealing with our business partners. We are fully transparent with our business partners and protect confidential information, know-how and other trade secrets shared by them.

Our business dealings are always based on transparency and timely, open and truthful communication. We also always communicate openly and truthfully about our work activities and future intentions. Only those employees who are authorised to enter into contractual relations are entitled to do so, always in accordance with any legal or internal regulations.

We only enter into a business relationship after a thorough assessment of the experience, qualifications and ethical standards of potential contractual partners. We also assess how these business partners comply with legal regulations and whether they observe the basic rules of ethics, morality and the principles of fair business dealings.

We strive to ensure that every contractual relationship includes a written commitment by the contractual partner to comply with the basic principles and rules contained in this Ethics and Anti-Corruption Code. To this end, a separate agreement forms part of/an annex to our contracts, under which a contractual partner undertakes to comply with the ethical and legal standards declared in this Ethics and Anti-Corruption Code.



5.1.10



## Dealing with public authorities

When dealing with public authorities, we always act fairly and always respect their impartiality and independence. We always provide all necessary cooperation to all authorities and never seek to unlawfully influence the decisions and procedures of public authorities on the Group's behalf.

5.1.11



## Dealing with the media

We make proper and timely disclosure of information where required by legal regulations. We disclose other information to the extent we consider appropriate to a particular situation. However, we take care to ensure that the information we publish is always accurate and truthful.

Only a person authorised to act on behalf of the STV INVEST a.s. Group is entitled to deal with the media; his/her name is published at the website of the STV INVEST a.s Group at [www.stvgroup.cz](http://www.stvgroup.cz).

An Affected Person shall not disclose any information about the Group or the companies belonging to the Group, other Affected Persons or business partners that may be a trade secret or of a sensitive or confidential nature.

If an Affected Person is contacted by the media regarding his/her activities for the STV INVEST a.s. Group, he/she is obliged to immediately report such fact to the Ethics and Anti-Corruption Commission or to his/her Senior Employee.

5.1.12



## Competition and principles for participation in public procurement

We always support free competition and refrain from any action that would restrict a free, healthy and competitive environment.

We always act in accordance with the relevant legislation governing competition and unfair competition.

We never, under any circumstances, enter into any pricing agreements (oral, written, implied, formal or informal) with competitors or other business partners regarding any elements of competition or market sharing, nor do we share sensitive information with competitors or damage their reputation.

We also always avoid any action that could be considered an attempt by the STV INVEST a.s. Group to achieve an undue advantage in public procurement, a public tender or public auction, or to influence their course.

5.1.13



## Lack of political engagement

The STV INVEST a.s. Group is not politically engaged in any way and does not sponsor any political parties, movements or politically active persons.

# ANTI-CORRUPTION CODE

## 6



# Introduction

The Anti-Corruption Code and the rules contained therein are related to the Ethics Code of the STV INVEST a.s. Group. It sets out in more detail the rules for the prevention, effective detection and avoidance of Corrupt Behaviour and for the protection of competition.

This Anti-Corruption Code declares the anti-corruption policy of the STV INVEST a.s. Group, which the STV INVEST a.s. Group recognises and implements in its relations with all its business partners, Affected Persons, as well as other natural persons and legal entities, organisations and institutions it encounters in the course of its activities. The STV INVEST a.s. Group accepts responsibility for promoting these values where it has demonstrable influence and the necessary powers.

The purpose of the Anti-Corruption Code of STV INVEST a.s. Group is to declare the will of its companies, as well as the Affected Persons, to observe this standard of behaviour, not only in the conduct of the companies belonging to the STV INVEST a.s. Group among themselves, but also in the conduct and relations of these companies with third parties.

# Basic background



## 6.1

The objective of the Anti-Corruption Code is to create and strengthen the anti-corruption climate, which means effectively reducing the motivation of all persons involved in Corrupt Behaviour and increasing the possibility of its detection and transparency.

The STV INVEST a.s. Group includes anti-corruption training as a separate part of regular employee training together with the anti-corruption training programme. Members of the statutory bodies, members of the Ethics and Anti-Corruption Commission and Affected Persons who are exposed to a higher possibility of corruption (managers, marketing and sales, etc.) shall receive separate training on anti-corruption at least every two years.

