
Code of Conduct of the TTC Group

A. Preamble

This Code of Conduct stipulates the fundamental principles and expectations for the conduct of all members of elected bodies in the TTC Group companies, and of all Employees.

The purpose of this Code of Conduct is, in particular, to provide for strict adherence to the law, internal regulations of the TTC Group, ethical, moral and professional principles, development of positive relationships between the Employees, clients, customers and business partners, with the aim to eliminate the risks of criminal liability of each TTC Group company, arising in particular under Act No. 418/2011 Coll., on Criminal Liability of Legal Entities and on Proceedings against Them, as amended, as well as the Employees of the TTC Group companies, arising in particular under Act No. 40/2009 Coll., the Criminal Code, as amended, all of the above with the view of sustainable development of business activities of the TTC Group and creating a safe and inclusive community of individuals participating in these business activities.

This Code of Conduct sets forth binding unified rules that shall serve, *inter alia*, as a preventive measure against any criminal sanctions imposed to the TTC Group companies and their Employees. The compliance with these rules is required of all members of elected bodies of the TTC Group companies and of all Employees.

Should the following text of this Annex to the CCP use terms and verb tenses connected with the pronoun “we” or “us”, this shall mean the members of the elected bodies of the TTC Group companies and the Employees, unless the context indicates otherwise.

B. Introductory Provisions

1. Our main principles, so-called “ETHICAL PROFESSIONAL STANDARDS”, are the following:
 - (a) the interests of the client and customer and his or her dignity and privacy shall always be our priority;
 - (b) we are honest in providing our services and in trading, and our conduct in the relationships is proper, we act in accordance with good morals and the principles of fair business relations;
 - (c) our conduct is responsible and confidential;
 - (d) we do not abuse our position for our own benefit or for the benefit of another;
 - (e) we do not put our personal interests, the interests of members of our families or of our friends in conflict with the interests of the TTC Group;
 - (f) we comply with the law, internal regulations of the TTC Group and the standards related to the performance of our profession / work;
 - (g) we respect our colleagues and we honour the moral principles;
 - (h) we perform our work with the required level of empathy and at the highest possible level of proficiency, which we continuously increase and supplement;
 - (i) we adhere to the principles of good behaviour regardless of the gender, ethnic or social origin, complexion colour, sexual orientation, nationality, property situation, health, age, faith and religion, political or other opinion;
 - (j) we always work only with the necessary minimum of personal data and confidential information. We always maintain confidentiality of information (in particular information regarding business secret) and we do not present it to unauthorized parties;
 - (k) we act and behave in a manner which would contribute to maintaining the prestige and goodwill of the entire TTC Group;
 - (l) we never tolerate any form of preferential treatment and corruption.

