



# Code of Conduct

in winning group

## Strong values mean growth

Our Code of Conduct determines how all Winning Group employees should work. We are proud of the ethical business practices we have in place and adhere to. Thanks to colleagues who share our solid values, we are a great group, which is essential to attract employees and clients to choose us for their projects. Adherence to these values builds the trust of our colleagues, partners, suppliers and customers. In addition, it builds pride and strengthens our group.

Our business and reputation are gaining momentum and we are constantly working to build a corporate culture as outlined in our Code of Conduct. With being a leader comes greater responsibility. Violation of our Code poses a significant business risk to us, at worst risking exclusion from the world of business with our partners, suppliers, customers and also our employees. This is precisely why we cannot accept unethical behavior and will take uncompromising and immediate action against all its forms.

Our values and Code of Conduct lead us to do the right thing, but they cannot replace thinking. Decision-making cannot be black and white, and this Code does not contain an answer to every question. Of course, we have to lead one another in the right direction. I expect each of you to share our values, promote open dialogue and participate in our ethics training.

We build a great company on a solid foundation of common values. We will also require our supply chain to meet our values.

# Code of Conduct

The Winning Group a.s. and its subsidiaries (hereinafter referred to as the "Winning Group") constitute a business group of legal entities (concern) operating in the construction, automotive and service industries pursuant to Section 79 of Act No. 90/2012 Coll., on Commercial Companies and Cooperatives (Act on Commercial Corporations). The Winning Group believes that ethical and economic values are intertwined and therefore rejects any action that is not in accordance with the law or moral and ethical standards. The Winning Group requires all employees in the various companies in the Group to comply with laws and ethical rules and to perform their duties properly. The Winning Group therefore adopts this Code of Conduct, which sets out the rules of conduct and behavior for all employees regardless of their job title, status or contract duration. The Code is based on the principles of fairness, tolerance, responsibility, respect for rights and human dignity. The managers are role models of moral and ethical qualities for other employees. They are responsible for ensuring that their subordinates adhere to the Code of Conduct. The values set out in this Code form an integral part of our corporate culture and business strategy. Failure to comply with the provisions of this Code will be considered a breach of work discipline in accordance with the Labor Code.





## Why we have a Code of Conduct

The Winning Group Code of Conduct (our Code) is a set of information declaring our values designed to help all Winning Group (Winning) companies identify with our values and to explain what is expected of our everyday behavior. In the Code, employees will find guidance on how to behave in contact with one another, but also with our customers, the communities in which we operate and business partners. This is where we should start when faced with an ethical dilemma, and where to seek information on who to contact with any questions or concerns.

## Foundations of the Code of Conduct

Our Code is based on our values, which represent a set of beliefs that guide us. Our values oblige us to act in accordance with the highest ethical standards and to conduct our business in a responsible and sustainable manner. Everything we do should reflect our values:

Life and health care – Act ethically and transparently – Be better together – Attend to customers

### We care about life

We only work safely, or not at all. We pay attention to all dangerous situations. We care about health, care about the environment and advocate for green solutions. We manage our operations in an environmentally friendly way. We act responsibly towards future generations.

### We act ethically and transparently

We do business honestly and transparently. We follow our Code of Conduct and never accept "shortcuts". We develop a working environment where everyone can express their opinion openly.

### Let's be better - together

We want to get better at everything we do. We are a company that constantly learns and shares its expertise. We pride ourselves on our quality and innovation. Together with customers and partners, we create teams in the spirit of "we are Winning".

We use diversity to achieve the best results. We develop a culture that is welcoming, where we are open and fair to one another, trust one another and show respect to one another.

### We are here for our customers

We help our customers to be successful in their business. We strive to understand their needs and those of their clients. We are here to help them turn their visions into reality.

The Code is supported by more detailed strategies that apply the principles and expectations defined in the Code. Such principles include those that apply at the



Winning Group level as well as at the level of individual business units. In some cases, such rules contain stricter standards than those defined by the Code. To make it easier for you to find the supporting strategies and documents that the Code builds on, we refer to them throughout this document under the heading “For more information”.

### **Human rights and global commitments**

Our Code and the actions we are expected to take are based on our values, which in turn have their basis in human rights. We support the rights of all people, as described in the Universal Declaration of Human Rights, adopted by the United Nations (UN) and regulated in the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the conventions of the International Labour Organization at the United Nations. We take seriously our responsibility to protect and improve the lives of people, whether they work closely with us or are only indirectly affected by our activities. Many parts of our Code relate to specific human rights that we believe are particularly relevant to our business.

## **To whom does the Code of Conduct apply?**

The principles and requirements of this Code must be adhered to by all Winning employees, regardless of their status or job title. They also apply to part-time workers, temporary workers or contract workers. If you are a manager or director, you have more responsibility, you should set an example for others and act in the spirit of this Code. The Code is our top priority. If you violate the Code or the rules associated with it, you must expect corrective or disciplinary actions, which may include termination of your employment contract as well as other penalties.

The Code does not only apply to Winning Group, as people and companies outside the company are also essential for our work. When dealing with us, subcontractors, suppliers, consultants, intermediaries and agents must also comply with the relevant parts of the Code. The company’s Code of Conduct is part of the contracts with such parties. In addition, our Code also applies to joint ventures and other entities in which we have an ownership interest. The term “joint venture” here refers to joint venture partners, associations, consortia, alliance members, team agreements and other contracts concluded for specific projects. For joint ventures, we need to make sure that each party has adopted either our Code or another comparable code of conduct. For some projects, the parties may agree to adopt a code that contains the most stringent requirements stated in the codes of all partnering parties.

### **Compliance with legislation**

We comply with all legal requirements that apply to our activities. In addition, we comply with our Code even when our policies, such as the minimum employment age, are stricter than legal requirements, unless our policies conflict with local law. Customs or local practice never take precedence over legal requirements. If anyone



suspects that our Code is in breach of relevant legal provisions, they are obliged to inform their manager or other contact person.

It is essential for all areas of this Code of Conduct and the basis of all business activities with the Winning Group that our suppliers know and comply with all applicable laws and regulations as well as the terms and conditions agreed with Winning. All legally required permits, approvals, licenses, registrations, inspections, examinations and related reports must be up-to-date and available for inspection upon request.

Where local laws and regulations are less stringent, the rules set out in this Code of Conduct apply.

