



**OSTROJ a.s. COMPLIANCE CODE**

# OSTROJ a.s. COMPLIANCE CODE

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Registered office: Těšínská 1586/66, Předměstí, 746 01 Opava

Company ID: 45193681

Company entered in the commercial register of the Regional Court in Ostrava, Section B, Insert 349

## Preamble

OSTROJ a.s. (herein referred to as the "Company") implements this **Compliance Code**, titled *Compliance Management System (CMS)*, representing the organisational and technical framework of the internal policy in the fulfilment of the compliance function in the daily activities of the Company. The aim is to establish binding internal rules and procedures for **prevention, detection, and response** to unethical and/or illegal actions or any damaging events which may be threatened or incurred.

The Compliance Code embodies the Company's commitments to ethics, integration, and compliance with legal regulations and concluded contracts. The Company and its employees are committed to strict compliance with generally binding legal regulations and standards, regulatory requirements and industry standards (herein referred to collectively as "legal regulations"), contractual and other voluntarily accepted obligations and ethical principles which are key to the Company's business activities, ensuring the due care of a good manager, compliance with the principles of *due diligence* and finding opportunities for procedures according to *best practices*.

The Company's goal with respect to the *Compliance Management System* is not merely to have a static framework but a dynamic tool which can adapt to the needs and challenges of the environment in which the Company operates.

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## GLOSSARY

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### **The following terms are shown alphabetically:**

**Best practice:** a procedure which was generally recognised as the most effective and best possible within the given issue; it thus describes a standardised and reproducible sequence of actions that leads to the most direct path to the desired result.

**OHS:** occupational safety and health protection

**CMS:** Compliance Management System

**Compliance:** the general name for compliance with the rules, or compliance with the rules. It applies in particular to the conduct of the Company, its employees and management in accordance with legal regulations and internal regulations. Great emphasis is placed on compliance with the Company's Code of Ethics.

**Due diligence:** a process to identify and respond to actual and potential adverse impacts related to both the companies' operations and their supply chains.

**Employees in blue-collar positions:** refer to workers performing manual labor or skilled trades.

**Lessons learned:** a tool to prevent repeated mistakes by means of effective and targeted transfer of information and experience.

**Pacta sunt servanda** = *Agreements must be kept*: the Latin principle symbolises the essence of the legal institution of the contract and the entire obligation law in general, without the observance of concluded agreements there may possibly be no business or other social relations.

**FP:** fire protection

**Breach:** for the purposes of the Compliance Code, this means violations of legal regulations, ethical standards and contracts

**Legal regulations:** for the purposes of the Compliance Code are meant collectively generally binding laws, standards, regulatory requirements and industry standards.

**QMS, EMS, HMS:** quality management system (QMS); environmental management system (EMS); occupational health and safety management system (HMS)

**SAP EP, RON portal:** the Company's internal portals within the information systems

**Technical and administrative employees:** employees of technical and economic professions

**ÚNMZ:** Office for Technical Standardisation, Metrology, and State Testing

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## Cited legislation

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Act on Business Corporations - Act No. 90/2012 Coll., as amended

Labour Code - Act No. 262/2006 Coll., as amended

Act on Auditors - Act No. 93/2009 Coll., as amended

Whistleblower Protection Act – Act No. 171/2023 Coll., as amended

# I. Basic principles of CMS

Compliance Management System (herein referred to as “CMS”) of the Company is based on three principles which form its basic building blocks:

- **Ethical behaviour and integrity**
- **Compliance with legal and other requirements related to the Company's operations**
- **Transparency and accountability**

## 1.1. Ethical behaviour and integrity

- Introduction and enforcement of ethical standards and values in the daily behaviour of the Company and its employees, both within the Company and externally in relations with business partners or other entities and external stakeholders (the OSTROJ a.s. Code of Ethics);

- introduction of anti-corruption policy (the OSTROJ a.s. Anti-Corruption Policy) - prohibition of corruption, bribery (zero tolerance for such behaviour), rules for receiving and giving gifts and for conflicts of interest and prohibition of other unethical practices; and

- building trust in the Company and its good name.

