



**EmbedIT s.r.o.**

**Basic Principles of Business Conduct and Ethics**

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## 1 Purpose

The purpose of this document “Basic Principles of Business Conduct and Ethics” is to highlight basic principles of the Code of Business Conduct and Ethics effective as of 19 January 2026, (“**Code of Ethics**”) of EmbedIT s.r.o., with its registered seat at Evropská 2690/17, Dejvice, 160 00 Praha 6, registered in the Commercial Register administered by the Municipal Court in Prague, under file no. C 367199, Id. No. 171 39 708 (the “**EIT**” or the “**Company**”).

The EIT Code of Ethics has been approved by the CAO as an EIT Executive Director. It is binding for all Staff of the Company and apply also to all EIT Subsidiaries and their employees to the extent in which the provisions of this Policy are not in contradiction with mandatory provisions of the local applicable laws and regulations.

EmbedIT, as a member of the PPF Group (hereinafter “**Group**”) maintains reputation of conducting its business activities in the highest ethical and professional manner. Reputation and integrity belong to Group’s most important assets and are instrumental in its business success.

The EIT Code of Ethics states fundamental principles, rules and values of EIT that must be complied with by each person working at all levels of EIT, including, without limitations, all full-time and part-time employees, executive directors, officers, directors, senior managers, consultants, contractors or any other third parties acting on behalf of EIT or performing any services for or on behalf of EIT in a position similar to that of employees (together as the “**Staff**”) during their day-to-day activities. The EIT Code of Ethics also sets out a framework within which all other internal regulations of EIT shall be interpreted, provides guidance and sets common ethical standards to promote consistency in behaviour across all levels of Staff.

The purpose of the EIT Code of Ethics is to promote honest, ethical and professional business conduct and to ensure compliance with laws, regulations, rules and related self-regulatory standards in order to protect the business and reputation of EIT as well as the best interest of its shareholders, customers, and other stakeholders.

The list of rules in the EIT Code of Ethics is not and cannot be exhaustive. In matters, situations, and relationships not expressly covered by the Code of Ethics, EIT and its Staff are obliged to act and behave in accordance with the principles and objectives of the EIT Code of Ethics, legal regulations, international policies, good morals, rules of ethics, and fair commercial conduct in order to maintain and develop the goodwill and reputation of EIT and the Group.

## 2 Company Values and Compliance

EIT is highly committed to respecting and complying with legal regulations, international treaties and also fundamental moral principles and fair commercial conduct. This applies to all areas of EIT business and activities and in relation to all third parties, public authorities, and also all its Staff.

EIT respects national legal orders of those countries where it operates or any territories which may be affected or influenced by activities or conduct of EIT. EIT also respects international treaties and agreements and any undertakings or obligations implied by them for EIT.

Within each of their acts on behalf of EIT, its activities, or for its benefit, the Staff are obliged to comply with and respect the relevant legal regulations and standards and to represent EIT and the PPF Group through their behaviour to preserve their goodwill and reputation and not to give rise to any doubts concerning the activities of EIT and the PPF Group. Also, in their private activities, the Staff act only and strictly in accordance with the values and rules outlined in the EIT Code of Ethics to avoid harming EIT or the PPF Group or their goodwill and reputation.

EIT strictly condemns and rejects any delict conduct or any behaviour or activity that is not in accordance with legal regulations or the EIT Code of Ethics. EIT and its Staff are bound to refrain from any conduct or activities which might be found delict in terms of the public law and regulations, and thus might be regarded as a criminal offence, administrative offence or infraction.

If in doubt regarding the application of laws and regulations to their conduct/activities, the Staff are obliged to consult the matter with their Business Line Manager and/or Compliance always in accordance and within the meaning of an EIT Internal Guideline designated as the Rules for Handling Notifications under the Code of Ethics. In order to avoid any delict conduct by the Staff, and to ensure that all relevant persons have a thorough knowledge of the Corporate Compliance requirements, obligatory training is provided to the Staff on a regular basis.

At the same time, all organizations face the risk of things going wrong, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur. The aim of the EIT Code of Ethics is also to encourage the Staff to report suspected wrongdoing as soon as possible, in the knowledge that the Staff concerns will be taken seriously and investigated as appropriate, that their confidentiality will be respected, and that they will be protected from retaliatory actions.

