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CODE OF ETHICS OF TSC GROUP, a.s.

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REGULATION NUMBER – IP 01

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1. Basic provisions

The Code of Ethics is one of basic standards of the whole TSC GROUP, a.s., with official address at Stodolní 316/2, 702 00 Ostrava - Moravská Ostrava, Id. No.: 294 52 066, registered in the Trade Register at the Regional Court in Ostrava, section B, file 10331 (hereinafter only as "TSC GROUP, a.s."), being the controlling entity under whose united management individual controlled entities are subject, i.e. the companies:

- ❖ **TSC Cleaning, a.s.**, with official address at Stodolní 316/2, 702 00 Ostrava – Moravská Ostrava 253 68 907, VAT NO.: CZ 253 68 907, registered in the Trade Register at the Regional Court in Ostrava, section B, file 4249 (hereinafter only as "**TSC Cleaning, a.s.**"),
- ❖ **Leastex, a.s.**, with official address at: K Myslivně 2140/61, Poruba, 708 00 Ostrava, Id. No.: 451 92 731, VAT NO.: CZ 451 92 731, registered in the Trade Register at the Regional Court in Ostrava, section B, file 434 (hereinafter only as "**Leastex, a.s.**"),
- ❖ **TSC Services, s.r.o.**, with official address at: Balcarova 1716/4, Moravská Ostrava, 702 00 Ostrava, Id. No.: 471 50 831, VAT NO.: CZ 471 50 831, registered in the Trade Register at the Regional Court in Ostrava, section B, file 3804 (hereinafter only as "**TSC Services, s. r.o.**");
- ❖ **TSC Hospital, s.r.o.**, with official address at: Stodolní 316/2, Moravská Ostrava, 702 00 Ostrava, Id. No.: 268 72 561, VAT NO.: CZ 268 72 561, registered in the Trade Register at the Regional Court in Ostrava, section C, file 40981 (hereinafter only as "**TSC Hospital, s.r.o.**");
- ❖ **TechClean, s.r.o.**, with official address at Slovenská 1085/1a, Přívoz, 702 00 Ostrava, Id.No.: 607 77 541, VAT NO.: CZ 607 77 541, registered in the Trade Register at the Regional Court in Ostrava, section C, file 6866 (hereinafter only as "**TechClean, s.r.o.**");
- ❖ **TSC Clena, s.r.o.**, with official address at: Slovenská 1085/1 a, 702 00 Ostrava – Přívoz, Id.No.: 278 57 239, VAT NO.: CZ 278 57 239, registered in the Trade Register at the Regional Court in Ostrava, section C, file 31936 (hereinafter only as "**TSC Clena, s.r.o.**");
- ❖ **TSC Job, s.r.o.**, with official address at: Stodolní 316/2, Moravská Ostrava, 702 00 Ostrava, Id. No.: 049 95 694, registered in the Trade Register at the Regional Court in Ostrava, section C, file 68577 (hereinafter only as "**TSC Job, s.r.o.**");
- ❖ **TSC Jet, a.s.**, with official address at: Stodolní 316/2, Moravská Ostrava, 702 00 Ostrava, Id. No.: 109 52 101, VAT NO.: CZ 109 52 101, registered in the Trade Register at the Regional Court in Ostrava, section B, file 11330 (hereinafter only as "**TSC Jet, a.s.**"),

- ❖ **TSC Marketing, s.r.o.**, with official address at: Stodolní 316/2, Moravská Ostrava, 702 00 Ostrava, Id. No.: 142 15 748, VAT NO.: CZ 142 15 748, registered in the Trade Register at the Regional Court in Ostrava, section B, file 88300 (hereinafter only as “**TSC Marketing, a.s.**”),
- ❖ **TSC Facility, s.r.o.**, with official address at Stodolní 316/2, 702 00 Ostrava – Moravská Ostrava, Id. No.: 607 11 175, CZ 607 11 175 registered in the Trade Register at the Regional Court in Ostrava, section C, file 72003 (hereinafter only as “**TSC Facility, s.r.o.**”);
- ❖ **TSC Spectre, s.r.o.**, with official address at Stodolní 316/2, 702 00 Ostrava – Moravská Ostrava, Id. No.: 055 92 968, CZ 055 92 968 registered in the Trade Register at the Regional Court in Ostrava, section C, file 68263 (hereinafter only as “**TSC Spectre, s.r.o.**”);
- ❖ **TSC Cleaning, s.r.o.**, with official address at: Ladislava Hudeca 2A, 974 01 Banská Bystrica, Slovak Republic, Id. No.: 51 868 661, VAT No.: 212 081 85 02, Id.No., VAT No.: SK2120818502, registered in the Trade Register at the Regional Court in Žilina, section Sro, file 70604/L (hereinafter only as “**TSC Cleaning, s.r.o.**”).

