

Our business principles

O2 CZECH REPUBLIC a.s. CODE OF ETHICS

INTRODUCTION

We, as a company, want to be a successful and credible. That's why we do things simply, with an emphasis on purpose, personal responsibility, fairness and sustainability in our business.

We and our customers We and our business

To achieve this, we have adopted Our Business Principles which apply to all of us at O2. They are based on the PPF Group's Code of Ethics, taking into account our industry and the scope of our company's business.

These principles are meant to be a practical guide for our daily work. Each of us has a share of responsibility for our company's performance and reputation. Our Business Principles also serve as a basis and starting point for more detailed rules governing our individual areas of activity.

> **Board of Directors** of O2 Czech Republic a.s.



	We are committed to quality	We offer innovative, reliable and quality products and services at a fair price.
2	We play fair	When promoting our products, we always provide our customers with truthful, clear, useful and accurate information. The products and services we offer meet the requirements of the law and match the description in our promotional content.
	We are here for the customer	We are always here for the customer if they have a query or complaint.
4	Information on the processing of personal data	We honestly disclose how we store and handle personal data of our customers. We also inform them about how to access and correct their data.
	We care about privacy	We safeguard all stored personal data – be it customer, business partner or employee data – with appropriate security measures. If security is compromised, we act quickly and redress the situation as soon as possible.

We and our business

	We are a fair competitor	We believe that open and free markets are good for consumers and society as a whole. In the course of our business, we comply with all laws and regulations that apply to our business.
2	Transparency	We make proper and timely disclosure of information required by law. In the spirit of transparency, we disclose other information to the extent we consider appropriate to the situation. We take care to ensure that the information disclosed is accurate, truthful and verified.
3	Control mechanisms	We apply appropriate control mechanisms to evaluate and manage risks to our company, our employees and our reputation.
4	Accounting and financial records	Our financial and accounting records provide a faithful and verifiable representation of our business.
	Anti-corruption policy	We do not accept or offer any gifts, invitations or other benefits that could be construed as a reward for, or that could influence, a particular decision. We will never take advantage of our position or contacts to benefit ourselves or anyone else.
6	Sustainability	We act with a focus on sustainability and the purpose of our business. We build on personal responsibility and fairness. In our work, we keep in mind that our business must be sustainable not only for us, but also for the nature, people and communities around us. We act ethically and transparently at all times.

We and our employees

	Recruitment	We want only the best people to work for us. In the selection, contracting, training and promotion of employees we are guided by clear criteria: skills, experience and credibility.
2	We do not discriminate	We build on mutual trust and respect among our employees. We create and promote equal opportunities for all. We denounce discrimination and strictly follow the regulations aimed at preventing discrimination. Harassment, intimidation, forced or illegal labour has no place in our company.
3	Safety in the workplace	We create a safe working environment for our employees. Safety and health of our employees are our priority. We ensure compliance with all legal and internal regulations in the field of occupational safety. Employees are consistently trained on them, and their supervisors have the responsibility to identify and prevent risks in the most effective way. Safety measures are continuously reviewed and updated.
	Unionization	We guarantee the right of our employees to join the trade union of their choice. We do not tolerate any kind of sanction or disadvantage against employees who join a union.
5	Employee assessment	In order to continue to improve our performance, we regularly inform employees about their performance reviews and expect their active participation. We ensure fair and equal pay conditions for all employees based on objective criteria.
6	Personal development	We care about the development and training of our employees. We offer training relevant to their profession as well as personal development opportunities to all employees. We regularly survey employee satisfaction and act on their feedback.