### **3 Rules for Third-Party Relationships**

Third-party relationships include, however, not exclusively, the relationships between EIT and public authorities, business partners, suppliers, customers, potential customers, media, and the public – i.e. any relationship that involves EIT or a Staff acting on behalf of EIT, within its activities or to its benefit, and that also affects any third party.

EIT does not tolerate and strictly rejects any match fixing of its economic results for any purpose.

#### **3.1 Acquiring and Promoting Business and Professional Ethical Conduct**

The Staff are required to carry out their professional duties in line with “good manners” and with respect to EIT’s and Group’s ethics principles including the respect and dignity to all colleagues, customers, and other individuals.

The Group seeks to outperform its competition fairly and honestly. The Group seeks competitive advantages through superior performance, not through unethical or illegal business practices. Indeed, all the Staff are expected to exhibit the Group's shared value of integrity. The EIT's officers and directors have ultimate responsibility for setting the direction and tone of the EIT's internal regulations and practices in line with this shared value of integrity.

The Staff shall carry out their responsibilities honestly, in good faith and with integrity, as well as behave with due care, competence, prudence and diligence, exercising their best independent judgment at all times.

The most productive environment is that where the Staff are valued and treated with respect and dignity and where there is no unethical behaviour. Ethical behaviour encompasses the concepts of honesty, integrity, probity, diligence, fairness, trust, respect, consistency, and privacy. It includes avoiding conflicts whenever possible, and not making improper use of an individual's position or of someone else's work without proper acknowledgement. Nobody should be forced to listen to bad language or insults or be belittled in front of others in any way.

### **3.2 Relationships with Public Authorities**

EIT cooperates with public authorities openly, transparently, and according to all relevant rules. All legally effective decisions and binding instructions of public authorities must be fully respected.

EIT and its Staff never and under no circumstances attempt to illegally influence decisions or procedures of public authorities. Any potential attempts in this regard are absolutely rejected and not tolerated by EIT.

EIT and its Staff are bound to refrain from any acts or activities which might give rise to any doubts about the nature of their relationships with persons acting on behalf of public authorities, in particular when such officials decide about awarding contracts.

EIT and its Staff are obliged to comply with all applicable laws when cooperating with public authorities. EIT and its Staff must provide public authorities with accurate, true, and up-to-date information and supporting documents as required.

### **3.3 Relationships with Business Partners, Suppliers and Customers**

EIT has an interest in free development of markets where it operates.

When dealing with business partners, suppliers and customers, EIT and its Staff must always comply with all applicable laws and regulations.

In their relationships with business partners, suppliers, and customers, EIT and its Staff provide only true, complete and accurate information. In particular, the Staff are obliged to provide true information on performance and results generated by EIT and the PPF Group and any other information relevant to a decision of a supplier or business partner, and not to conceal any decisive circumstances. The provisions of clause Disclosure of Information and Provision of

Information to Third Parties and Media and clause Confidentiality are without prejudice to the previous sentence.

Before entering into a transaction on behalf of EIT, the respective Staff are obliged to (i) learn and follow all relevant laws and regulations and (ii) make sure, within their means, that the potential business partner is not involved in any illegal activity and its financial resources are legal and that concluding the transaction would not be in contradiction to the provisions of clause Restrictive Measures and Other International Sanctions.

The Staff obtain information on competitors and customers only in a manner that complies with legal regulations and from legal sources. Within their activities, EIT and its Staff never knowingly state untrue or distorted information on competitors, their products and services.

The Staff are prohibited from entering into agreements on behalf of EIT with competitors whether oral, written or implied, formal or informal, in relation to any aspects of competition, namely concerning price, sales terms, product range, preferential product or service supply conditions or any agreements which could have prohibiting impacts on competition.

The Staff must avoid any act that could be assessed as an attempt of EIT to achieve an unjustified advantage in an award of a public contract in a public tender or a public auction, or of affecting their course.

