



CRA CODE OF CONDUCT

Principles of the ethical code implemented by České Radiokomunikace a.s.

(hereinafter referred to as „České Radiokomunikace“ or „CRA“)



Dear colleagues,

Why do we have an ethical code of conduct?

We are a part of the great and unique team of CRA. We have excellent experts, technical knowledge, experience and unique infrastructure, on which we are building our business.

Nevertheless, being a great team and a recognized company is not just about what we do. It is also about how we do it.

We have decided to do business responsibly, ethically and in full compliance with the law, because we believe that this is the right thing, which also has its business justification - it will help us gain and maintain the trust of our customers and partners.

The aim of the CRA Code of Conduct is to summarize the principles and rules of conduct, communication and ethical principles of CRA, the observance of which we expect from all our employees and associates.

Therefore, I ask you to familiarize yourself with it and follow its principles. Use it as a guide to who we are and want to be whenever and wherever we act on behalf of our company České Radiokomunikace.

Our Code of Conduct is based on CRA values. It's not just words - they express how we try to live every day.

Miloš Mastník
CEO



Who does the Code apply to?

The CRA Code of Conduct is binding for everyone who is employed by our company, full time as well as temporarily - employees, directors, managers, supervisors, external collaborators and temporary workers. Everyone has a duty to familiarize themselves with this Code and to act in accordance with it.

We also expect our suppliers, consultants and other partners to act at a high ethical level in accordance with the CRA Code of Conduct.

What does it mean for me?



All CRA employees and associates are expected to:

- act in accordance with the general principles of polite conduct,
- these include mutual respect, helping each other, treating others as equals and not initiating conflict,
- communicate openly with all partners and listen to the opinions of others,
- comply with the principles and rules set out in this Code,
- draw attention to behavior or practices that are inconsistent with this Code. Compliance with the Code is monitored by the managers of individual departments. At the same time, they are expected to set an example by adhering to the Code and the general principles of polite conduct.

Violation of the Code may be considered a breach of employment duty.

If you are ever unsure whether your actions are in line with the expectations of the Code, ask yourself:



- Is it legal?
- Is this the right thing to do?
- Do I feel good about it?
- How will I feel about it later?
- What would it look like on the front page of a newspaper?
- Will my actions stand the test of time?
- Would I be able to explain this to my family?

If you answer „no“ or „I'm not sure“ to any of the questions, ask your colleague or supervisor for advice.

If you witness behavior that appears to be illegal, unethical or corrupt, report it to someone from the personnel team or your supervisor. Your anonymity will be ensured. If you report such a matter, no action will be taken against you, even if no unlawful conduct or violation is found.



To whom do we apply the principles of the Code?

We are committed to applying the rules of the Code towards all our partners with whom we have business and social obligations. Our partners are:

CUSTOMERS

We deal with our customers individually and with the utmost care.

BUSINESS PARTNERS

We establish and maintain fair relationships with our suppliers and other business partners, based on the contracts and their consistent fulfillment.

EMPLOYEES

We recognize the rights of our employees. We create safe working conditions and a working environment where we feel good. We pay attention to fair remuneration, we appreciate an initiative attitude, high work performance, honesty and transparency. We encourage and support development and education of our employees.

SHAREHOLDERS

We apply the principles of effective corporate governance and management. We are doing everything we can to ensure financial stability of CRA and its future development.

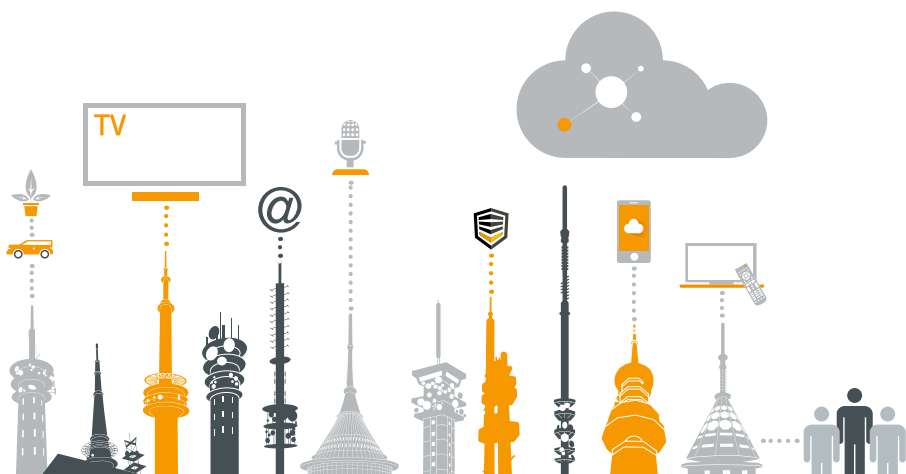
PUBLIC INSTITUTIONS

We create and maintain transparent and fair relations with public administration institutions, whose decisions affect our business.