## **Due diligence**

Due diligence is given to ongoing risk management to identify, prevent and mitigate risks and impacts on climate, resources and people. Winning requires each supplier to perform in-depth due diligence in the areas covered by this Code of Conduct. The supplier's due diligence must comply with international standards such as OECD Due Diligence Guidance for Responsible Business Conduct, and UN Guiding Principles on Business and Human Life. The supplier must include the impacts of its own operations and its supply chain, focusing on where there is the highest risk of harm, and appropriately to the size and circumstances of the company.

## **Continuous improvement**

The Winning Group believes in continuous improvement and recognizes that the implementation of the standards of this Code of Conduct by our employees and suppliers is a dynamic rather than static process. It is important to us that our staff and contractors show an inclination to incorporate requirements into their operations and activities and strive for continuous improvement so that they are able to demonstrate progress in all areas covered by this Code of Conduct.

## **Management systems/corrective actions**

Suppliers must establish and maintain adequate management systems to supervise all elements of this Code of Conduct, proportionately to the size, complexity and risk environment of the supplier. Management systems must include a commitment by the contractor to their compliance, as well as ensuring effective risk control and assessment, assignment of responsibilities to relevant personnel, and monitoring and reporting mechanisms for all areas of this Code of Conduct. This management system must be continuously reviewed, monitored and improved, preferably through third-party certification.

## **Whistleblowing**

The Winning Group's commitment to doing business with the utmost integrity and transparency depends on a culture in which no one is afraid to report instances of violations of our Code, including suspected illegal or unethical behavior (collectively called inappropriate behavior).



If you suspect that conduct has occurred that is not in accordance with legal, ethical and internal policies, you may report it to the contact points listed below. The Whistleblower's information will be treated as confidential and no form of retaliation or revenge for reporting illegal or unethical behavior will be tolerated. The identity of the whistleblower will at all times be known only to a predefined small circle of persons under the conditions set out in the Whistleblower Protection Rules.

The report should contain specific information, such as the names of the persons involved, witnesses and other relevant information. While direct reporting of unethical and fraudulent behavior is preferred, it can also be done anonymously. However, an anonymous report may make it difficult or impossible to properly investigate the whole matter and take proper action. All reports will be treated as confidential.

It is not permitted to abuse this procedure to make false reports. Such behavior will not be tolerated and, depending on the severity of such false reporting, may be referred to law enforcement authorities for further investigation. The sender of the non-anonymous report will be informed of the findings of the investigation once it has been completed.

For all whistleblowers who make their notifications in good faith, the Winning Group provides protection from potential negative consequences.

**Contact for whistleblowing:**

- **e-mail:** [kodex@be-winning.com](mailto:kodex@be-winning.com)
- **ethics line:** +420 775 263 847

**Revenge/retaliation**

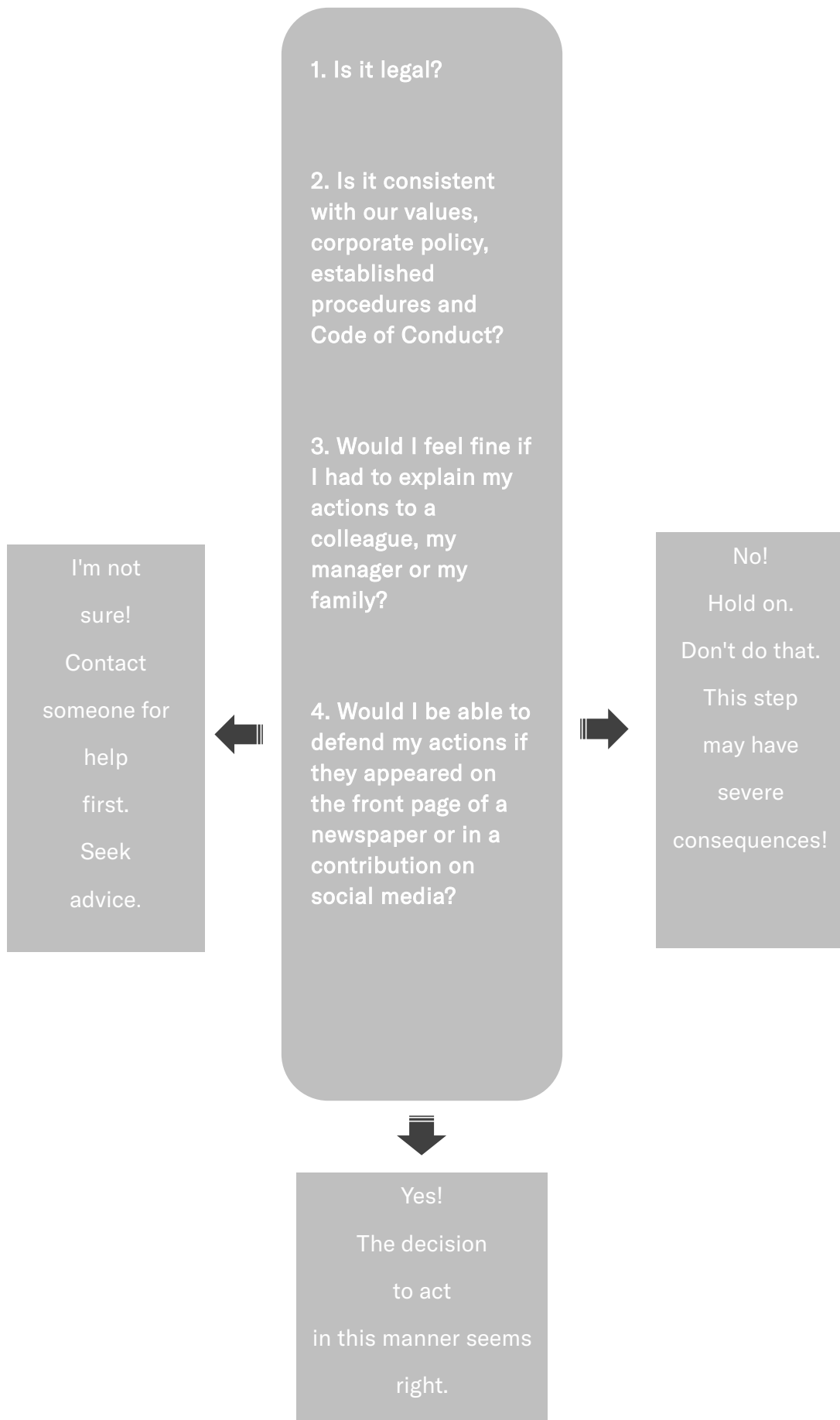
If you are a manager or director, you are responsible for ensuring that all reports of suspected or known misconduct are addressed to the correct person or location.

