



Code of Conduct

Employee

givet

Preamble

A company GIVET Czech s.r.o. (hereinafter "GIVET") is built on values that place an open corporate culture first. We believe that our strength lies in our people, their open communication, innovative thinking and ability to continuously improve. We do not tolerate any form of rule violation, human rights abuse or health hazards.

We are aware that the trust of our business partners, employees and the general public in our company depends on the behaviour of every single employee and member of the GIVET team. To maintain this trust, it is essential to consistently comply with legal regulations, laws, as well as all internal guidelines and regulations of GIVET and good manners. Each employee acts independently, makes impartial decisions and refrains from anything that could jeopardise trust in our company. We place similar demands on our business partners.

This Code of Ethics therefore sets out the basic principles and expectations that help us maintain a healthy and motivating work environment. The purpose of this regulation is to define and promote the desired standards of conduct at GIVET. The Code of Ethics does not replace other company documents, but is consistent with and builds on them. Every employee is required to comply with this Code of Ethics, along with other applicable GIVET policies and processes, to contribute to the success and sustainability of our company. Any conduct that violates laws, internal guidelines, GIVET documents, and generally accepted standards of behaviour will be dealt with and punished by GIVET without compromise.

We believe that compliance with this Code of Ethics not only contributes to our business success but also strengthens the trust of our customers, business partners and the general public.

1. Human rights, working conditions and respect

1.1. Human rights and sensitive approach

We are committed to acting in accordance with internationally recognised human rights principles and Czech and European legislation.

GIVET strongly condemns any use of child labour, unequal treatment, harassment and any form of illegal behaviour. We require the same from our business partners. At the same time, we strongly reject, report and combat any form of labour trafficking, exploitation, smuggling or any form of forced labour.

1.2. Equal Opportunity Statement

Commitment to equality: At GIVET, we are committed to providing equal opportunities to all employees and job applicants, regardless of gender, age, race, ethnic origin, religion, sexual orientation, health status or any other protected status.

Promoting diversity: We value diversity and believe that different perspectives and experiences contribute to innovation and the success of our company. Our employment decisions are based solely on an individual's qualifications, abilities and performance.

Inclusive work environment: We are committed to creating a work environment where every employee feels respected, supported and valued. We actively work to ensure that all employees have access to opportunities for development and career growth without any barriers or discrimination.

1.3. Open communication and decency

Respect and transparency: We believe in honest and open communication. Every employee has the right to express their opinion and be heard. We expect all employees to respect the opinions of others and contribute to a transparent working environment.

Feedback: We encourage a culture of regular and constructive feedback. Feedback is a key tool for personal and professional growth and should be given and received with respect and a positive attitude.

Decency: We are committed to treating everyone with consideration and, as far as possible, individually, in a manner appropriate to their social skills and communication needs.

1.4. Innovation and creativity

Support for ideas: We welcome and support new ideas. Every employee has the opportunity to come up with innovative solutions and actively contribute to the development of our company. Every suggestion is valuable and every employee has the right to be heard.

Constant improvement: We are committed to continuous improvement and innovation. We want our employees to look for new ways to improve processes, products and the working environment.

1.5. Support for newcomers

Mentoring and support: New employees are a priority for us. We are committed to their smooth integration into the company through mentoring and support to help them adapt quickly and feel part of the team.

Welcoming environment: All employees are committed to creating a welcoming and friendly environment where new colleagues feel supported and have room to learn and grow.

1.6. Constant learning

Commitment to growth: At GIVET, we believe that continuous learning and professional development are key to personal and collective success. We are committed to supporting and developing the skills of our employees through various training programmes, courses and opportunities to expand their knowledge.

Company support: GIVET provides resources and opportunities that enable employees to continuously learn and improve. These resources include internal and external training, access to professional courses, and mentoring programmes. Our goal is to ensure that every employee has the opportunity to grow and reach their full potential.

1.7. Teamwork and collaboration

Support for colleagues: We believe in the power of teamwork and cooperation. Every employee is responsible for supporting their colleagues and actively cooperating to achieve common goals.