TSC Group, a.s. with this Code of Ethics accepts defined principles that are basis for business and social behavior, conduct, manner and at the same time for creation of company culture in the company.

TSC Group, a.s. follows relevant laws, rules, internal regulations, local standards and ethical principles in all areas of its activities.

The Code of Ethics is a document of TSC Group, a.s. to form its company culture of employer. It is made of a set of basic ethical standards of which the compliance with is requested by TSC GROUP, a.s. from its employees and other concerned persons.


The Code of Ethics aims to improve internal as well as external relationships and communication and to achieve fully professional behavior of employees and other concerned persons.

The conduct of employees and other concerned persons is always and under any circumstances legal, ethical and transparent and conforms to laws of the Czech Republic and values of TSC GROUP, a.s. All procedures and activities are based on best practices of management and operational excellence with focus on the due manager’s care, safety and protection of environment.

The Code of Ethics links to valid laws of the Czech Republic and internal regulations of TSC GROUP, a.s. and defines basic rules of behavior of employees and other concerned persons.

The Code of Ethics is an integral part of the Criminal Compliance Program (hereinafter as “CCP”) which means a complex system of internal company measures and procedures for prevention, detection and reaction for possible criminal or unethical negotiations that is a strategic part of TSC GROUP, a.s. culture.

2. Scope

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The Code of Ethics is an internal regulation and is valid within the whole TSC GROUP, a.s. and all companies belonging to TSC GROUP, a.s. concern, for individual employees or persons in similar position, general manager, general manager deputy, the Supervisory Board and members of the Supervisory Board, the persons at management post within TSC GROUP, a.s. who is authorized to act on behalf of TSC GROUP, a.s., the person performs managing or controlling activity at TSC GROUP, a.s. (hereinafter as “concerned persons”), individual top managements of individual companies of TSC GROUP, a.s. concern. It is available at the Intranet of TSC GROUP, a.s. to concerned persons. Due to its maximum transparency the Code of Ethics is also available for the public and business partners at web pages of TSC GROUP, a.s.: www.tsc-group.cz.

The Code of Ethics CCP relates to the area of moral rules. The Code of Ethics is organically linked to other internal regulations of TSC GROUP, a.s. that also define principles and rules of behavior of TSC GROUP, a.s. and concerned persons. The Code of Ethics conforms to all other internal regulations of company of TSC GROUP, a.s. to which it links, refers and that amends.

3. Used terms and abbreviations

CCP	Criminal Compliance program
CO	Compliance officer
CCP Code	Criminal Compliance program Code of TSC GROUP, a.s.
EC	Ethical commission
IMSD	Department of integrated management system

4. Code of Ethics

4.1. Principles of the Code of Ethics

4.1.1. Generally valid principles of work and performance of actions

- ❖ scheduling and implementation of individual objects of action to create an optimum relation among activities performed by TSC GROUP, a.s. concern and the market economic environment;
- ❖ to permanently adapt the organizational set-up pursuant to basic principles of work.

4.1.2. Generally valid principles of external communication

- ❖ to ensure desirable representation of the company TSC GROUP, a.s to create its good reputation and promote and protect its legitimate interests;

- ❖ positive representation of company TSC GROUP, a.s. in events held for public and at public meetings;
- ❖ provision of objective and credible information to media through assigned persons;
- ❖ to ensure the protection of business secret and avoid data loss, leakage or abuse;
- ❖ helpful negotiation with state administration bodies and institutions;
- ❖ we perform legal action that is fully conform to the Act No. 418/2011 Coll., the act on criminal liabilities of legal entities and on procedures against them, as amended (namely pursuant to the novelization made by the Act No. 183/2016 Coll.), i.e. such action that will prevent (avoid) possible imputation of criminal action of the company TSC GROUP, a.s. or to TSC Group.