Winning does not tolerate any form of retaliation against an employee who has reported a breach of the Code of Conduct in good faith. "In good faith" means that they reported the matter to the best of their knowledge and conscience, that they reported only the true facts and that they reported everything they knew. All employees who engage in such retaliation will face a disciplinary action. -If you believe someone is retaliating against you, you should report such retaliation as a suspected violation of the Code of Conduct.



## A guide to decision-making

If you are faced with a moral dilemma and are not sure how to proceed, use this algorithm to guide you to act in the best way.







## Chapter 1 - Business Ethics

### Fighting corruption and bribery

**Corruption** is the abuse of power, often for personal gain. This includes conflicts of interest, embezzlement, bribery, corruption, usury practices, fraud, nepotism, and the employment of relatives or friends (clientelism). This also involves facilitating payments. These are bribes, often small sums, paid to civil servants to speed up mandatory official processes and make available services to which the payer is legally entitled. Corruption undermines legal business activities, spoils competition, ruins corporate reputations, destroys brands, and puts companies and individuals at risk.

**Bribery** is an attempt to influence someone in the performance of their duties by giving, offering or promising them a morally objectionable benefit or reward.

Bribery may also be accepting such a morally objectionable benefit or reward, accepting the promise of such a benefit or demanding it. Such benefits or rewards may include a financial payment, cash or anything of value, such as an unpaid internship.

### Principles of Winning

- We are committed to conducting business with a high level of moral integrity and not tolerating any form of bribery or corruption.
- We avoid situations that may give the impression of bribery, corruption or any improper conduct.
- We do not solicit, accept, pay or offer bribes, either directly or through other parties acting on our behalf. Through contracts, we oblige our external partners to comply with the same anti-corruption and anti-bribery rules and procedures that apply to Winning.
- We do not make facilitating payments and do not allow other parties to represent us in such conduct and make such payments even where this is permitted by law.

### Practices of Winning

- Under no circumstances may you ever solicit, accept, pay, offer or approve bribes, directly or indirectly. It also means that you will never try to improperly influence or bribe a government official, including foreign civil servants, or any other person or entity.
- You must not offer or make facilitating payments, nor must you allow anyone else to make or offer such payments on your behalf.
- You must ensure that you use intermediaries only for legitimate business purposes, that you pay intermediaries fees at a reasonable rate in relation to the services actually delivered, that you record payments to intermediaries appropriately, and that you keep the proofs of such payments appropriately.
- You must not circumvent our Code through charitable contributions or sponsorship.



- You must never attempt to influence how a civil servant performs their duties by offering, promising, granting or approving any improper remuneration. This applies whether you offer such a remuneration or benefit directly or through someone else.

## **Money laundering**

Money laundering is covering up the origin of money or property that was obtained illegally, or attempting to make it appear to be from a legal source.

## **Principles of Winning**

- We only do business with reputable customers and business partners who conduct lawful business activities and finance them with funds obtained from legal sources.
- In the event of any reasonable suspicion of money laundering, we notify the competent authorities in accordance with the laws governing such situations, or the legal department.

## **Practices of Winning**

- You must take due care to understand the business of your future customers and business partners and the background from which they come. You need to find out where their funds are coming from and where they are going.
- Money laundering usually involves irregularities in money transfers. You must be especially careful in the following cases:
  - payments to or from someone who is not a party to the contract;
  - payments to or from offshore accounts, or to and from accounts in countries outside our home markets;
  - requests for payments to accounts other than those specified in the relevant contracts or agreements;
  - requests for cash payments;
  - requests for overpayments;
  - requests to divide payments into several transfers of smaller amounts.
- If you suspect money laundering, talk to your legal department and finance department.



## Sponsorship

Sponsorship is a transaction carried out in anticipation of a business benefit and where Winning makes a cash payment or provides a benefit to associate our brand with an activity or organization. In return for sponsorship, Winning will receive certain rights and privileges, such as the right to use the sponsored organization's name, advertising credit, the right to use buildings, or opportunities to promote Winning's name, products and services.

### Principles of Winning

- We choose sponsorship activities that focus on opportunities related to our business and our values. Sponsorship activity should be directly linked to business: to our business channels, to the sectors we work for, to our commitment to sustainable development and to other business-oriented topics such as public relations, human resources, etc.
- Where sponsorship could be or is perceived as undue influence, we never use it.
- Our sponsorship activities must not appear inappropriate in relation to business opportunities.

### Practices of Winning

- You must carefully select sponsorship activities and ensure that sponsored entities and Winning adhere to similar values.
- You must understand that sponsorship activities involve a certain degree of risk, as some might consider them a bribe.
- You must ensure that we never offer sponsorship as an incentive bonus or reward for receiving or retaining a job or for any other unacceptable purpose.
- You need to understand the sponsorship policy and limits set by your business unit. Sponsorship requires permission from a supervisor.

### Sponsorship is not:

- Activity to support community development on a voluntary basis, such as a charitable contribution
- Advertising in magazines, newspapers, radio, television, internet and on social networks
- Any form of contribution to a political entity
- Any form of lobbying



## **Fraud**

A person committing a fraud deliberately tries to deceive someone, acts dishonestly, or abuses their position to gain some kind of material advantage, or engages someone else in such activities. Fraud is usually committed by people to obtain money, property or services in an unfair way. In most countries, this is a crime.

One possible type of fraud is false claims where someone knowingly or negligently wrongly or inaccurately records the costs of providing materials or services, intentionally conceals errors or produces false evidence.

## **Principles of Winning**

- We always act honestly and fairly. We do not tell lies.

## **Practices of Winning**

- You must ensure that your registers and records are accurate and complete and not misleading. You must thoroughly check or examine everything that is your responsibility.
- You must verify that your documented costs include only items for which you may claim reimbursement and that such costs properly incurred in the execution of Winning's contracts.
- You may only issue legal invoices to our customers and must ensure that contractual claims can be supported by relevant and credible documents.



## Corporate hospitality and gifts

**Corporate hospitality:** companies provide their customers and business partners with various forms of corporate hospitality to promote their business, such as entertainment, hospitality, sporting events and travel.

**Gifts:** A gift is what is given voluntarily, without expecting anything else in return. When gifts are given correctly, they do not create the impression that business decisions are unduly influenced.

