



Anti-corruption policy and the policy for the prevention of violations

In all its activities, České Radiokomunikace a.s. ("CRA") respects all laws applicable in the jurisdiction in which it conducts its business activities and undertakes to act in accordance with its fundamental objectives and values, in accordance with the CRA Code of Ethics and good morals.

A fundamental principle of CRA's Anti-Corruption and Prevention of Illegal Conduct Policy (the "Anti-Corruption Policy") is zero tolerance for any form of corrupt conduct, either directly or through third parties. Bribery, corruption, or other illegal conduct is incompatible with the Company's Code of Conduct (R-002) and the expectations of integrity and moral turpitude placed on CRA employees.

The primary responsibility for the application of this Anti-Corruption Policy rests with department directors and senior management. Each director is responsible for ensuring that employees and businesses under his or her purview comply with this Anti-Corruption Policy.

Violations of this Anti-Corruption Policy are unacceptable to the CRA and appropriate consequences will be drawn from any such violation. Reasonable suspicion of a violation of the Anti-Corruption Policy will be reported to law enforcement, regulatory authorities, or other responsible public authorities, depending on the severity. Violations of the Anti-Corruption Policy may also result in private liability (for damages) or public liability (for a criminal offence or misdemeanour). For third parties, violation of the Anti-Corruption Policy may result in immediate termination of contractual cooperation with CRA.

Bribery and corruption

Acts referred to as bribery or corruption include the undue exercise of personal influence in the performance of a person's duties, whether in the public or private sector. CRA employees shall not directly or indirectly give, offer, promise, accept, solicit or approve bribes, nor shall they directly or indirectly participate in any corruption or corrupt practice.

A "*bribe*" is anything of value that is given, offered, promised, accepted, required, or approved (in each case either directly or indirectly) with the purpose of inducing a person in whom confidence is placed or who is expected to act in good faith or impartially to perform that function in a partisan manner or to obtain or retain an advantage during business. A bribe may also be an advantage given or offered to a related person, who may be, for example, a relative or business associate, or an advantage given through a business agent or other intermediary.

"*Anything of value*" refers to all sums of money, gifts, entertainment, expenses, reciprocal benefits, business, or employment opportunities, political or charitable contributions, and a variety of other direct or indirect benefits.

"*Corruption*" is the abuse of public office or authority for personal gain or the misuse of private influence in connection with business activities outside the scope of public authority.

Dealing with and through third parties

All companies that are engaged to perform work for or on behalf of CRA must take the necessary steps to ensure that the acts or conduct of such third parties do not contravene this Anti-Corruption Policy.

In relation to third parties, thorough due diligence must be conducted to ensure that such third parties are suitable partners for the CRA and that appropriate controls are in place to prevent and detect bribery and corruption. Particular consideration should be given to arrangements with consultants, agents or third parties who assist in the procurement of business, mediate with key representatives of customers or potential customers in decision-making positions or act in a manner that may be inconsistent with this Anti-Corruption Policy.

Dealing with public officials

CRA employees' dealings with public officials are subject to strict compliance with generally binding legislation containing specific rules that apply to matters relating to the provision of gifts, gratuities, entertainment or other favours to public officials and which may prohibit such dealings altogether. In addition, when dealing with public officials abroad, CRA employees must familiarise themselves with and comply with applicable foreign regulations and laws.

Payments (or other benefits) made to public officials or local government officials or employees to expedite or secure action by a public authority (e.g., to expedite the processing of an application, minor permits, etc.) are prohibited. This prohibition also applies to third parties acting on behalf of the CRA and it is important that this arrangement is clearly communicated to all such third parties prior to their engagement.

Other conduct that could be considered bribery and corruption includes, for example, the provision of contributions or donations to political parties and charities, sponsorship, compensation arrangements and arrangements for the entry of private sector representatives into the public administration or, conversely, public administration representatives into the private sector, where the purpose of such conduct is to unduly influence an individual or organisation. The CRA also prohibits such conduct.



Gifts and refreshments

The CRA prohibits the acceptance of gifts and entertainment and the offering/giving of gifts and entertainment under conditions that tend to conceal the existence of such gifts or entertainment, or if their nature would be contrary to the law, internal regulations, the CRA's contractual obligations, this Anti-Corruption Policy, the CRA Code of Conduct, or if they could violate good morals, and in particular prohibits the acceptance of gifts in the form of money or cash equivalents (e.g. cash, gift vouchers, travel vouchers or exchangeable property, loans, etc.).

Accepting gifts or treats

The responsible director (or his/her designee) decides whether or not to accept a gift based on an assessment of whether the acceptance of the gift/entertainment complies with the law, this Anti-Corruption Policy, the CRA Code of Ethics and good morals.

The employee may retain gifts or entertainment valued up to CZK 5 000 but must always inform his/her director (or his/her designee). All gifts/treats more than CZK 5 000 must be reported to the appropriate director (or his/her designee).

All offers of travel or accommodation must be refused unless it is demonstrably in the interests of the CRA to accept them. All offers of travel and/or accommodation must be approved in advance by the relevant Director (or his/her delegate).

Providing gifts or treats

If an employee intends to provide a gift/treatment valued at up to CZK 5 000, the provision of the gift must be in accordance with this Anti-Corruption Policy, the CRA Code of Ethics, the law, good morals and CRA's contractual obligations.

All gifts/treats more than CZK 5 000 must be approved by the relevant director (or his/her delegate), who will decide whether the employee may make such gifts/treats and will assess the compliance of the gifts/treats with the law, this Anti-Corruption Policy, the CRA Code of Conduct and good morals and CRA's contractual obligations.

It is prohibited to provide travel or accommodation unless it is demonstrably in the interest of CRA to provide it. All offers of travel or accommodation must be reviewed and approved by the appropriate director (or his/her designee).

Illegal Conduct

Illegal conduct includes actions by CRA employees that may constitute criminal offences or misdemeanours (administrative offenses) and may be legally attributable to CRA.

This includes misconduct in connection with environmental matters, public procurement, tax obligations, granting of subsidies, data protection, and privacy.

Illegal conduct also includes the bribery and corruption.

CRA may be held responsible for its employees' illegal conduct, even if CRA does not benefit from it. Attempts, even in good faith, to assist third parties in illegal conduct will be considered as acting contrary to applicable laws and regulations.

CRA employees must not engage in, solicit, or approve illegal conduct, either directly or indirectly. Illegal conduct is against the law and exposes CRA and its employees to criminal or administrative penalties. Additionally, disciplinary actions, including termination of employment or other business and contractual relationships, may be taken against employees involved in such actions.

Reporting Rights and Obligations

CRA employees must immediately report any cases or suspicions of corruption or other corrupt practices or illegal conduct to the legal department and the relevant director. Reports can be made directly to the responsible CRA employees or through the implemented Whistlelink reporting system, managed by an independent law firm.

Reports can also be made anonymously.

Detailed reporting conditions are outlined in the internal regulation S-089 CRA Internal Reporting System.

CRA employees who report such conduct will be protected from retaliation, attacks, or other repercussions in response to their reports. Additionally, CRA employees will be provided with all necessary assistance, including legal consultations.