### **3.4 Prevention of Corrupt Practices**

#### **3.4.1 Bribe and General Restrictions**

EIT absolutely rejects and the Staff shall refrain from any act, directly or indirectly (e.g. through authorized representatives, business partners or other third parties), of receiving, providing, offering, or promising of unfair benefit, unauthorized performance or performance without legal grounds, regardless of form or manner of providing such benefit or performance in order to gain any commercial, contractual, regulatory or personal advantage (hereinafter referred to as a “**Bribe**”).

Any cash or non-cash performance provided directly or indirectly, the goal of which is to generate profit or maintain business in other manner than through own economic performance, influence a business or other decision, and/or arrange an unfair benefit are deemed to be a Bribe.

Facilitation Payment (or “grease payment”) is a modest payment made directly or indirectly to a Public Official to prompt the Public Official to perform or expedite a routine, non-discretionary act that the Public Official is otherwise required to perform as part of his or her ordinary duties. They may be common in some jurisdictions in which EIT or its Subsidiaries operate. Kickbacks are typically payments made in return for a business favour or advantage.

Staff must avoid any activity that might lead to, or suggest, that a Facilitation Payment or a Kickback will be made or accepted by EIT or a Subsidiary, even if the facilitation payment is not considered illegal under the local law or is otherwise common in the respective jurisdiction. Staff shall not make or accept Facilitation Payments or Kickbacks of any kind except in exigent circumstances (e.g. imminent threats to health or safety).

If a Staff member is asked to make a payment on EIT's behalf, the Staff member should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. The Staff should always ask for a receipt which details the reason for the payment. If the Staff has any suspicions, concerns or queries regarding a payment, the Staff should raise these with a member of Compliance, or contact Chief Administrative Officer (hereinafter referred as "CAO").

Prior to giving or receiving a gift or any other performance (e.g., payment for services), the Staff are obliged to learn the relevant rules of legal regulations, internal regulations of EIT and the applicable and available internal regulations of the business partner, or the relevant cultural and social conventions.

The Staff must take extra care when interacting with Public Officials, their Family Members, agents, representatives, close associates and favoured organizations or any entities associated to them to avoid even appearance of impropriety.

Compliance shall conduct regular anti-bribery and anti-corruption risk assessments to identify and evaluate existing and new risks, mitigation measures and controls.

#### 3.4.2 What is Not Acceptable regarding Gifts and Hospitality

It is not acceptable for the Staff (or someone on Staff's behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a Public Official, their Family Members, agents, representatives, close associates and favoured organizations or any entities associated with them to "facilitate" or expedite a routine procedure;
- accept payment from a third party knowing or suspecting that it is being offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if the Staff knows or suspects that it is offered or provided with an expectation that a business advantage will be provided by EIT or Group in return;

- threaten or retaliate against another Staff who has refused to commit a bribery offence or who has raised concerns under the EIT Code of Ethics; or
- engage in any activity that might lead to a breach of the EIT Code of Ethics.

#### 3.4.3 What Is Not Bribe

It is not deemed to be a Bribe if: a gift is received or given in accordance with standard market practice in order to promote or support the goodwill of EIT or Group; its giving is not related to illegal or unethical acts; the character, value, and frequency of giving such a gift is not inappropriate in view of the relevant circumstances.

#### 3.4.4 Gifts, Hospitality, Donations

The EIT Code of Ethics does not prohibit normal and appropriate gifts and hospitality (including meals and entertainment and travel expenses), whether given or received, to or from third parties.

The giving or receipt of gifts and hospitality is not prohibited, if the following requirements are met:

- It has been reported and approved in line with clause 3.4.5;
- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is appropriate in the circumstances, it is in good faith and it complies with law;
- it is given in EIT's name, not in Staff's name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- taking into account the reason for the gift/hospitality, it is of an appropriate type and value and given at an appropriate time;
- it is given or received openly, not secretly;
- it is reasonable, proportionate and for legitimate business purpose;
- its giving or receipt does not give rise to conflict of interests;
- its giving or acceptance does not jeopardise the impartiality and integrity in business relationships;
- the Company may host meals and receptions for third parties and their respective representatives, provided that appropriate Staff are present, the venue is not

inappropriate and meal or reception is directly related to the promotion or explanation of the Company's business /services;

EIT only makes charitable donations that are legal and ethical under local laws and practices. The Staff can make charitable contributions or sponsorships on behalf of, or in the name of EIT only for bona fide charitable, educational, humanitarian, non-profitable or cultural purposes. Charitable contributions or sponsorships should never be used as a substitute for political contributions.