	Technologies that improve people's daily lives	We strive to make a contribution to social, technological and economic development. We create jobs, invest in telecommunications technology and deliver services that improve people's daily lives. In doing so, we focus on the security of our services and networks.
2	We limit our footprint on the environment	We are committed to sustainable development, environmental protection and reducing the footprint of our activities on the environment. In addition to strict compliance with environmental legislation, we continuously analyse the impact of our activities on the environment in order keep our footprint to the minimum. We minimize the use of toxic or otherwise hazardous substances and materials in our operations and ensure that toxic or otherwise hazardous substances and materials are disposed of appropriately. We strive to use the most environmentally friendly processes and technologies available.
	We advocate for our interests in a responsible way	We actively participate in discussions with government authorities and other organizations regarding pending legislation and regulation that may affect our legitimate interests. We do not use illegitimate or illegal methods to promote them, and we do not support any organizations or groups pursuing illegal activities or acting in illegal domains.
4	We are apolitical	We are committed to democratic principles, but we do not participate in political competition. We do not support any political parties or contribute to any groups associated with politics.
5	Commitment to ESG	We are always mindful of the non-financial criteria of our business, which we measure regularly and publish the results in our public reports. We apply due diligence rules in the areas of corporate governance, human rights, social responsibility and the environment and take them into account in everything our company does.

We and our suppliers and business partners

Commercial terms We strive to obtain services and goods for our company at the best available market terms. We base our relationships with suppliers and other partners on transparency in negotiations, neutrality in We are predictable business decisions and equality of opportunity. We keep our word We honour commitments agreed with our suppliers. We require our suppliers to comply with the laws and regulations that apply to them and to share our values. **Trusted suppliers** We choose suppliers who operate in accordance with the principles of sustainability (ESG). We encourage We support our suppliers in applying ethical principles aligned with our values. ethical behaviour

1	We play by the rules	We comply with market competition and public procurement rules. We do not enter into any agreements with competitors regarding competition (price, terms of sale, product or service offerings, preferential terms for the supply of goods or services) or that may have a prohibitive effect on market competition. We obtain information about competitors and customers only in accordance with the law and from legal sources. We never knowingly provide false or misleading information about competitors, their products, services or performance.
2	Public authorities	We respect final decisions and binding instructions of public authorities. We cooperate fairly and openly with public authorities and respect their independence and impartiality. We never attempt to influence their decisions or actions unlawfully and reject any possible efforts to do so. We are committed to provide public authorities with the cooperation required by the relevant legislation and to the extent provided for in such legislation.
3	Measures against illegal practices	We do not endorse or facilitate money laundering in any way. We strictly comply with all legal regulations aimed at preventing money laundering, financing of any illegal activities, and at fighting terrorism and aiding and abutting any such practices. We only cooperate with business partners whose business plans are, to our knowledge, financed from legal sources.
	International sanctions	We comply with restrictive actions and other international sanctions to the extent that they are binding on our operations. We monitor sanctions and related risks and take the necessary measures and procedures.
5	Integrated management system policies	We have integrated management system policies in place and undergo regular certification to ISO standards. This demonstrates our commitment to continuous improvement in certified areas.

	Protection of intellectual property rights	We respect copyright and intellectual property rights and take appropriate actions to protect them. Before we use any work, we make sure that we have the right to do so.
7	Trade secrets are safe with us	We take appropriate actions to protect trade secrets and all confidential internal information about our company, as well as data obtained about third parties. We handle information strictly in accordance with the law and international treaties, with the utmost care and responsibility; the same goes for any communication with third parties. In the course of our business and in the course of our business transactions, we take care to disclose only necessary and relevant information to third parties. We make sure that any communication with a third party or contractual relationship includes an obligation of the other party to maintain the confidentiality of sensitive and confidential information. In the course of our business, we take care not to interfere with any communication not intended for us.
	Network and service security	We are aware of our responsibilities arising from the essential importance of our networks and services. We continually assess information and cyber security risks and take appropriate measures to protect against attacks, service disruptions and other threats to the integrity of our services and networks.



We and our customers

]	We are committed to quality	We constantly monitor developments in technology and market trends. Our colleagues in the technical departments closely monitor the quality of our communications networks so that we can respond to any service disruptions and plan investments where they are needed. We have a quality policy in place according to international ISO standards.
2	We play fair	Our sales force is responsible for making sure that every customer receives all the information they need to know about the service, its features and its pricing terms and conditions, and that they are able to check everything. Although the technical details are often complex, we try to describe them in a way that the average user can understand.
3	We are here for the customer	We have a number of ways for customers to make a complaint if they are not satisfied with anything relating to our product or service. Where a contract can be concluded, we are prepared to accept a complaint in the same way.
4	Information on the processing of personal data	Our Privacy Policy is publicly available on the website and describes all the purposes for which we process personal data by law or may process it based on consent. Any customer can, after proper identification, find out what data we hold about them and request the correction of those that are incorrect or out of date. We have also appointed a Data Protection Officer whose contact details are freely available on our website.
5	We care about privacy	Under our internal regulations, each employee must strictly protect all personal data that they come into contact with in the course of their work and only disclose it to those who have the right to do so under the relevant regulations or as instructed by an authorised person. Any employee who suspects a leak or misuse of personal data must contact O2's Data Protection Officer and work with other departments to remedy the situation. All employees receive mandatory training, and the use of computer equipment is set up to require regular authorisations and strong passwords.