4.1.3. Generally valid principles of internal work communication

- ❖ application and implementation of principles of mutual good cooperation of employees in individual companies of the concern and the cooperation among other companies of TSC GROUP, a.s. concern;
- ❖ handing-over of true and objective information to colleagues who need them to perform their jobs;
- ❖ direct administration of common work matters among employees of TSC GROUP, a.s. concern; cases beyond their competences, or possible disputes, are solved by employees through their superiors;
- ❖ application of claims, suggestions and findings by the employee to his/her direct superior, higher management in cases when it is urgent or the direct superior has not settled the claim or suggestion;
- ❖ we also perform fully legal action in our internal communication that reflects requirements of the Act No. 418/2011 Coll. on criminal liability of legal entities and procedures against them (namely pursuant to the novelization made by the Act No. 183/2016 Coll.) resulting in elimination of attributable criminal action against the company TSC GROUP, a.s. or TSC Group.

4.1.4. Basic duties of concerned persons for external and internal communication

Concerned persons are aware of the fact that their behavior co-create the reputation of TSC GROUP, a.s. concern and that they represent its good will and their actions co-create work atmosphere and form the company culture.

In their communication, the concerned persons are namely obliged to:

- ❖ perform communication on behalf of individual companies of TSC GROUP, a.s. concern in correct and polite manner, with no prejudice;
- ❖ communicate only with persons who are authorized to it, not to give information to random persons; to always communicate in polite way, responsible and available way, and to create the atmosphere of mutual trust and cooperation;
- ❖ make decisions and solve matters in objective way based on facts, to regard only legal valid facts and with no undue delays;
- ❖ communicate with the other party in intelligible way so that the content of provided information is factual and correctly understood - to adapt the way of communication and wording to the person whom the information is determined;
- ❖ communicate in the interest of TSC GROUP, a.s. and to protect its legitimate interests, to provide only such information that is not in conflict with legitimate interests of TSC GROUP, a.s., to proceed with prudence in communication and to take care to communicate only regarding the specific area;
- ❖ provide only such information that conforms to generally valid legal regulations, managed documentation of TSC GROUP, a.s., business terms and conditions and activities of TSC GROUP, a.s.;
- ❖ not to disclose untrue or misleading information, to communicate information in unambiguous way to avoid any double interpretation, not to disclose information that would mislead the person in communication;
- ❖ keep confidentiality on facts of business secret character, on personal data of concerned persons (unless publicly available), wage data of specific concerned persons and information on concerned persons not related to their activities in TSC GROUP, a.s.;
- ❖ not provide information that could endanger matters that are subject of investigation by state or monitoring bodies;
- ❖ apply principles of prohibition of discrimination regardless race, color, appearance, religion, political opinion, nationality, nationality, gender, age, or other criteria;
- ❖ avoid any favoritism in negotiations and communication resulting from personal motivation;
- ❖ consistently keep confidentiality towards unauthorized persons regarding information, relations and negotiations held among companies of TSC GROUP, a.s. concern and their business partners or prospect business partners;

- ❖ avoid unauthorized disclosing of information on property situation of business partners or their evaluation;
- ❖ avoid illegal action that would be judged as a crime that would be adjudged to the company TSC GROUP, a.s. or TSC Group to the Act No. 418/2011 Coll., on criminal liabilities of legal entities and on procedures against them, as amended (namely pursuant to the novelization made by the Act No. 183/2016 Coll.);
- ❖ apply principles of data protection pursuant to the Directive of the European Parliament and the Council (EU) 2016/679, on the protection of natural persons and in connection with the processing of personal data and on the free movement of such data (hereinafter also referred to as "GDPR") - i.e. we work only with the necessary scope of necessary personal data, for which we always have the necessary legal title to process them and such data we fully protect against their accidental misuse, destruction or loss.

The concerned persons consistently take care of data processing protection in the work with computer, communication or office devices in terms of valid legal regulations and managed documentation.

The concerned persons are obliged to dully follow OSH principles and to protect health and property of themselves as well as their colleagues, TSC GROUP, a.s. property and to avoid any damages with their action. They are obliged to act in conformance with internal safety regulations of TSC GROUP, a.s. under any circumstances.

The concerned persons are obliged to take care of their look. Their clothes shall always conform to needs, environment, work classification, common habits and plate of work of their job.

The concerned persons are aware of the fact that any provision of information to media and any declaration on behalf of TSC GROUP, a.s. is assigned to the determined person.

The concerned persons are obliged to take care of their professional growth, enabling their quality performance of job tasks.

4.1.5. Principles of behavior of managers

In addition, the managers

- ❖ cannot abuse their authority against their subordinates;
- ❖ are obliged to create work and team atmosphere leading to the professional performance of tasks and obligations;
- ❖ cannot exceed the authorization given them in relation with the job performance.