## 1.2. Compliance with legal and other requirements related to the Company's operations

- Ensuring compliance with legal regulations and other voluntarily accepted obligations related to the Company's business, in which there is zero tolerance for any such violations;

- respecting the principle “Pacta sunt servanda” (translated from Latin, as *Agreements must be kept*);

- proceeding with the due care of a good manager and observing the principles of *due diligence*;

- active monitoring of legislation and adaptation to changes in the legal environment and regular updates of the Company's policies, internal regulations and procedures in accordance with them.

## 1.3. Transparency and accountability

- Ensuring open and transparent communication within the Company, in business relations with partners and also with external interested parties (e.g., by administrative authorities, law enforcement authorities, etc.);

- introduction of an internal notification system and other internal mechanisms for reporting and solving potential problems;

- publication of the OSTROJ a.s. Compliance Code on the Company's website [www.ostroj.cz](http://www.ostroj.cz);

- emphasis on compliance with the OSTROJ a.s. Compliance Code by all employees and accepting responsibility for the activities of the Company and its employees, even in the case of negative situations.

## II. Basic pillars of CMS

The Company's Compliance Management System (*CMS*) stands on three fundamental pillars that are interconnected, complementary and designed to work seamlessly together, ensuring an effective and comprehensive CMS framework:

- **Prevention**
- **Detection**
- **Reaction**

Collectively, these pillars form the Company's integrated approach to managing and minimising compliance risks and help the Company achieve and maintain high standards of legal and ethical behaviour and ensure CMS compliance within the Company.

### 2.1. Prevention

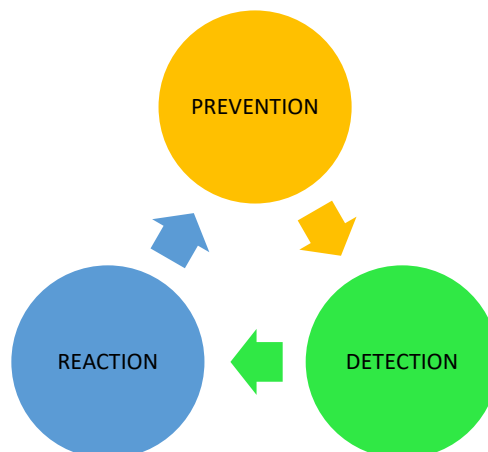
- Plays a key role in mitigating risk and preventing violations of laws, contracts and ethical standards (herein referred to as “Breaches”);
- establishes and implements measures and procedures that minimise the risks of violations occurring; and
- if a violation does occur, it is important for the Company that it be identified in time using the second pillar, i.e., *Detection*, through the use of established detection mechanisms.

### 2.2. Detection

- Enables quick identification and detection of existing violations;
- if any violations have been detected, it is essential for the Company that they are appropriately processed and addressed using the next pillar, i.e., *Reaction*.

### 2.3. Reaction

- Focuses on adequate and effective resolution of identified violations, including drawing consequences and taking measures to prevent the recurrence of similar violations in the future, which is also the role of the first pillar, i.e., *Prevention*.



# III. Basic CMS Documents

The basic principles and basic pillars of the Company's CMS, presented in Chapters I and II, are reflected in the basic CMS documents. These documents must always comply with legal regulations and ethical standards of the Company. They are consistent with each other to avoid confusion and conflicting information, must always be up-to-date and accurate to reflect any changes in the Company's compliance and clearly written so that all employees understand their content and requirements. The employees have access to the documents within the Company's information system and are regularly trained and informed of the content and changes in these documents to ensure they are understood and adhered to. In this way, the CMS core documents provide a solid framework for maintaining the Company's high compliance standards.

