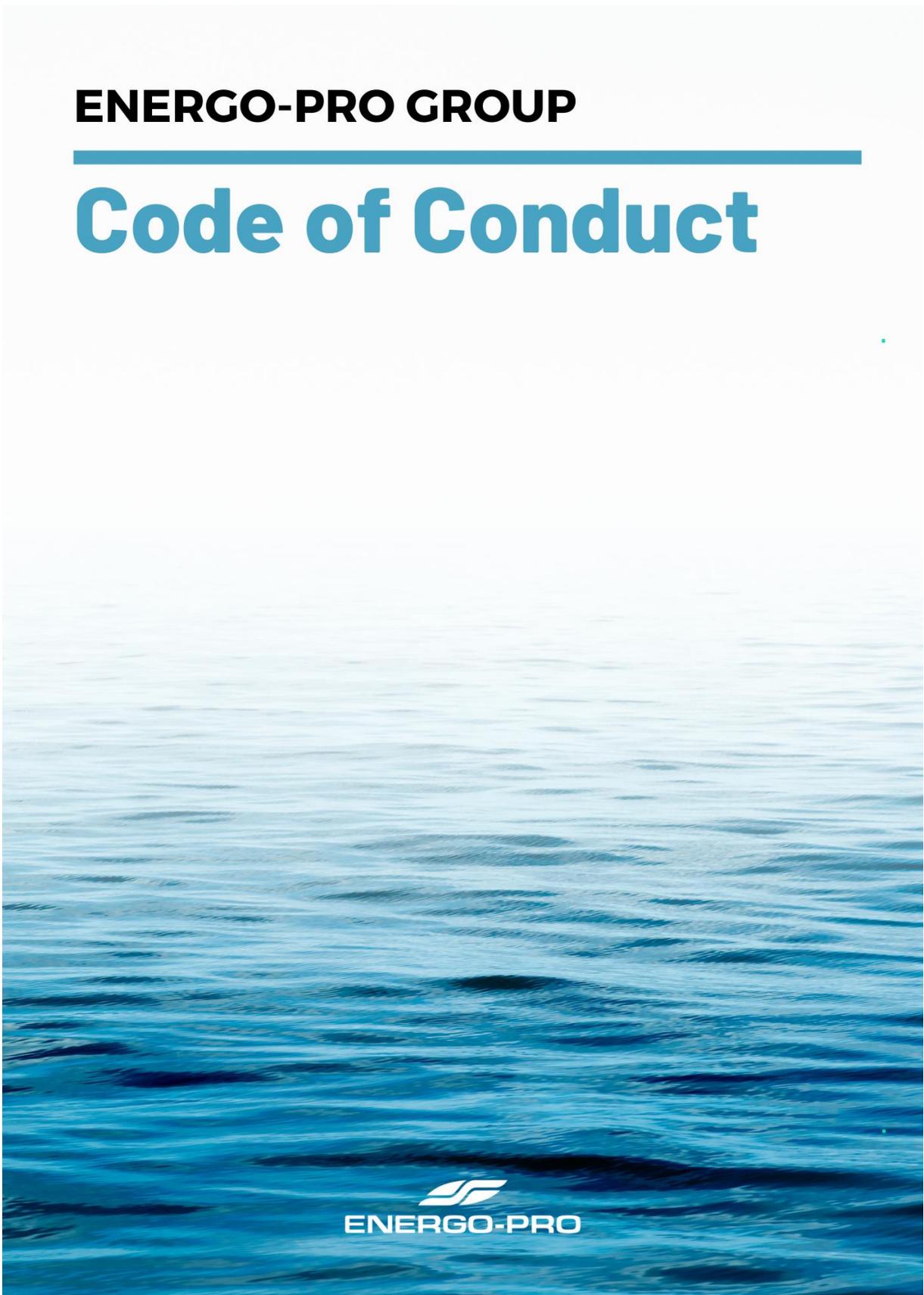


ENERGO-PRO GROUP

Code of Conduct



GLOBAL CODE OF CONDUCT

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Introduction

Message from CEO

Dear Colleagues,

I am pleased to present our first Global Code of Conduct. As a leading hydropower operator, distributor and supplier of electricity in Central and Eastern Europe, we are committed to undertaking our business with integrity and ethically. This Global Code of conduct reflects the expectations of the hydropower industry, stakeholders and partners and the dynamic business environment in the industry.