#### 3.4.5 Approval of Gifts, Hospitalities, Donations

**Provision.** Provision of a gift, hospitality or other performance above certain value specified in the EIT Code of Ethics must be in advance notified to Compliance and approved in advance by approval authorities as specified in the EIT Code of Ethics.

**Acceptance.** Gift or hospitality shall not be accepted if the conditions specified in clause 3.4.4 are not met. If such gift was already received, it shall be:

- i. returned back to the donor; and
- ii. notified to Compliance above certain value specified in the EIT Code of Ethics.

Accepted gifts or hospitality fulfilling conditions specified in clause 3.4.4 above certain value specified in the EIT Code of Ethics must be notified to Compliance within 5 working days from the acceptance of the gift or hospitality at the latest and approved without undue delay by the authorities as set out above in this clause.

**Donations.** All charitable contributions and sponsorship shall be always in line with the values and principles set out in this Code of Ethics and any applicable laws and regulations. All requests for charitable contributions and sponsorship (donations) or above certain value specified in the EIT Code of Ethics must first be sent to Compliance for approval by CEO.

EIT appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

#### 3.4.6 Records Keeping

The Staff must keep written record of all gifts and hospitality accepted or offered above certain value specified in the EIT Code of Ethics including the information on identity of a recipient/donor, specific reason and purpose of such gift or hospitality. This information shall be submitted to Compliance within the notification.

Compliance must keep written records of all notifications related to gifts, hospitalities, donations, contributions etc. including information about the outcome of the approval process.

#### 3.4.7 Political Parties, Organizations and Public Officials

EIT does not make contributions to political parties, political organisations, or independent candidates or charities or not-for-profit institutions associated with them.

Gifts should not be offered to, or accepted from, Public Officials or politicians or political parties, independent candidates or charities or not-for-profit institutions associated with them.

The Staff shall not provide gifts, entertainment, meals, travel or accommodations to any Public Official's Family Members, agents, representatives, close associates and favoured organizations or any entities associated with them.

EIT respects the right of the Staff to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction. Contributions to political parties or candidates by the Staff, acting solely in their personal capacities, may not involve the use of any Company funds or office space and must be made in accordance with all applicable laws and regulations.

#### 3.4.8 General Notification Duty

All Staff are obliged to inform the relevant Business Line Manager of any attempt of a third party to influence their activities, attitudes, or decision within EIT or Group. Staff are also obliged to notify his or her Business Line Manager or Compliance of any actual or potential conduct which is corruptive by nature.

Staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Any uncertainties as whether a particular act constitutes bribery or corruption, or any other queries, should be raised with Compliance, Head of Compliance, or CAO.

The CAO can be contacted at notification channels described in the EIT Code of Ethics.

#### 3.4.9 Protection Against Extortion

Staff shall reject any direct or indirect request by any third Party for a Bribe (including Facilitation Payment and Kickback), even if by rejecting such a request EIT is consequently threatened with adverse actions.

EIT, however, recognises that in some cases an individual's own welfare and safety could be at risk if they do not respond to such requests. If a member of Staff finds themselves in this situation, she/he should never put itself in danger but should promptly report the request to a member of Compliance or contact CAO.

EIT shall not take disciplinary action against any Staff who makes a payment in such circumstances if they genuinely believe that she/he or her/his Family Members would have been put in danger if they had not done so.

### **3.5 Anti-money Laundering Measures**

Money laundering is a process through which profits from illicit activities are actively hidden, a process based on which it is impossible to find sources of such profits and their beneficial owner, or a process through which characteristics of those profits are changed so that they appear to be legal profits.

EIT and its Staff strictly comply with all legal regulations related to anti-money laundering, fighting financing any illegal activities, and combating terrorism and support of terrorism.

EIT cooperates only with business partners, suppliers and customers whose business plans are, according to knowledge of EIT and its Staff, financed from legal sources. Within their means, the Staff are obliged to verify whether activities of a business partner are legal and whether funds of such a business partner originate from legal sources. For this purpose, the Staff collect and maintain documents and information related to business partners and transactions performed.