## **List of basic CMS documents:**

- OSTROJ a.s. Compliance code
- OSTROJ a.s. Code of Ethics
- Regulatory information
- OSTROJ a.s. Articles of Association
- OSTROJ a.s. Anti-Corruption Policy
- Basic documents of the Company
- The Company's policy for quality, the environment including energy management and occupational health and safety.
- The Company's QMS, EMS, and HMS Handbook
- ISMS Handbook - Total ICT Security Policy
- Other internal regulations of the Company

# IV. Responsibility for compliance

## 4.1. Main responsible persons

- **The Company's Board of Directors** (responsibility is given by the Business Corporations Act)
- **Top management:**
  - **CEO**
  - **Management members, i.e., division and department directors**

These persons bear the main responsibility for the Company's compliance and, with their own integrity, represent a model of behaviour and actions for others. They have the ultimate decision-making authority in all matters of Company compliance.

### 4.1.1. Responsibility of the main responsible persons

- Responsibility for the functionality of the Company's CMS; and
- Responsibility for compliance with the Company's CMS.

## 4.2. Persons entrusted with the sub-part of compliance

- **For legal compliance - Legal in-house counsel**
- **For quality management - Director of the Quality Management Department**
- **For OSH and FP - Safety technician**
- **For ecology - Head of Ecology**
- **For cybersecurity – Director of the Information Technology Department**

### 4.2.1. Duties and powers of persons in charge of the compliance sub-part within their area

- Serve the purpose of control;
- Revise and update set procedures and rules;
- Monitor and search for risk areas;
- Provide the Company and its employees with cooperation in solving tasks and problems;
- Issue binding instructions within the scope of fulfilling the Company's compliance tasks;
- Check any suspicion regarding the existence or possibility of a violation;
- Solve and evaluate the violations which have occurred;
- Propose corrective measures to the Company;
- Provide regular training; and
- Continuously inform the management of the Company.

## 4.3. Other responsible persons

Responsibility for the organisation and management of compliance at a lower level the Company derives from the position, scope and duties of senior employees and employees according to the Labour Code:

- **Senior employees**
- **Employees**



#### 4.3.1. Obligations of senior employees

- Control and manage the activities of subordinate employees;
- Know and ensure compliance with legal regulations, internal regulations, contractual obligations and basic CMS documents by subordinate employees;
- Familiarise all subordinate employees with legal regulations, internal regulations, contractual obligations, and CMS basic documents;
- Define consequences in accordance with the Labour Code from violations by subordinate employees.

#### 4.3.2. Employees' obligations

- Familiarise oneself with basic CMS documents, including their updates;
- Act legally, i.e. in accordance with legal regulations, concluded contracts, internal regulations and CMS basic documents;
- Follow the instructions of one's superior manager;
- Participate regularly in all training organised by the Company, including compliance training;
- Prevent illegal or unethical behaviour from occurring;
- Take adequate measures to prevent imminent danger or the occurrence of damage;
- Report detected illegal or unethical behaviour;
- Notify your superior manager of deficiencies and defects at the workplace, extraordinary events, deficiencies in organisational measures, etc.

### **4.4. Principles governing the Company's activities**

Generally, two main principles are applied in the management of the Company, each being intended help to define the basic hierarchy and responsibility within the Company, which is crucial for the effective implementation of the CMS and maintaining the Company's compliance.

The only leader in charge: given by defining the scope and relationships of organisational units and individual employees of the Company, each of whom has only one manager who is authorised to issue work instructions. The senior employee is fully responsible for his decisions and for the results of the activity of the entrusted organisational unit.

Direct subordination: the right and obligation of a superior to issue orders to direct subordinates and the obligation of employees to respect and comply with these orders (if they do not conflict with legal regulations and ethical standards).

## V. Prevention

The Company understands prevention as a key element of corporate culture and a commitment to compliance with legal regulations, contracts and ethical principles in accordance with the Code of Ethics. Prevention within the Company includes a wide range of measures and procedures which serve to minimise the risks of violations and damages.