2. These rules apply to all members of elected bodies of the TTC Group companies, and to all Employees. Managers always bear higher responsibility, they shall lead their teams by example of impeccable conduct and they shall create environment in which honesty, dutifulness and moral integrity shall be presented as the fundamental principles.
3. We may never be forced to act contrary to this Code of Conduct.
4. The Code of Conduct is embodied directly in the general definition of the TTC Group mission, and it forms its fundamental and most important standard, followed by other regulations which form parts of the CCP. The Code of Conduct and such other CCP policies jointly form and determine the required behaviour model in the TTC Group.
5. Monitoring of compliance with the Code of Conduct in the TTC Group is performed primarily by the Compliance Officer, who shall notify in this respect of any violations and general deficiencies. Failure to comply with any standard within the Code of Conduct may, following an impartial evaluation, lead to sanctions in accordance with and within the limits of the applicable law. Any sanctions shall be imposed following an independent, sensitive and fair investigation.
6. This Code of Conduct may be further elaborated by more specialized codes of individual companies within the TTC Group.
7. The requirements of the TTC Group exceed simple compliance with the law. The TTC Group requires and expects all members of the elected bodies in the TTC Group companies and all Employees to act in accordance with these rules, in particular within business activities and in all related situations.
8. The Managers shall live up to their positions and set appropriate examples. Every person acting publicly on behalf of the TTC Group bears the responsibility of a representative of the TTC Group. Ethical conduct shall also include an obligation to comply with all internal regulations of the TTC Group and restraining from any attempts to circumvent such regulations by formal justification.
9. Identification with this Code of Conduct and unconditional compliance with it is a decisive prerequisite for the economic success of the TTC Group and its respect in the eyes of the general public. Violation of the rules arising from the Code of Conduct may expose the TTC Group to risk and therefore, it shall not be tolerated at all.
10. The TTC Group expects also from its business partners to be irreproachable and act in compliance with the law. In the business relations with suppliers, service providers, subcontractors, business brokers and partners in work or professional associations or cooperating companies within the TTC Group, the TTC Group strives for the compliance with the internal standards applicable in this area.
11. The TTC Group cares for the compliance with the general rules for contact with third parties:
 - (a) **lawfulness** – participation of the third parties shall be in accordance with the respective law, principles and internal rules of the TTC Group;
 - (b) **goodwill** – the public opinion on the TTC Group may be harmed by unlawful conduct of third parties and therefore, the selection of business partners and cooperating subjects shall be governed by their integrity and goodwill;
 - (c) **controlling duty** – participation of a third party may lead to a controlling duty of the TTC Group companies, and a violation thereof is subject to sanctions (this pertains e.g. to control of subcontractor capacity utilization) – therefore, it must be ensured that not only the conduct of the TTC Group but also of any third party complies with the law.

C. Focusing on Clients, Customers, Business Partners and Economic Prosperity

1. We strive for achieving excellent results in all entrusted tasks. We put strong emphasis on the prosperity of our clients and customers. We make continuous efforts to increase the quality of our services so that they exceed the expectations of our clients and customers.
2. Towards the clients, customers and the general public, we promote open communication.

3. With each client/customer, we respect and promote right of the client/customer to free choice of provided services, right to accept or reject the presented offer and right to information. However, the members of elected bodies of the TTC Group companies shall at the same time care for economy and expediency of their steps, prosperity of the TTC Group and sustainable development. We respect and promote the rights and each choice of each client/customer, business partner and the addressed public. We inform potential clients/customers and business partners in a comprehensible and timely manner of the offered products, services or solutions of the TTC Group, we care for informing the contacted clients/customers of what forms the content of a business relationship with the TTC Group, so that the right of each party to select a possible alternative was respected, in accordance with the principle of autonomy. We also take into account the level of knowledge of each client/customer that we deal with, and we only offer such products and services which correspond to the actual interest and requirements of these clients/customers and business partners.
4. In particular, we:
 - (a) strive for fully meeting the expectations and requirements of clients/customers;
 - (b) create a responsive and safe environment which enables meeting the individual needs of each client/customer and respecting their needs;
 - (c) are proper, honest and polite, we address the clients/customers using their names, and we treat them with due respect and regard;
 - (d) are dressed with respect to any particular situation, and we adapt our clothes to the situation so that we properly represent the TTC Group;
 - (e) strive for creating professional relationship with the clients/customers, for the satisfaction of both parties;
 - (f) shall perform our job (profession) dutifully, with full use of our proficiency and acquired experiences;
 - (g) approach each client/customer equally, making no differences between them, and we put their benefit above our own interests, with the exception of situations endangering our live, health or the justified and legal interests of the TTC Group;
 - (h) do not accept from the clients/customers any performance, to which we have no legitimate right and which may endanger our independence and impartiality or transparency of our conduct;
 - (i) never discuss internal affairs of the TTC Group companies in front of our clients/customers;
 - (j) are aware of the need to cope with emotionally stressful situations in dealing with some clients/customers and their representatives;
 - (k) never abuse goodwill of the TTC Group or our position in the TTC Group to promote our personal interests, opinions or interests of third parties;
 - (l) are under no circumstances allowed to offer to clients/customers the services, advice or any other form of aid, which could lead to the violation or circumvention of the law, internal regulations and rules of the TTC Group;
 - (m) fully recognize and comply with the law, all internal regulations of the TTC Group, trade customs and moral principles;
 - (n) and we also strive for the economic profit of the TTC Group and positive perception of the TTC Group by the general public.

