




CODE OF ETHICS

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4	Head of Technical Infrastructure	Martin Jirků	
5	Technical Director	Zaid Al-Tamimi	
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The parent company SHERLOG Technology a.s., as well as its subsidiaries SHERLOG NG a.s., SECAR SILESIA s.r.o., SECAR MORAVIA s.r.o., SECAR NORD s.r.o. (hereinafter the “SHERLOG Group”) aims to ensure that all its activities, as well as the activities of its shareholders, statutory representatives, management, employees and persons in a similar relationship are not only in accordance with the legal order, compliance with which it understands as its basic duty, but also in accordance with generally recognised ethical principles of business.

The objective of the SHERLOG Group Code of Ethics is to openly declare the will to comply with this standard of conduct not only in the course of daily activities in the SHERLOG Group, but also in other circumstances and relationships with other entities shaping the business environment, to help cultivate the business environment and to deepen transparency and partnership in business relations.


Therefore, all statutory representatives, employees and other persons cooperating with the companies undertake to comply with the **SHERLOG Group** Code of Ethics not only in relations with each other, but also in relations with their business partners. The Code of Ethics is a moral obligation for each member.

In addition to the SHERLOG Group **Code of Ethics**, another key document is the **Criminal Compliance Programme** (hereinafter the “**CCP**”), which formulates the basic principles of behaviour of all entities involved in the SHERLOG Group’s activities and is binding on members of the board of directors, the management, employees and other persons in a similar relationship (hereinafter an “**Employee**”) regardless of their position in the hierarchy. The **CCP** is freely available to Employees on the Intranet data network and is fully compliant with applicable and effective legislation.

All SHERLOG Group members and Employees undertake to comply with these rules of conduct

In the field of creating a favourable business environment

- act freely within the limits of internationally recognised fair trade rules in competition;
- create an atmosphere of trust and fairness through their attitudes and behaviour in business relationships;
- distance themselves from any provision of benefits or rewards to potential customers, public authorities, public facilities or representatives of such bodies that are not in accordance with law or with good business practices;
- thoroughly ensure compliance between their activities and the legal order of the Czech Republic; for this purpose, the board of directors of the SHERLOG Group has established the position of **Compliance Manager (CM)**, whose task will be to implement the principles of corporate culture formulated by this Code of Ethics into everyday practice and through related activities (training, monitoring and control, etc.) ensure maximum compliance of Employees’ behaviour with legal and ethical standards;
- join in the fight against corruption and observe the principles of open and fair competition, correct accounting and compliance with tax liabilities in accordance with international standards;
- not tolerate illegal, unethical or unprofessional conduct by their Employees, or by business partners and other persons/entities; in the event such conduct is ascertained, proceed strictly in accordance with their statutory duties, as well as those in the CCP;

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- take an equal and fair approach to all their Employees, not tolerate any form of discrimination, select, evaluate and reward their Employees solely in accordance with their knowledge, skills and work performance;
- respect human dignity, social rules and accepted practices, respect the rights of their Employees;
- respect their business partners' internal rules, if they are familiar with them;

In the field of rules and principles of Employee behaviour

- respect the SHERLOG Group's reputation and refrain from any act that could endanger or even cause harm to it;
- treat supervisors, subordinates, colleagues and others with respect and in accordance with the standards of decent behaviour; any manifestation of discrimination or harassment will not be tolerated and will be punished in accordance with the law;
- treat business partners and third parties with the maximum amount of professionalism and empathy, ensure the exemplary representation of the SHERLOG Group;
- carry out their work to the best of their ability, at a high professional standard and in full compliance with applicable laws and internal regulations;
- use working hours efficiently and effectively, solely for the SHERLOG Group's benefit;
- all activities of a private nature during business hours or using the resources of the SHERLOG Group without prior approval are prohibited;
- use SHERLOG Group assets entrusted to them sparingly, efficiently and economically;
- internal and external communication always takes place in a material and constructive spirit and in accordance with the rules of decent behaviour;
- only Employees whose job description includes communication with the public and the media may act on behalf of the SHERLOG Group;
- communicate with competitors and their representatives only on a professional basis and in accordance with the standards of decent behaviour;

In the field of rules and principles of SHERLOG Group manager behaviour

- ensure a dignified atmosphere at work, treat subordinates properly, honour accepted practices and common social rules. Respect their rights and human dignity, do not allow any discrimination contrary to the law and interpersonal relations. Respect equal and fair access for all subordinates; any form of favouritism or discrimination is inadmissible. Evaluate subordinates solely on the basis of their knowledge, skills and work performance;
- lead employees to act honestly, decently and with personal responsibility;
- properly motivate their subordinates to perform high-quality work and guide them to develop the relevant skills and abilities;
- give clear, complete and appropriate tasks to an Employee that must be and are in accordance with applicable legislation and internal regulations;
- strictly require the performance of the tasks assigned in an appropriate time period and quality, not tolerate unprofessional, unethical or even illegal conduct. In the event such conduct is ascertained, proceed in accordance with internal regulations or statutory duties;
- always respect and defend the legitimate interests of shareholders and investors;

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- always treat all shareholders, associates and members fairly, including minority shareholders and members, and cultivate good relations with them, protect their rights and never favour one group at the expense of another;
- treat shareholders and supervisors with respect and provide them with timely, truthful and complete information about the status of the SHERLOG Group or an organisational unit managed thereby, about the performance of the assigned tasks, etc.,