### 5.1. Creating an ethical corporate culture

Ethical behaviour is an integral part of the Company's daily actions and decision-making, which is reflected in a set of basic ethical standards in the form of the *OSTROJ a.s. Ethical Code*. One of the main elements is also the introduction of an anti-corruption policy in the form of the *OSTROJ a.s. Anti-Corruption Code*, which is based on zero tolerance for corrupt behaviour and the establishment of binding rules for receiving and giving gifts and for conflicts of interest.

The OSTROJ a.s. Code of Ethics and OSTROJ a.s. Anti-Corruption Policy were approved by the Company's Board of Directors and are binding on the actions of the Company and all its employees.

The Company requires employees to adhere to ethical principles and act with respect and dignity in all matters and dealings with anyone, including their colleagues.

The OSTROJ a.s. Code of Ethics and the OSTROJ a.s. Anti-Corruption Policy are available to the Company's employees within the Company's internal portals (SAP EP and the RON portal), and, at the same time, they are required to regularly participate in training related to this issue. The documents are available to the general public on the website [www.ostroj.cz](http://www.ostroj.cz).

The Company also requires compliance with ethical rules and zero tolerance for corrupt practices from all its customers, suppliers, subcontractors and other cooperating persons.

### 5.2. Implementation of internal rules and procedures into internal regulations (controlled documentation)

The Company establishes and implements internal rules and procedures into internal regulations which define the duties and responsibilities of employees and standards of behaviour in accordance with the Company's legal and ethical obligations. These rules are binding for all employees and serve as a framework for their daily work activities and minimise the risks of illegal and unethical behaviour.

Internal regulations are subject to a controlled regime and are interconnected with the fact that their issuance is approved according to their nature by the Company's Board of Directors or the CEO, or in cases stipulated by the Labour Code or the Collective Agreement, also on the basis of consent or discussion with the workplace trade union council.

Each year, the bearer of the internal regulations conducts a review of the internal regulations to ensure they're up to date, and it is decided which regulations will be updated, cancelled or remain in their original form. This does not affect the possibility to update the internal regulation whenever necessary, for example in the event of a change in legislation or as a corrective measure.

The current wording of the internal regulations is accessible to all employees within the Company's internal portal (SAP EP). Technical and administrative employees are informed about all changes in internal regulations online through a subscription from the Company's internal portal (SAP EP) and as part of a management meeting. Employees in blue-collar positions are informed of the issuance, change or cancellation of internal regulations by their superiors.

### **5.3. Legislation tracking and access to legislation**

The Company ensures active and regular monitoring of legislation and, if necessary, adaptation to changes in the legal environment and regular updates of the Company's policies, internal regulations and procedures.

The list of regulations issued in the Collection of Laws, which is updated monthly, is publicly accessible to all employees within the SAP EP system. Management members are also presented with information regarding the new edition of the ÚNMZ Bulletin (Office for Technical Standardisation, Metrology, and State Testing) and are sent monthly a recommended selection of newly issued legal regulations in the Collection of Laws, which serves as supporting information regarding newly published regulations, which, with regard to their content, should be taken into account in a specific department or division of the Company.

Employees are required to regularly monitor information on newly published regulations and standards, which they must assess as part of their work and, if necessary, apply them to the performance of their work duties and the Company's activities.

The Company has contractually secured the provision of usage rights to the ASPI service, which provides access to current legal regulations, case law and professional literature.

The Company further processes and, as necessary, updates the *Register of legal and other requirements in the field of OSH and FP*, *Register of legal and other requirements in the field of environmental protection* and *Register of legal and other requirements in the field of energy management*, which are published within the Company's internal portal (SAP EP).