If corporate hospitality and gifts are inappropriate, they may create a conflict of interest or appear to be bribery.

### Principles of Winning

- We must not solicit, accept or offer corporate hospitality and gifts that may influence or give the impression of influencing our business decisions or business decisions of those with whom we work. Whether you give or receive corporate hospitality and gifts, they must be appropriate and:
  - must comply with local laws and customs,
  - must not put the recipient in a situation where they are obliged to the donor in any way or that gives such impression,
  - must serve a valid business objective,
  - must not have an indecent character and must not harm the dignity of others,
  - must be permitted by the recipient's employer's corporate policy,
  - the corporate hospitality must be of a reasonable value,
  - gifts must have a nominal value, e.g. pens, diaries or other low value commercial goods. Remember that promotional items are gifts.
- All business units are responsible for formulating policies governing corporate hospitality and gifts, including monetary limits, which must be approved by Winning Group CEO. In addition, each unit must establish a process for approving and documenting any gifts given or received that exceed the approved limits.

### Practices of Winning

- Use your best judgment when deciding whether to offer or receive a gift. If it does not feel right, it probably is not right.
- Never offer or accept cash or its equivalent as a gift.
- Avoid offering or accepting any form of gift that could affect your objectivity or that of the recipient in making business decisions.
- Also keep in mind that gifts or corporate hospitality may seem inappropriate when given frequently or routinely.
- You must report any gifts beyond the approved limits in accordance with your unit's corporate hospitality and gift policy.
- It is your responsibility to know and follow the gift policy that applies to our customers.
- Never solicit any form of corporate hospitality or gift from customers, suppliers or any other external entity.



**Specific instructions for accepting invitations to or attending a conference associated with a contractor.**

- Attendance at a contractor-sponsored conference should have a clear business purpose.
- Ask yourself: does the conference have a meaningful agenda that is related to Winning's business?
- You must always inform your director and they must approve your attendance.
- Travel and accommodation costs must be covered by Winning.
- Your attendance at the conference must not give the contractor the expectation of favorable business dealings.
- All planned activities outside the conference schedule must be modest, appropriate and reasonable, and comply with your unit's gift policy.



## **Privacy policy (data protection)**

The aim of data protection is to safeguard your personal integrity when processing your personal data. Personal data refers to a natural person or can be used (directly or indirectly) to identify such a person. This often includes date of birth, contact information, names of family members, health information, photographs or personal identification number.

We process personal data in accordance with Directive No. 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016 (General Data Protection Regulation - GDPR) and the Czech Data Protection Adaptation Act. We protect all personal data and do not disclose it to anyone else without reason. We make sure that it is kept only for as long as necessary. We provide access to personal data only to authorized persons.

### **Principles of Winning**

- We ensure that all use of personal data, such as its collection, registration, comparison, storage and deletion, takes place in accordance with applicable laws and regulations.
- We respect the right of every person to the protection of their personal data.
- We protect personal data regarding our employees and other stakeholder groups.
- We ensure that only those who need such personal data to perform their job duties have access to it.
- We ensure that everyone who has access to personal data takes appropriate measures to protect it.
- We ensure that personal data is not retained for longer than necessary to achieve the purpose for which it was intended.

### **Practices of Winning**

- Always behave respectfully and respect the privacy of others. Access personal data only if you are authorized to do so and only to the extent necessary to perform your job duties.
- If you have permission to access personal data, you must protect that data and not disclose it to anyone.
- You will allow others to access only the personal data they necessarily need, with the necessary permission and in accordance with legal requirements.

**For more information: Winning Group Privacy Policy**



## **Financial responsibility, record keeping, disclosure**

Winning Group consistently and accurately records and reports business information, which means that our records and financial reports must always reflect the actual state of business operations. Our company also meets the conditions of non-financial reporting, which is required by applicable legislation and regulations.

### **Principles of Winning**

- We believe that properly maintained records are an integral part of honest and transparent business.
- We record financial transactions in a complete and accurate form in accordance with the accounting principles applicable in the given country. In addition, all Winning Group financial statements comply with the standards in force and effect in the country of the entity's registered office and with the relevant internal rules of Winning Group.
- We also maintain consistent non-financial records, such as records of quality, safety, health, environment, human resources, time sheets and training.

### **Practices of Winning**

- Ensure that all records and reports are complete and accurate and are not incorrect or misleading.
- You must never falsify tests or their results.
- You must never delete or change any information and data that must be retained for legal or contractual purposes or that is required for subsequent audits or investigations.





## **Conflict of interest**

Conflicts of interest arise where our personal interests conflict with our responsibility as an employee or representative of Winning. Even the mere appearance of a conflict of interest may be as devastating as the conflict itself. Conflicts of interest may arise in the provision of gifts, entertainment, donations, philanthropic contributions, contributions to political parties and sponsorship contributions, and in cases of close relationships or other forms of contact with an entity that is a business competitor of or engaged in a business relationship with Winning.

## **Principles of Winning**

- We have a responsibility to our stakeholders to make decisions regardless of personal gain.
- We identify potential conflicts of interest in accordance with relevant strategies at the levels of both Winning Group and units, and with contractual obligations.

## **Practices of Winning**

- Do not engage in activities that could cause even an apparent conflict between your personal interests and those of Winning.
- Avoid situations in which conflicts of interest or apparent ones may arise.
- If there is a potential conflict of interest, you must report it in the manner specified for your unit or to your supervisor.



## Counterfeit parts

There is increasing evidence that the number of counterfeit components on the market has been growing. Counterfeit components are defined as those that have a distorted origin or quality. Although we are not aware of any specific manufacturer producing counterfeit components and selling them as our product, we understand that this may occur. There are two main ways manufacturers may contribute to the protection against counterfeit goods entering the supply chain. These are marking products and packaging with identifiable information and/or logo and protecting the supply chain.

## Principles of Winning

- Our products always have an identification mark as required by the customer in the shipping and supply packaging.
- Our products are always stored in secure warehouses.
- Our company uses only verified and audited suppliers for the purchase of raw materials and components.
- We never buy materials and raw materials in the so-called grey (parallel) market. Buying in this market is not illegal, but poses a high risk. We apply the same requirement to our suppliers.
- We do not advise our customers to use the grey market for sourcing components, as this may jeopardize the integrity of the customer's final product and the reputation of their company.
- We dispose of our discarded (non-conforming) products or render them unusable at the point of origin and never resell them.
- If our company discovers counterfeit materials, it quarantines the goods and informs the source from which it obtains the material of its suspicions. If relevant, it will report the incident to state authorities.



