

Code of Ethics

VALID FROM 10/02/2025

Code of Ethics

The Code of Ethics is a fundamental document setting out the principles of ethical conduct for employees of OPT OnDemand s.r.o. (hereinafter referred to as the “Employer”). Its aim is to establish a common understanding of how these shared values are manifested in everyday working practice. The Code of Ethics is a binding document for all employees and members of the employer’s governing bodies (hereinafter collectively referred to as “employees” for the purposes of this Code of Ethics).

One of the fundamental principles on which the Code is based is that employees are aware that their conduct may expose both the Employer and themselves to criminal, administrative or civil penalties. They therefore act in such a way as to avoid committing criminal offences or otherwise breaching legal and internal regulations. The employer does not tolerate any breach of the Code of Ethics and may, furthermore, regard such a breach as a serious breach of employment duties. The Code of Ethics is an expression of our commitment to ethical conduct towards partners, users and colleagues.

I. General Principles

1. The employer undertakes to comply with legal regulations guaranteeing employees working conditions and an environment that enable them to perform their work safely, including the prevention of work-related stress. For this reason, the employer provides employees with access to information regarding significant changes in the employer’s structure, operations and activities. Similarly, the employer takes a proactive approach to preventing the risk of violence and harassment in the workplace. Furthermore, given the informal culture at OPT OnDemand s.r.o., employees have the option of contacting their line manager, the relevant director or the HR department at any time (not only in the event of uncertainties or questions).
2. Employees are not obliged to hand over their personal identification documents to the employer as collateral and may terminate their employment at any time subject to the statutory notice period.
3. The employer ensures a safe and hygienic working environment, taking into account industry-specific knowledge and other specific risks, and minimises the causes of risks.

4. Employees shall comply with all legal and internal regulations and the employer's instructions in the course of their work. They shall also keep abreast of the relevant legal regulations required for the performance of their duties.
5. Employees shall perform their work to the best of their knowledge and ability, with the utmost professionalism, courtesy and helpfulness towards third parties, and a willingness to assist. A third party is understood to mean any natural or legal person other than the employer and the employee, including business partners or public authorities (hereinafter referred to as the "third party"). Employees shall always act in such a way as not to mislead third parties, providing only truthful and accurate information. They are aware that their behaviour and conduct represent the employer. They shall act transparently and uphold good conduct.
6. Employees help to build the employer's reputation, as well as that of its products and services. Together, they strive to achieve ever-better results for the employer.
7. Employees shall protect the legitimate interests, good name and reputation of the employer, colleagues and third parties. They shall actively avoid any conflict between their personal or family interests and those of the employer. Should such a conflict of interest arise, they shall inform the employer without delay. Employees are obliged to take measures proposed by the employer to eliminate the effects of a conflict of interest. Employees may only engage in gainful employment that is identical to the employer's business activities with the employer's prior written consent (approved by the relevant director, administered by the HR department). In the course of any gainful activity, including that which does not coincide with the employer's business activities and is not subject to approval, they shall not use the resources and work equipment entrusted to them by the employer.
8. Employees shall make every effort to ensure the prudent use of the employer's assets and entrusted property. In the performance of their duties, they shall act in such a way as to avoid incurring unnecessary costs for the employer. Employees are not authorised to misappropriate funds, resources or assets belonging to the employer, other employees or third parties for their own use or for the use of another person.
9. Employees shall respect the property rights of third parties. Employees shall carry out their duties in such a way as to prevent harm to the health and property of the employer or third parties, or to the environment. In the event of an imminent risk of damage, employees shall attempt to avert such damage. If this

- is not possible, they shall inform those who can avert or mitigate the damage. Employees shall always inform the employer of any risk of damage.
10. If an employee discovers damage caused to the employer, they shall report it to the employer without undue delay.
 11. Employees protect their employer's intellectual property rights and respect and protect the intellectual property of third parties.
 12. Employees ensure security when using IT systems and processing data.
 13. Employees who come into contact with third parties' personal data in the course of their duties are required to handle such data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter referred to as the "Regulation"), Act No. 110/2019 Coll., on the processing of personal data, and Act No. 111/2019 Coll., amending certain acts in connection with the adoption of the Act on the processing of personal data.
 14. Employees shall respect and strictly maintain the confidentiality of communications, and shall not access the content of other employees' written or email correspondence. If they become aware of such content, they shall maintain confidentiality.
 15. Employees shall not misuse their position, the employer's property or equipment, their working hours, or information obtained in the course of their work for their own private interests or those of third parties, even after the termination of their employment.
 16. Employees shall maintain impartiality and equal treatment of all natural and legal persons.
 17. If an employee has been authorised to act on behalf of the employer in specific matters, such as concluding contracts or placing orders, they are obliged to adhere to the limits of such authorisation.
 18. When negotiating contractual relationships with the employer's partners, responsible employees are obliged to consider the risks of entering into a contractual relationship, including checking the contractual partner against available public registers (e.g. the insolvency register or the register of unreliable tax payers). The responsible employee shall notify the employer of any risks associated with entering into a contractual relationship.
 19. The employer complies with all tax legislation, and the relevant employees are required to make every effort to ensure that all the employer's obligations towards the tax authority are fulfilled properly and on time. Employees are