### **5.4. Required employee training**

As part of the employees' professional development, the Company ensures their training/apprenticeship and regular deepening and raising of qualifications, including mandatory statutory periodic training in the field of health and safety, occupational health and safety, the environment and EMS, QMS, and HMS.

Employees are also regularly provided training in the area of compliance, which includes training in regard to this Compliance Code, the OSTROJ a.s. Anti-Corruption Policy and the OSTROJ a.s. Code of Ethics. These trainings serve to strengthen awareness of the Company's values, principles and expectations in the field of behaviour of the Company and its employees.

### **5.5. Legal support**

The Company employs a lawyer who provides the Company and its employees with legal support and legal consultation and expertise in dealing with issues in the day-to-day work activities so that they are carried out in compliance with legal regulations.

Other internal tools also help ensure employees always comply with legal regulations in their activities. These include

- model contracts and forms,
- rules for concluding contracts, including the mandatory reminder procedure for selected types of contracts, and
- the lawyer's duty to ensure compliance of all activities and processes in the Company with legal regulations.

## **5.6. Monitoring and evaluating risks and CMS functionality**

The Company has identified its internal and external aspects which are relevant to its activities, and which may not only negatively affect its ability to achieve compliance goals but may also be an opportunity for their improvement.

Aspects are maintained in the *Register of internal and external aspects - organisation context*, which is accessible to all employees within the Company's internal portal (SAP EP). The Company regularly monitors these aspects and evaluates identified risks associated with possible violations of legal regulations and behaviour in violation of the OSTROJ a.s. Code of Ethics. Based on these analyses, the Company determines the suitability, adequacy and effectiveness of the systems and adjusts and improves preventive measures and procedures and thus the functionality of the CMC. Accordingly, the Company updates the *Register of internal and external aspects - the context of the organisation* each year.

Each year, the Company also reviews and evaluates risks and takes corrective measures in the field of the environment and documents the result in the *Register of environmental risks, aspects and impacts*. Pursuant to § 101 et seq. of the Labour Code, the Company searches continuously for dangerous agents and evaluates risks in the health and safety department. In the *Register of occupational risk assessments*, identified risks are reviewed and evaluated annually from the point of view of health and safety, and measures are taken to eliminate them or limit their effects. Both registers are accessible to all employees within the Company's internal portal (SAP EP).

## VI. Detection

Detection mechanisms, whether internal or external, play a key role in the rapid detection, identification, and resolution of potential risks and specific violations. This protects the Company from actions related to non-compliance, financial losses, damage to its reputation, and legal complications whilst strengthening its credibility and sustainability in the market.

### 6.1. Regular internal audits and controls

The Company regularly conducts internal audits and controls focused on key areas of compliance in order to identify potential deficiencies, violations or unethical behaviour, namely:

- Internal audit
- Internal audits of QMS, EMS, and HMS
- Audit 5S
- Occupational safety inspections and annual health and safety inspections in all workplaces
- Controls of senior employees

#### 6.1.1. Internal audit

The Company has established the position of internal auditor for the purpose of independent and objective assurance and consulting activities aimed at adding value and improving activities in the Company. The internal audit focuses on evaluating the Company's internal control system, the effectiveness and efficiency of processes, and compliance with internal regulations and, consequently, legal regulations, or basic CMS documents in the activities of the Company and its employees. The internal auditor provides the Company's Board of Directors and the Company's management with information, evaluations, analyses, and recommendations for the effective performance of their tasks and the elimination of objectionable conditions.

#### 6.1.2. Internal audits of QMS, EMS, and HMS

Internal QMS, EMS, and HMS audits are carried out at annual intervals in accordance with the approved plan, in order to check compliance with the Company's policies for quality, the environment, including energy management, and safety and health at work. In addition, unplanned internal audits are carried out during the year, e.g., in the event of a greater occurrence of complaints, in the event of a change in legislation according to customer requirements, etc. Audits are carried out by trained employees of the Company. Further details are set forth in the Company's internal regulations.

