

■ Company code of conduct

1.1.1 General Principles

Exe's main priority is the development and maintenance of a healthy and prosperous business. Exe accepts responsibility in all areas, where an efficient management of its operations can be achieved. We have responsibility towards our business sectors, employees, business partners and the general public. Therefore, we have set to adhere to the following core principles:

- We commit to conduct our business according to the highest moral and ethical standards.
- We follow all legal standards and regulations of the countries in which we conduct our business.
- We follow the UN Universal Declaration of Human Rights, and we take responsibility to uphold these rights in relation to our employees and communities that are affected by our operations.
- We are open towards everyone that is affected by our business.
- Within our reach, we try to ensure that our vendors, subcontractors, representatives, and partners follow the Company Code of Conduct while conducting business with us.

The exe Company Code of Conduct defines ethical rules that are binding for all exe's employees and must be followed while working or representing the company anywhere in the world. We do not tolerate corruption, unfair competition, discrimination, or harassment in any form. On the contrary, we encourage ethical business practices, fair employee treatment, diversity, and equal opportunities for all.

*Richard Hrabovský
Managing Director of exe, a.s.*

Employee Relations

It is of key importance for exe that the relations with all its employees are based on mutual respect and dignity. Our working conditions must be in accordance with national laws and regulations, as well as with corresponding International Labor Organization (ILO) conventions.

- We provide a safe and healthy workplace and we constantly strive to improve it.
- We provide equal opportunities for all, regardless of their race, skin color, gender, nationality, religion, ethnic background or other characteristics. We do not allow discrimination or harassment.
- To our employees, and other individuals connected with exe, we provide means of expressing their legitimate concerns and complaints through such means that allow their investigation and appropriate amendment without penalization.
- We provide opportunities for our employees that support their current and future working plans by means of various trainings and education activities.
- None of our employees is younger than 15 years of age, or other local minimum age requirement.
- We do not use slave, forced, or any other type of involuntary labor. We do not allow any practices limiting the free movement of our employees.

1.1.2 Conduct in the national market

Corruption, bribery, and unfair competition disrupt the market and present a hindrance to economic, social, and democratic development. exe does not tolerate any of these activities.

- We shall not act in violation of any current competition laws in force.
- We will not offer nor provide any payments or other remuneration to any person or entity, directly or indirectly, with the intent to impel the person or entity to act in violation with his/hers responsibilities in order to gain, keep, or control a business opportunity, or secure an unfair advantage of a different nature.
- We will not ask for, nor accept, directly or indirectly, inappropriate payments or other remunerable inducements gifted to impel our company to act in violation with our responsibilities.
- We dutifully and accurately log all financial transactions and keep accounts in accordance with exe's accounting rules and regulations.
- o Our IT technologies and practices contain control and security features that ensure the required level of customer data protection.

1.1.3 Environment

exe believes that by providing IT services, including development, translation, and localization, it can significantly contribute to improvement in processes of globally and environmentally sustainable development. In accordance with this belief, we strive to proactively protect the environment on all levels.

o We deploy such organizational structures, management systems, trainings and training plans that assure compliance with all relevant laws, regulations, and standards.

- In an attempt to constantly improve ourselves, we incorporate our employees, vendors, and other parties into the environmental management process.
- Our goal is to constantly improve the rating of our projects, products, and services in terms of environmental protection by means of an active search for ways to reduce any negative impact on the environment during the life cycle of our business activities.