COMMUNITIES AND THE ENVIRONMENT IN WHICH WE OPERATE

We are aware of CRA's social responsibility and strive for responsible behavior towards the communities around us and the environment in which we live. When cooperating with communities, we focus mainly on supporting students, disadvantaged groups and cooperation in the regions where we operate.





Our principles of ethical behavior and conduct

- /// We comply with the law and legal and internal regulations
- /// We follow an equal-access approach and do not tolerate discrimination
- /// We take health and safety at work seriously
- /// We do not allow corruption and we avoid conflicts of interest
- /// We protect the data, information, property and reputation of CRA
- /// We respect the environment and help our communities



W We comply with the law and legal and internal regulations

We perform our tasks, goals and daily work in accordance with our internal regulations, the legal regulations of the Czech Republic and the EU, as well as with the international agreements by which the Czech Republic is bound. We respect competition law and the protection of competition.

According to laws governing criminal liability, a legal entity may be held criminally liable for the unlawful conduct of its employees. Therefore, we avoid conduct that could be classified as criminal and where there could be a risk of sanctions against CRA.



What does it mean for me?



- Do not commit nor directly or indirectly encourage any infringement.
- Keep in mind that CRA may be liable for the wrongdoing of its employees, even when their actions do not benefit CRA in any way.
- We respond in a timely manner to requirements of supervisory authorities and cooperate with them in accordance with legal regulations.
- Have a basic understanding of how competition rules apply to you.
- Be vigilant in business negotiations.
- If you are in doubt about compliance with laws and competition rules, ask a colleague from the legal team.
- Infringement is incompatible with the CRA Conditions of Employment.

Anti-competitive conduct includes, for example, sharing sensitive information with competitors, price agreements with competitors, division of customers or markets, etc.



W We follow an equal-access approach and do not tolerate discrimination

We make sure that our decision making is objective, impartial and that the solutions adopted are always in line with the best interests of CRA. We respect each individual and follow an approach based on mutual respect and equal opportunities. We treat everyone equally and do not tolerate any form of discrimination or bullying.

We offer the same working conditions and opportunities to everyone regardless of gender, age, duration of employment, ethnicity, religion, cultural background, physical appearance, sexual orientation or membership in interest groups. During the reconstruction of the Strahov complex, great emphasis was placed on setting up a barrier-free workplace.

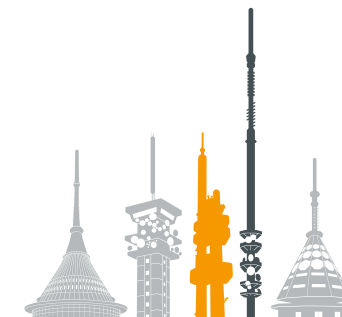
We create an open work environment where everyone feels respected.



What does it mean for me?



- When making decisions, do not prioritize personal or group interests, nor allow yourself to be influenced by positive or negative relationships with specific people.
- Refrain from anything that could jeopardize confidence in the impartiality of your decisions.
- Evaluate work performance according to the work done. In identical or similar cases, act in such a way that does not create differences between the individual processes.
- Offer all job seekers the same opportunities and conditions for individual job positions.
- Do not discriminate against or tolerate disrespectful behavior, insults, intimidation, discrimination, bullying or harassment in the workplace.
- Promote a culture of diversity and inclusion.



We take health and safety at work seriously

We protect health and safety of our employees and others who are affected by our workplace. We build a work environment that is safe, where health is promoted and which meets all legal requirements in the field of safety and health at work (BOZP) and fire protection (PO).

We strive to prevent risks and accidents, which is why we adopt the so-called Near-Miss culture, the aim of which is early identification of events that could lead to injuries and damage of health.

If you witness a near-miss incident, report it to your supervisor and the IT help-desk. A near-miss is an event related to work or the condition of buildings and equipment, which could have led to an accident, damage to health or fatal accident, but luckily none of the listed accidents occurred.



What does it mean for me?