We recognize that although we operate in a global environment and our workforce is multicultural and diversified, we all share common values about how we work. Fundamentally, our workforce behaves with integrity and ethically in all our business dealings and we comply with all the applicable laws and regulations in the countries where we operate.

This Global Code of Conduct describes how we conduct business and how we engage with our stakeholders. It also describes our expectations regarding human rights, sustainability and ESG. It explains the expectations we have from all our employees and contractors and provides guidance to help our workforce navigate through their daily tasks and decisions.

We require our workforce to read, understand and comply with this Global Code of Conduct. If in doubt, I encourage the workforce to seek advice from their supervisors. Leaders in particular have a commitment to lead by example.

I would like to thank all of you for embracing this Global Code of Conduct, using good judgement, behaving with integrity and advancing our commitment to good corporate citizenship.

Mr. Jaromír Tesař
Chairman of the Board of Directors

Who we Are

Our core business is the hydropower sector. We operate hydropower plants in Central and Eastern Europe, the Black Sea and the Caucasus. We are also engaged in electricity distribution and power trading, operating large-scale distribution grids in Bulgaria and Georgia with more than 2.3 million grid customers.

Our company was established in 1994 in the Czech town of Svitavy, participating in the modernization and rehabilitation of hydropower energy in Central and Eastern Europe in the period of economic transition. The total installed capacity of our power plants is 1,241 MW, while annual power generation is more than 3.5 TWh.

One part of the multinational group ENERGO-PRO, headquartered in Prague, is the Slovenian manufacturer of water turbines, Litostrój Power d.o.o., with significant projects in Canada, Egypt and Iceland. Litostrój Engineering a.s., registered in the Czech Republic (formerly known as ČKD Blansko Engineering, a.s.), focuses on research, design and engineering works. Litostrój Group also supplies equipment for hydropower plants, including pumped-storage HPP and pumping stations.

Our Core Values

ENERGO-PRO is guided by the following 4 core values.

- **Integrity:** We all share integrity as one of our priority values and abide by this while conducting professional and personal activities. We are consistent and lead by taking a stand for what we believe is right and complying with the law, this Code of Conduct and corporate policies and standards.
- **Respect:** We respect each other and our partners and stakeholders and are aware that we work in a multicultural environment. We create an environment enabling all our staff to treat each other with respect.
- **Transparency:** We value transparency in all business undertakings, reporting and verbal communication.
- **Ethics:** We are committed to ethical standards in our professional and personal behaviour. We take responsibility and accountability for each of our individual actions and decisions and behave professionally during our daily activities, whether it is dealing with our business partners or working in a sustainable manner.

Purpose of Code

This Global Code of Conduct (the Code) was developed to provide practical guidance to support staff in carrying out their day-to-day activities in an ethical manner. It is our commitment towards responsible business practices. The code does not replace good judgement and common sense and we encourage all staff to seek advice if in doubt. Ignorance of the existence of the Code or the law, will not be accepted as a reason for non-compliance. The application of the Code will contribute to promoting our brand image and gain the trust of our partners and clients.

It is important that everyone, whether employees or contractors, understand the Code. ENERGO-PRO Group Companies can prepare specific local codes of conduct to supplement the Code.

Much of the content in the Code is reflected in detailed policies and standards established by ENERGO-PRO. All employees and contractors are expected to comply with the Code and ENERGO-PRO's policies and standards. These policies and standards are

- Anti-Bribery and Anti-Money Laundering Policy
- Data Protection Policy

- ESG Policy
- Health and Safety Policy
- Human Resources Policy
- Human Rights Policy
- Security Policy
- Procurement Policy
- Sustainability Policy
- Whistle Blower Policy

Who does the Code of Conduct Apply to?

This Code applies to all ENERGO-PRO's employees, including temporary workers, directors and executives. We also expect our contractors and consultants, who are paid by the Company, to abide by the Code while undertaking work for ENERGO-PRO.

Global Code of Conduct Priority Areas

Priority 1 - Where we Work

Our People

Our most valued asset is our people. Our team is made up of more than 2000 talented and diversified professionals enabling us to provide exceptional service to our clients and partners.