- required to report to the employer any payments that cannot be identified or linked to a specific transaction.
20. The employer does not tolerate any form of unfair competition, and employees shall make every effort to prevent such competition. Unfair competition is defined as conduct contrary to the principles of fair competition which is capable of causing harm to other parties, including business partners, competitors and/or the employer's customers.
 21. If an employee is asked or pressured to act in breach of the law, internal regulations or instructions from a superior or another employee, they are obliged to refuse to do so and to report such conduct to the employer. Managers treat their subordinates equally, placing the main emphasis on results and the quality of work performed when selecting, assessing and developing them. They also facilitate their further development to improve work efficiency and encourage the practical application of acquired skills and knowledge. They are responsible for the full integration of their subordinates into work teams. They serve as role models not only in the application of the Code of Ethics.
 22. If an employee, acting of their own accord in the employer's interest or in the course of their duties, commits a criminal offence, this constitutes a breach of the law on the part of the employee, in which the employer has no part.
 23. If the employee has any doubts regarding decisions made by the employer, the employer's instructions, or the interpretation of legal or internal regulations, the employee is obliged to seek all necessary information or opinions on how to proceed in order to minimise the risk of breaching them.
 24. Colleagues maintain respectful and courteous relationships with one another. They encourage mutual cooperation and help to foster an atmosphere of trust. Any disputes are resolved calmly and objectively.

II. Anti-corruption measures

The employer applies a zero-tolerance approach to bribery and corruption; therefore, in this section of the Code of Ethics, it sets out rules for the provision of gifts to third parties and the acceptance of gifts from third parties with the aim of establishing a system to combat bribery.

1. Definitions used in Article II of the Code of Ethics:

- For the purposes of this policy, gifts are considered to be any tangible items, hospitality (invitations to lunch or social events), private trips, monetary contributions or their equivalents, and other benefits (hereinafter referred to as “gifts”).
- A bribe is defined as a gift offered, promised or given with the aim of obtaining any benefit for oneself or another person (e.g. commercial, contractual or personal) (hereinafter referred to as a “bribe”). Offering, promising or providing a bribe, or demanding, consenting to receive or accepting a bribe, are criminal offences for which both natural and legal persons may be held criminally liable. Bribery also constitutes an act that fulfils the criteria of unfair competition.

2. Rules for giving and receiving gifts:

- An employee may only give or accept a gift that is not a bribe.
- The giving or receiving of gifts complies with legal regulations and customary practice (gifts that are in line with customary practice, and are therefore permitted, include, for example, gifts for birthdays and other anniversaries, for Christmas or other significant occasions, invitations to a partner’s party, or to a training event related to work, etc.).
- Gifts are reasonable in terms of both value and frequency.
- Gifts are given and received openly, on behalf of the employer and not in a personal capacity.
- It is prohibited to give or accept gifts in the form of cash. Gift vouchers for goods or services may only be given or accepted if such vouchers cannot be exchanged for cash.
- Business trips paid for by a third party may be extended by an employee for personal reasons, exclusively at the employee’s own expense and during their free time. Family members are not permitted to accompany the employee on a business trip paid for by a third party.
- It is prohibited to accept any gifts during a selection process (including informal ones).

III. Prevention of Criminal Offences

1. The employer does not tolerate any form of criminal activity on the part of employees relating to their work or the performance of their duties. Avoiding criminal liability on the part of the employer is one of the employer’s objectives.

Employees are obliged to act honestly and make every effort to prevent criminal offences committed by natural persons which, pursuant to Section 8 of Act No. 418/2011 Coll., on the criminal liability of legal persons and proceedings against them, as amended, could be attributed to the employer.