D. Work Environment and Usage of Working Hours

1. A long-term success of the TTC Group depends in particular on our high work efficiency.
2. We shall use the working hours efficiently and only perform activities which are beneficial for the TTC Group and which are not in conflict with the main interests and goals of the TTC Group. These activities are set forth in particular by the law and the internal regulations of the TTC Group.

E. Addictive Substances Affecting Performance

1. The consumption of alcoholic beverages, use of intoxicating and other addictive substances during working hours may lead to endangering health or life, substantial damage to the goodwill of the TTC Group or a significant financial damage/loss.
2. The law and the internal regulations of the TTC Group prohibit us from working under the influence of intoxicating, psychotropic or other addictive substances or alcohol.
3. The consumption of any alcoholic beverages, use of intoxicating and other addictive substances at the workplace is strictly prohibited, and the elected bodies of the TTC Group companies and the Managers shall not tolerate it. A violation of this prohibition shall be strictly sanctioned, with all sanctions arising from the law (the Labour Code, the Criminal Code) and from the internal regulations of the TTC Group.

F. Commitment of Elected Bodies and Managers

1. We promote our mutual cooperation within the entire TTC Group. We have sufficient room to create such procedures, standards and rules to convince our Employees or clients/customers of the TTC Group of the high level of our services.
2. As members of the elected bodies and Managers of the TTC Group companies, we shall strive for the following, aside from compliance with the law, internal regulations and standards of the TTC Group:
 - (a) we set example to other Employees by our honest and fair conduct;
 - (b) we form the mission and visions of the companies that we manage, also with regard to the interests of the Employees themselves;
 - (c) we create conditions for ensuring a fully cooperative environment with each company (department, etc.);
 - (d) we ensure that our subordinate Employees have sufficient information, knowledge and means enabling them to perform their work duties properly and without disturbances in accordance with the law, this Code of Conduct and other internal regulations and policies of the TTC Group;
 - (e) we continuously work for increasing the quality of provided services and we create an atmosphere for the achievement of permanent and desirable changes with respect to the rapidly changing external conditions;
 - (f) we permanently develop a dialogue between us and the Employees; we respect the opinions of other Employees, care for their needs and help them achieve the set goals;
 - (g) we support those Employees who in good faith pose substantial questions or express doubts regarding the compliance with the rules and ethical conduct;
 - (h) we actively create conditions and environment for the protection of Employees, including procedures and rules protecting the Employees from aggressive conduct of clients/customers or third parties;
 - (i) we make sure that no unlawful sanctions, harassment or personal vengeance against Employees were applied;
 - (j) we create and actively apply a suitable system of monitoring efficient usage of all resource of the TTC Group;
 - (k) we create and promote a strong entrepreneurial spirit for the purposes of success of the TTC Group in business;
 - (l) we promote and appreciate creativity and initiative of our Employees.
3. We base our conduct on healthy business mindset and we act as if we were the actual owners of the company.

F. 1. Responsibility of Managers

1. Compliance with the rules, law, internal regulations of the TTC Group and ethical standards is a task for the entire TTC Group (individual companies).
2. The task of us as Managers is, aside from our position, to set an example and further promote the system of compliance with the law, all internal regulations of the TTC Group and standards, as well as ensure that we make our subordinate Employees acquainted with the Code of Conduct and other binding regulations, so that the Employees had these in mind and acted in compliance with them. To this end, we use personal interviews as well as organizational measures.

F. 2. Compliance with Entrusted Powers and Mandate

1. In business relations, each particular company of the TTC Group is always represented by a specific Employee who directly deals with the client/customer and creates long-term business relations with them.
2. We comply with all authorizations regarding signing, decision-making and approvals, as well as trading limits. We are authorized to conclude, decide on or approve obligations in the name of the company only to the extent of granted approval authorization.