Failure to report suspected Corrupt Behaviour, a conflict of interests or other suspicions leading to Corrupt Behaviour are considered a gross violation of the Anti-Corruption Code. In the event of a suspicion of Corrupt Behaviour, the STV INVEST a.s. Group will conduct an investigation with its employee or other Affected Person to verify the reasonableness of such suspicion, including the possible involvement of a specific person in such practices.

# Basic principles of Anti-Corruption Code

## 6.2

### 6.2.1



### Accepting and giving gifts and other benefits of certain value

In connection with the performance of activities for the STV INVEST a.s. Group, it is forbidden to accept or solicit gifts or other favours for one's self or for someone else, or to engage in similar influencing for one's own benefit or for the benefit of someone else, except for common acts of courtesy and hospitality or symbolic gifts corresponding to business practices.

No Affected Person shall provide gifts, attention or other benefits to any officials, i.e. a person who represents or acts on behalf of a public authority in any respect. If an Affected Person is asked to provide such a gift, benefit or other attention by an official, he/she is obliged to refuse to provide such value with reference to the ethical rules of the STV INVEST a.s. Group and to inform his/her Senior Employee or the Ethics and Anti-Corruption Commission immediately.

In the event of uncertainty regarding the acceptance or provision of a gift or other courtesy, the employee or other Affected Person shall contact his/her Senior Employee or the Ethics and Anti-Corruption Commission. If the value of a gift exceeds CZK 500 (five hundred Czech crowns), the acceptance or provision of the gift must be approved by a senior company officer (chairman of the board, member of the board, executive officer, etc.).

If it is a form of hospitality, its acceptance or provision is governed by the same rules as the acceptance and provision of gifts. The limit for accepting or providing hospitality is CZK 5,000 (five thousand Czech crowns). If hospitality exceeds this value, the service must be approved by a senior company officer (chairman of the board, board member, company executive officer, etc.).

The provision of gifts and/or hospitality of any value shall be subject to proper recording, including identification of the provider, recipient, value, reason and purpose of the gift or other act of hospitality so that the record can be checked at any time.

Family members are not allowed to accept gifts or hospitality from business partners or other persons arranging partnerships or business transactions.

The STV INVEST a.s. Group's anti-corruption policy prohibits agency fees except in situations where they protect against threats to life, limb or loss of liberty. No such payments will be accepted and they are not required by STV INVEST a.s. itself.

In the event of detected Corrupt Behaviour, the employer (a company belonging to the STV INVEST, a.s., Group) will use the options given to it by the Labour Code to penalise such act and will consider reporting it to the relevant law enforcement authorities, carefully considering beforehand the possibility of applying the principle *nemo tenetur se ipsum accusare*, i.e. that no one is obliged to accuse himself/herself.

## 6.2.2



## Transparency

The STV INVEST a.s. Group always ensures that all actions taken within the Group are transparent, verifiable and reviewable.

If an agreement is concluded between a company belonging to the STV INVEST a.s. Group and a business partner, the person in charge of the negotiations is obliged to ensure that the agreement is concluded or recorded in writing.

6.2.3



## Risk of conflict of interests

The STV INVEST a.s. Group prohibits Affected Persons from any conduct leading to a Conflict of Interests. An employee or other Affected Person shall not be responsible or accountable to two or more organisations or authorities whose requirements for his/her conduct are divergent. Companies in the STV INVEST a.s. Group are an exception to this.

In the event of a suspected or actual Conflict of Interests, an employee or other Affected Person is obliged to report such fact to his/her Senior Employee and/or the Ethics and Anti-Corruption Commission.

6.2.4



## Measures to combat money laundering

The STV INVEST a.s. Group cooperates only with business partners whose business plans are, to the best of the knowledge of the Group and the Affected Persons, financed from legal sources. In any transfer of property made by the Group, as part of its activities or in its interest, the relevant Affected Person is obliged to properly identify both the beneficiary of the transaction and the purpose of the transaction. All transfers of assets made by the Group in the course of its business are duly recorded in the relevant documentation.

Affected Persons shall verify, to the best of their ability, that the activities of a selected business partner are legal and that the funds originate from legal sources.

For this purpose, employees collect and store documents and information relating to business partners and transactions.



# Corruption risks and regular monitoring



## 6.3

### 6.3.1



### Corruption risk assessment

The STV INVEST a.s. Group undertakes to investigate and analyse corruption risks.