We and our business

7	We are a fair competitor	We regularly train employees whose activities may have a significant impact on our business in aspects of competition law compliance. We have internal procedures for detecting violations. We do not tolerate or reward illegal conduct; on the contrary, it is considered a breach of an employee's duties to the employer.
2	Transparency	We report our operating results and company information in our publicly available financial statements and annual reports. We comply with the regulations on beneficial ownership records. We communicate with the media factually and exclusively through or with the knowledge of a press officer. Employees are not allowed to independently provide any information to the media or to publish such information, for example on social media or elsewhere. If an employee is contacted by the media in connection with O2, they must inform the responsible press officer.
3	Control mechanisms	We have a mechanism in place to record and manage business risks. The development of these risks is regularly evaluated and employees responsible for the area in question must take measures to eliminate or mitigate them.
4	Accounting and financial records	Our financial statements are subject to a statutory audit which guarantees the correctness of our processes and the accuracy of the disclosed data.

We and our business

How we make sure that our policies are implemented?

Training on anti-corruption rules and their importance is mandatory for all employees. Before giving or accepting an invitation, a gift or any other value (e.g. payment for services), our employees are required to familiarize themselves with applicable laws, our internal regulations and those of the business partner (if available to them), as well as cultural and social customs, as applicable.

Our definition of what is considered a bribe and what is not is clear-cut:

A bribe is any financial or non-financial consideration (whether given directly or indirectly) to which there is no legal entitlement, and which is intended to secure or retain business otherwise than through the conduct of one's own business and economic performance; it may also be the influencing of a business or other decision or the securing of some other undue advantage.

Anti-corruption policy

On the other hand, a gift made in accordance with market practice and intended primarily to present or promote our reputation or that of the PPF Group is not considered a bribe. Unless there is an expectation of an undue advantage in return, it is not illegal or unethical. It is also important that the gift and the frequency with which it is made is not disproportionate in nature or value given the circumstances. Nor is participation in a social, educational or sporting event, etc. (e.g. a payment for services) considered a bribe if it meets the conditions set out above. However, gifts and entertainment above the threshold set by the internal rules must be reported by the employee to avoid any suspicion in the future ("Please register gifts" principle).

The provision of a gift in excess of CZK 5,000 (or the equivalent in foreign currency) must always be approved in writing in advance by our Compliance Officer. Any related expenses are compulsorily recorded, including the identity of the recipient, the reason and purpose of the gift, so that the record can be reviewed at any time. Our regulations and processes include a policy for dealing with conflicts of interest. Employees strictly avoid situations that could be considered a conflict between their own interests and those of O2. If they suspect a conflict may arise, they must report the matter in accordance with internal regulations and refrain from acting on behalf of O2.

Employees must report any attempt to illegally influence their activities, attitudes or decisions within O2 or the PPF Group to their supervisor and the Compliance Officer. The same applies to conduct that is corrupt in nature.

Sustainability

Our business is rooted in sustainability – that is why we have adopted an ESG Strategy. According to this strategy, the Board of Directors sets objectives and activities and monitors their implementation on a quarterly basis. The ESG Committee, which is composed of the company's executive management, supervises the implementation of our ESG objectives. O2's ESG Strategy is aligned with the PPF Group's strategy and ESG objectives.