G. Responsibility (Relationship to the “Civil Society”)

1. We accept full personal responsibility for our tasks. We serve the interests of our clients/customers and we deserve their trust by working in an ethical and financially sound manner. We publish the results of our companies in a transparent manner.¹
2. In our contact with the public authorities, we always act in accordance with the law while adhering to the internal procedures adopted in this area via the internal regulations of the TTC Group.
3. We provide the public authorities with maximum cooperation which may be reasonably required of us upon the performance of statutory inspections by these authorities.
4. We cooperate with the public authorities in areas where our expertise and experiences acquired in our professions contribute to an efficient aid in the performance of the tasks of public interest or to preventing a serious threat to the environment or property.
5. Within the TTC Group, we also promote philanthropy, we sponsor charity events or matters with a generally beneficial purpose. We always conclude contracts on sponsoring in writing and under transparent conditions.

H. Environment Protection

1. The Employees and members of elected bodies of the TTC Group shall always act in a manner preventing the occurrence of environmental damage. They also separate waste, and they protect all elements of the environment in their work procedures.
2. The TTC Group enjoins its Employees and elected individuals to strict adherence to all relevant laws relating to the area of environment protection and waste management.
3. The TTC Group shall insist on the interest in environment protection also in its contractual relationships with its cooperating persons, suppliers, business and other contractual partners.

I. Informing Employees of Internal Regulations of the TTC Group

1. Members of bodies of the TTC Group companies and Managers require of all Employees the compliance with all legal, work (professional) and internal regulations and standards of the TTC Group, and they continuously monitor the compliance therewith.
2. The Employees are informed of the applicable internal regulations of the TTC Group and they are enabled to inspect such regulations, e.g. at the website. For this purpose, the TTC Group regularly

¹ E.g. filing documents (final accounts for the respective financial period) to the Trade Register and other Public Registers.

- organizes courses and trainings, e.g. in the form of e-learning, workshops, lectures or expert internships.
3. Members of the bodies and Managers of the TTC Group companies are responsible for the Employees being acquainted of the provisions of this Code of Conduct and other related internal regulations, for explaining their content, meaning and purposes to the Employees, and for their full practical implementation.
 4. TTC HOLDING, a.s. creates a training within the Criminal Compliance Program so that all Employees in each TTC Group company were duly acquainted with this Code of Conduct and the related internal regulations.
 5. Each person affected by the internal regulations of the TTC Group shall, upon the performance of his or her activities, turn to his or her line manager or via the line manager to the TTC HOLDING, a.s. Legal Department or directly to the designated Compliance Officer, and request explanation of provisions of the regulations concerned, provided that he or she has any doubts regarding the meaning or application of such regulations.

J. Conflict of Interests

1. The TTC Group performs all its activities so that it avoided to the maximum extent possible the occurrence or even any impression of any conflict of interests, and the TTC Group expects the same of all its Employees.
2. The TTC Group expects of all its Employees to always act in a manner maintaining independence, avoiding any conflict of interests, and also distinguishing the line between a professional relationship and private life.
3. A conflict of interests shall mean in particular interests of personal nature (e.g. the existence of ownership, trade or other financial/participation share in business corporations of the partners or competitors) which could affect the independence of any person assessing what is in the interest of the TTC Group and deciding on the methods of advancing such interests.
4. We may not do business or conclude agreements in which we are directly or indirectly personally interested, and which could therefore lead to a conflict of interests.
5. We must refuse any intervention, pressure, influence, wish or request which could endanger our impartiality in decision-making in the matters of clients/customers or business partners.
6. Any other than purely professional relationship between us may not disturb our regular work performance or the performance of our work team.
7. In case we work for any other person, having an existing or future business relationship with the TTC Group, or in case we have a relationship of financial, business, professional, family or social nature with such a person, we have to immediately notify of such fact our line manager or directly the respective Compliance Officer.
8. We may not become a member of an elected body of any other company, with the exception of TTC Group companies, performing activities identical to the line of business (business areas) of the TTC Group companies, without a prior approval by the respective body of a TTC Group company for which we perform our function or a TTC Group company of which we are Employees.
9. In particular, it is inadmissible to endanger our personal independence by accepting a loan or another performance from clients, customers, suppliers or business partners, or to provide them with a loan as a private person. This prohibition does not apply to entering legal relationships under usual conditions provided by the clients, customers, suppliers or business partners to the general public, if the legal relationship is at the same time without any connection with the TTC Group or with the performance of activities of the TTC Group.
10. In case we are unsure of any situation relating to a possible conflict of interests, we shall immediately inquire with our line manager or via the line manager with the TTC HOLDING a.s. Legal Department, or directly inquire with the respective Compliance Officer.