In the field of information protection


- the SHERLOG Group is obliged to collect and process personal data only to the extent necessary and fully in accordance with the law;
- all internal information about the activities of the SHERLOG Group that has not been officially published (e.g. on the website, in press releases, etc.) is confidential and every Employee is obliged to protect such information from misuse, in particular to maintain confidentiality about it;
- all the SHERLOG Group's know-how is exclusively owned by it and cannot be shared with a third party without prior permission of the board of directors of individual SHERLOG Group companies;
- an Employee who needs the information to carry out his/her activities, his/her supervisors as a part of their powers and the authorised supervisory staff as a part of their activities can familiarise themselves with information about a specific business case;
- there is a prohibition against discussing internal information in places where it is not possible to ensure security;
- there is a prohibition against taking storage media containing sensitive internal information out of SHERLOG Group premises, except when necessary for the specific performance of work activity;
- an Employee may not allow access to premises or a zone in premises to persons who do not have access rights for the relevant zone, except where the entry of such a person is desirable in terms of the performance of work tasks;
- additional details on information protection are contained in other internal regulations.

In the field of measures against corruption and practices otherwise distorting free competition

- provide training to employees in the field of business ethics and anti-corruption measures;
- apply whistleblower protection and positive motivation for Employees in the detection of corrupt behaviour in the SHERLOG group;
- an Employee may not, under any circumstances or in any way, take an active part in conduct that could lead to a corrupt offer or in any more fundamental way could breach the rules of competition, in particular, he/she may not promise, give, request, have promised or accept anything in connection with his/her work that could be perceived as a bribe or an unreasonable benefit or that could affect decision-making in a business case. In the event that an Employee is present or becomes aware of such a conduct, he/she is obliged to immediately notify the CM or his/her supervisor, who will ensure the further transmission of this information; in case of doubt whether an action is corruption or interference with competition, it is appropriate to consult the CM;
- if an Employee or other person is a witness to unlawful or corrupt conduct or a breach of ethical rules, he/she is obliged to notify the CM immediately, either in person or via the ethics line (eticka.linka@sherlog.cz) or directly via the form on the SHERLOG website in the

COMPLIANCE section, or he/she may disclose his suspicions via a physical mailbox located at SHERLOG's registered office;

- in the event the SHERLOG Group bids for a public contract or enters a similar procedure, an Employee is obligated to proceed with caution and avoid any conduct that could be perceived by the contracting authority, a bidder or a third party as unfair or interfering with free competition;
- an Employee may not request, accept or have any benefit promised in contrast to the other bidders;
- an Employee may also not participate in any cartel;
- when communicating with bidders for a contract, an Employee only provides true and undistorted information and does not misuse any ignorance or error of the other bidders or other circumstances to obtain an illegitimate advantage for the SHERLOG group or another entity, or to damage third parties;
- an Employee is obliged to refrain from prohibited conduct that is intended to or could cause another supplier not to participate in a procurement procedure or to withdraw a bid already submitted;
- an Employee may not negotiate with other suppliers about the bids they have submitted or intend to submit in a proceeding in which the SHERLOG Group is also participating, in particular about prices and pricing policies used in their bids;
- an Employee may also not engage in any other activity aimed at awarding a public contract at an unreasonably high or otherwise disadvantageous price;
- an Employee may not disclose to the other participants in a proceeding any information about a bid submitted by the SHERLOG Group, except such information as is necessary for proper participation in the proceeding;
- all communication with the other participants in a proceeding must be conducted by an Employee in such a way that it is quite transparent and traceable;
- in the case of communication with the contracting authority as a part of a procurement procedure under the Act on Public Procurement, an Employee is obliged to use only the methods provided for by the law (requests for additional information/explanation of the procurement documentation, objections to a procedure used by the contracting authority, etc.), which applies by analogy to all proceedings conducted outside the regime of these acts, typically small-scale public contracts, and also to public contracts within the meaning of the Civil Code;
- in cases where it is socially appropriate or necessary to give a gift to a business partner or third party, an Employee is obliged to ensure, in particular, that such a gift is of appropriate value, not outside the reasonable limits of standard business practices, and that it is appropriate in terms of its character to the recipient, otherwise an Employee may not provide such gift;
- in cases where it is socially appropriate or necessary to accept such a gift, the same applies by analogy and if it is an inappropriate or evidently inappropriate gift, an Employee is obliged to report this fact to the CM or his/her supervisor immediately;
- Employees must be extra careful when the business partner is a body financed from public budgets (central government body, local authority body, contributory organisation, etc.). In such a case, the handing over and receiving of gifts is essentially excluded. Exceptions to this rule are always subject to prior approval by a supervisor or the CM;
- the individual statutory bodies of SHERLOG Group companies decide on the granting of a sponsorship or similar donation, while generally the SHERLOG Group supports, in particular, education, science, culture, sport and charitable, social and humanitarian projects through its sponsorship activities;

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- an Employee may not participate in the SHERLOG Group’s business relations in a direct or indirect way on the part of suppliers or customers for goods and services. He/she may not have any personal benefit from such relationships from entities other than the specific SHERLOG Group company;
- an Employee may not participate in any way in the activities of another natural person or legal entity if his/her/its activity could be in competition with the SHERLOG Group’s activities;
- an Employee must report the risk of a conflict of interest arising, for example, from the membership of family members or friends in the bodies of companies that are suppliers, customers or competitors of the SHERLOG Group or the holding of interests in such companies, for preventive reasons to the CM or his supervisor;

In the quality of production and achievement of environmental objectives

- develop and offer products and services in the required quality, with the required safety that are environmental-friendly and healthy;
- implement a policy of continuous improvement of all health, safety and environmental measures to achieve more favourable parameters than those laid down in applicable legal standards;
- achieve prosperity based on the principles of sustainable development and promote a preventive approach to environmental protection;
- provide maximum guarantees for the quality of products and services.