4.1.6. Conflict of interest and abuse of employee status

The employee is obliged to refrain from any activities that would be the subject of the employer's activity or that would be of a competitive character for the duration of the employment relationship.

It namely includes following activities:

- ❖ doing business in an area that is identical to the employer's object of activity and in an area that would be of a competitive character towards the employer's business;
- ❖ mediation or provision of businesses of employer for other persons;
- ❖ participation in business of another person as an associate or controlling persons of another person doing business in the sector that is identical to the employer's object of activity and in the sector that would be of a competitive character towards the employer's business and due to the employer's legitimate interest he/she shall have no legal relation in such terms to any competitive business;
- ❖ perform activities of statutory body, member of statutory body or employee of any other legal entity doing business in an area that is identical to the employer's object of activity and in an area that would be of a competitive character towards the employer's business unless it is a legal entity directly controlled by the employer and the employer is informed on such fact and has no objections.

The concerned persons do not involve directly or indirectly in any activity that could be qualified as seeking or asking for bribe, illegal commission or other payments or benefits from current or prospect business partners of TSC GROUP, a.s.


The concerned persons shall not receive financial or material gifts and other benefits (except for promotional memory gifts) from persons for which it can be reasonably assumed that have or will have in the future business relations with TSC GROUP, a.s. as well as from competitors of TSC GROUP, a.s. and they also cannot provided or promise them.

The employee is obliged to immediately inform his/her superior on any possible conflicts of interest, including those in which he/she is involved without own endeavor or due to personal relations with business partners or competitors of TSC GROUP, a.s. In case it is not possible to immediately inform the direct superior, the employees shall directly address CO.

4.1.7. Principles of behavior in business relationships

The concerned persons shall refrain from any activities that could be considered as illegal.

The use obtained information only for the purpose for which it was provided.

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The concerned persons shall have sufficient knowledge on economic competition in order to avoid or not discuss matters that could invoke doubts within their action in TSC GROUP, a.s. The concerned persons are obliged to act and behave so that they do not breach the law nor cause a suspicion of its breach.

This Code of Ethics serves to promote and increase company culture, namely the work culture within the company TSC GROUP, a.s. and also between the company and environment in which it makes its business.

4.2. Accepted principles

Below stated principles serve all concerned person to be rules of behavior for the performance of their work tasks and duties. They serve as a guide for decision in situation that this Code does not mention.

4.2.1. Compliance with the law and social standards

TSC GROUP, a.s. does its business in accordance with legal rules of the Czech Republic and all concerned persons are obliged to respect such rules. TSC GROUP, a.s. applies rules of good management and control. Such rules are valid internally as well as externally. TSC GROUP, a.s. respects social rules and habits valid in the Czech Republic. The conformance with legal rules of the Czech Republic is the supreme principle and all other principles defined in this Code of Ethics shall never be in contradiction with it.

4.2.2. Responsibility

We are responsible for safety, environment and highest quality of products and services, for our behavior and results of work, for the good will of TSC GROUP, a.s.

4.2.3. Health and safety

Safe and health conforming workplace is the right of every employee and the obligation of everybody when it is secured.


4.2.4. Professionalism and high quality of services

The main goal of concerned persons is to purposefully develop professional skills and personal properties, to come up and represent TSC GROUP, a.s. at professional level.

4.2.5. Respect

TSC GROUP, a.s. observes basic principles of mutual respect and esteem when performing its business activities. The mutual respect and esteem among concerned persons affects in its effect the quality of products and services and economic results of TSC GROUP, a.s. TSC GROUP, a.s. respects nationality, race, religion and political opinion of all persons concerned, collaborators and external partners.

4.2.6. HR management

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The Code of Ethics engages employees to have correct attitudes in accordance with external and internal regulations, to motivate and strive for mutual trust between employees by open, clear and timely communication.

Managers shows in their mutual relations mutual respect, they are an example for others and, especially in conflict situations, they act as competent persons.

4.2.7. Integrity

TSC GROUP, a.s. follows principles of integrity in its business as well as social events. TSC GROUP, a.s. and all concerned persons namely keep their word and show honesty in all relationships with employees and external partners.

4.2.8. Openness and transparency

TSC GROUP, a.s. engages to jointly stand against any form of corruption, including extortion and bribery, to make business activities in a way that is unquestionable from the point of view of law and ethics, to require all this from its external partners as well. Every concerned person is bound to respect strict division between personal interests and interests of TSC GROUP, a.s. and to avoid situation in which a conflict of interest can occur.