11. The TTC Group respects private activities of the Employees outside the working hours. However, it is possible that subjects, in which the Employees engage, are in such business relationship with the TTC Group which constitutes a conflict of interests. Therefore, any business activities (including mandates) performed outside the work relationship with the employer (a TTC Group company) shall be in accordance with the law, work contract and internal regulations of the TTC Group. The Employees may not perform such business activities, which would or could lead to a conflict of interests or damage the interests of the TTC Group.

K. Rules for Handling the TTC Group Property

1. The TTC Group property serves to the needs of the entire TTC Group. It must be protected from misuse for any own or someone else's purposes.
2. The TTC Group expects its Employees to handle all property entrusted to them responsibly. Care and responsibility are also necessary in any dealing with confidential information, of which the Employees learn as part of their activities. Such information may not be misused for own purposes or made available to any third parties without permission. Personal data of all types shall be duly protected against unauthorized access and misuse.
3. The TTC Group provides the Employees with various types of communication devices, so that they may work efficiently (e.g. computers, notebooks, phones, tablets, access to the Internet and data, as well as other technical devices). We may use these means solely in connection with the work activities for which they are designated, and in accordance with the internal regulations of the TTC Group.
4. Unless the internal regulations or contracts provide otherwise, we may use the property of the TTC Group solely for work purposes; we may only use the provided resources in accordance with the law or the internal regulations of the TTC Group.
5. We shall keep our workplace and its surroundings in perfect order and clean.
6. In particular, we shall perform our work (activities) in a manner preventing the misuse, damage or destruction or unjustified wear and tear of the property and equipment of the TTC Group, and effectively prevent any occurrence of damage.
7. When handling financial means, we shall act with maximum possible care and caution. In particular, we shall ensure that payment transactions are duly accounted for, documented and recorded.

L. Equal Treatment (No Discrimination)

1. The TTC Group prohibits any form of direct or indirect discrimination or unequal treatment against the Employees or clients/customers because of their race, gender, sexual orientation, age, family status, handicap, religion, etc. Further, the Employees and clients, customers, business partners or the general public may not be discriminated against with respect to the offered products and services, access to work, work conditions, education, work promotion or assignment to a certain position.
2. The TTC Group strives to ensure that persons assigned to any position complied with the key requirements for the performance of work at such position. The TTC Group further strives for maximum expertise and qualification of its Employees.
3. The TTC Group provides equal opportunities to job applicants to acquire a work position, and to Employees to their professional growth.
4. The TTC Group does not accept and will strictly sanction any form of discrimination or harassment at the workplace. The TTC Group rejects any form of physical or verbal expressions at the workplace which may be unpleasant, threatening, hostile or disparaging to any individual or a group of persons of a certain gender. Any expressions of sexual nature are forbidden at the workplace.

5. The TTC Group absolutely rejects and will not use child or forced labour, or any form of exploitation or procedures which would restrict free movement of Employees, with the exception of restrictions set forth by the law or internal regulations of the TTC Group adopted based on the law, in particular with respect to compliance with HSE and fire prevention.
6. The TTC Group respects the law regulating remuneration of Employees for work, and undertakes to provide its Employees with fair wages for the work performed.
7. We shall act in a manner ensuring that any political engagement had no adverse effect on the TTC Group (its members) and compliance with the obligations arising from the work or another relationship connected with the TTC Group.