## **Economic sanctions**

Sanctions are legal instruments used by governments and supranational bodies to influence their foreign policy by prohibiting trade with certain countries, individuals, entities or sectors. Sanction lists are issued separately by the United Nations, the EU, and EU Member States, among others.

### **Principles of Winning**

- We will not engage directly or indirectly with any person or entity on the sanctions list.
- We do not trade directly or indirectly with any country or region subject to sanctions.

### **Practices of Winning**

- Make sure you know the external parties and their beneficial owners with whom Winning works in business.
- Vigilantly monitor external entities that may be on the sanctions list or have a related company in a country subject to sanctions.
- If you have any questions or concerns about sanctions laws and regulations or a specific external entity, please consult the legal department.

Parties subject to sanctions are typically not transparent and try to hide behind a financial transaction. In the following cases, you should be especially careful:

- The other party is reluctant to provide information such as who the beneficial owners are or how it is financed.
- The other party has little or no obvious business activity.
- Cash payments are required.
- Payments are required for another entity that is not a party to the contract.
- Bank account details are not given until the last moment or are changed between signing the contract and paying the money.



## **Information security, confidential information, and intellectual property**

To maintain our competitiveness and the trust of our stakeholders, it is important to protect our ideas, processes and business information. For this reason, certain information is proprietary to the company and is considered confidential. Confidential information includes trade secrets, know-how and proprietary information. This information includes business plans, financial statements, customer information, details of projects we submit to tender or implement, pricing information, personnel files and matters, allegations and investigations of violations of the Code of Conduct, financial and accounting data, and other business matters and methods.

Winning Group's intellectual property, such as inventions, patents, copyrights, know-how, trade secrets, secrets, designs, trademarks and related licenses, is highly valuable property whose value may be lost or compromised if these values are misused or inappropriately disclosed. Winning takes steps to defend its intellectual rights and respects the intellectual property rights of others.

### **Principles of Winning**

- We respect confidential information that relates to Winning Group and our stakeholder groups.
- We do not ask new employees for confidential information about their previous employers.
- We take all reasonable measures to prevent disclosure of confidential information by anyone who has no right to such information and who does not need it for their work.

### **Practices of Winning**

- You may not access, use, store or share confidential information without proper permission.
- You must protect confidential information from loss or theft, including the protection of mobile computer devices such as laptops and tablets.
- If you receive confidential information by mistake, whether it is provided by an outsider, colleague, customer, competitor or someone else, contact the sender, inform your supervisor of the situation and do not act as if you were actually to receive the information.

**For more information: Winning Group Information Security Standard**



## **Relations with stakeholder groups**

How the market perceives us determines the way we present ourselves in our daily dealings with stakeholder groups. When we are straightforward and fair and act in accordance with Winning Group values, we become the company we want to be. We must all contribute to this.

Stakeholder groups include employees, customers, owners, external entities we contract with and the local communities where we work. External entities include joint venture partners, subcontractors, suppliers, intermediaries, consultants and other entities with whom we have contractual relations governing the supply of goods or services.

## **Principles of Winning**

- We are committed to creating positive, constructive and long-term business relations with organizations with similar values to ours.
- We believe that stakeholder groups that do business with Winning are entitled to the same level of behavior and moral conduct that we expect from them.
- We do not compromise on our values when dealing with any stakeholder group.

## **Customer relations**

- We strive to anticipate their needs and exceed their expectations by acting in an innovative and proactive manner.
- We try to understand their business and make them successful.
- We try to solve their problems, both simple and complex ones.

## **Practices of Winning**

- You must be honest and fair in all your dealings with our stakeholder groups. Always treat them professionally and with respect.
- You must ensure that our Code is included in contractual agreements with external entities.
- Before you enter into any relations with external entities, you must work with them to understand our moral standards.
- Actively listen to our customers and make sure you understand their needs and expectations.



## **Quality commitment, system solutions**

We pride ourselves on quality and innovation and understand that doing high-quality work brings benefits for both customers and Winning.

### **Principles of Winning**

- Whatever we do, we try to do a good job and focus on continuous improvement.
- Together with our stakeholder groups, we work to provide products and services that meet or even exceed their expectations.
- We recognize shortcomings in our work in accordance with our contractual obligations and strive to address them accordingly.

### **Practices of Winning**

- You will strive to do all aspects of your work in excellent quality.
- You will work with our customers and external entities to understand their expectations and required quality levels.
- You must report to your supervisor any suspected deficiencies that have not been corrected in a timely manner.

**For more information: Winning Group Quality Policy**



## **Inside information and abuse of market position**

Inside information is information about a company that has not been published publicly and which is likely to affect the price of financial instruments. Examples of what may fall within inside information include financial results, material acquisitions or material projects.

Insider trading is prohibited, i.e. it is forbidden to use inside information when buying or selling financial instruments, whether you do so yourself or provide such information to someone else. In other words, insider trading is an attempt to use inside information for your own gain. In addition to insider trading, crimes of market abuse include illegal disclosure of inside information and market manipulation.

## **Principles of Winning**

- We comply with all applicable laws and guidelines when dealing with Winning shares and other financial instruments.
- All employees are prohibited from using inside information about Winning or other companies to buy or trade financial instruments.
- We disclose information that could affect the price of our shares through the department of investor relations.

## **Practices of Winning**

- You must never divulge any confidential material or information that is not intended for the public to anyone who has no legal need and right to know it.
- You must not engage in market manipulation by disseminating false or misleading information, and engage in other activities intended to manipulate the price of publicly traded principals.
- You must not use inside information to trade shares of Winning or any other company with which Winning does business, or inform anyone else that they may do so.
- Refer requests for information about Winning shares to the investor relations team.



## **External communication**

External communication is an important part of our marketing activities and brand promotion efforts. This includes all communications targeted at customers, potential customers and employees, partners, suppliers, investors, shareholders and other interested groups. External communications include media, press releases, statements, social media, publications, advertising and public presentations.

### **Principles of Winning**

- We follow the communication rules applicable to companies registered in the EU.
- We express ourselves honestly. Our statements should be correct and reliable so that we continue to maintain a high level of trust.
- We always use an open approach when communicating with people affected by our activities.
- We answer questions and communicate professionally with the parties concerned.