#### 6.1.3. Audit 5S

The Company has implemented a good management system, known as the *5S system*, for the purpose of ensuring a clean, tidy, orderly, hygienic and safe working environment. In order to confirm compliance with the 5S System, 5S audits of the actual state take place at least once each month at various workplaces. Further details on the 5S System and 5S audit are set forth in the Company's internal regulations.

#### **6.1.4. Occupational safety inspections and annual health and safety inspections in all workplaces**

The Company searches continuously for risk factors and processes in the working environment and working conditions in order to identify their causes and sources. A three-level control system is used for the control method, comprising daily control activity (level I), random and monthly control activity (level II) and annual control activity (level III). degree) when, in accordance with the requirements of the Labour Code (Section 108, paragraph 5), the Company organises occupational health and safety inspections at all workplaces once a year, in agreement with the trade union.

#### **6.1.5. Controls of senior employees**

Senior employees are required to regularly check the work of subordinate employees.

### **6.2. Cooperation with external auditors and experts**

Cooperation with external auditors and experts provides the Company with valuable external insight and know-how. The benefit of this external collaboration is an independent and objective view, specialised knowledge and a comparison of the Company's performance and processes with the best practices and standards in the industry (comparison with *best practices*), which makes it possible to identify potential deficiencies and violations which may possibly be overlooked by internal control mechanisms.

The Company designates:

- and to give financial statements in terms of Act on Auditors - for the purpose of verifying the financial statements, whether they present a true and fair view of the subject of accounting in accordance with legal regulations and the relevant financial reporting framework, on the basis of which the financial statements are prepared,
- recertification and surveillance audits - for the purpose of verifying by independent certification bodies whether the certified management system meets the specific requirements of the standard, given the subject and scope of the certification,
- new certification audits - in order to obtain new certificates which the Company can use to ensure the consistent quality of its products and services, and thus internal processes,
- customer audits (external audits by its customers) - in order to verify the quality of internal processes and compliance with legal regulations.

Based on the contractual arrangements, the Company cooperates with other external consultants and experts from various compliance areas as needed, who can provide the Company with an objective view and help in identifying risks and deficiencies in the Company's CMS.

The Company also makes effective use of the information provided and extracted within the framework of controls by state authorities, especially in the area of occupational safety, fire protection, environmental protection and energy management.

### **6.3. Support for open internal communication and reporting**

The Company supports open communication and active reporting of cases of suspected unethical behaviour or violation of legal regulations or their existence. This includes creating a safe environment where employees can express their opinions and ideas without fear of negative consequences or retaliation.

In accordance with the Whistleblower Protection Act, the Company has implemented the “*Internal Whistleblower System*” to report illegal activity. The Company guarantees and ensures all notifications are assessed objectively, impartially and confidentially to the Company's Board of Directors by the designated person.

Other open and internal communication channels include the following.

- Communication with a senior manager;
- CEO meeting with employees;
- Communication with the Director of Human Resources;
- Management advice;
- Individual meetings within divisions and departments;
- Green box;
- Satisfaction surveys and other questionnaires;
- HelpDesk - reporting security incidents.

All reported cases are adequately processed and investigated, and the complainant is informed of the outcome, and appropriate solutions are adopted as necessary.

#### **6.4. Other internal control mechanisms**

The Company has implemented additional internal control mechanisms to minimise the possibility of errors and misuse or unintentional exceeding of competences:

- Double checks: implementation of a system of double checks, where it is required that each transaction, decision or contract signature (including the authorisation of orders issued within the Company's information system) be independently approved by at least two persons. This mechanism helps to minimise the risk of errors or abuse of authority.
- Split functions: separation of key functions and powers within the Company to minimise the risk of conflict of interest and abuse of authority, for example separation of the functions of approving and executing financial transactions.

#### **6.5. Supply-chain controls**

Reviewing suppliers and subcontractors of materials and services is a key element in detecting risks within the supply chain and ensures the Company only works with suppliers who act in accordance with its ethical, anti-corruption and legal standards.