M. Gifts and Bribes

1. Corruption and bribery have global devastating impact on the society, markets and businesses, and may also significantly harm the TTC Group. Therefore, the TTC Group combats and resists corruption and bribery, in particular via transparency, in order to prevent any sign of corruption or bribery. Dishonest influencing of decision-making by providing benefits of any kind is prohibited.
2. The TTC Group therefore strongly emphasizes prevention of conflict of interests, transparency in relationships between Employees, clients, customers and third parties, and in particular moral integrity of its own Employees.
3. In connection with the performance of work, we may neither accept nor provide any gifts and similar performances, with the exception of circumstances set forth in the internal regulations of the TTC Group.
4. Accepting, offering or brokering bribes from or to third parties is inadmissible.
5. The TTC Group refuses all forms of bribery and corruption, and applies zero tolerance policy with respect to them.

N. Tax Regulation

1. Compliance with the law in the tax area is essential for the goodwill of the TTC Group. The TTC Group is a responsible taxpayer, and it is particular about professional compliance with the tax law and tax planning in accordance with such law.
2. The provision of any support or aid in transactions, the purpose of which would be acquiring unlawful tax benefit or advantage, is prohibited.
3. Upon introducing new services or products to the market or upon penetrating a new market, the respective tax regulations, laws and requirements in this area must be respected.
4. In case of any doubts, we shall contact the respective Tax Department of the TTC Group of Employee of a TTC Group company with the corresponding expertise, and request a position regarding further steps, which shall ensure compliance with the law.

O. Ethics and Fraud

1. In the everchanging environment, or as a result of both internal and external pressure, faults or violations of the rules and regulations may occur, either intentionally or by negligence. Such errors must be openly communicated, in order to enable preventing deterioration of the situation and enable other Employees to learn from such mistakes.
2. In accordance with the ethical principles and principles regarding addressing fraudulent behaviour, the TTC Group applies zero tolerance policy with respect to fraud.
3. As members of bodies and Managers in the TTC Group companies, we shall also strive for the following, aside from compliance with the law, internal regulations and standards of the TTC Group:
 - (a) we shall act honestly, and retain our moral integrity at all times;
 - (b) we shall know all respective laws, internal regulations of the TTC Group, and the usual work (professional) or trade procedures relating to our work, and fully comply with them;

- (c) we shall care for the resources for which we are responsible;
- (d) we shall cooperate and to the maximum extent possible aid the investigating bodies.
- 4. In case we have a suspicion of any fraudulent or unlawful activity, we shall immediately inform our line manager (or possibly directly the Compliance Officer of TTC Holding, a.s.).
- 5. We can under no circumstances attempt to investigate in person, carry out interviews, investigations or contact the “suspects”, or search on our own.
- 6. The Board of TTC HOLDING, a.s. is, as the top management of the TTC Group, responsible for ensuring that all activities in the investigation were carried out in a manner which:
 - (a) is in accordance with all laws (tax, accounting) and the internal regulations of the TTC Group;
 - (b) enables to perform due control by the local and other competent public authorities.
- 7. With respect to fraud, the bodies of all TTC Group companies are responsible for:
 - (a) making due acquaintance with the types of fraud, which might occur in each organizational unit;
 - (b) constant caution and vigilance with respect to any indicators of fraudulent activities;
 - (c) introducing efficient controls and procedures for mitigating the risk of fraud, and ensuring that the controls were efficient and operational at all times;
 - (d) setting up a procedure which would ensure immediate notification of any activity suspicious of fraud or unlawfulness, or its exposure to the line manager (or, as the case may be, the Compliance Officer of TTC Holding, a.s.).
- 8. The TTC Group expects that we are aware of the need of both internal and external controls, and that we shall not circumvent or thwart them in any manner.
- 9. We pay attention to the principle ***“We comply with, not violate the rules, and we contribute to their reasonable restoration”***.