### **Practices of Winning**

- When communicating with other parties, you must provide timely, accurate, relevant and reliable information.
- You play an important role in communicating who we are and influencing all stakeholder groups. Keep in mind that the way you communicate and who you communicate with affects Winning.
- Speak to the media on behalf of Winning only if you are authorized to do so. Media requests for information should be referred to the competent spokesperson for your unit.
- Media inquiries about our shares and other financial issues should be referred to the department of investor relations.
- When communicating externally, make it clear whether you are speaking as a Winning representative or as a private individual.
- You protect the Winning brand and respect your colleagues and others when using your personal social media profiles.

**For more information: Winning Group Brand and Communications standard**





## **Fair competition**

Competition and antitrust laws protect and promote free and fair competition. These laws apply in all countries where Winning does business and are intended to prevent illegal practices such as price fixing, customer allocation and cartel agreements, as well as other practices designed to prevent competition or to result in the cessation of competition.

## **Principles of Winning**

- We believe that fair and open competition is best for our company, our shareholders, our customers, our employers and society in general. Fair competition is the engine of efficiency and innovation that underpin a well-functioning market economy.
- We do not tolerate any violation of antitrust laws, competition laws or related regulations.
- When employees are exposed to a higher risk due to their status and responsibilities, we provide them with training to identify situations in which they should consider whether or not they are violating antitrust and competition laws.

## **Practices of Winning**

- You are responsible for understanding how antitrust and competition laws relate to your daily work.
- You must not take any action with competitors to restrict competition.
- You must not discuss or exchange sensitive business information with competitors.
- If you have any questions or concerns about compliance with antitrust and competition laws, please contact the legal department of Winning.



## **Political activities**

### **Political contributions**

Financial and non-financial support for political organizations, parties, candidates or referendums. Non-financial donations may include the provision of services, materials or staff time, or the use of company premises.

### **Lobbying**

An activity aimed at influencing public policy decisions by providing information or opinions to elected or appointed officials. Lobbying activities include both direct communication with such officials and providing support to anyone who engages in such communication. In some countries, lobbying is regulated.

### **Political contact**

Engaging with politicians from various parties without the specific aim of directly influencing any participant.

## **Principles of Winning**

- We do not make donations to political parties to such an extent or in such a context that they might be perceived as excessive or inappropriate.
- We understand that lobbying is one way we can positively impact our industry and/or Winning's business opportunities.
- We ensure that all lobbying activities carried out on our behalf are suitable for Winning's business and do not adversely affect it.
- We welcome interest in Winning's projects and initiatives from all political parties.
- We want to provide politicians with relevant information about our industry sector so they can make informed decisions.
- Political contact will always be consistent with Winning's values and mission.

## **Practices of Winning**

- Before promising, making or approving any donation to a political entity on behalf of Winning, you must always obtain the necessary permissions. Donations to political entities are subject to approval by the Winning Group CEO.
- Never use political contributions to circumvent our anti-corruption policies.
- All political lobbying, contacts and meetings must be completely transparent.
- You have the right to provide a political contribution from your own resources, but you may not claim reimbursement of such expenses from Winning.
- You have the right to participate in political life as a private person.
- You understand that a lobbyist is an intermediary, so you must always follow the protocols for engaging the intermediary.



## Chapter 2 - Environment

### ENVIRONMENT

The environment is affected by the impacts of our operations and work processes, including the impact on the climate and the long-term environmental impact of the products and services we supply to the market. Environmental progress is a key element of our mission. Achieving environmental prosperity means pursuing infrastructure solutions that are safe, fossil fuel-free and productive.

#### Principles of Winning

- We are committed to protecting the environment and believe we can make a substantial contribution to a sustainable balance of the world.
- We actively strive to improve the environmental impact of our activities, projects, products and services throughout their lifecycle.
- When participating in project tenders, we consider opportunities and risks related to the environment.
- We involve stakeholder groups in our environmental performance. These include employees, customers, suppliers and those who live and work close to where we operate.
- All Winning Group companies operate under an environmental management system registered and certified under the international standard ISO 14001. All activities that Winning manages or where it is a major shareholder must participate in this system. New business projects must meet this requirement within three years of acquisition. For projects that we do not manage ourselves, we strive to maintain comparable environmental management standards.

#### Practices of Winning

- We must set aside sufficient time to understand the environmental risks and impacts associated with our daily work, and we must actively seek opportunities to reduce them. These include waste generation and recycling, greenhouse gas production and consumption of energy, water and materials, decarbonization, air quality, chemical management and sustainable resource management.
- We must comply with the requirements for the use, storage, labelling, transport and disposal of chemicals and hazardous substances and follow the relevant processes associated with them.
- We must regularly monitor energy consumption and energy intensity of our activities, and use renewable energy as a priority.
- We need to report regularly on our environmental activities, in particular on the use of natural resources, emission and pollution generation, waste generation and recycling, energy media consumption, raw material use and our opportunities in clean technologies, green construction, renewable energy use and biodiversity conservation and land use.

**Other requirements: Winning Group Environmental and Energy Policy**



## Chapter 3 – Human Rights and Working Conditions

### **Fair working conditions**

All employees should be adequately remunerated for their work and treated fairly and with respect to their labor rights. The working environment should be of a reasonable standard. We require such conditions because they are described in the ILO human rights standards and requirements to which we subscribe, not only for us, but also for the employees of our suppliers.

The Winning Group does not tolerate any forms of modern slavery or forced labor, including forced, serf and slave labor and human trafficking. Our suppliers must not engage in restrictions on movement, collection of recruitment fees for brokerage, confiscation of identity documents and/or passports, withholding of wages, abuse of working conditions, debt bondage, violence or any other kind of exploitation or abuse.

The Winning Group does not tolerate child labor and requires its suppliers not to tolerate it either.

The Winning Group respects and complies with applicable legislation and collective agreements to determine working hours, rest periods, overtime (overtime may only be on a voluntary basis) and annual leave time. We prefer an even distribution of working hours. Allowing our employees a time off is a matter of course in the event of a confirmed illness and taking sick leave, which is paid according to the applicable regulations. As a matter of course, we allow our workers a time off for taking parental leave. We require the same principles from our suppliers.

The Winning Group respects and complies with applicable law and collective agreements on reasonable wages, benefits and wage deductions. Wage information is provided to workers in an understandable form. Our aim is to ensure that our workers are paid a wage allowing them and their families a decent standard of living and being in line with the industry's usual pay. We require the same principles from our suppliers.