We have developed a Human Resources Policy and we aim to create an environment which treats all employees fairly and with respect.

Workplace bullying or harassment can lead to unproductive behaviour and can cause health problems including work injuries and psychological illness. It can affect morale and productivity and create an unsafe work environment. Victims of harassment or bullying might not want to speak up, which can lead to a perception of workplace culture that tolerates this kind of behaviour. We do not tolerate any form of workplace discrimination, bullying, or harassment based on sex, religious or political affiliation, nationality, age, race, ethnicity, or sexual orientation.

We promote diversity and inclusion, evaluating candidates and employees according to their qualifications and promoting workers based on their abilities and performance. We treat all our employees and contractors with respect. Our employees have the right to a safe workplace, fair compensation, job security and equal treatment. We will make reasonable efforts to employ people from the communities where we operate and make efforts to offer development opportunities.

What can you do?

- Promote employees based on merit and job performance.
- Lead by example and treat all employees with respect.
- Report all harassment and bullying to your supervisor or the Human Resource department.
- Make reasonable efforts to hire and promote women, including people from different ethnicities, supporting our commitment towards diversity and inclusion.
- Follow the Human Resource Policy and related standards and procedures.
- Do not make fun of employees, including making offensive jokes or using inappropriate language or gestures.



More information regarding our people is available in the Human Resources Policy, Whistle Blower Policy and related standards.

Health and Safety

Health and Safety is indispensable to the success of ENERGO-PRO. We promote a zero-harm culture within our operations and make all efforts to minimize risks to our workforce, contractors and the communities by creating a safe working environment. Every person within the organization is accountable for his and her own safety and that of their co-workers. We establish health and safety management systems (HSMS) at all our construction and operation sites to mitigate safety risks.

Managers are responsible for developing and implementing fit-for-purpose risk-based health and safety measures and for taking appropriate actions for creating and maintaining a safe and healthy working environment.

We expect all leaders to promote a safety culture and lead by example, showing a genuine concern for their safety and the safety of others. We ensure all employees understand their safety obligations. Unsafe practices or non-compliance with our safety obligations are addressed immediately and reported to leaders. We make distinctions between intentional and unintended acts which place people at risk of harm. We investigate all incidents regarding health and safety and encourage corrective behaviour rather than punishment, when appropriate.

We do not tolerate recreational drugs or inebriation at our offices or work sites.

What can you do?

- Ensure health and safety risk assessments are performed regularly.
- Prior to undertaking work activities ensure the environment is safe and you have adequate skills and Personal Protective Equipment (PPE) to perform the task.
- Understand the tasks that are required and feel free to ask questions if it is not clear.
- Become familiar with all the health and safety management plans relevant to your job.
- If you see a co-worker performing an unsafe practice, ask this person to stop the activity immediately until it is safe to continue.
- All leaders must encourage a safety culture within all construction and operation sites, making health and safety a priority.
- Report all incidents and undertake a thorough investigation with mitigation and preventive measures.
- Become familiar with the evacuation plan in case of an emergency.
- Get involved in providing ideas for continuous improvement of health and safety.



More information regarding health and safety is available in the Health and Safety Policy, standards, and the site-specific plans and procedures.

Communications

We are committed to a transparent and two-way engagement with our employees, communities, government, clients, shareholders, partners, and other stakeholders. We use various tools and media to communicate with our stakeholders including our website, published reports, subject specific documentation, press conferences, media interviews, community meetings, community boards, one-to-one discussions and other.

We aim to make our communications culturally sensitive and appropriate, timely and accurate, encouraging discussion and dialogue, and developed to target different audiences.

Communication with the media is aligned with the Communications Department in Prague and only pre-approved ENERGO-PRO people are authorized to engage with the media. The media includes print news, radio, TV, and social media. You are strongly advised not to make

comments about ENERGO-PRO to the media, including Twitter and Facebook and other social media platforms without consent from the Prague Communications Department.

All employees and contractors are required to obtain permission from the Board before agreeing to participate at any public event to discuss ENERGO-PRO matters, this includes scientific information that could have been obtained at any of the ENERGO-PRO sites.

What can you do?

