

## Integra Czech Republic, s.r.o.

# Ethics and Anti-Corruption Policy

Date of issue: July 1, 2019

Effective from: July 1, 2019

Approved by: Jiří Harcuba, Executive

### Introductory provisions

The purpose of this document is to establish the principles of ethical and anti-corruption conduct at Integra Czech Republic, s.r.o. (hereinafter referred to as ICR). Adherence to these principles by ICR's employees and permanent associates, both within ICR and in relation to the public, business partners and public authorities, aims, in addition to complying with legal obligations, to enhance and strengthen ICR's reputation.

### Applicability

This document is applicable and binding for all ICR employees and collaborators.

### Essentials

#### Principles of ethical and anti-corruption behaviour in ICR

- ICR employees and associates are familiar with ICR's mission and strategy. Through their activities, they actively help in their fulfilment. They are aware of the shared responsibility for the good results of the ICR;
- ICR employees and collaborators perform duly entrusted tasks in accordance with the constitutional order, laws and other legal regulations and the law of the European Union, as well as with international agreements by which the Czech Republic is bound;

- ICR employees and associates must be familiar with the laws and regulations that affect their work activities. If in doubt, contact your supervisor. Ignorance is not an excuse for the potential consequences of breaking the rules;
- ICR employees and associates must be familiar with all applicable ICR internal regulations;
- Confidential information obtained in connection with the performance of work activities is not used by ICR employees and associates for personal gain, even if such conduct does not harm ICR;
- ICR employees and collaborators are aware of the importance of personal data protection and processing and compliance with cyber security principles;
- ICR employees and associates are aware that their actions represent ICR in public, including their behaviour on social media, even if they are acting as a private individual at the time;
- ICR employees and associates act objectively towards the participants in legal relations so as not to mislead them about their rights and obligations, they inform them clearly; all evaluations are carried out professionally, objectively, without emotions and without monitoring personal gain;
- ICR staff and associates work matters responsibly, without undue delay;

- ICR employees and associates prevent the risks of corruption, fraud and undesirable external influences that could jeopardize the proper performance of work.
- Any corrupt conduct or suspicion of such conduct, of which an ICR employee or employee has learned in a credible manner, must be reported to his or her supervisor or law enforcement agency. Furthermore, he is obliged to immediately notify the offer or obtaining an unjustified advantage;
- ICR employees and associates must not, by their actions, contribute to the laundering of the proceeds of crime or terrorist financing;
- ICR employees and associates may not accept or make monetary donations. They may accept / give in-kind gifts only if they do not go beyond the business practices and adequacy of the donor and the recipient;
- ICR employees and associates contribute to strengthening the reputation of ICR and its positive perception throughout the company through their actions and behavior;
- ICR employees and associates maintain loyalty to ICR, making the necessary efforts to achieve and maintain a high level of professionalism. In this respect, they make optimal use of opportunities for education, professional and personal growth;
- An ICR employee or associate is responsible for ensuring that conduct conducted on behalf of the ICR is in accordance with generally binding legislation, business practices and conditions generally recognized in international business;

- An ICR employee or associate will not knowingly mislead the company's management, owner, colleagues, business partners, supervisory authorities or the public by making a misleading or misleading statement;
- Communication with the media, main partners and state administration bodies and the creation of its strategy is fully within the competence of the ICR management;
- Each ICR employee and collaborator represents the company through their actions and appropriate clothing. The clothing of the employees is in principle appropriate to the occasion;
- An ICR employee and associate must always respect the difference between business and personal relationships between colleagues. It must strive to meet the fundamental conditions, and these are: mutual respect, helpfulness and mutual respect, including the protection of privacy, and an effort to understand the problems that other employees have in their work;
- ICR employees and associates will never allow unauthorized persons to use the entrusted technical means or access to the company's premises and will not allow access to any internal information;
- If the relationship with the business partner goes beyond a purely business framework, the ICR employee or associate maintains an appropriate distance between the business and personal aspects of the contacts. Where there is a risk of a conflict of interest, the interests of the ICR always take precedence.
- The ICR manager or co-worker sets a good example for colleagues, creates a team environment and ensures information flows in the company from management to subordinate levels and from subordinate levels towards company management;

- ICR employees and collaborators cooperate with each other, share information and share their experience in performing work tasks;
- The ICR employee or collaborator must process any correspondence, letter, fax, e-mail in such a way that the principles of ethics, personal data protection in accordance with the relevant legislation and the relevant internal regulations and transparency are observed, clear and content-consistent so that present to a third party (for example, an investigative body, a court or another state institution).
- There are never racist, ethnic or other discriminatory abuses in the ICR. ICR employees and associates avoid conduct that constitutes sexual harassment. The principle of equal opportunities applies. They always observe the principle of not consuming alcohol and psychotropic substances before starting work and respect the ban on smoking in all internal areas of company;
- ICR employees and associates respect the principles of Corporate Social Responsibility (CSR);
- ICR and all of its employees and associates respect and protect the environment in order to preserve it for future generations;
- Ethical principles follow the basic rights and obligations of employees set out in the Labor Code. A fundamental violation will be considered as a violation of the Labor Code or the Civil Code.