4.2.9. Open communication

TSC GROUP, a.s. prepares conditions for smooth exchange of opinions with all available communication means so that the concerned persons as well as external partners can deepen and enlarge their contacts. Within TSC GROUP, a.s. as well as within external contact it encourages open and honest communication while maintaining confidentiality on information and information of business secret character, also with regard to the privacy protection pursuant to GDPR.

4.2.10. Political non-involvement

TSC GROUP, a.s. it is impartial and does not engage in any way in politics and it believes that such a practice could be contrary to the company interests and the interests of its founder.

Any attempts to apply political influence on employees of TSC GROUP, a.s. shall be notified by the employee to his/her superior or EC or CO and it will be presented at the meeting of the Supervisory Board.

TSC GROUP, a.s.:

- ❖ does not support any political parties or organizations financially, materially or otherwise;
- ❖ does not support any politician;
- ❖ does not participate in election campaigns of political parties or candidates for political positions;

- ❖ does its business and applies its employment policy in accordance with the best interests of TSC GROUP, a.s.

Notwithstanding the above principles, the concerned persons have the right to participate in political life as guaranteed by the constitutional laws of the Czech Republic.

Concerned persons:

- ❖ participate in political life as private persons, not as representatives of TSC GROUP, a.s.;
- ❖ they shall not use the property of TSC GROUP, a.s. (equipment, premises, company car, phone etc.) or their working hours during which they shall perform work duties for any political purpose;
- ❖ shall not make any election campaign or any other political activities in premises of TSC GROUP, a.s.;
- ❖ shall not abuse public benefit activities and events of TSC GROUP, a.s. to present political interests;
- ❖ shall not make any political press on their subordinates or colleagues.

The political activity of concerned persons is limited to the private sphere of their lives and has no connection with the performance of their job tasks for TSC GROUP, a.s.

4.2.11. Attitude towards the surrounding community

TSC GROUP, a.s. makes and develop its business activities in accordance with environment and social environment.

We feel responsible for the environment in which we work and consider social responsibility to be an integral part of our business.

TSC GROUP, a.s. searches for way how to develop good relations with environment in which it makes business and strive for long-term relations with the environment based on partnership and mutual trust. The company supports public benefit interests.

TSC GROUP, a.s.:

- ❖ supports educational, health, humanitarian, cultural, educational and other public benefit activities in its surroundings;
- ❖ analyzes the long-term impact of its activities on the environment in which it operates;
- ❖ engages in charity activities and supports projects to support the socially deprived persons;

- ❖ supports initiatives to develop the cooperation between various areas of activity;
- ❖ supports concerned persons in active participation in the life in its surroundings.

TSC GROUP, a.s. is aware that the economic success and care of environment are also important for permanent development of the company besides its economic success.

4.2.12. Environment

TSC GROUP, a.s. takes care of the heritage of previous generations, maintains it and further develops it, in the performance of its activities it proceeds in accordance with all valid legal regulations and in accordance with the conditions of long-term sustainable development.

In terms of above stated the managers shall namely:

- ❖ promote and check the observance of internal regulations of TSC GROUP, a.s. that rules the environment issue and approved standards;
- ❖ exactly define responsibilities of individual organizational units and competences of individual employees involved in activities related to the environment protection;
- ❖ support the awareness and responsibility of employees within the environment protection.

4.2.13. High quality of products and services

TSC GROUP, a.s. strives for:

- ❖ dully and timely observe all its duties;
- ❖ prevent any organizational or technical issues, to ensure effective checks, possibly immediate remedy of incurred issues or professional-human failures;
- ❖ dully and timely settle possible claims;
- ❖ modernize current equipment and work devices;
- ❖ innovative approach.

The concerned persons shall, when performing work tasks or in direct relation with them:

- ❖ protect the good will of TSC GROUP, a.s. and dully represent it;
- ❖ ensure that services comply with all standards, regulations, laws and other requirements;

- ❖ provide professional and competent services, to be welcoming, open and solve constructively incurred issues.

TSC GROUP, a.s. takes full responsibility for own products and services and is open to discuss. Improvement of activities and services is the priority for TSC GROUP, a.s.

4.2.14. Clear rules

TSC GROUP, a.s. fulfills its obligations in accordance with the applicable regulations and agreed conditions.

4.2.15. Mutual respect

The concerned persons shall, when performing their work tasks or in relation with them:

- ❖ provide effective and correct information and services;
- ❖ are open to dialogue and strive for options of cooperation and effective communication;
- ❖ avoid disrespectful expressions or any conduct incompatible with good morals;
- ❖ treat everybody equally, regardless of age, gender or race;
- ❖ strive for mutual trust and do not take advantage of the lack of experience or knowledge of other employees.