- Do not make comments about ENERGO-PRO on any social media platform such as Facebook or Twitter.
- If you are contacted by someone from the media, refer that person to the Prague Communications Department.
- If you would like to speak at a public event, such as annual conferences and discuss ENERGO-PRO, obtain approval from the Board.
- Ensure public documents are accurate and factual.
- Do not spread malicious rumours or gossip about ENERGO-PRO or your co-workers.
- Promote open, transparent, inclusive and constructive engagement, particularly with the communities, including women, the elderly, and vulnerable people in all matters that concern them and have regard to community participation in decision-making.
- While we recognize and endorse Freedom of Speech, as an ENERGO-PRO employee you accept any required investigation and potential disciplinary action for employee communications or actions that are damaging to our reputation, even if this happens outside working hours. For the avoidance of doubt, the Company may only take disciplinary action on lawful and justified grounds.

Priority 2 – How we Conduct Business

Privacy and Personal Data

The ability to share information easily and in a timely manner is essential for decision making. It also poses a risk if confidential information or personal data is shared. All employees dealing with sensitive information must protect such information from unauthorized parties. This includes vendor lists, contract pricing, bidding documents, investor information, non-public financial reports, information on mergers and acquisitions and other.

Our employee personal information is used in accordance with local laws and includes personal data relating to employees and/or candidates, contractors and suppliers.

Employees having access to personal and confidential data must:

- Not share confidential information unless allowed to do so by a manager with appropriate authority.
- Store confidential information safely.
- Erase personal data that is no longer required.
- Ensure the data is accurate.
- Use personal data only for the purpose for which it was acquired.



More information regarding data is available in the Data Protection Policy.

Bribery and Money Laundering

Group companies interact with many public and private entities. At each such interface a risk exists that bribes may be given or received or that money laundering takes place. We strongly believe in taking an active stand against bribery and money laundering and, as such, we have prepared an Anti-Bribery and Anti-Money Laundering Policy to guide all employees and associated persons towards behaving lawfully and with integrity whilst performing their work.

We have established an anti-bribery and anti-money laundering committee responsible for the introduction and overall implementation of the Anti-Bribery and Anti-Money Laundering Policy, including the supervision of training activities and the review of reports of internal investigations into alleged irregularities. The Committee has three members: one member of the Board of Directors, the Group head of the Human Resources Department and the Group general counsel.

Bribery usually means a person, whether acting directly or through an intermediary, giving something to another person as an inducement or reward for the second person (or another person) acting in an improper way. It also includes the second person receiving the thing in question.

Money laundering means converting the proceeds of crime into legitimate property or activities, thus hiding their true source. Money laundering often constitutes a criminal offense, depending on local laws.

What are some examples of potential unethical behaviour?

- Offering gifts or hospitality to government officials, including local authorities, exceeding 150 USD which have not been authorized.
- Offering “facilitation payments” to government officials to speed up an approval process.
- The conversion or transfer of property, knowing that such property is derived from criminal activity for the purpose of hiding or disguising the illicit origin of the property.
- The hiding or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from an act of participation in such activity.
- The acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such activity.
- Participation in, association to commit, attempts to commit and aiding, abetting, facilitating or counselling the commission of any of the actions referred to in the bullet points above.



More information regarding conflict of interest is available in the Anti-Bribery and Anti-Money Laundering Policy.

Conflict of Interest

At ENERGO-PRO we want to conduct business in a professional and ethical manner, we understand that sometimes the lines between professional and private interests are blurry. You could be unwillingly exposed to situations of conflict of interest during your work. For example, a conflict of interest could occur if you have a personal relationship with a supplier or with a potential employee candidate. It is normal, in fact most of the time beneficial, to know suppliers, contractors or employment candidates from previous work experiences. If this situation arises, it is your duty to inform your supervisor to minimize exposing yourself to a potential conflict of interest. If you are in a position that the supplier, contractor or employment candidate are family members, you should not participate in the selection process.

Conflicts of interest could also arise if you are participating or have a personal financial interest in a situation that could affect ENERGO-PRO or your job performance, for example a direct competitor. The most important thing is to inform you supervisor or the Human Resource department if you are uncertain about a potential conflict of interest. We suggest this communication is made in writing, for example via email.

What are some examples of potential conflict of interest?