Respect for diversity: Our company is built on respect for diversity. We value different perspectives and experiences that contribute to a richer and more inclusive work environment.

2. Ethical conduct and prohibition of corrupt and illegal behaviour

Honesty and integrity: All employees and members of the GIVET team must always act honestly, fairly and in accordance with applicable laws. Any form of illegal or unethical behaviour is prohibited. We support integrity and trust in our working environment.

Responsibility: Every employee is responsible for their actions and decisions. We expect them to act in accordance with the company's values and goals and to manage the resources entrusted to them responsibly.

2.1. Policies against harassment, bullying, bossing and discrimination

Zero tolerance policy: At GIVET, we have zero tolerance for any form of harassment or bullying. We respect the dignity of every individual and are committed to maintaining a work environment where all employees are protected from any inappropriate behaviour.

Definition of harassment and bullying: Harassment can include any behaviour that is unwanted, hostile or humiliating towards another employee. Bullying involves the deliberate abuse of power or intimidating behaviour that threatens the mental or physical health and safety of others.

Bossing: Bossing is a form of bullying in which a superior abuses their power to deliberately make working conditions unpleasant for their subordinates. It can include systematic belittling of an employee's abilities, excessive criticism, pressure to resign, or deliberate ignoring. This practice threatens the mental health of the employee and disrupts the work environment.

Discrimination: Discrimination includes any unfair treatment of a person based on their age, gender, race, nationality, religion, sexual orientation, health status, or other characteristics protected by law. At GIVET, discrimination is prohibited, and it is our duty to ensure equal opportunities for all employees regardless of their individual differences.

Responsibility and duties: Every employee is responsible for contributing to a safe and respectful working environment. Employees who engage in harassment or bullying will face disciplinary action, including possible termination of employment.

2.2. Anti-corruption policy

Zero tolerance policy: GIVET has a zero tolerance policy towards any form of corruption, bribery or illegal influence. Corruption is incompatible with our values and our commitment to ethical conduct. This prohibition applies to cases where corrupt conduct is actively engaged in (e.g., offering a bribe), passively accepted (e.g., accepting a bribe) or facilitated in any way.

Definition of corruption: Corruption includes any attempt to obtain an undue advantage through unethical or illegal means, including bribes, gifts, commissions or other forms of financial or non-financial benefits. This applies both to our employees and to third parties with whom we cooperate.

Responsibility and duties: Every employee is required to act honestly and in accordance with the laws and internal regulations of GIVET. Any suspicion of corrupt conduct must be reported immediately to the appropriate authorities within the company so that it can be properly investigated and addressed.

Rejection of bribes: GIVET employees must not accept or offer any bribes, gifts or benefits that could influence their decisions or cause a conflict of interest. Any offers of this kind must be rejected and reported to the company management.

Prohibition of providing benefits to family and acquaintances: GIVET employees and team members must not place their personal interests above those of GIVET and must always act professionally. Personal interest includes any benefit for themselves, their family or close acquaintances. In particular, GIVET employees and team members must not grant unauthorised benefits to family members, friends or acquaintances that could lead to a conflict of interest or impair fair and objective decision-making. Any attempts to do so must be reported and dealt with immediately.

Cooperation with authorities: GIVET cooperates with the relevant authorities and institutions in the investigation and prevention of corruption or any illegal conduct. We are committed to complying with all applicable laws and actively fighting corruption in all its forms.

Consequences of violation: Violation of this policy may result in serious disciplinary measures, including immediate termination of employment, and, where appropriate, referral of the matter to the criminal authorities.

2.3. Reporting unethical behaviour or suspected unethical behaviour (including bullying, harassment, discrimination, corruption or other forms of illegal conduct)

At GIVET, we are committed to maintaining an environment where all employees and team members feel safe and respected.

In the event of reasonable suspicion or discovery of illegitimate, unethical or even illegal (unlawful) conduct, or a violation of the rules of this Code of Ethics or internal rules, all GIVET employees and team members are required to report this immediately.