During any transfer of assets performed by EIT within its activities or interest, the relevant Staff member is obliged to duly designate the recipient of performance and the purpose of performance provided. All transfers of assets performed by EIT within its activities must be duly recorded in the relevant documentation.

### **3.6 Restrictive Measures and Other International Sanctions**

EIT and its Staff follow international restrictive measures issued, in particular, by EU, U.S. or U.N., by which international community aims to achieve that certain states and/or other entities (persons) presenting a threat to international peace and security change their conduct without the use of force so that their behaviour no longer threatens international peace and security (hereinafter referred to as the “**Sanctions**”).

As a precaution EIT acts so as not to unreasonably expose itself, directly or indirectly, at risk of breach of the Sanctions.

EIT, through the Compliance, maximizes its best effort in the process of monitoring Sanctions and related risks for EIT. EIT adopts and implements measures and procedures which are necessary to prevent and avoid risks relating to the breach of the Sanctions.

If the Staff member is aware of any risk relating to the Sanctions or has any suspicion about it, even if it is only hypothetical risk, she or he is obliged to notify her or his Business Line Manager or Compliance.

### **3.7 Disclosure of Information and Provision of Information Third Parties and Media**

EIT duly and in timely manner discloses information as required by applicable laws. Other information is disclosed by EIT based on the principle of openness to the extent that is deemed to be appropriate in the particular situation. Information disclosed by EIT should always be accurate, true, and verified.

The Staff are not entitled to provide third parties and media with any information (e.g. about the clients, market rivals, price sensitive information, comments on changes of ownership) on EIT and/or the PPF Group or any of their Subsidiaries, or to disclose such information through any communication instruments, including social networks.

Information to third parties or media is provided solely by the Staff who are authorized to communicate to such third parties or media on behalf of EIT or the PPF Group.

If the Staff member is requested to provide any information or statement to the respective third party or media with respect to or on behalf of EIT and/or the PPF Group, their activities and cooperation with business partners, she or he is obliged to inform the Business Line Manager and the Marketing team.

### **3.8 Basic Rules for Internal Relations**

Internal relations mean, in particular, relationships between EIT and its Staff and relationships between the Staff themselves.

EIT and its Staff comply with applicable legal and internal regulations affecting internal relationships in EIT and relationships between the Staff. EIT does not allow any form of discrimination of the Staff, not even in relation to work allocation and remuneration. All Managers are obliged to comply with these principles in relation to the Staff.

EIT does not allow any form of harassment, intimidation, forced labour, or illegal labour.

Managers are obliged to make sure that their subordinated Staff are duly informed, qualified and professionally trained, and that the Staff take part in trainings regarding the Code of Ethics.

EIT respects privacy of its Staff and request its Staff to respect each other in general and to respect the privacy of each other as much as possible. In particular, it is prohibited to talk inappropriately, offensively, or pejoratively about other Staff, or to harass, intimidate, or humiliate them verbally or physically.

It is prohibited to discriminate the Staff who pointed out to a potential breach by filing a Submission or who made any other proposal for the improvement of EIT activities and processes.

### 3.9 Conflict of Interest

Staff must not take any steps on their part that could harm the interests of the Employer and is obliged to protect the Employer's good reputation and legitimate interests when performing work.

#### 3.9.1 Close Personal Relationships

Spouses, registered partners, companions, parents, grandparents, children and siblings must not be assigned to work positions where one of them would be subordinated to the other or under his/her supervision. In the event that an Employee is to be assigned to such work position or if such relationship arises during their employment, the concerned Employee is obliged to inform his/her direct manager without undue delay. Such Employee's direct manager (if necessary, after discussing the matter with the People Division and other Managerial Employees) shall adopt measures so that the affected Employees are not subordinated to or under supervision of each other. If this is not possible, the direct manager shall adopt measures to prevent any abuse of this situation.

#### 3.9.2 Potentially Harmful Actions

Any Staff member may not take any actions that could harm interests of the Employer and is obliged to take care of protection of the Employer's good reputation and legitimate interests.