- You participate in the selection of a candidate who is a family member.
- You participate in the selection of contractors who are family members or close friends.
- You accept gifts or hospitality, other than small courtesies, from a supplier or potential supplier or government authority.
- You participate in the board or work for a competitor during your free or company time.
- You have family members or close friends who have jobs at ENERGO-PRO that you can influence.

Fair competition and Anti-Trust

We promote free competition and abide by laws and regulations that promote free competition. We seek competitive advantage through lawful and ethical practices between our competitors and at different levels of our supply chain. We abide by anti-trust local and international regulations and other laws regulating fair competition.

What can you do?

- If you have access to sensitive company information such as contracts, hydropower project bidding documentation or contractor proposals, make sure you understand anti-trust rules.
- Do not leave hard copies of documents that may contain confidential and sensitive data at locations or under conditions where they may be accessible by any unauthorized persons.
- Do not disclose confidential data to unauthorized third parties during your employment or retain the same after the end of your employment.
- It is forbidden to discuss with competitors' price and technical offers of bidding processes
- Proactively distance yourself from inappropriate or unethical behaviour from other companies or associations and report any incident to the legal department.
- If unsure of appropriate conduct, contact the legal department. Violation of anti-trust and competition laws is a serious issue which could result in disciplinary action, including dismissal.

Inside information and insider trading

When performing duties, our employees may have access to inside company information that should not be used in breach of laws and regulations, and the trust we have placed on them. Inside company information can include pricing information, proposals, personnel changes, acquisitions, unpublished information, future earnings or losses and other sensitive non-public information.

We expect all employees to treat inside company information with due care and caution. Inside information may be disclosed to third parties only if permitted by law and regulations and is necessary for the performance of work duties, with appropriate reference to the confidentiality of the information. We condemn insider trading and will take all measures to prevent it.

What can you do?

- Do not disclose confidential business information such as financial information, business strategy, planned transactions and other.

- Abide by laws, regulations and internal rules regarding protection of personal data.
- Do not use ENERGO-PRO confidential commercial information for personal or third-party financial gain or advantage.

Priority 3 - Our Partners

Government

We endeavour to establish a relationship with all our government partners based on trust and integrity. Good relations with the national, regional and local government are essential to the success of our business in all the countries where we operate. We behave with integrity and the utmost professionalism when we engage with all levels of governments, including local government and elected community representatives.

We are committed to a two-way communication with all our government partners based on transparency and trust. We ensure all required permits and licences are obtained on time. We provide fact-based documentation, when required by government officials and assist with any information that might be needed, including documentation required in regulated audit processes. We work with the government to avoid or mitigate impacts on the communities and the environment, including collaborating in community development projects.

We do not employ government officials and we do not employ members of their family while such officials could influence a decision about ENERGO-PRO.

ENERGO-PRO could be required to aid government officials to attend industry conferences or visit ENERGO-PRO operations.

Gifts or hospitality provided to government representatives must comply with the terms of the Anti-Bribery and Anti-Money Laundering Policy.

What can you do?

- If pressured to employ government officials or members of their families, inform them of ENERGO-PRO's Global Code of Conduct and inform your direct supervisor.
- Ensure all documentation and information provided to the government or local authorities is accurate.
- Report all potentially suspicious behaviour by an ENERGO-PRO employee in dealings with the government or local authorities to your direct supervisor or the Human Resource Department.
- Make sure all contact with the government and local authorities is done with integrity and professionalism.

Suppliers and Contractors

We are required to work with multiple suppliers and contractors daily. Our suppliers and contractors are evaluated and selected to ensure they uphold the Code and related policies and standards. Contracts with our suppliers and contractors require compliance with our Code and local regulations, and if applicable Good Industry International Practice (GIIP).

Purchases of goods and services are made by each individual site or office. The selection of business partners follows a rigorous selection process. Throughout the selection process we ensure that all transactions are properly authorized and documented and follow local regulations. Procurement decisions are based on a combination of experience of company, best value, quality, and performance, including sustainability performance. Gifts or hospitality received from our suppliers and contractors must comply with the terms of our Anti-Bribery and Anti-Money Laundering Policy.

We encourage all sites to make reasonable efforts to source locally or regionally prior to seeking national or international business providers. All efforts are made to work with local companies, giving preference wherever possible.

What can you do?