P. Competition Rules

- 1. All companies in the TTC Group are bound by strict rules created to ensure free and not disrupted competition in the market (e.g. prohibition of unfair competition, cartel agreements, and unfair business practices such as deceptive advertising, violation of business secret, etc.).
- 2. Therefore, we have to comply with the competition rules in all areas of our work (activity) and avoid any conduct, which would constitute their violation.
- 3. We have to resolve all incidents relating to any violation of the competition with our line manager, or with the Legal Department of TTC HOLDING, a.s. via the line manager.

Q. Preventing the Legitimisation of Proceeds of Crime

- 1. We may not perform or be anyhow involved in any activities which could indicate to form part of so-called “money laundering”, i.e. legitimisation of proceeds of crime (e.g. transfer of financial means or other property with the knowledge that such financial means or property origin in criminal activity, for the purposes of concealing or covering the illegal origin or for the purposes of aiding any person participating in such criminal activity).
- 2. For the purposes of preventing the legitimisation of proceeds of crime, we shall carefully evaluate and handle the available information on future business partners and suppliers, in order to verify their trustworthiness and legality of the intended transaction.

R. Protection of Data and Confidential Information

- 1. Our relationship with each client/customer is always based on mutual trust and maintaining confidentiality.
- 2. Confidentiality must be maintained with respect to all information about the clients, customers or business partners of the TTC Group acquired during the performance of the activities of the TTC Group. Such information must be considered confidential. We shall protect all confidential information and data regarding the clients, customers and business partners against unauthorized

- use (misuse), publication, alteration or destruction. We may use this information solely for the purpose for which it was acquired. The protection of confidential information (including personal data) pertains also to any data carriers, regardless of their form.
3. We may not insert in the TTC Group information systems faulty or distorted data, and we may not conceal any data necessary for the due and uninterrupted operation of the TTC Group and the performance of its obligations.
 4. We may not enable unauthorized persons to access the TTC Group information systems.
 5. We shall comply with the law and the TTC Group internal regulations on the confidentiality of personal data, and on the handling and processing such data.
 6. The TTC Group further protects all data and personal data regarding its Employees in accordance with the respective laws.
 7. In case we are requested or invited by a public authority to provide information regarding the TTC Group, its activities or clients/customers, we shall consult surrendering such information without delay and prior to providing such information with the Legal Department of TTC HOLDING, a.s. (or the Compliance Officer of TTC HOLDING, a.s.) via our line manager.
 8. We shall protect all confidential information regarding the TTC Group, its clients, customers and business partners, which was provided to us within the performance of work, and we may not use it for personal gain or for the benefit of another, even after the termination of the work relationship.

S. Company (Social) Behaviour Culture and Perception of the TTC Group by the General Public

1. Proper and ethical behaviour of each Employee of any TTC Group company affects the goodwill of the entire group, contributes to a positive company and business culture, and also affects the personal motivation and performance of each Employee. Each Employee of the TTC Group is always expected to act in accordance with the principles defined in the Code of Conduct and in the related internal regulations.
2. The TTC Group puts great emphasis on the proper conduct of all Employees. The conduct of any Employee at the workplace may not aggravate the situation of other Employees or endanger their health and safety.
3. In accordance with the law and the TTC Group internal policy regarding the prevention and intervention, we are prohibited from:
 - (a) putting improper pressure or influence on others;
 - (b) making insulting comments;
 - (c) acting in a manner which undermines the integrity or dignity of other colleagues at work;
 - (d) ganging up against other colleagues;
 - (e) annoying, pestering of sexually harassing colleagues;
 - (f) abusing one's position in relation to one's colleagues.
4. The perception of the TTC Group by the general public is also affected by the conduct of its Employees. Maintaining a professional approach in all activities expresses regard for the goodwill of the TTC Group.
5. The success of the TTC Group as a whole is significantly dependent on the quality and level of communication and cooperation between its Employees.
6. The TTC Group expects of its Employees a friendly and open approach to colleagues, respect and building a team spirit.
7. We shall share information which could be important for the others, always with regard to the compliance with other rules, e.g. maintaining confidentiality of information / protection of personal data.
8. We shall always act within our activities in a representative manner and thus contribute to the building of goodwill and reputation of the TTC Group and its services.