In particular, the Staff cannot:

- a) adversely affect or disrupt the Employer's business and other dealings with third parties e.g., suppliers, customers);
- b) where relevant (not applicable to e.g. independent contractors), work for any other person whose business or other activities are competing or may be competing the Employer;
- c) use his/her work position to obtain any unjustified benefit for himself/herself or a third party or use it to influence or force another Staff to undertake any act as a result of which influencing Staff would gain unjustified benefit or advantage for himself/herself or for another.

Staff's obligations relating to the matter of conflict of interest may be further regulated in Employment Contract or other agreement concluded between the Staff and the Employer.

If any circumstances prevent a Staff from taking impartial approach to the assigned work task or that could raise reasonable doubts about the Staff's impartiality, he/she is

obliged to immediately inform his/her direct manager or Compliance about it. The Employee's direct manager / Compliance shall forward all such information to the People Division without undue delay. The People Division in cooperation with the Legal Department will decide whether the Staff can continue to perform the work task. If this is into the case, the direct manager will assign such work task to another Staff.

#### **4 Safety at Work**

Safety at work and protection of health of the Staff is one of the EIT priorities. EIT and the Staff ensure that all legal and internal regulations relating to safety at work are complied with and thoroughly prevent damage and harm caused by breaching such regulations. Managers and the Staff thoroughly eliminate potential risks related to employment activities.

EIT adopts appropriate preventive, security measures in order to protect health of the Staff, and these are updated as necessary. For this purpose, EIT also arranges suitable courses, trainings and tests for the Staff relating to safety at work.

EIT accepts proposals from the Staff to increase the level of safety at work and protection of health at work, processes and evaluates such proposals, and, if justified, adopts relevant measures. Every Staff is entitled to file the Submission under the previous sentence.

If the Staff member suspects that legal regulations relating to safety at work have been breached or might be breached, the Staff is obliged to notify the relevant Business Line Manager or/and Compliance.

#### **5 Confidentiality**

EIT is committed to protect its own sensitive and confidential information, as well as any other information on its Staff, business partners, suppliers and customers.

Generally, Staff must maintain the confidentiality of information entrusted to them by EIT, the Group or its customers, except when disclosure is authorized by the Compliance function or required by laws or regulations. The obligation to preserve confidential information continues even after the Staff leaves EIT.

Confidential information includes all non-public information, in particular that information that might be of use to competitors, or harmful to EIT or to the Group or their customers, if disclosed. It includes information which the customers and other parties have entrusted to EIT.

All the Staff shall sign a confidentiality policy within their employment contract which sets forth specific obligations regarding confidential information. Any questions regarding such policy or other issues relating to confidential information should be directed to the Legal function.

Key principles for data protection within the EIT are stipulated in the EIT internal regulations for data protection and information security.

When performing their activities and while discussing business transactions, Staff may communicate to third parties only strictly the necessary and relevant information. Staff must ensure that in relation to third parties they make such third party obliged to maintain confidentiality concerning any communicated information.

If the Staff member suspects that sensitive or confidential information has been disclosed or misused, or that such a disclosure or misuse is impending, the Staff is obliged to notify the relevant Business Line Manager or/and Compliance.

## **6 Personal Data Protection**

The key rules, principles and procedures for personal data protection are set forth in the EIT Personal Data Protection Policy.

Personal data mean any information obtained by EIT and relating to an identified or identifiable natural person (Personal Data subject) such as Staff, business partners, customers or any other data subject; an identifiable natural person is one who can be identified, directly or indirectly.

EIT and its Staff thoroughly comply with all regulations related to the personal data protection. Every Staff is obliged to thoroughly protect all personal data she or he has learned in her or his activities and provide such data exclusively to persons entitled pursuant to the relevant legal regulation or written consent of the relevant person.

If the Staff member suspects that personal data has been disclosed or misused, or that such a disclosure or misuse is impending, the Staff member is obliged to notify without undue delay the Data Protection Officer, the relevant Business Line Manager, or/and Compliance.

## **7 Intellectual Property Protection**

EIT and its Staff thoroughly protect intellectual property rights and comply with all legal regulations and international treaties affecting this area.

All Staff are obliged to protect intellectual property rights owned by EIT.

All Staff are obliged to respect copyright of other entities and always ensure that they are entitled to use the certain work.

If the Staff member suspects that intellectual property rights have been misused or could be misused, the Staff member is obliged to notify without undue delay the relevant Business Line Manager, Legal or/and Compliance.