- With your behavior, you participate in creating a safe workplace environment.
- Never compromise on health and safety.
- Familiarize yourself with legal and internal regulations to ensure safety and health at work, as well as with the foreseeable risks and measures in place to protect against these risks.
- In accordance with your job classification, you participate in training on occupational health and safety (BOZP), fire safety (PO) and other mandatory training.
- If you are a manager, ensure that your subordinates are familiar with and fully trained in health and safety at work and have the appropriate equipment to perform their work safely.
- Regular preventive medical examinations.
- Report all safety and health incidents including the so-called near-miss events. Every accident at work must be entered into the Accident Register, regardless of whether it resulted in someone's sick leave or how long their leave lasted.

α - ω of work safety:



- Always drive safely and in accordance with regulations, wear a seat belt and maintain the prescribed speed.
- Never work under the influence of alcohol or drugs.
- Never carry out hazardous work unless you are qualified to do so (e.g. work at heights, work with electrical equipment, etc.).
- Always use protective equipment for all hazardous activities.
- Report any work accident you witness to your supervisor immediately.

⚡ We do not allow corruption and avoid conflicts of interest

We carry out our business with a high level of moral integrity in order to maintain the trust of our customers and business partners. We approach any form of corruption and bribery with zero tolerance. We compete fairly and have honest and open business relationships with our business partners.

Never offer or accept any form of bribe.



What does it mean for me?



- Compete in a fair way. Never ask for gifts or hospitality.
- Avoid accepting gifts and hospitality that do not correspond to usual business practices and could be understood as a bribe or that could influence your business decisions or those of your colleagues or other parties involved.
- Do not accept or offer gifts in the form of cash or cash equivalents.
- Familiarize yourself with the CRA Anti-Corruption Policy.
- Corrupt practices are incompatible with the CRA Conditions of Employment.

The following applies to the acceptance and offering of gifts and hospitality in CRA:



- You can keep and offer gifts or hospitality of up to CZK 5,000 in value, but you must inform your director or a person authorized by your director.
- Your director or a person authorized by your director will approve the acceptance and delivery of a gift or hospitality over CZK 5,000 in value. These gifts are recorded in the Register of gifts and hospitality at the secretariat of the sales department.
- Reasonable hospitality and items that are part of the social etiquette (flowers, souvenirs, books, etc.) are not considered a bribe.
- Reject all offers of travel or accommodation and do not offer them either, unless their acceptance is clearly in the interest of CRA.
- If you are dealing with public officials, you need to know the rules that may restrict or prohibit the giving and receiving of gifts and other services.

⚡ CONFLICT OF INTEREST

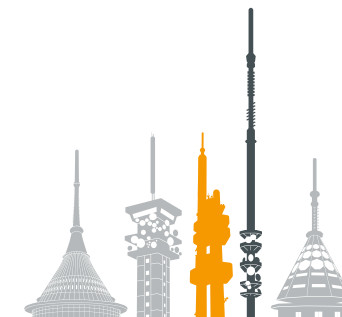
We prevent situations that would present a conflict between our private interests and our job position and offer unjustified benefit or advantage to ourselves or someone else. When we act as CRA representatives, we have a responsibility to ensure that our decision is in the best interest of CRA, regardless of personal gain.

What does it mean for me?



- Report any activities that may be considered a conflict of interest to your supervisor and discuss with them how to proceed.
- If you want to do other gainful activities that are the same as your CRA job, you need the approval of the CEO or HR Director.
- If you find that your colleague or external collaborator is experiencing a conflict of interest, notify the person concerned.

Examples of possible conflict of interest: membership (yours or of your close relative) in the statutory body of CRA's customer or supplier, other employment, close relationship with a manager of a supplier or competitor, significant financial interest (yours or of your close relative) in CRA's supplier or customer.



We protect the data, information, property and reputation of CRA

DATA AND INFORMATION

We respect everyone's right to have their personal data protected. We protect confidential information of CRA, our customers and business partners, in particular to prevent its leaks and misuse. We maintain confidentiality of facts related to our company so that it is not damaged or its activities endangered.

What does it mean for me?

- Make sure that the use and processing of personal data (collection, registration, storage and deletion) comply with applicable laws and regulations.
- Follow internal rules and procedures for classifying information.
- Do not disclose internal information outside the scope of authorized employees, to competitors or third parties, unless you are entitled or officially authorized to do so.
- Observe CRA's 10 fundamental safety rules

CRA'S REPUTATION

Communicate in a professional and open manner. We always act in a way that does not negatively affect the reputation of CRA or our business partners. We recognize that CRA's reputation may be damaged even by inappropriate behavior in our private life.