9. We shall treat the brand, logos, symbols and other elements identifying or representing the TTC Group in accordance with their statutory protection, due respect and regard, in particular refrain from misusing them in a disparaging or otherwise undesirable manner.
10. At work, we wear clothes corresponding to our work position which would not reduce the dignity of our work position, unless specific clothes are prescribed to us by the law or by the internal regulations of the TTC Group.
11. In contact with third parties, we act properly, decently, and we always act on behalf of the TTC Group seriously and politely. We perform each contact with third parties in a manner respecting the dignity of such persons and enhancing the goodwill of the TTC Group.
12. The perception of the TTC Group by the general public is strongly affected by the media, including both the traditional media (radio, television, press, etc.) and the new (social) media (e.g. text messages, the Internet, chats, blogs, discussion fora and social networks such as Facebook, LinkedIn and others).
13. When publicly expressing our opinions and in communication with the media, we comply with the internal policy of the TTC Group regulating contact with the media, and we also respect the principles and values of the TTC Group.
14. Only authorized persons may issue press releases or give statements in the name of the TTC Group; contact with the media is reserved only for the competent persons in the Marketing and PR Department of TTC HOLDING, a.s.

T. Needs of Employees and Professional Growth

1. The TTC Group understands that motivation of its Employees is based, *inter alia*, on the extent of fulfilling their individual needs and requirements. The TTC Group notes such needs and requirements via Managers, it offers the Employees possibilities for professional growth and strives for fulfilling their reasonable wishes, with regard to the nature of work, technical and operational conditions, so that the Employees could deliver quality performance at work.
2. The TTC Group supports individual initiative regarding their own personal growth, and offers the Employees with an opportunity to acquire the necessary knowledge for the performance of their work/occupation.

U. Activities Outside the TTC Group

1. The TTC Group supports activities which strengthen the motivation of Employees, such as e.g. specific programs developing the social sensitivity. (See the We Help Together Program.)
2. The TTC Group welcomes when its Employees devote their free time to sport, culture, scientific research, education, activities in interest organizations, etc. However, in such activities, the Employees may under no circumstances act as the TTC Group Employees. This also applies to their possible political or religious activities.
3. The TTC Group does not support political, religious or another ideological campaigning at the workplace or towards the general public, business partners, clients and customers.

V. Internal Measures and Sanctions

1. Violation of the law, internal regulations of the TTC Group, work (professional) standards and measures arising from this Code of Conduct by the Employees shall be considered tort, in which the TTC Group has no part at all. Such conduct will be considered a gross violation of the work duties (work discipline) and as such, it will be strictly sanctioned within the meaning of the respective laws (Labour Code, Civil Code, possibly also the Criminal Code).
2. With the exception of any civil, administrative or criminal law sanctions imposed by the public authorities in connection with any criminal activity or another unlawful conduct or violation of the law or other regulations by the Employees, the TTC Group applies reasonable disciplinary, labour-law and criminal-law measures and sanctions, in particular:

- (a) decreasing or revoking personal surcharge;
 - (b) decreasing or non-payment of bonuses;
 - (c) compensation for damage or another immaterial harm;
 - (d) termination of work relationship;
 - (e) filing a criminal complaint, etc.
3. The Employees of the TTC Group who voluntarily abandon further unlawful conduct and exert maximum effort possible to prevent or remedy the adverse effects of such conduct, inform of such conduct and fully cooperate in investigation of such incident, may be under certain circumstances acquitted of a disciplinary or labour-law sanction. Under such circumstances, these Employees may be even provided with legal aid by the TTC Group in any criminal proceedings in the form of providing the necessary counsel (legal aid).

W. Final Statement

Should any of us violate the above ethical standards, he or she harms the TTC Group and its Employees.