## **8 Protection and Proper Use of EIT's Assets**

The Staff should endeavour to protect the EIT's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the EIT's profitability. Any suspected incident of fraud or theft should be immediately reported to the Staff's Business Line Manager or the Compliance

function for investigation. The EIT technology, equipment or other resources should not be used for any non-EIT business, though incidental personal use may be permitted.

The obligation of the Staff to protect the EIT's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, systems, software programs, designs, databases (including customer and business partners databases), records, salary information and any unpublished financial data and reports.

Unauthorized use or distribution of the proprietary information would violate the Code of Ethics, and it could also be illegal and result in civil and/or criminal penalties.

## **9 Written Records and Record Keeping**

EIT requires honest and accurate recording and reporting of information in order to conduct its business and to make responsible business decisions. Generally, all of EIT's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to EIT's system of internal controls.

Business records and communications often become public, and the Staff must avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mails, internal memos, and formal reports. Records should always be retained or destroyed according to the EIT's record retention internal regulations. Finally, in the event of litigation or governmental investigations, Staff must consult the Compliance regarding any specific record-keeping requirements or obligations.

## **10 Environmental Protection**

EIT is fully aware of its environmental responsibility and strictly complies with all applicable legal regulations related to environmental protection.

EIT regularly analyses the effects of its activities on environment and adopts corresponding measures for its protection. EIT regularly updates on these measures.

EIT minimizes the use of toxic or other hazardous substances and materials within its activities and provides for the proper handling with toxic or other hazardous substances and materials. EIT attempts to use only procedures and technology that are environmentally friendly.

If a Staff member notices any fact or event in its workplace which might have a negative effect on the environment, the Staff member is obliged to notify without undue delay the relevant Business Line Manager or/and Compliance.

## 11 Whistleblowing

### 11.1 What Can Be Reported?

The Company has established an internal whistleblowing system in accordance with the Whistleblowing Act under which the following concerns can be reported by the person defined in clause Who Can Report:

- a) criminal activity;
- b) offence subject to sanctions above CZK 100,000;
- c) breach of the Whistleblowing Act; or
- d) breach of other EU law in the following areas:
  - financial and auditing services, financial products and markets;
  - corporate income tax;
  - prevention of money laundering and terrorist financing;
  - consumer protection;
  - product safety and compliance;
  - transport safety;
  - environmental protection,
  - food and feed safety, animal health and welfare;
  - radiation protection and nuclear safety;
  - public health;
  - protection of privacy and personal data, and security of network and information systems;
  - financial interests of the European Union as referred to in Article 325 TFEU (Treaty on Functioning of European Union); and
  - public procurement, breaches relating to the internal market, competition, and state aid rules.

A list of 'red flag' activities that might be grounds for whistleblowing concerns is included in Annex 2 of the EIT Code of Ethics.

## 11.2 Who Can Report?

Whistleblowing reports may be filed by persons who are Employees of EIT, or execute similar activity for the Company, including the members of corporate bodies, job applicants, trainees, or former employees (“**Whistleblower**”).

Company taking advantage of Section 9 (2)(a) of the Whistleblowing Act decided that Whistleblowing reports protected by the Whistleblowing Act cannot be submitted by persons who provide their services to EIT based on contracts on provision of supplies, services, construction works or other similar performance according to Section (2)(3)(j) of the Whistleblowing Act. Those persons can notify the Company about its concerns submitting a Submission in line with clause Notification Outside Whistleblowing Channels.

## 11.3 How to Report?

Whistleblowing Reports may be filed via one of the following channels:

- e/mail: [whistleblowing@embedit.com](mailto:whistleblowing@embedit.com);
- phone: +420 725 193 553;
- in person to any Nominated Person;
- in writing at the address EmbedIT s.r.o., Evropská 17, 160 00 Praha, attn. to Roman Loučka;
- through the relevant department of Ministry of Justice.

## 11.4 Nominated Persons

The following are the persons nominated by EIT to receive and investigate Whistleblowing Reports in line with the EIT Code of Ethics and the Whistleblowing Act:

- a) Martin Šeda, Branch Manager of Home Credit N.V., Branch Office;
- b) Dušan Malota, Chief Administrative Officer; and
- c) Roman Loučka, Head of Compliance;

(the “Nominated Persons”).