We and our employees

7	Recruitment	We care about the security of personal data, the security of our networks, services and our integrity. We therefore apply adequate rules for the selection of employees. As part of the recruitment process, our recruiters consistently and within what is permissible under law check all relevant requirements related to the position to be filled (e.g. education, qualifications, experience, absence of a conflict of interest and personal integrity in relation to the activity performed).
2	We do not discriminate	According to our internal regulations, career development and remuneration are determined with regard to the level of education, professional skills, experience, diligence and a performance record. Our internal regulations contain a strict prohibition of discrimination in accordance with anti-discrimination legislation. In order to prevent undesirable phenomena, we have set up the necessary processes to investigate any suspicion of unlawful harassment or intimidation. As part of our internal regulations, each employee is obliged to respect the personality and privacy of their colleagues. Employees are prohibited from making inappropriate, abusive or derogatory comments about other employees or harassing, intimidating, humiliating or insulting them in any way through verbal or physical expressions.
3	Safety in the workplace	Specialized departments ensure that our workplaces comply with regulations governing health and safety conditions for employees. We regularly assess and review conditions at individual workplaces and take corrective action if needed. In addition, employees receive regular training in occupational safety and the prevention of health risks related to their work.
4	Unionization	We have a open line of communication with trade union representatives. We consult with them on suggestions to improve conditions for employees and the stability of their jobs. The trade union has the right to nominate a candidate for election to the Supervisory Board representing the employees.
5	Employee assessment	The criteria for remuneration are known to employees in advance. Performance and attitude are regularly evaluated to give employees the opportunity to improve their performance. And we are fair - we only pay for results achieved within the framework of compliance. We don't reward for results achieved by circumventing or directly breaking the rules; this encourages employees to respect the rules.
6	Personal development	The range of training courses is easily accessible directly on the intranet. Some courses can be conveniently taken by remote means. Employee satisfaction surveys are conducted at least once a year. We then share the measurement methodology and results with employees, and we inform them about the measures we have taken to improve the working environment. We identify talent and cultivate it with the help of specialised talent development programmes.

We and our communities

How we make sure that our policies are implemented?

Technologies that improve people's everyday lives

We have processes in place that connect the different departments so that feedback from customers on the quality of service or features, the accuracy of billing or information provided, and other suggestions can be used to correct any shortcomings. Before launching a service or a new feature, we test different user scenarios with an emphasis on ordinary users. We have a quality policy in place which is publicly available on our website. We are regularly certified for our quality management system and IT service management system according to international ISO standards. We publish detailed information on our website.

We limit our footprint on the environment

We have an energy management system in place, which is certified according to the international ISO standard. The introduction of this standard in the company allows us to better develop the systems and processes necessary to reduce energy consumption, improve energy efficiency and energy use. Our Energy Management Policy is a public document.

We strive to reduce the amount of waste we produce. We consistently sort waste in our offices, warehouses and technical facilities, as well as in the course of the construction and maintenance of our telecommunications network. In cooperation with external partners, we provide our customers with free take-back of end-of-life small electrical equipment, portable batteries or accumulators from households, which we then commit to recycling. For each electrical device, battery and packaging placed on the Czech market, we pay a recycling fee towards its subsequent ecological disposal. Detailed information is published on our website. In compliance with the Packaging Act, we have a contract for the collection and recovery of packaging waste with an authorised packaging company. We publish a link on our website to detailed information on sorting, collection and recovery of packaging as secondary raw materials.

By 2050, we aim to become a carbon neutral company. We are therefore committed to reducing our greenhouse gas emissions to 50% by 2030 compared to the baseline of 2021.

We organize educational and volunteer events for our employees to contribute to the restoration of the ecosystem.

We advocate for our interests in a responsible way We are a member of several professional associations and platforms where we formulate and advocate our position on the upcoming regulation. Through them, we also consult on draft regulations in the consultation process when directly invited to do so. We voice our comments and proposals in such a way that they are objective and reasoned and can be discussed in a substantive manner.

We and our communities

How we make sure that our policies are implemented?

We are apolitical

In matters of sponsorship and external communication we follow our internal policies. We have a press officer for communication with the media and any consultation regarding it. However, we do not comment on political issues. The activities of our company and our foundation are strictly apolitical. We do not support any political parties or contribute to any groups linked to politics. But we clearly stand for democratic principles, respect for human rights and international humanitarian rules.

Commitment to ESG

We have processes in place to measure the non-financial criteria of our business. Reports are published regularly and responsible employees are regularly required to report on the development of criteria in each area. We apply due diligence rules in the areas of corporate governance, human rights and the environment and take them into account in all our activities.