The Company contractually secures the possibility of auditing and monitoring suppliers and, as necessary, other business partners to ensure their integrity and compliance with ethical and legal standards.

The Company regularly monitors the performance of suppliers and evaluates them, for which it has established rules and evaluation criteria in internal regulations, such as reputation, supply history, quality of supplies, financial stability, etc. At the same time, the Company creates an information network of eligible suppliers for internal use.

## VII. Reaction

The Company prefers a quick and adequate response to detected violations with the aim of minimising damages and preventing the recurrence of similar situations in the future. The process must be properly documented and archived for an adequate period of time. Generally, the response includes the basic steps listed below, with the fact that detailed procedures for specific cases of violation are regulated in the Company's internal regulations.

### 7.1. Investigation of violations

Immediately upon the detection of a violation or suspected violation, the person or persons responsible for investigating the resulting violation case shall be designated. The designated responsible person must secure relevant evidence and information, conduct a thorough analysis of the facts, qualify the severity of the violation, determine the causes of the violation, identify the culprit, and determine the internal and external impacts.

### 7.2. Corrective action

Following the conclusion of the examination according to paragraph 7.1, corrective measures are proposed by the responsible person, and after their approval by the relevant senior employee and/or the person responsible for the sub-part of compliance which concerns the violation, the person responsible for their implementation, the deadline for their implementation, and subsequently the implementation of the corrective measures are checked.

### 7.3. Preventive measures

Interested parties are required to consider taking additional preventive measures to minimise the risk of a repeat violation in the future, e.g., reviewing and updating contracts, revising CMS core documents, employee training, etc.

### 7.4. Drawing consequences

According to the nature and intensity of the violation according to paragraph 7.1, the corresponding consequences are drawn towards the culprit, whether towards an employee or a business partner, e.g., reduction of bonuses to employees in accordance with the procedures according to the basic Labour Code document; application of other procedures according to the Labour Code in response to the violation of obligations arising from legal regulations relating to the work performed by the employee; recovery of damages, termination of a business relationship; change of supplier, imposition and enforcement of contractual sanctions; implementation repeated audit at the supplier; planning of an internal audit with a certain time interval from the occurrence of the violation, etc.

### 7.5. Learning from mistakes

The Company applies *Lessons Learned* ("LL"), a tool with which to prevent repetitive errors through the efficient and targeted transfer of information and experience. It is based on the principle of "*learning from your own mistakes and experiences*". Specifically, the Company uses the identified deficiencies and violations to strengthen its policies, internal procedures and activities in order to minimise the risk of similar situations repeating in the future, not only



within the specific situation but also for similar cases and within all divisions and departments of the Company as opposed to focussing only on production areas. This process involves the following key steps.

- Dissemination of acquired knowledge and experience throughout the Company through communication, training, advice and sharing of stories;
- Requiring self-reflection of employees involved in an erroneous situation to understand their role and contribute to the correction of errors and to realise how to prevent similar situations in the future; and
- Focusing not only on “negative” aspects but also on positive cases and examples.

#### **7.6. Reporting to the Company's management or the Company's Board of Directors**

The relevant member of the Company's management must be informed of each violation, and in the case of a violation which significantly damages the good name and reputation of the Company and its economic interests or was committed intentionally, the Company's Board of Directors must also be informed.

## VIII. Final provisions

The OSTROJ a.s. Compliance Code is binding for all employees of the Company, to whom it is accessible within the Company's internal portal, in addition to which it is accessible to the public on the Company's website [www.ostroj.cz](http://www.ostroj.cz).

The OSTROJ a.s. Compliance Code was approved by the Company's Board of Directors on 26 November 2024 and becomes valid and effective on the date of this approval.

Ing. Vladimír Trochta  
Chairman of the Board of Directors  
OSTROJ a.s.