The Ethics and Anti-Corruption Commission shall perform the duties arising from this programme, unless otherwise expressly provided.

The identification of the main risk points and potential sources of corruption is regularly updated in the Corruption Risk List. It includes the naming of specific risk areas (departments and positions in individual companies belonging to the Group), a description of an area's content, a description of possible facts in an area relating to Corrupt Behaviour and a proposal for specific measures. These mechanisms are audited by the Ethics and Anti-Corruption Commission at least once a year.

## 6.3.2



## Anti-corruption risk assessment procedure

A corruption risk assessment is carried out by preparing Corruption risk assessment report. The Ethics and Anti-Corruption Commission is entrusted with the preparation of a report as part of its annual assessment of compliance with the Ethics and Anti-Corruption Code, with the report to be submitted to the Group's management by 31 December of the year in question.

### Corruption risk assessment report includes:

- A** - identification and use of anti-corruption tools and options for improving them;
- B** - form and scope of training provided;
- C** - list of corruption risks;
- D** - cases of suspected Corrupt Behaviour and their resolution;
- E** - conclusion and results of the evaluation;
- F** - recommendations for improvement or update (any update must be made within thirty (30) calendar days of the issuance of a Corruption Risk Assessment Report).

## 6.3.3



## Stakeholder checks

Regular checks on anti-corruption work at the STV INVEST a.s. Group and persons responsible for its implementation/review are carried out by the Ethics and Anti-Corruption Commission at least once a year.

Regular checks on the positions of Senior Employees, managers or representatives of the companies in the STV INVEST a.s. Group, both current and newly appointed, leading to the investigation of possible Corrupt Behaviour and its prevention, are carried out every two (2) years or when a new manager/representative is appointed, by the Ethics and Anti-Corruption Commission.

The STV INVEST a.s. Group prides itself on screening business partners and other natural persons and legal entities in order to reduce the risk of Corrupt Behaviour. This screening is carried out by the Ethics and Anti-Corruption Commission every two years. The STV INVEST a.s. Group informs all its partners about its anti-corruption policy. In the event of proven Corrupt Behaviour or other conduct in violation of this Anti-Corruption Code, the STV INVEST a.s. Group will terminate its relations with a business entity or not establish them.

# Reporting suspected unethical, corrupt or other illegal behaviour

## 7

Our goal is to enable everyone to participate in upholding and shaping the ethical, moral and anti-corruption principles that are part of this Ethics and Anti-Corruption Code. Everyone has the right to ask questions about anything related to the ethical, moral and anti-corruption principles set out in this Ethics and Anti-Corruption Code.

In the event of suspected unethical or illegal conduct by an employee, another Affected Person, any of the companies belonging to the Group, one of our business partners or any other third party, we hereby ask you to immediately report this fact to the Ethics and Anti-Corruption Commission.

### Notification can be made:



In person, either to a Senior Employee or directly to a member of the Ethics and Anti-Corruption Commission, but also anonymously:



By phone on +420 274 012 208;



By email to [ethical@stvgroup.cz](mailto:ethical@stvgroup.cz); or



In writing to STV INVEST a.s., Ethics and Anti-Corruption Commission, Hvězdova 1716/2b, 140 00 Prague 4 - Nusle.

The Ethics and Anti-Corruption Commission will acknowledge receipt of your Notification, unless it is an anonymous Notification, within 7 (seven) days of its receipt.

You will also be informed of the outcome of the investigation by the Ethics and Anti-Corruption Commission, unless you filed an anonymous Notification, no later than three (3) months after the acknowledgement of receipt of the Notification.

Details regarding the procedure of the Ethics and Anti-Corruption Commission in receiving and handling Notifications are regulated by the Procedural regulations for handling Compliance incidents of the STV INVEST a.s. Group.

# Final and Implementing Provisions of the Ethical and Anti-Corruption Code



## 8

Compliance with and the operation of this Ethics and Anti-Corruption Code is regularly checked and evaluated by the board of the STV INVEST a.s. Group, at least once a year.

The STV INVEST a.s. Group shall implement this Ethics and Anti-Corruption Code by 30 November 2022 at the latest, and any subsequent amendments hereto shall always be implemented no later than two (2) months after adoption by the STV INVEST a.s. board.





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