- Explain to suppliers and contractors our expectations regarding the Code and company policies and standards.
- Ensure you plan ahead your business requirements to follow the appropriate procurement process.
- Work with the social team to identify local and regional companies and ensure these companies are registered in the procurement database.
- Obtain pricing quotations from several companies prior to selecting and document the selection process.
- If you know any of the providers inform your supervisor.
- Pay the providers on time and make payments only to the person or organization that provides the goods or services.
- Ensure security contractors follow a Human Rights due diligence process.
- Avoid litigations by always first attempting to resolve disputes in an amicable manner.



More information regarding suppliers is available in the Procurement Policy and related standards.

Political Parties, Religious Organizations or Trade Union Associations

ENERGO-PRO does not make donations to political parties or movements, including politicians or any public office candidates. Charitable donations to government organizations are authorized only by the General Manager(s) and only donations that are for group benefits rather than individuals will be authorized. Donations provided to government organizations must comply with the terms of the Anti-Bribery and Anti-Money Laundering Policy.

What can you do?

- As a private citizen you are allowed to participate in political processes outside of working hours, clarifying that you are not representing ENERGO-PRO in any way.

Priority 4 – Sustainability and ESG

The Environment Where We Work

ENERGO-PRO is committed to sustainable development, and we have prepared a Sustainability Policy and related standards to ensure that our operations are aligned with Good International Industry Practice (GIIP). In addition, we have committed to reporting on Environmental, Social, Governance (ESG) through an ESG third-party risk rating provider.

We recently joined the UN Global Compact and as such we are committed to supporting the 10 principles on human rights, labour, environment, and anti-corruption.

We understand that integrating sustainability in our operations, from planning to operations, will maximize our commitment towards preserving the natural and physical environment and the communities where we work. Finally, we hold our leaders and managers accountable for delivering and complying with the ENERGO-PRO Sustainability Policy and related standards.

We comply with the environmental laws and permitting requirements in all the countries where we operate, including binding laws regarding climate change. We aim to reduce the carbon footprint of our operations by improving energy, water, and natural resource efficiency in an effort to combat climate change. We are also committed to reporting our GHG emissions, setting science-based targets and taking action to decarbonize our operations.

What can you do?

- Read and understand the Sustainability Policy and related standards. We expect all our employees to be familiar and comply with the policy requirements.
- Recognize that climate action requires collective thinking and concrete plans and contribute your ideas on how we can reduce our climate footprint.
- Ensure that suppliers and contractors understand our sustainability requirements and share our commitment to the protection of the environment.
- Get involved in providing solutions to reduce the environmental footprint in our areas of operations and support the continuous improvement culture at ENERGO-PRO. Share your ideas with your supervisor and co-workers.
- Report environmental data accurately.
- Look for creative ways to reduce our environmental footprint and ensure all operations are rehabilitated and restored as much as possible to their pre-construction habitat.
- Report all environmental incidents that you witness, or you are aware of and contribute to the solutions to manage incidents and prevent reoccurrence.
- Make sure your daily work activities comply with the Sustainability Policy and related standards.
- Ensure you have the required regulatory and internal licenses or permits prior to starting activities or otherwise in good time. If unsure, contact the environment or legal department.
- Think individually of actions that you can do to reduce waste, energy consumption or water usage. For example, turning off the lights at the end of your shift, using reusable products instead of single-use products or supporting a community initiative to plant trees.



More information regarding the environment is available in the Sustainability Policy and ESG Policy and related standards.

Our Communities

We work with stakeholders including communities, associations, local government, governments and non-governmental organisations to design and develop programmes that benefit the communities in our areas of operation. We contribute to the social and economic development of communities through employment creation, community investment programmes and procurement opportunities. We aim to avoid or minimize the impact of our operations in these communities and maximize positive impacts.

We respect the cultural heritage, customs and traditions in our areas of operations and engage in a respectful and transparent manner with our stakeholders. We believe that by contributing to the well-being of local communities and establishing an open dialogue, we enhance our brand image and are able to operate globally and access new projects and financing opportunities.

What can you do?

- Engage with communities in a culturally appropriate manner and inclusive and share data that is factual and timely manner.
- Contribute towards the preparation of stakeholder engagement plans and grievance mechanism procedures.
- Maximize local employment and local purchases.
- Report all community incidents and grievances to the social department or your supervisor.
- Make community relations an integral part of your decision making.
- Provide recommendations on continuous improvement of community relations and stakeholder engagement.