4.2.16. Data protection

In order to protect information the concerned persons act in accordance with the law and relevant internal regulations of TSC GROUP, a.s. TSC GROUP, a.s. does not allow making of copies or the use of business secret without the prior consent of the relevant manager.

Provided the concerned persons of TSC GROUP, a.s. use, in cooperation with other companies, internet technologies, they shall alert such companies to use suitable and reliable systems to secure information to ensure the inviolability and confidentiality of all communications, in particular transactions and payments. If these companies do not do so, the employees of TSC GROUP, a.s. shall inform on such fact their relevant manager or EC or CO.

The employees are obliged to secure their assigned computer with access password that shall have prescribed format and contain lower and upper cases and security sign (0-9, a-z, A-Z), special sign (@#&a_*...) of minimum length of 8 above stated characters. Such defined format of securing password shall be changed by employees each 3 months.

4.2.17. Suppliers

TSC GROUP, a.s. seeks to build long-term partnership relations with own suppliers. TSC GROUP, a.s. fulfills its obligations in accordance with the agreed conditions.

We always verify the creditworthiness and solvency of the supplier or any other business partner, as well as the criminal integrity resulting from ZTOPO that can be verified through the abstract from the Criminal records register of legal entities available at www.justice.cz.

We use so-called Criminal compliance contractual clause to business contracts with unverified suppliers of which sample format is enclosed to the Anti-corruption program.

4.2.18. Employees

The success and working conditions of employees depend on the approach of all employees of TSC GROUP, a.s. to the work and work environment. The success depends on the positive work atmosphere that is created by combining responsible work, sense of responsibility, will to cooperate, positive communication and loyalty towards TSC GROUP, a.s.

Cooperation in a friendly atmosphere allows better use of the skills and abilities of all employees for the benefit of TSC GROUP, a.s. and for the successful work development of each employee.

Employees of TSC GROUP, a.s. shall not be used by the employer to perform activities which are in breach with legislation, employment contract, collective and other individual agreements with employees or the provisions of the Code of Ethics.

TSC GROUP, a.s. does not accept any form of harassment, discrimination or belittling of employees. Work environment is built on mutual tolerance and respect of needs of others. Disrespectful behavior that degrades others and damages their reputation is not tolerated.

TSC GROUP, a.s. strives to avoid following in relation to employees:

- ❖ no form of bullying;
- ❖ no form of harassment;
- ❖ abuse of any position of the employee of TSC GROUP, a.s. for personal profit or to interfere with personal rights of others;
- ❖ distribution of information that affects personal rights of others;
- ❖ spreading of fames and untrue information that could cause conflicts and cause unbalance of internal relations at the workplace.

Managers shall, when performing work tasks or in direct relation with them, ensure safe and adequate work conditions so that their subordinates perform to their best.

4.2.19. Equal opportunities of employment, access and professional growth

TSC GROUP, a.s. strive to build an atmosphere of trust by making no difference between gender, age, job function, length of employment, union membership or not, physical appearance or political beliefs.

In the employment relationships TSC GROUP, a.s. treats everybody equally, regardless of age, gender, nationality, politic opinion or religion.

Managers shall evaluate the performance of employees objectively, with not personal bias:

- ❖ they use objective and fair criteria based in namely on the evaluation of skills and performance of individual employees.
- ❖ apply the same criteria for evaluating employees regardless of their gender, age, duration of employment, physical look or involvement in union, political or interest organizations.
- ❖ they inform on prepared measures and decisions that affect the position of employee within his/her team or within TSC GROUP, a.s.
- ❖ they do not prioritize some employees against others when providing information;
- ❖ they assist employees in their professional development and apply the same rules for all employees.


4.2.20. Employee Privacy protection

TSC GROUP, a.s. respects the privacy of its employees as one of the key values of its relationship with employees. TSC GROUP, a.s. collects and keeps only such information that are necessary to perform duties of TSC GROUP, a.s. as employer according to valid regulations.

The employees have the right to:

- ❖ know what information TSC GROUP, a.s. records and keep regarding them;
- ❖ to refuse to give information on themselves that would affect their privacy or otherwise affect their right for protection of personality.

All employees are obliged to protect the personal information of other persons and, if, with regard to their

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their job classification or activities, they get access to such information, they may not disclose it to unauthorized persons.

