



Code of Conduct for GasNet Group

Employees

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 our 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, adhere to current legislation, and comply with internal regulations, rules and directives. We conduct ourselves in keeping with sustainability principles, which underpin our corporate strategy.

The Code of Conduct sets out the principal rules of conduct that are applied within GasNet Group and that enable it to deliver on its stated values:

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Safely – We act in accordance with established rules and procedures. No exceptions. We prevent, detect, and respond to risks. We foster, promote, and maintain a safe environment.

Reliably – We carry out our work professionally and are systematically evolving within the industry. We keep to our agreements and get the job done. We are not afraid to ask for help. We take responsibility for the work we do.

Respectfully – We engage with others willingly and constructively. We respect differences in opinions and positions. We take an interest in the people around us. We are considerate to the environment and our society.

Each GasNet Group employee is expected to act in accordance with the principles set out in the Code of Conduct and with the values held by GasNet Group. Our senior staff must lead by example in this regard.

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



Scope

The Code of Conduct is binding on all employees and other individuals assigned to work for individual GasNet Group companies in accordance with employment laws and the requirements of GasNet Group company bodies.

Corporate social responsibility

A sense of responsibility towards society and the environment is a key driver of long-term sustainable business success. Recognising this, we promote social engagement, particularly when it comes to the community, environment, and culture. We initiate dialogue with groups that are affected by our operations or whose activities may affect GasNet Group's business. We encourage employees to become involved privately in civic and community causes – especially charitable and social activities.

Internal relations

Equality of opportunity and mutual respect

We foster a motivating work environment for our employees where they can explore their potential and grow professionally. The dignity and personality of each employee is respected. We approach each other with respect, integrity, and openness. We honour the agreements we make and accept personal responsibility for our work. No employees or candidates are discriminated against on grounds of gender, marital status, ethnic origin, nationality, age, religion, political opinion, trade-union membership or activity, sexual orientation, or physical or mental disability. In the selection, remuneration, training and promotion of employees, the main criteria considered are their skills and qualifications. We promote equality of opportunity and diversity. In performing our work, we engage willingly and constructively with others. We are committed to the fair treatment of all staff. We do not tolerate any physical or psychological abuse, sexual harassment, or other inappropriate behaviour towards employees. GasNet Group does not exploit, tolerate, or benefit from any type of child or forced labour. We respect freedom of association, privacy, collective bargaining and are committed to reconciling GasNet Group's interests with employees' private lives.



Conflicts of interest and corruption

Employees must refrain from conflicts of interest with GasNet Group and from activities that run counter to their responsibilities to GasNet Group. Employee activities must not in any way prejudice GasNet Group's reputation or legitimate interests. We pursue a zero-tolerance policy on corruption and bribery.

Occupational health and safety, protection of property and information

We strive to make continuous improvements in occupational health and safety and the protection of property and information. In our work, we are proactive in preventing hazards and seeking solutions that foster and maintain a safe environment. We always act in accordance with established rules and procedures. All employees share responsibility for their own and others' health and safety and for environmental friendliness in the work they do at GasNet Group. Any information obtained must not be used for personal gain or for any activity that would be contrary to the law or to GasNet Group's legitimate interests, rules and values.

External relations

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General principles

We feel bound by the UN Global Compact. Within our sphere of influence, we recognise, support, and put into practice the UN Global Compact's ten principles, which cover human rights, labour, the environment, and anti-corruption.

We employ only legally and ethically sound means in the pursuit of our business objectives. We expect and demand the same of our business partners.

Behaviour towards customers

We offer our customers relevant and efficient solutions, provide them with high-quality and professional services, and treat them fairly. We seek solutions that best meet their needs and consumer protection requirements under the law.

Behaviour towards shareholders

Our business is premised on and underpinned by the capital of GasNet Group's owners, so we want to increase it and use it to make reasonable returns.



Behaviour towards suppliers

In our dealings with suppliers, our watchwords are mutual respect and integrity. We uphold the principle of free competition and transparent markets, and we take a stand against unfair business practices.

Behaviour towards the public

We disclose objective and truthful business information as required of us by law and promote transparency with all parties. We respect the professional autonomy of journalists and the media. We use social media exclusively to promote our operations and our business model. We protect our information and defend it from being leaked, compromised or misused.

Behaviour towards public administration and other institutions

We are apolitical in our approach to business and treat government authorities with courtesy and mutual respect. We are committed to neutrality towards political parties. We do not make donations to political parties or political movements, or to organisations, foundations, associations or other legal or natural persons who are closely affiliated with politically exposed persons. We do not make financial contributions to organisations or individuals in situations where there is a risk of a conflict of interest.

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Compliance with the Code of Conduct

General principles

GasNet Group's reputation shapes what we do and how each of us behaves. Any illegal or otherwise inappropriate conduct, even by just one of us, could be damaging to GasNet Group. We should therefore all take care to safeguard GasNet Group's reputation through our conduct. Senior staff are responsible for actively encouraging and enforcing compliance with rules defined by law and the Code of Conduct. Regular inspections and audits are conducted to ensure compliance with the Code of Conduct and the application of its principles.

Code of Conduct compliance management system

To minimise the risk of breaches of this Code of Conduct, GasNet Group has put in place, among other things, a compliance management system to identify potential structural risks and signs of misconduct. Steps required to eliminate or minimise these risks are taken and regularly notified and are continuously monitored and improved.



Contact person and Compliance Officer

Employees may contact their manager or the Compliance Officer with any questions they may have regarding the Code of Conduct and compliance with it, or if they suspect a breach of the law or the Code. A Green Line has been set up for employees to report possible breaches of the Code of Conduct, which can then be referred for investigation anonymously. The Compliance Officer treats all questions, concerns and suggestions in the strictest confidence and addresses them as required by the specific issue. Employees are informed in an appropriate manner how their concerns have been dealt with and whether and what action has been taken. If the Compliance Officer becomes involved in a situation at an employee's request, this will not result in any personal disadvantage or discrimination against the reporting employee.

Acknowledgement and reporting

All senior employees with staffing responsibilities must regularly report to their employer on the status of compliance with the Code of Conduct within their sphere of responsibility.

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