We and our suppliers and business partners

1	Commercial terms	Negotiation of supplier contracts is handled by specialized departments that strive to obtain services and goods for our company at the best available terms. This ensures transparency in negotiations, high professionalism and eliminates the risk of conflicts of interest.
2	We are predictable	At every stage, we base our relationships with suppliers and other partners on transparency in the negotiation process. That is why we also publish our contract negotiation policy so that it is clear what terms we are prepared to enter into and what are the requirements.
3	We keep our word	We honour the commitments agreed with our suppliers in a proper and timely manner; therefore, when negotiating contracts, the responsible departments proceed with awareness of our capabilities and do not commit to what we cannot deliver. Once a contract is concluded, the responsible departments will set up internal mechanisms to ensure that our contractual obligations are met. If a discrepancy nevertheless arises, we first try to resolve the matter through negotiation.
4	Trusted suppliers	Before the transaction takes place, employees are obliged to check, using available resources, the attitude of the business partner towards compliance with legal regulations and the quality of the business partner's control mechanisms (the existence of a compliance system and its effectiveness). For the purpose of this screening of business partners, we make the best effort as may reasonably be required and we use all adequate means at our disposal for this purpose.
5	We encourage ethical behaviour	When entering into contractual relationships with suppliers and business partners, we strive to ensure that each contractual arrangement includes a commitment to comply with applicable and effective laws, a minimum standard of ethics and morality, fair business practices, and that our partners continually work to reduce the environmental footprint of their business. To this end, we have developed standardized contractual arrangements, a sample of which is attached to this policy.

7	We play by the rules	Our employees are obliged to avoid any action that could be considered as an attempt to obtain an undue advantage in the award of a public contract, tender or public auction or to influence the conduct thereof. We communicate transparently and within the framework of the legal rules with contracting authorities. We regularly train the employees concerned. If they are unsure of appropriate action in a particular situation, they have contacts available for consultation.
2	Public authorities	Our employees are obliged to avoid any action or activity that could cast doubt on the nature of their relationship with persons acting on behalf of public authorities, both in the exercise of their public authority and when these officials are making procurement decisions for a public authority. We regularly train the relevant employees. If they are unsure of appropriate action in a particular situation, they have contacts available for consultation.
3	Measures against illegal practices	Our employees are obliged to verify, to the best of their ability, that the activities of the selected business partner are legal and that their funds come from legal sources. To this end, employees collect and store documents and information relating to business partners and transactions. Any transfers of assets are duly recorded in the relevant documentation, indicating the recipient of the transaction and the purpose of the benefit provided. This system ensures the prevention of money laundering practices by third parties. We consider money laundering to be any action aimed at concealing profits or funds derived from illegal activities, making it impossible to identify the source of such profits or funds and their beneficial owner, or altering the nature of such profits or funds so as to give the appearance of legitimate profits or funds. We do not undertake or condone any action that could be considered as concealing, transferring, keeping or using items that could be the proceeds of crime, or concealing or obstructing the identification of their origin.
4	International sanctions	Prior to conducting any business, relevant employees are required to familiarise themselves with all relevant legislation and comply with such legislation. They are also required to satisfy themselves, to the best of their ability, that the business partner is not engaged in any illegal activity, that its sources and profits are legitimate, and that the conduct of the business does not contravene any other provisions of this policy.

5	Integrated management system policies	We have integrated management system policies in place and undergo regular certification to ISO standards. This demonstrates our commitment to continuous improvement in the certified areas.
6	Protection of inte- llectual property rights	Employees who intend to use, for commercial purposes, a work created by a third party are required to ensure that we have sufficient rights to such use. The same applies to patents and other similar rights. When making audio-visual content available, we make sure that we obtain the rights to such content from the rights holder. We do not engage in any form of piracy, illegal distribution, unauthorised copying or illegal sharing of content. When providing internet connectivity services, we comply with the law so that we do not violate regulations relating to so-called "net neutrality" or prohibition of censorship. We take measures on the basis of instructions from an authorised person based on a specific legal regulation. If the responsibility lies with another person, we communicate this clearly to the authorities concerned.
7	Trade secrets are safe with us	Our internal policies make the protection of trade secrets is a fundamental obligation of our employees. We have technical measures in place to mark sensitive information and limit its dissemination.
8	Network and service security	Specialised departments monitor trends in technology and regulatory developments, as well as the frequency and type of threats to our communications network and service availability. We communicate with the relevant public authorities in the field of critical infrastructure and cyber security. Specialised departments consistently manage supplier relationships in this area. We protect specific information about our network security and security mechanisms from disclosure to ensure that network security is not compromised.