4.2.21. Conflict of interest

Employees of TSC GROUP, a.s. shall not make any earning activity that is the same as the activity of the employer without prior consent of the employer.

4.2.22. Obtaining information and documents from others

Obtaining and collecting information on companies with a similar business from public and legitimate sources for the purpose of comparative analysis is permissible.

Practices such as industrial espionage, theft of documents, theft or concealment of identity in order to get non-public information from others are inadmissible.

The concerned persons shall not make impolite remarks about another person's affairs and problems in order to obtain information or benefit.

4.2.23. Authority

The concerned persons who are authorized to make decisions on behalf of TSC GROUP, a.s. within their work duties strive to use their best knowledge for such decision-making and to make all effort to protect interests of TSC GROUP, a.s.

4.2.24. Use of property, equipment and working time of TSC GROUP, a.s.

- ❖ they strive for the efficient and economic use of working hours and work resources to fulfill their job tasks and duties;
- ❖ they dully take care of entrusted property and equipment of TSC GROUP, a.s. entrusted them to perform their work tasks and duties;
- ❖ they use property, equipment and work means of TSC GROUP, a.s. (phones, company cars, faxes, copy machines, devices, products) only for the performance of work tasks and duties and in accordance with relevant legal regulations and internal regulations of TSC GROUP, a.s.;

4.2.25. Provision and acceptance of material benefits

TSC GROUP, a.s. observes rules of fair and open dealings with external partners or any other stakeholders. The concerned persons shall, when performing their work tasks and duties, observe basic values of ethical principles, namely:

- ❖ they do not accept or offer gifts or services without proper, legal and adequate consideration on behalf of TSC GROUP, a.s.;
- ❖ do not abuse personal work relationships to obtain benefits for them or a close person;
- ❖ they respect that any accepted benefit, attention, gift must not be provided or make impression that it is provided for the purpose of rewarding wrongful, unethical, illegal action;
- ❖ they respect that they can accept a gift only if the donor does not expect and does not require any counter-consideration;
- ❖ they avoid any action that could make impression of asking or receiving unauthorized benefits, gifts, gratuities.

Minor gifts, gratuities or benefits can be accepted namely when the refusal of a common gift or gratuity would be perceived as impolite. Thus it is possible to accept only such gift, gratuity or benefit which falls within common politeness. The similar is valid for invitations for food or drinks. The price of such invitation, i.e. benefit, gratuity or gift shall be adequate.

Provided the concerned persons are found in a difficult ethical situation, namely as for the reception of material benefits or use of any gratuities, gifts or other material benefits, or are in doubts for such situations, they shall inform their superior, EC or CO.

Concerned persons namely:

- ❖ strive for having their important business negotiations under the presence of a third person;
- ❖ shall notify their relevant manager or EC or CO on any offered bribery or other benefit made to them and shall make a written record on such fact.

4.2.26. Attendance at social events

The concerned persons attend social events and unformal meetings held by business partners whereas they take care that such participation does not adversely affect the position of TSC GROUP, a.s. and scheduled and performed business relations. Employees shall participate in such social or unformal events when assigned to be there by their manager. The concerned persons shall follow ethical principles, key values of TSC GROUP, a.s. and rules of civility when participating in social and unformal events.

4.2.27. Occupational safety and health (OSH)

TSC GROUP, a.s. endeavors to ensure safe and harmless workplace for its employees.

TSC GROUP, a.s.:

- ❖ improves working conditions and health and safety measures in accordance with relevant regulations and standards;
- ❖ improves methods of risk assessment and accident and occupational diseases prevention;
- ❖ establishes measures to improve the work effectiveness;
- ❖ establishes measures to improve the work environment;
- ❖ informs own employees on valid internal standards to ensure safety and health protection in work and on their impact;
- ❖ employees are completely forbidden to use any addictive and narcotic substances at the workplace, as well as immediately before entering the workplace or performing the work itself, under penalty of gross breach of work discipline with all the consequences arising from the Act No. 262/2006 Coll., Labor Code, as amended.

4.2.28. Communication

TSC GROUP, a.s. believes that the effective human communication and understanding of strategy, values and goals of the company by concerned persons are the key presumptions of loyalty of concerned persons towards TSC GROUP, a.s., contributing to the quality and effectivity improvement of their work.

