

## EPH Group Code of Conduct

### 1. BASIC PRINCIPLES & COMMITMENTS

Energetický a průmyslový holding, a.s. ("EPH") and the subsidiaries and companies controlled by it ("EPH Group") are committed to conducting business activities in a transparent and operationally excellent manner and expect the same of their employees.

The principles laid down in the ESG Master policy are at the core of the EPH Group's business activities, and they are to be respected and followed by all its employees.

The subsidiary companies follow at minimum these main principles and implement them in their own binding internal policies and country of operation language.

This Policy defines the EPH Group's commitments in its standards of behaviour and code of conduct, setting it as a practical value for its day-to-day business and making all employees personally responsible for the performance and reputation of the EPH Group, ensuring a good relationship with all its stakeholders.

#### **The EPH Group is committed to following these basic principles with its stakeholders:**

##### **1. BUSINESS PARTNERS:**

**Regulatory compliance.** In performing their activities, the EPH Group and all its employees always comply with generally binding legal regulations, fully perform their contractual obligations pursuant to the agreed terms and conditions, apply the principle of reliability and act as a trustworthy partner.

**Fair competition.** The EPH Group competes fairly in its market and believes that consumers and society in general benefit from free and open competition, using lawful business procedures towards our business partners, customers, suppliers and competitive entities.

**Transparent communication.** The EPH Group provides its business partners with the relevant information they need for investment decisions subject to confidentiality and business objectives

**Risk management.** The EPH Group ensures that appropriate controls are in place to assess and manage the risk to its business, people and reputation.

**Reliable information.** The EPH Group prepares its business, financial and accounting records accurately and reliably.

**Gifts and hospitality.** None of the EPH Group's employees offer or accept gifts, hospitality, or other types of incentives, which may reward or influence a business decision, neither misusing their position or contacts to seek benefits for the EPH Group or third parties.

##### **2. CUSTOMERS:**

**Responsible offer.** The EPH Group offers its customers high-quality products and services, which are safe, innovative and reasonably priced, in line with applicable legal regulations.

**Responsible marketing.** The EPH Group is fair to its customers, providing them with truthful, clear and practical information when marketing its services (unless a provision of such information could be considered sensitive or harmful to the EPH Group), which comply with all the required and advertised specifications.

**Dialogue.** The EPH Group provides open communication channels to solve customers' needs.

**Data security.** The EPH Group respects the privacy of required data according to applicable legal regulations, allowing only authorised employees access to such data for the purposes of the EPH Group, ensuring the data safety with appropriate security measures, acting fast and responsibly if there is a security threat.

### 3. EMPLOYEES:

**Equal opportunities.** The EPH Group acts in line with the relevant labour codes, applicable legal regulations and internal policies, ensuring the recruitment, promotion and treatment on the sole basis of employees' qualifications, abilities, experience, and work performance, avoiding all forms of discrimination.

**Healthy environment.** The EPH Group is committed to creating healthy and safe working conditions compliant with applicable law or regulation, with appropriate health and safety management system to mitigate potential risks arising from technological processes, technical equipment, human activity and working environment.

**Safety at work.** The employees are obliged to adhere to all of the EPH Group's safety policies, with the EPH Group ensuring that all of its employees are informed of applicable laws and regulations and have completed relevant training in the area of health and safety at work. The EPH Group ensures that all working facilities and assets are fully covered at the minimum by the quality standards given by the respective laws and regulations, and where feasible permanently monitors the safety and health of employees.

**Freedom of association.** The EPH Group respects its employees' right to belong to the trade union of their choice and does not tolerate any type of retaliation or hostile action towards those people who participate in union activities.

**Talent.** The EPH Group keeps its employees informed on how their contribution at work is evaluated, expecting them to actively take part in the evaluation process so they can keep improving their performance.

**Training.** The EPH Group ensures appropriate education to increase awareness among its employees regarding health and safety at work, which also involves business partners and visitors to a reasonable extent. The EPH Group pays attention to the professional growth of its employees.

### 4. SUPPLIERS:

**Excellence.** The EPH Group seeks to attain services and products at the best possible terms for the company.

**Objectivity.** The EPH Group bases its relationships with suppliers and other partners on transparency in negotiations, objectivity in business decision making and equal opportunities, which might however be, in case of need, specific to the EPH Group's business operational, commercial and environmental objectives.

**Commitment.** The EPH Group fulfils the commitments it has agreed to with suppliers.

**Compliance.** The EPH Group encourages its suppliers to comply with the laws and regulations affecting mutual business. EPH Group Procurement Policy further elaborates on what is expected from our suppliers.

**Responsible supply chain.** The EPH Group encourages its suppliers to apply principles similar to the implemented ones for the EPH Group.

**Health and safety.** The EPH Group communicates to its suppliers adequate information that may affect health and safety of their employees in connection with the provision of goods and services for the EPH Group. The EPH Group ensures that employees of the supplier who perform their duties in

the business premises of the EPH Group or in a cooperation with EPH Group employees are provided with adequate information regarding relevant health and safety procedures.

## **5. COMMUNITIES:**

**Social impact.** The EPH Group contributes to the technological, economic and social development, investing in particular in energy infrastructure and power generation, creating jobs and providing services that improve the quality of life.

**Environment.** The EPH Group strives to prevent and minimise environmental impact, prioritising modernisation of processes and facilities, launching and maintaining the appropriate environmental management system standards and ensuring appropriate awareness among employees and business partners.

**Public affairs.** The EPH Group participates proactively and responsibly in discussions with governments and other organisations about the development of proposed legislation and other regulations, which may affect legitimate business interests.

**Community development.** The EPH Group promotes community development by involvement of local stakeholders.

**Responsible investment.** The EPH Group neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

**Human rights.** The EPH Group respects the Ten Principles of the United Nations Global Compact in the areas of human rights, labour, environment and anti-corruption, ensuring that all employees' and business partners' relationships are based on respect, dignity, mutual trust and open communication.

*Document approved by the Board of Directors of Energetický a průmyslový holding, a.s. at its meeting on March 31, 2021.*