### **Principles of Winning**

- We do not tolerate any form of forced or compulsory labor, including practices such as illegal or unlawful wage retention and intimidation, at our sites and in our supply chain. Only persons who have voluntarily chosen to work may be employed.
- We do not tolerate any form of child labor at our sites and in our supply chain. The minimum age for a child to work must not be lower than the lowest school leaving age and must in no case be lower than 15.
- We do not allow any practices that restrict the movement of employees. These include requiring employees to hand over personal documents, passports or work permits to meet employment conditions.
- We recognize the special needs of employees under the age of eighteen and our duty to take care of them.
- We only allow working hours, wages and remuneration that comply with national and local laws and relevant ILO conventions.



- We recognize and respect collective agreements and the right of employees to freedom of association in order to support and protect employees and to conclude collective agreements where guaranteed by law.
- Where national standards restrict the right of association and the right to collective bargaining, we allow employees to come together freely and independently to conduct negotiations. Company management and elected employee representatives cooperate with mutual trust for the welfare of employees and the company.
- We strive for good relations with labor organizations, trade unions and workers' representatives.
- We maintain a dialogue with our employees to ensure that their rights are respected.

### **Practices of Winning**

- You have the right to be treated with dignity and integrity. In return, you must respect the dignity, privacy and rights of all individuals you deal with, as well as those affected by our business.
- If you become aware of any unfair working conditions at Winning or its subcontractors or suppliers, you are responsible for reporting such suspicions.



## Ethical recruitment, personal growth and development

A specific and ethically sensitive area is the selection of new employees. Recruitment holds up a mirror to the organization, and its form and execution, including the communication and behavior of the HR staff as representatives of the company, indelibly create the image of the organization. From a human point of view, looking for a job is a stressful life situation, so it is necessary to understand and take into account the impact of participation in the selection process on the psyche of job seekers.

Personal growth and development opportunities help company employees cultivate their talents and potential, and use their new skills and abilities to further improve our teams performing at peak performance.

The stated Winning principles are also reasonably binding on our suppliers and contractors.

### Principles of Winning

- When recruiting employees, we proceed in accordance with legal regulations and international labor standards, never giving false information to applicants about the nature of work, wages, working conditions, etc.
- We treat all applicants with respect, impartiality and equality, always communicating clearly, politely and in a language they understand.
- We use reasonable selection methods according to the level and difficulty of the position to be filled, and obtain references only with the consent of the applicants.
- We ensure equality of chances for each candidate according to professional prerequisites, eliminate personal motives or prejudices in the selection of applicants, save time and nerves of applicants, and do not put them under unnecessary stress.
- We keep candidates informed about what is happening in the selection process, its progress and deadlines, inform all candidates about their success or failure in the selection process in the shortest possible time, and provide true feedback to unsuccessful candidates.
- We believe our people are our greatest assets.
- We support our employees in their personal and professional growth and development.
- We offer training and development opportunities to improve the knowledge and skills of our employees.
- We encourage our employees to further develop and learn through various networks and sharing best practices.

### Practices of Winning

- Your behavior inspires others to act ethically as well.
- You should accept responsibility and actively participate in your education and personal development.
- You have the right to receive feedback from your manager.

**For more information: Winning Group Talent Management**



## Diversity and inclusion, non-discrimination and fair treatment, women's rights

Employee diversity holds great potential. Therefore, out of its own convictions, Winning employs people of diverse backgrounds and experience. We create an atmosphere of mutual respect and strongly oppose any discrimination based on race or ethnic origin, nationality, gender, belief or world view, physical limitation, age or sexual identity.

We achieve inclusion by valuing and fostering a wealth of ideas, unique perspectives, points of view and opinions.

### Principles of Winning

- We respect all individuals. We strive to work as one team and foster open, straightforward communication based on mutual respect.
- We believe that better customer solutions are created in a diverse and inclusive workplace.
- We treat everyone equally and offer everyone equal opportunities regardless of their appearance, ethnicity, nationality, religion or belief, gender, sexual orientation, gender identity or expression, age, handicap, marital status or any other feature protected by laws and guidelines.
- Our company's equal employment opportunity policy covers all aspects of the employment relationship including training, promotion, remuneration and all other employment conditions.
- We do not tolerate any form of disrespectful behavior, intimidation, discrimination, bullying or unwanted sexual advances.

### Practices of Winning

- You should promote and contribute to a positive work environment where everyone feels valued, respected and appreciated for their differences.
- Be open, promote teamwork and encourage others to share new ideas and opinions.
- You must not engage in any form of bullying, harassment, intimidation or discrimination. If you notice such signs in your workplace, speak up and act.
- You must not post any material that is objectionable, unlawful, sexually suggestive or otherwise offensive, and you must not engage in activities that have these characteristics, whether at work or when you represent Winning, including on business trips.

**We do not tolerate any forms of bullying, harassment, discrimination or offensive conduct by both our employees and our suppliers.**



## **Community investment, local community rights, forced evictions**

Community investment (CI) is an important way to engage and invest in the communities in which we operate. Dissatisfaction of local communities leads to frustration, which has many negative effects (low cohesion of the society, negative impact on sustainable development). With our values we want to achieve positive development of local communities.

### **Principles of Winning**

- We believe that investing in communities builds our reputation as a good corporate entity and helps create long-term relationships with our investors.
- We support communities by providing our time, knowledge and resources (in-kind contributions) along with cash contributions. We never use charitable contributions to communities for our enrichment or for gaining influence.
- We focus on learning opportunities that have clear and long-term benefits for community members.
- We do not tolerate behavior contrary to the rights of minorities and local communities, especially in obtaining resources for our development, whether it be the removal of land, forests, water and living space contrary to legal procedures. We place the same requirements on our suppliers.

### **Practices of Winning**

- We encourage you to participate in Winning's community activities.
- We understand that investing in a community involves some risk, such as the impression of bribery, and therefore requires approval at senior worker level. Obtain the necessary approval before promising to invest in the community on behalf of Winning.
- Never offer or promise anything that creates unreasonable expectations of either party.





## Use of private or public security forces, company assets

The Winning Group assets are tangible and intangible. Examples of tangible assets include raw materials, money, products, computers, real estates, machinery and equipment. Examples of intangible assets are our brand, patents, sub-brands, know-how, trade secrets and copyrights.

We also protect Winning's assets with the help of private or public security services in accordance with applicable law, both direct physical security and electronic protection. These services are not deployed for activities other than protection of company assets. The use of security forces must in no way lead to legal and human rights violations.