MANAGEMENT RESPONSIBILITY



As part of the prevention of unlawful conduct, managers are required to ensure that their subordinates are properly trained and educated, including attending mandatory training on this policy. Managers are required to ensure that their subordinates perceive the importance and relevance of the compliance system in our company and the PPF

Group. At the same time, senior employees shall, to the extent possible, reinforce the confidence of their subordinates in the effectiveness of these compliance systems. It is unacceptable to disadvantage in any way employees who have raised concerns about possible violations of labour, internal or other legal regulations and who have made a report or any

suggestion for improving the activities and procedures of the Company or the PPF Group.

These principles and PPF Group's Code of Ethics are continuously revised and updated to reflect the current social need, the needs of O2 and the PPF Group and the needs of employees.

A HOTLINE FOR REPORTING SUSPECTED BREACHES OF THIS POLICY

("WHISTLEBLOWING CHANNEL")

O2, as a member of the PPF Group, strictly observes legal regulations and international treaties in all areas of its operations, externally in all its activities in relation to any third parties and public authorities, and internally in relation to its employees. O2 respects the laws and regulations of the Czech Republic as well as those of the countries in which it or its employees carry out their activities (including temporary operations or activities) or in which the operations and actions of O2 as a member of the PPF Group may have an impact and influence.

O2 and its employees are obliged to comply with the relevant laws and regulations in all their actions where they act on behalf of O2 as a member of the PPF Group, in the course of its business or in its interest, and to represent O2 and the PPF Group by their conduct in such a way as to preserve the good name and reputation and not to cast any doubt on the activities of O2 or the PPF Group. Similarly, in their private activities, employees shall act only and strictly in accordance with the principles and values set out in this policy, so that their actions do not in any way damage O2 or PPF Group's good name and reputation.

Both O2 and PPF Group strictly condemn and reject any criminal activity or tortious conduct. O2 as a whole and its employees are obliged to refrain from any act or activity that could appear to be tortious in the eyes of public law; that is, as a criminal offence, an administrative offence or a misdemeanour.

In the event of any doubt as to the application of the law to their actions, employees are required to consult with

their manager, the Legal Department or the Compliance Officer.

In order to ensure effective monitoring of compliance with these principles and the PPF Group Code of Ethics, O2 has introduced a system enabling its employees and third parties to report suspected violations of these principles. O2 processes such notifications regardless of the person of the whistleblower and the method of submission. There are no penalties from O2 for filing a report. However, O2 does not tolerate knowingly false, harassing reports or any abuse of this institution.

O2's system for reporting breaches of these principles is aligned with the PPF Group's Code of Ethics. PPF Group has its own tools to enable its employees and third parties to report potential breaches of the PPF Group's Code of Ethics.

NOTIFICATION OBLIGATION:



In the event that an O2 employee suspects that someone in the course of O2's business, on its behalf or in its interest intends to commit or is committing any act that is in breach of this policy or the PPF Group Code of Ethics, they must promptly

report this fact by one of the methods listed above .

In carrying out this duty, the employee should take care to avoid violating the laws applicable to the matter, particularly those relating to the protection of confidential, classified and similar information.

This full version of our Our Business Principles takes effect on 1 July 2023 and replaces the previous version.

REPORTS CAN
BE MADE TO O2
USING ANY OF
THE FOLLOWING
CHANNELS:



IN WRITING (in paper form to the address published on the O2 website)



BY TELEPHONE (to the telephone number published on the O2 website)



DIGITALLY (using the form published on the O2 website)



IN PERSON, if the whistleblower so requests by way of one of the other means.



or in any OTHER WAY published on the O2 website.



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https://www.o2.cz/en/company/responsible-approach?setLanguage=en