2. In the event of any doubt regarding an instruction or decision issued by a superior, an employee is entitled to assess whether such an instruction or decision complies with legal or internal regulations or the Code of Ethics. If an employee suspects that their actions could constitute a criminal offence, they are obliged to report this suspicion to the employer and seek their guidance.
3. Should an employee discover unlawful conduct or an ongoing unlawful situation within the employer's operations, they shall, having regard to the circumstances of the case, make every reasonable effort that can be fairly expected of them to prevent such unlawful conduct or situation and avert its harmful consequences. At the same time, the employee shall inform the employer of this fact.

IV. Environmental Responsibility

OPT OnDemand strives to continuously improve its commitment to sustainability and environmentally responsible business practices and supports the human right to a clean, healthy and sustainable environment. It expects the same commitment from its suppliers.

1. **Treatment and discharge of industrial waste water** – Waste water from operational procedures, manufacturing processes and sanitary facilities must be monitored and treated as necessary prior to discharge or disposal. In addition, measures should be put in place to reduce the volume of waste water produced.
2. **Waste and hazardous substance management** – OPT OnDemand adopts a systematic approach aimed at identifying solid waste, managing it, reducing its volume, and disposing of or recycling it responsibly. Chemicals and other materials that pose a hazard if released into the environment must be identified and managed in such a way as to ensure safety when people come into contact with these materials, as well as during their transport, storage, use, recycling or reuse, and disposal.
3. **Reducing the consumption of raw materials and natural resources** – It is necessary to limit and prevent the use and consumption of resources during the production process and the generation of any kind of waste, including water and energy. This is achieved either directly at the point of waste generation or

through processes and measures – for example, by changing production or service procedures or processes within the company, using alternative materials, making savings, recycling or reusing materials.

4. **Energy consumption and efficiency solutions** – Energy consumption must be monitored and documented. Energy-saving solutions that comply with human rights must be identified in order to improve energy efficiency and minimise energy consumption. OPT OnDemand should assess and identify areas of high energy consumption and potential areas for improvement. The introduction of energy-efficient technologies and practices, such as optimising heating, ventilation and air conditioning, and the introduction of energy-efficient machinery, can lead to a significant reduction in energy consumption.

OPT OnDemand should also consider investing in renewable energy sources to further reduce its environmental impact. Regular monitoring and tracking of energy consumption patterns is essential for identifying trends and areas for further optimisation. OPT OnDemand should also bear in mind that staff training and awareness programmes play a vital role in promoting energy-saving practices, thereby not only reducing environmental impact but also improving operational efficiency and reducing costs in the long term.

Long-term objectives:

- Reducing raw material consumption
- Reducing energy consumption
- Reducing the production of non-recyclable waste

V. Handling situations that conflict with the Code of Ethics

1. **Compliance and monitoring** – The company regularly monitors compliance with this Code of Ethics, using information obtained through the reporting system and internal and external audits.
2. **Code of Ethics Officer** – The Company Director is appointed as the highest-ranking officer responsible for the Company's Code of Ethics. He decides on corrective measures and follow-up actions arising from investigations into reported complaints.

3. **Principles of non-retaliation** – The Company will not take any retaliatory action against an employee who has reported a possible breach of the Code of Ethics. This means that the employee will not be dismissed or otherwise discriminated against on the grounds that they reported possible breaches of the rules. This does not apply to persons who knowingly make false accusations or deliberately provide incorrect information.
4. **Submitting a complaint or comment** – If an employee has any questions, is concerned about something, or wishes to provide information regarding compliance with the rules, they should contact their line manager, the HR department, the company director, or email info@optondemand.com
5. **Breaches of the Code** – If an employee breaches the Code of Ethics, disciplinary measures may be taken in accordance with legal regulations and the company's internal policies and rules. Appropriate disciplinary measures may also be taken against managers and directors in cases of breaches of the Code of Ethics.
6. **Investigation of reported complaints** – The company will investigate all reports fairly and thoroughly and take appropriate action. It will also make every effort not to disclose the identity of the complainant, unless this is necessary for the investigation or required by law. The same applies if the complainant asks the company to treat the information provided as confidential. The company also expects everyone to cooperate fully in any internal investigation.
7. **Contact for business partners** – To report a breach of the Code of Ethics by OPT OnDemand s.r.o., an email address has been set up to which business partners may report such breaches: etickykodex@optondemand.com

VI. Final Provisions

Responsibility for familiarising staff with the Code of Ethics lies with the Human Resources Department and all managers and senior staff of the company. All employees shall be properly and demonstrably familiarised with the Code of Ethics.