Concerned persons have the right:

- ❖ to current information on strategy, plans and goals of the company;
- ❖ to be informed on their work environment, including scheduled changes that can affect their work performance;
- ❖ to be informed on the evaluation of their work performance;

When performing their work tasks or in connection with it the managers clarify all matters related to conditions of job performance by employee and if they cannot provide such information, they refer the employee to a competent person who can give a satisfactory answer.

4.3. Enforcement of the Code of Ethics

Every concerned person, regardless his/her work position or position in the organizational structure is obliged to get acquainted with provisions of this Code of Ethics and to follow it.

Any concerned person can ask his/her superior, EC or CO, for explanation of any provision of the Code of Ethics or to present own comments and to propose changes. Any concerned persons is entitled to propose measure to avoid ineffective procedures or unsuitable conduct within the company.

The managers shall, when performing work tasks or in direct relation with them:

- ❖ participate in enforcement of principles of the Code of Ethics;
- ❖ be example for other employees in terms of ethical behavior and conduct;
- ❖ promote example individuals and solutions and to strive for being also example of conscientiousness and credibility;
- ❖ make accessible the Code of Ethics to their subordinates and to explain its provisions upon request;
- ❖ immediately react to notified breach of conditions of the Code of Ethics;
- ❖ monitor the observance of the principles of the Code of Ethics by his/her subordinates.

4.3.1. Monitoring of compliance with the Code of Ethics

In case of breach or suspicion of breach of any provision of this Code of Ethics or law the employee shall contact his/her manager so that preventive or corrective measures can be adopted. Provided the employee does not want or can contact his/her superior, he/she can contact OPEP manager or EC or CO.

Concerned person who notify the breach of law or this Code of Ethics shall be protected pursuant to conditions given by the CCP Code.

4.4. Key values

Key values are the base for action of any concerned person and are the base for mutual trust, positive interpersonal relations, reliability, performance and focus on values.

In order to keep and develop key values TSC GROUP, a.s. ensures sufficient and timely awareness and communication towards all concerned persons.

4.4.1. Consistency in task fulfilment

- ❖ I am conscientious in performing my duties.
- ❖ I am devoted to achieve my goals.

- ❖ I am dedicated to my work.
- ❖ When in doubts, I ask.

4.4.2. Cooperation

- ❖ I cooperate with others on behalf of TSC GROUP, a.s.
- ❖ I communicate with others in a clear and direct way.
- ❖ I increase confidence building through my cooperation.
- ❖ The success of the team is important to me.

4.4.3. Integrity


- ❖ I am honest with others and with myself.
- ❖ I say openly what I think.
- ❖ I follow principles of the Code of Ethics.
- ❖ I dully take care of property of TSC GROUP, a.s.

4.4.4. Professionalism

- ❖ I want to be an expert in my field.
- ❖ I dully fulfil tasks entrusted to me.
- ❖ I strive for the highest quality.
- ❖ I respect my colleagues regardless of their job position.
- ❖ I develop my skills.

4.4.5. Responsibility

- ❖ I keep my word.
- ❖ I take responsibility for my actions and actions of the team under my control.
- ❖ I don't make promises I can't keep.
- ❖ I always finish the tasks I start working on.

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4.4.6. Business

- ❖ I identify myself with my work and goals of TSC GROUP, a.s.
- ❖ I am willing to accept new tasks.
- ❖ I consciously take risks.
- ❖ I'm aware of costs.
- ❖ I am creative and flexible when it comes to a change.

5. Responsibilities and authorizations

EC, CO and OPEPK are responsible for the implementation of the Code of Ethics and all concerned persons shall cooperate to achieve its targets.

6. Final provisions

In case the concerned persons are informed that this Code of Ethics was breached, they are obliged to avoid any damages when possible that could incur to TSC GROUP, a.s. or individual concerned persons and shall immediately inform on such action their superior or EC or CO. The concerned persons are obliged to be acquainted with the Code of Ethics and to follow principles and instructions stated in.

This Code of Ethics represents namely a moral obligation of concerned persons to a certain behavior or conduct, it does not contain sanctions immediately arising from the breach of these moral standards, but in certain cases it will be possible to classify its breach as a violation of work discipline of the employee with all legal consequences.

Criminal compliance program TSC GROUP, a.s.

TSC GROUP, a.s. has established its effective Criminal compliance program TSC GROUP, a.s. („CCP“) that is binding for the whole TSC GROUP, a.s. concern. CCP Codex, Anti-corruption program and Code of Ethics are the basic regulations of this program. Everyone who gets informed on any breach of this internal regulation provision being the breach of CCP is obliged to inform on such breach through the procedure assumed in CCP Codex.