In accordance with Act No. 171/2023 Coll., on the protection of whistle-blowers, as amended, GIVET has an internal reporting system in place for reporting serious forms of illegal and unethical conduct. In accordance with internal regulation POPka HR-02, suspicions of serious unethical or illegal conduct may be reported to members of compliance management, who are the so-called competent persons under the aforementioned Act. All detailed information can be found in the relevant POPka HR-02 directive.

3. Confidentiality, information protection, property protection

At GIVET, we consider the protection of confidential information to be crucial, which is further confirmed by the signing of non-disclosure agreements (NDAs), which are mandatory for all employees and partners. However, in addition to the legal obligations of the NDA, we expect every employee to act in accordance with the company's ethical standards, which include:

- a) Never disclose confidential information unless expressly authorised to do so.
- b) Ensure that confidential information is always protected, both in physical and digital form.
- c) Use information solely in the interests of GIVET and never for personal gain.

This policy serves to reinforce our ethical standards beyond the legal obligations set out in the NDA.

3.1. Protection of property, use of IT

GIVET employees and team members are obliged to manage the resources entrusted to them properly, to guard and protect GIVET's property from damage, loss, destruction and misuse, and not to act contrary to the legitimate interests of GIVET.

Devices (in particular computers, laptops, mobile phones, tablets, etc.) must always be stored in an appropriate manner. If the nature of the device allows it, security features (passwords, fingerprints, facial recognition, etc.) must be used, which must not be disclosed to other employees or even third parties. Any loss or misuse of the above equipment must be reported immediately to a superior.

GIVET employees and team members must respect intellectual property rights and always refrain from any infringement of third-party intellectual property rights. Violation of third-party intellectual property rights or even any handling of counterfeit goods will not be tolerated.

4. Health, safety and environmental protection

Safe work environment: The protection of health of our employees is one of our key priorities. We are committed to maintaining a safe and healthy work environment for all employees, eliminating hazards and risks in the area of occupational health and safety, and creating a safe working environment. We expect all employees to comply with safety regulations and contribute to risk prevention. We will impose the same conditions on our business partners.

Health care: We support activities focused on the physical and mental health of our employees. We expect everyone to take care of their health and respect the health of others.

Sustainability and ecology: We actively strive to improve the environmental impact of our company. We are therefore committed to promoting sustainable practices and environmental protection, environmentally responsible behaviour and the responsible use of natural resources. Every employee is obliged to contribute to the company's sustainability goals.

5. Responsible approach to business partners and suppliers

Trust and transparency: At GIVET, we value long-term, strong relationships with our business partners and suppliers. Our cooperation is built on trust, open communication and transparency. We expect our partners to act in the same way and adhere to high standards of ethical behaviour.

Ethical business practices: We are committed to adhering to the highest standards of ethical business conduct. Our partners and suppliers are selected not only on the basis of their capabilities and the quality of the products and services they provide, but also on their commitment to ethical business practices. We expect all our business partners to act in accordance with applicable laws, standards and regulations.

Sustainability and responsibility: At GIVET, we support sustainable and responsible practices. Our business partners and suppliers are encouraged to minimise their environmental impact and contribute to sustainable development. We expect them to ensure responsible use of resources, protect the environment and promote working conditions that respect the dignity of every worker.

Cooperation and growth: We believe that cooperation is the key to long-term success. We strive for a partnership approach that enables mutual growth and innovation. Our partners and suppliers are key partners in achieving our business goals, and we are committed to continuously improving our relationships and seeking new opportunities for joint development.

No distortion of the market environment: The selection of suppliers and our business partners will be based on clear, verifiable and transparent criteria. We do not tolerate any form of clientelism, influencing selection procedures, or distorting fair competition (e.g., price agreements, agreements on terms and conditions, sharing information on costs and margins, etc.).

Conflict resolution: In the event of disagreements or conflicts, we are committed to resolving them through open dialogue and constructive cooperation. Our goal is to find solutions that are fair and beneficial to all parties involved.

6. Conclusion

This Code of Ethics is the foundation of our corporate culture and represents a commitment we have all made to ourselves. Adherence to this Code of Ethics is critical to maintaining our reputation and creating a work environment where every employee can be successful and satisfied. Together, we can build a company where innovation, open communication, and respect for each individual come first.