



Code of Conduct for GasNet Group Suppliers

Preamble

We at Czech Grid Holding, a.s.¹, GasNet, s.r.o.², and GasNet Služby, s.r.o.³ ("GasNet Group") are mindful of the role we play in society and of our responsibilities to GasNet Group's owners, staff, customers, and business partners.

Lasting business success can be achieved only by acting with integrity in all areas of business dealings. Accordingly, we uphold ethical and moral principles and adhere to current legislation. We conduct ourselves in keeping with sustainability principles, which underpin our corporate strategy.

Objectives and expectations

The Code of Conduct for GasNet Group Suppliers applies to natural and legal persons – and their affiliates – who provide goods or services to GasNet Group (hereinafter referred collectively to as "Suppliers").

All Suppliers are obliged to comply with the rules set out in this Code of Conduct for GasNet Group Suppliers. The Code of Conduct for GasNet Group Suppliers is integral to any business relationship between a GasNet Group company and a Supplier.

GasNet Group reserves the right to monitor and verify a Supplier's compliance with the rules set out in the Code of Conduct for GasNet Group Suppliers, in particular by means of a statement of assurance, a compliance questionnaire, or an external review. By entering into a contractual relationship with any GasNet Group company, Suppliers

¹ Czech Grid Holding, a.s., registered office: Prosecká 855/68, Prosek, 190 00 Prague 9, registration number: 24310573, incorporated by entry in the Commercial Register kept by the Municipal Court in Prague under registry number B 18283

² GasNet, s.r.o., registered office: Klíšská 940/96, Klíše, 400 01 Ústí nad Labem, Czech Republic, registration number: 27295567, incorporated by entry in the Commercial Register kept by the Regional Court in Ústí nad Labem under registry number C 23083

³ GasNet Služby, s.r.o., registered office: Plynárenská 499/1, Zábřovice, 602 00 Brno, Czech Republic, registration number: 27935311, incorporated by entry in the Commercial Register kept by the Regional Court in Brno under registry number C 57165



undertake to comply with the Code of Conduct for GasNet Group Suppliers and to provide GasNet Group with all assistance necessary to verify compliance with this obligation.

Breach of the Code of Conduct for GasNet Group Suppliers may result in the termination of the contractual relationship between the GasNet Group company and the Supplier breaching the Code, and/or may result in the pursuit of other claims against that Supplier. The Supplier is obliged to ensure that the provisions of this Code of Conduct for GasNet Group Suppliers are observed by its employees and the contractors it uses to fulfil its obligations to GasNet Group companies.

Basic obligations

Compliance with legislation and binding technical standards

Suppliers are obliged to comply with all applicable legislation and binding technical standards of the countries in which they engage in activity for GasNet Group companies.

Suppliers are obliged to maintain suitable monitoring systems in the course of their activities in order to prevent breaches of legislation and binding technical standards and to enable compliance with such legislation and binding technical standards to be verified.

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Respect for and protection of human rights

Suppliers are obliged to protect human rights and treat all employees fairly, with dignity and respect. They must also respect employees' personal rights and their rights to dignity and privacy.

All Suppliers must take appropriate action to prevent the use of raw materials in their products which directly or indirectly finance non-state armed groups that violate human rights.

Compliance with labour rights

In their employment policies, Suppliers must respect the right to freedom of association, the right to collective bargaining, and principles of equal opportunity, and must undertake not to discriminate against employees on grounds of sex, age, ethnic origin, nationality, colour, disability, sexual orientation, religion, political opinion, or



similar criteria. There must be zero tolerance of physical or psychological abuse, sexual harassment, or other inappropriate behaviour towards employees.

Suppliers must make sure that they do not use or benefit from any type of child or forced labour. All legislation and binding international agreements and conventions that lay down minimum age limits for employees or that prescribe working conditions must be respected.

Suppliers engaging foreign nationals in the performance of their activities for GasNet Group companies are required to comply with legislation governing the employment of foreign nationals.

The remuneration and working hours of Suppliers' employees must comply with legislation.

Suppliers must arrange for the occupational health and safety of their employees and create a working environment that actively promotes the prevention of occupational accidents and diseases and minimises the health risks faced by employees. Suppliers must comply with – and require that their employees and contractors comply with – occupational health and safety regulations.

Fair competition

Suppliers are obliged to comply with competition law and must not enter into any prohibited competition-related agreements.

Countering corruption

GasNet Group pursues a zero-tolerance policy on corruption and bribery.

GasNet Group Suppliers are prohibited from giving or promising benefits to GasNet Group employees with the intention of obtaining a business or other advantage. In the case of consultants and intermediaries in particular, there must always be a balance between the service rendered and the financial consideration provided.

Under no circumstances may Suppliers solicit or agree to a bribe or other unlawful payment or other in-kind consideration (e.g. gifts, entertainment, favours) in order to pursue business or other opportunities with GasNet Group. Suppliers must not, in the context of their contractual relationships with GasNet Group, offer GasNet Group employees or their family members unjustified benefits from Suppliers or companies forming a group with them. GasNet Group expects its Suppliers not to tolerate any illegal practices in their dealings with administrative authorities or courts of law. Where



public contracts are awarded, legislation on public procurement and fair competition must be respected.

Money laundering

Suppliers are obliged to comply with all legal requirements on the prevention of money laundering and must not engage in any form of money laundering.

Avoidance of conflicts of interest

Suppliers must conduct themselves with transparency and integrity in their activities. A Supplier is obliged to advise GasNet Group of any direct or indirect close relationship between the Supplier and an employee or employees of GasNet Group, or of similar circumstances that influence or may influence contractual relations. Any conflict of interest must be disclosed before negotiations commence or as soon as the conflict of interest arises.

Support and sponsorship

Support and sponsorship may be provided solely on a voluntary basis and in accordance with applicable legislation, and must not be used to obtain unlawful benefits.

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Personal data protection

Suppliers must respect and comply with applicable regulations on the protection of personal data.

Import and export rules

Suppliers are obliged to comply with all applicable import and export control regulations, sanctions, embargoes, laws, state regulations, government decrees, and directives relating to the transportation, importation, exportation, transit, transfer, shipping, or dispatch of goods and transfer of technology.

Environmental protection

Suppliers are obliged to comply with all applicable laws and binding technical standards and to minimise the adverse impact that their activities have on the environment. In order to obviate risks to the environment, Suppliers must adopt appropriate management systems conducive to the efficient and rational use of



natural resources, and to a reduction in energy consumption and greenhouse gas emissions.

Confidential information and intellectual property

Suppliers are obliged to ensure that GasNet Group's confidential information and trade secrets obtained in the course of business with GasNet Group are securely protected and not used or disclosed to third parties without the prior consent of a responsible GasNet Group officer.

Suppliers are obliged to protect GasNet Group's intellectual property rights. GasNet Group's intellectual property may be used solely on the basis of the corresponding agreements concluded with a GasNet Group company that is authorised to dispose of the intellectual property in question.

How to proceed in cases of doubt

If you encounter a situation that causes you to suspect collusion, a violation of legislation, or a breach of ethical rules or this Code of Conduct for GasNet Suppliers:

- Define the information that has made you suspicious (who, what, when, where)
- Use the [Green Line](#)
(telephone: +420 735 156 657; postal address: Martin Dohnal, Compliance Officer, GasNet, Prosecká 855/68, Praha 9, mark the envelope visibly with the **Do Not Open!**)

The text above is merely a convenience translation, which itself is not legally operative. Only legally operative version is the Czech source text.