Nominated Persons are appointed and dismissed by a resolution of executive director/s. If necessary, Nominated Persons may be appointed on ad hoc basis for handling particular case.

## 11.5 Whistleblower´s Protection Rules

Whistleblowing Report made via phone can be recorded with the consent of the Whistleblower.

At any personal meeting related to whistleblowing, the Whistleblower may request to be accompanied by another Employee. Both however, must respect the principle of confidentiality. Brief meeting minutes will be taken by the Nominated Person and copy will be given to the Whistleblower.

Within 7 days after filing the Whistleblowing Report, the Whistleblower, if not anonymous, will be informed on the receipt of the report by a Nominated Person. The Nominated Person may, as part of the information gathering process, request supporting documents from other departments and from the Whistleblower; such documents will form part of the investigation file. The Nominated Person will assess the reasonableness of the report and inform the Whistleblower within 30 days about the results of his or her assessment and on the adoption of appropriate remedial or preventive actions. In complicated cases, the deadline can be extended by additional 30 days, but no more than twice. In case the Whistleblowing Report is not found reasonable, the Nominated Person will notify the Whistleblower thereon and he or she may then lodge a notification with a relevant public authority.

Whistleblowing Reports will be held strictly confidential and no personal information on the Whistleblower will be disclosed or shared except between the Nominated Persons for the purpose of investigation of the reported whistleblowing concern. Whistleblowers are protected from any retaliatory actions. However, protection to anonymous Whistleblowers cannot be provided until the identity of such Whistleblower is revealed and such anonymous notification will be investigated in the regime under clause Notification Outside Whistleblowing Channels.

The protection cannot be provided to persons who submit Whistleblowing Report under knowingly false or untrue facts. Such submission is an administrative offence which can be subject to a legal fine up to CZK 50,000.

Public disclosure of a Whistleblowing Report should be the last resort channel and should be made only in case that appropriate action has not been taken in response to a reported Whistleblowing Report, public disclosure is necessary to avoid an immediate or obvious threat to the public interest, or, if an external reporting channel is used, there is a risk of retaliation taking into account the special circumstances of the case.

## 12 Notification Outside Whistleblowing Channels

In addition to the whistleblowing channels described in clause Whistleblowing, the following channels can be used for submitting Submissions (as defined below):

- ethics e-mail sent to [whistleblowing@embedit.com](mailto:whistleblowing@embedit.com);
- in person to any Nominated person.

These channels are intended for:

- a) any member of the Staff and any other third parties, including persons who provide their services to the Company based on contracts on provision of supplies, services, construction works, or other similar performance, and including, for example, their Family Members (the “**Complainant**”) and/or

- b) concerns outside the scope described in clause Whistleblowing above, for example failure to act in accordance with good morals or fair commercial conduct, or breach of internal rules and procedures of apparently lesser intensity or impact

(“**Submissions**”).

These channels and procedure as described in this Clause 12 are furthermore intended for Staff of EIT Subsidiaries.

In case of uncertainty as to which channel to use, i.e. whether to use the whistleblowing channels under the preceding clause Whistleblowing or to file a Submission under clause Notification Outside Whistleblowing Channels, the notifier may use any of the whistleblowing channels and will be informed by Nominated Person in what regime his or her notification will be investigated.

EIT will process all Submissions regardless of the Complainant and the nature of their filing. Filing the Submission is not sanctioned by EIT in any manner and the Staff will not suffer demotion, penalty, or other disciplinary action for reporting. However, knowingly untrue or vexatious Submissions will not be tolerated.

An Internal Guideline may be issued and developed by the Chief Administrative Officer to provide guidance procedure applied to the internal processing of the Submissions (Guideline titled Rules for Handling Notifications under the Code of Ethics).

If the Complainant is not satisfied with the way in which his or her reported concern has been handled, he or she can raise it with the CEO.

CAO reports the status and outcome of all investigations initiated by Submission to the CEO on quarterly basis. CAO also reports to the CEO all major violations of the EIT Code of Ethics or the internal regulations and procedures referenced herein even if identified not through a Submission.