More information regarding social issues is available in the Sustainability Policy and ESG Policy and related standards.

Good Governance

We have established internal controls and governance structures to ensure that we fulfil our business obligations and objectives in an ethical and transparent manner. We do not tolerate fraud in our reporting or improper use of company resources to commit fraud. Our financial and business performance reports, including our Environmental, Social and Governance (ESG) and Sustainability Reporting is accurate and timely. We disclose accurate reports and data to our shareholders, partners, governmental authorities, communities and other third parties.

Falsifying or misrepresenting reports can result in disciplinary action and possibly also civil and criminal liability. We have a zero tolerance towards fraud in our documentation and data.

Our board is fully accountable for ensuring the implementation of the Code and related policies and standards. We endeavour to remunerate our board and leaders based on good governance practices and sustainability performance.

What can you do?

- Speak up if you are witness to false documentation and data.
- Contribute accurate information to our partners, including governmental authorities and third-party auditors.
- During investigations contribute accurate information regardless of who is being investigated.



More information regarding governance is available in the Sustainability Policy , ESG Policy and Whistle Blower Policy.

Human Rights

We uphold and promote human rights within our areas of influence. We have regard to the principles recognized by the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Voluntary Principles of Security and Human Rights, and the declaration of the International Labour Organization on Fundamental Principles and Rights at Work. We require our suppliers and contractors to abide by similar standards and principles. We support the Human Rights principles of the UN Global Compact.

We recognize the rights of every employee to freedom of association, collective bargaining, equal opportunities and treatment, fair compensation and a safe and healthy work environment.

We understand the right of communities to a safe and secure environment and we conduct due diligence of our security contractors to ensure they have not been complicit in human rights abuses.

What can you do?

- Report cases of human right abuses to the Human Resource Department or your supervisor, this could include racial comments, promotion discrimination, unsafe work environment or suspicious work practices such as employment of children.
- Conduct due diligence of any potential security contractor.
- Leaders and managers should ensure that human rights awareness is provided to security personnel.
- Human resource personnel should be aware of and avoid human rights issues which are more commonly violated such as working hours and conditions, discrimination

and equality, child labour, unfair wages, compulsory or forced labour and modern slavery.



More information regarding human rights is available in the Human Rights Policy and Security Policy.

Application of the Code

Our Responsibilities as Employees, Suppliers and Contractors

We are all responsible for reading and understanding the Code and asking for clarifications if details in the Code are not clear.

Leaders in particular are responsible for leading by example and creating an environment where employees will not be exposed to illegal actions or non-conformities. In addition, leaders are responsible for developing awareness regarding the Code.

As an example, when confronted with business/work dealings ask yourself:

- Do I have doubts whether the issue is acceptable? (If you have doubts, then most likely the issue is not acceptable.)
- Is it legal?
- Are the actions consistent with the Code and ENERGO-PRO policies and standards?
- Am I comfortable discussing this issue with co-workers and my supervisor?
- Could there be negative consequences for me and/or ENERGO-PRO?

How to Raise Concerns About Potential Breach of the Global Code of Conduct

We all have a responsibility to work in an ethical manner when conducting activities for ENERGO-PRO. All employees and contractors that witness or are aware of a breach of the Code, even a decision made by a supervisor, are encouraged to report the issue to your supervisor, a Human Resources representative in their country and/or the Human Resources Director based in Prague.

Investigation Process

Employees or contractors who violate the Global Code of Conduct and policies could face disciplinary action if justified and depending on the severity level of non-compliance and in accordance with local laws. Severe cases could include dismissal and legal action. A respectful due diligence process will be followed, including an interview with the concerned person(s). The concerned person(s) will be notified in writing of the investigation, approximate duration of the investigation and interview and whether they will be allowed to go to work during the investigation. The concerned person(s) will be allowed to bring a support person and documentation to the interview. Key decisions will be communicated to the concerned person(s).

Disciplinary Action

The Group has a zero-tolerance approach to unethical business activities. Any employee or contractor involved in a breach of the Code will face disciplinary action and possible dismissal and legal action, depending on the severity of the non-compliance. A contract entered into with any associated person may in such circumstances be terminated.