

CODE OF CONDUCT

I&C Energo a.s.

I&C Energo a.s. (the 'Company') aims to provide high-quality services while adhering to ethical principles that form the foundation of the Company's business. This Code of Conduct is intended for all employees and business partners of the Company and sets out the fundamental principles to be observed in the conduct of our business activities.

All employees and business partners of the Company are expected to adhere to this Code of Conduct. Each employee is responsible for following these principles and fostering an ethical work environment. Deliberate violations of this Code of Conduct may result in disciplinary measures.

Compliance with Laws and Ethical Standards

Our employees and business partners must always respect applicable laws, regulations and ethical standards. Preventing criminal activity and other unlawful conduct is one of the Company's fundamental objectives.

No violations of applicable laws, regulations or ethical standards will be tolerated.

Protection of Privacy, Intellectual Property, Privileged and Confidential Information (insider trading)

The Company is committed to protecting information related to its business activities as well as information owned by its customers. We emphasize safeguarding against security risks and have implemented security measures to ensure the protection of all sensitive information.

The personal data of employees, customers, and business partners is protected and secured in accordance with applicable laws and internal policies. Personal data is processed only for legitimate purposes, on a proper legal title and is disclosed solely to the extent necessary to achieve those purposes.

The Company protects its intellectual property, as well as the intellectual property of its employees and third parties.

The Company protects trade secrets and will never disclose internal or confidential information. Internal or confidential information will not be disclosed or released without the written consent of the relevant party, even after the termination of the contractual relationship.

Company employees must never buy, sell, or recommend the purchase or sale of any securities based on internal information. Internal information means non-public information that, if disclosed, would likely have a material impact on the price of tradable securities.

Conflicts of Interest Prevention and Maintaining a Zero-Tolerance Approach to Corruption

The Company, along with all employees and business partners, seeks to prevent conflicts of interest and any situations that may give the appearance of conflict. Any form of corruption, bribery, unlawful enrichment, or the giving or receiving of unauthorized benefits is strictly prohibited.

Prevention of Accounting Fraud

The Company, together with its employees and business partners, actively prevents any manipulation of financial records that could harm the financial interests of the Company or the European Union. Any conduct involving fraud, data distortion, or the misuse of financial resources is strictly prohibited.

Protection of People, Property, and Shareholder Interests

The Company protects its premises against unauthorized access and safeguards its property from theft or misuse. All of the Company's business activities are conducted in alignment with the interests of its owners and with the aim of preserving the Company's good reputation.

Respect for Human Rights and Employee Protection (OHS)

The Company is committed to respecting and protecting human rights in all aspects of its business operations.

Every employee and business partner must respect the dignity, equality, and rights of every individual. Discrimination, harassment, or any form of violation of human rights is not tolerated.

The Company promotes open communication and enables employees to report suspected unethical behavior or legal violations without fear of retaliation. For this purpose, it is recommended to use the following tool: <https://www.ic-energo.eu/o-nas/oznamovani-protipravniho-jednani-whistleblowing>

Workplace safety is a priority for the Company; therefore, it strictly ensures regular and proper training of employees, as well as the provision and use of personal protective equipment.

Environmental Protection and Sustainable Development

The Company takes all possible measures to protect the environment and to ensure the sustainable use of natural resources.

Every employee has a duty to contribute to the protection of nature, minimize the negative impact of our activities on the environment, and support sustainable development.

Relations with Business Partners and Customers

The Company fulfills its commitments to customers and business partners and fosters long-term cooperation.

The Company always deals with customers and business partners politely, respectfully, and fairly, without any favoritism or discrimination.

Employees are expected to maintain loyalty to the Company and its business partners at all times, particularly by safeguarding confidential information, avoiding conflicts of interest, and refraining from conduct that could be detrimental to the Company or its partners.

Cooperation with Public Authorities and Politically Exposed Persons

In dealings with public authorities, other public institutions, and politically exposed persons, the Company acts transparently, with respect for their representatives, and in compliance with applicable laws and regulations.

International Trade Regulation

The Company complies with applicable laws and regulations governing international trade. The Company strictly adheres to international sanctions and refrains from any prohibited dealings with sanctioned countries, individuals, or entities.

Prevention of Money Laundering and Terrorist Financing (AML)

The Company complies with applicable AML legislation and regulations regarding the registration of beneficial owners.

Competition Rules and Public Procurement

The Company promotes healthy competition and complies with the rules set forth in competition laws. The Company will not tolerate any form of price manipulation or unethical behavior towards competitors or consumers, or contracts or informal agreements that restrict competition between competitors or customer freedom. The Company also warns against spreading false information about other companies and discussing prices, costs, or any sensitive business information with potential competitors.

When participating in public tenders, the Company acts transparently, in accordance with applicable laws, and avoids illegal coordination with other competitors.