### Principles of Winning

- We use our assets responsibly.
- We protect the Winning Group assets from damage, theft, loss and misuse as they are crucial to our business.
- We do not use computers and electronic communication systems to communicate inappropriately. This includes any illegal activity or behavior that might be considered discriminatory, offensive or bullying.
- We protect assets entrusted to us by our customers and other stakeholder groups against damage, theft, loss and misuse.
- When protecting assets, we use only licensed security services with personnel who are personally certified.

### Practices of Winning

- Use good judgment when using company assets for the work you perform for the Winning Group and our customers.
- You only use company assets for personal purposes if allowed by the rules of your unit.
- You do not use company assets for personal gain, e.g. for side business.
- You must not use the company assets in an improper manner, i.e. for fraudulent conduct, data breaches, bullying and the use of offensive or obscene content of a sexual or ethnic nature.



## Chapter 4 – Health and Safety

### Health, safety and well-being

Safety and health care is about preventing accidents and promoting a healthy and safe working environment for our employees, our collaborators and the general public that comes into contact with our projects.

This is a fundamental priority for Winning, and its goal is to achieve an injury-free environment. Well-being means a feeling of contentment. This feeling often influences the atmosphere in the workplace. It arises because we look after and support our employees as well as because we feel that our work makes sense and because we feel physically safe.

It is important for Winning and its suppliers to ensure that their workers are not exposed to excessive safety risks (machinery, equipment, substances or other chemical, biological or physical agents). Therefore, these risks must be identified, evaluated and controlled through risk analyses, preventive maintenance and safe working practices. Ergonomic risks (prolonged standing, sitting, conditionally accepted working postures, unilateral physical load, and repetitive movements) must also be identified.

If risk factors cannot be completely eliminated, workers must be provided with personal protective equipment.

Hazardous substances in chemical products must be handled safely during use, transport and storage as well as their disposal. All workers must have access to first aid items.

Safety information must be available to everyone to educate, train and protect themselves from the risks of their work. When contractor workers are on Winning premises, it must be ensured that they are aware of and comply with local Winning regulations.

Emergency, accident and fire safety procedures must also be taken into account when setting up safety procedures. Emergency plans, fire safety and emergency response procedures must be in place, including procedures for personnel and procedures for notification and evacuation. These procedures must be regularly reviewed and, where necessary, reviewed by local authorities as well.

Ensuring adequate and reasonable working conditions is important to Winning and its suppliers, as is providing adequate sanitary facilities.

### Principles of Winning

- We take care of our employees and those affected by our workplace.
- We continuously strive to build a working environment that promotes health, safety and well-being, enabling our employees to work from home in accordance with legal requirements.
- We believe that visible leadership (employee leadership) is essential for the existence of a strong health, safety and well-being program.



- We promote reliable practices for personal safety and accident prevention and share them with our supply chain and within our industry.
- We provide occupational health and safety training and education relevant to the particular work situations and environments of our employees.
- We ensure that the employees of our subcontractors are adequately trained and have the proper equipment to perform their work safely.
- Our goal is to be an industry leader in occupational health and safety and to continuously show measurable improvement on the path to an injury-free environment.
- All Winning Group companies operate according to the Occupational Health and Safety Management System, which is implemented according to the international standard ISO 45001. This system must cover all businesses in which the Winning Group has a majority stake, its representatives in the management or otherwise significantly influences or controls the concerned company.

### Practices of Winning

- You have the right to a safe and secure workplace.
- You are personally responsible for helping to ensure a healthy and safe working environment.
- You must not be indifferent to the health of your colleagues and you will report any accidents in the workplace and any working conditions that are not completely healthy and safe to your manager or the relevant safety officer.
- Do not be indifferent to work that is not completely safe or endangers human health. Instead, stop such an activity, including the one you are doing yourself.
- No matter what position you hold, you may contribute to workplace safety by acting proactively, boldly and visibly on health and safety issues to set an example for others.
- You should immediately report any suggestions regarding safety to your manager or responsible person.

You must never endanger your own health and safety  
and the health and safety of others to complete a task.  
If the conditions change, stop work and adjust the work  
schedule.

**For more information: Winning Group Occupational Health and Safety Policy**



# Whistleblower protection rules

## Report

Any person, as a Whistleblower, may submit a report containing information about a possible violation of internal regulations of the Winning Group, a criminal offence or misdemeanor, or a violation of European Union law of which the Whistleblower has become aware in connection with an activity related to the Winning Group. The report should contain specific information, such as the names of the persons involved, witnesses and other relevant information. The Winning Group has set up an internal reporting system, according to the rules of which individual reports are reviewed by an authorized person.

## Procedure after making a report

The Whistleblower shall be informed in writing of the receipt of the report within 7 days from the date of receipt, except where the Whistleblower requests not to be informed of where the receipt or the information would reveal the identity of the Whistleblower.

The report will be screened through the Winning Group's internal process and the results of the screening will be communicated to the Whistleblower within 30 days of receipt of the report, whereas in the case of a report that may have a material impact on the Winning Group, the 30-day period may be extended up to two times, each time for a maximum of 30 days. The Whistleblower will be informed of the extension and the reasons for it.

If the report is found to be justified, the Winning Group or the relevant group company will take action to remedy the infringement. The Whistleblower will be informed of the adopted remedy without undue delay.

If the report is found to be unjustified, they shall inform the Whistleblower without undue delay and inform the Whistleblower of their right to file a report with a public authority.

## Authorized Person

The person authorized to investigate the notification is JUDr. Martin Drahotský, attorney at law, reg. no. ČAK 15924, which ensures the independence of the investigation of the report and the protection of the Whistleblower.

## Whistleblower protection

The Winning Group will not retaliate against the Whistleblower and other persons whose protection is guaranteed by law in connection with the report, nor will any information about such persons be retained unless the persons concerned provide their consent.



The Winning Group highly values Whistleblowers and individuals who, through their reporting and cooperation, help to expose and eliminate any wrongdoing.

### Procedure of Making a Report

Reports can also be made anonymously through the internal reporting system, orally or by contacting the contacts listed below:

- **e-mail:** [mdrahotsky@judrdrahotsky.cz](mailto:mdrahotsky@judrdrahotsky.cz)
- **reporting line:** +420 775 263 847

In Brno on 11.8.2023

Sebastian Peter Wagner  
Chief Executive Officer