We use official channels for media statements in accordance with the CRA Communication and Crisis Manual. When communicating on social networks, we express ourselves in a polite and professional matter.

What does it mean for me?

- Communicate information to your teams openly and clearly. Ensure that your internal and external communications are approved when applicable.
- Never provide comments or information to the media without the authorization and knowledge of the marketing and communications team. This applies in emergency situations also, such as system failures, accidents, staff departures, terrorist attacks, etc.
- Pass on any questions from third-parties that you are not authorized to answer to the marketing and communications team.
- When posting information on social media, consider whether it could harm CRA's business, brand, customers or partners. Never publish any internal information. Do not engage in spreading rumors and speculation.

Rules for communicating with third parties:

- Don't talk about work matters in public, you never know who can hear you.
- Check who you are communicating with to see if the person is really who they say they are.
- Make sure the person requesting information from you is authorized to see it.
- Never speak on behalf of CRA unless you are entitled or authorized to do so.


CSA'S PROPERTY AND BRAND

We safeguard and protect CRA's assets from damage, misuse, theft and loss, because they are key to our business. This applies to both tangible assets - real estate, technology, equipment, money, etc., and intangible assets - our brand, know-how, trade secrets, etc.

We have a unique technological brand that we do not make available for political competition, such as for use in a political campaigns, for political parties or to support a particular political candidate.

What does it mean for me?

- When creating or commissioning a new product or service, ensure that it is properly protected by a patent, trademark, etc.
- Keep CRA assets safe. Report any loss to your supervisor.
- Do not use CRA property for personal activities unless otherwise instructed by CRA. When working, use only property which our company is allowed to use.
- Report suspected misuse of our brand or logo to the marketing and communications team.

We want all CRA employees to be good ambassadors of our brand. 

|| We respect the environment and help our communities

We are aware of CRA's social responsibility and strive for responsible behavior towards the communities around us and the environment.

ENVIRONMENT

Working at CRA also means protecting the environment. Carrying out our work, we always consider its environmental impact, because we believe that we can contribute to a sustainable balance in nature and in the world around us. We focus on eliminating risks and preventing accidents.

What does it mean for me?



- Comply with environmental legislation and the standards required by the established environmental management system.
- Reduce waste, do not print documents that can be archived in digital form.
- Recycle and use recycling options available at your workplace.
- Avoid unnecessary travel - take advantage of conference calls and video conferencing.
- When making purchasing decisions, keep in mind the environment, give preference to environmentally friendly products and technologies, and choose suppliers who have certificates confirming compliance with environmental standards.

Think about how you can change our habits at CRA for us to be more economical and environmentally responsible. Even a small thing can help the world around us.



|| COMMUNITIES

As a successful technology company with a regional scope, we support children and young people in the development of their skills, especially in the areas that we understand best - technology and other areas of our expertise.

We help them prepare for their professional lives and enter the labor market. We support their ideas, which we help them implement. We focus on supporting individuals and groups from disadvantaged backgrounds, especially from the less-favored regions.

What does it mean for me?



- Your involvement in activities aimed at supporting children, students and other disadvantaged groups will benefit the person or group concerned, as well as you personally and CRA.

We focus on working with communities in the following areas:



- We support disadvantaged groups
- We support students
- We want to be active especially in the less-favored regions
- We help with technology



Our values

FOCUS ON THE CUSTOMER

Customer satisfaction is the priority for every single person in our company. We strive to provide our customers with the expected value and to establish strong and long-term relationship with them.

RESPONSIBILITY AND PROFESSIONALISM

We take responsibility for our results, actions and behavior, as individuals and as a team. We carry out each activity in a professional way, meticulously and responsibly, with emphasis on maximum efficiency. We work at full steam and if necessary, are always prepared to make an extra effort to guarantee an excellent result.

INTEGRITY

Our behavior is bound by key ethical and moral principles, honesty and adherence to the company's internal rules. We support open and direct communication.

ENTHUSIASM

We seek methods for handling matters faster, in a smarter way and leading to a higher level of quality. We support new ideas, concepts and opinions, which will move us forward.

TEAM SPIRIT

Each of us has a specific role within the company, but we all strive towards the same goal. We complement each other and are aware that we can only reach our goals if we work together as one team.



www.CRA.cz

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