

## INTEDOOR ANTI-CORRUPTION CODE

*The Company's **Anti-corruption Code** adds to, and elaborates upon, the Company's Code of Conduct. Just like the list of rules contained in the Code of Conduct, the Company's Anti-Corruption Code is not and cannot be exhaustive. Therefore, even in situations not regulated under the Anti-Corruption Code, the Company and its employees are required to act in accordance with its principles and objectives.*

*The Code is an internal Company guideline, which is binding on all employees.*

### **1. Definition of corruption under Czech law**

Corruption primarily denotes such conduct where a person acting in a capacity that allows them to offer or provide an undue advantage to another person, promises to provide, offers or provides such undue advantage in return for an undue benefit, typically of a personal nature.

Corrupt practices also include conduct where a person accepts, or has another person promise to them an unjustified advantage, for example, in exchange for information, a service or other consideration, which the person providing the unjustified advantage would not otherwise be entitled to in law.

Finally, the notion of corruption also extends to situations where a certain person is a “mere” intermediary in the act of promising, providing or soliciting an unjustified advantage.

Legal compliance is at the very heart of the Company's ethical policy. Intedoor always follows all applicable laws, regulations, rules and standards of the Czech Republic.

### **2. Sanctions for corrupt conduct according to Czech laws**

Most forms of corruption constitute a crime in the countries where the Company operates. In most of these countries, just like in the Czech Republic, individuals and legal entities can be sanctioned for corrupt practices (provided that individuals may even be sentenced to unconditional imprisonment).

### **3. Principles underlying anti-corruption behaviour**

The Company fully rejects any form of corruption and expects its employees to always act ethically, honestly, fairly and with integrity.

In particular, the Company prohibits, in their entirety,

- providing undue advantages to any persons,
- receiving undue advantages from any persons,
- suggesting or proposing the possibility of offering or accepting undue advantages,
- soliciting undue advantages,
- offering or mediating any undue advantages or handling such advantages in any other way, or
- using other people to engage in any of the above acts.

An undue advantage, typically referred to as a bribe, can take a variety of shapes; it can be offered or provided, for example, in the form of cash, goods, job positions or travel

opportunities, but also in the form of gifts, entertainment or other benefits, the value of which exceeds a habitual display of hospitality. Habitual displays of hospitality include promotional items, gifts of symbolic value or, for example, reasonable entertainment.

It is irrelevant whether the person who acts to the benefit of the briber is also the beneficiary of the undue advantage, or not. The beneficiary may be a completely different person (e.g. their relative, friend, supervisor, etc.); such conduct even constitutes a bribe and is therefore outlawed.

Similarly, it is inconsequential whether the person who acts in response to an offer or a provision of an undue advantage is an official or not. Corruption can also occur in the private sector, so any form of corruption in relation to any person subject to private law (whether they are an individual or a natural entity) is prohibited.

The Company and its employees are required to act in such a way that none of their actions can be construed as a corrupt practice in view of the foregoing. At the same time they must ensure that no third parties who in any way participate in the business or operations of the Company engage in any corrupt practices on behalf of the Company as defined above.

The Company fully realises the harmful impacts corruption can have on its business. Therefore, it is dedicated to honesty and fairness when striving for business success, always making sure it adheres to the law and wins its customers and orders purely with the quality of its services.

Employees who suspect any corrupt practices in the Company's operations are required to immediately report such instances to their supervisor, or directly to the Company management.

#### **4. Receiving and providing gifts and other benefits**

Employees must not offer or provide to third parties any gifts, entertainment or benefits, whether in kind, or monetary, or in any other form, or receive such benefits from third parties or have them promised to them, except for habitual hospitality or symbolic gifts appropriate to trade usage such as promotional items, symbolic entertainment or reasonable refreshments, all at a reasonable value, which typically will not exceed CZK 1,000.

#### **5. Risk of a conflict of interest**

A conflict of interest denotes a situation where the employment or contractual duties of employees and/or of the Company are in conflict with the private interests of a particular employee.

If an employee believes that a conflict of interest has occurred or may occur, they are required to immediately notify their supervisor or the Company's management to agree on the further course of action. Until the conflict of interest is resolved, the employee may not take any further steps in the matter at hand.

## **6. Transparency**

The Company and its employees are committed to making sure all actions they take within the realm of the Company's operations are transparent, verifiable and reviewable.

Contracts with business partners are concluded in writing, and they fall under the exclusive competence of the Company management.

It should be noted that any event that may affect the Company's operations and is not reviewable or certifiably documented may cast a negative light on the Company and its employees.

## **7. Corruption risk management**

The Company is dedicated to putting in place and implementing a number of mechanisms to identify and, where necessary, eliminate corruption. The main mechanism involves a requirement that all business contracts, offers, received invoices and key decisions be authorised by the owners of the Company at all times.

If a breach of this Anti-Corruption Code or any other violation of the Code of Conduct is identified, the Company management must always analyse the functioning and efficiency of the anti-corruption policy in place, even beyond the standard plan.

The Company intends to have the Anti-Corruption Code updated on a continuous basis with a view to ensuring its maximum efficiency at all times. Actions to increase the effectiveness and efficiency of the Anti-Corruption Code are proposed and adopted by the Board of Directors. However, any employee's initiative is welcome in this realm.

The current state and efficiency of the Anti-Corruption Code are reviewed at least once a year.

The Company mainly updates the Anti-Corruption Code in the context of these yearly reviews. However, where necessary, the Anti-Corruption Code may be updated at any time throughout the year.

## **8. Final provisions**

This Code of Conduct was approved by the Company Board of Directors on 20 April 2020, taking effect on 1 May 2020. Any amendments to this Anti-Corruption Code must be approved by the Company Board of Directors.

**Yvona van Wasseem Langerová**  
**Ethics Manager / Executive Officer**