

# MND Group Code of Ethics

MND a.s. (joint-stock company) and its subsidiaries ("MND Group") provide comprehensive services related to energies, participate in ensuring the raw materials and energy security of the Czech Republic and contribute to the sustainable future of business in the Czech Republic and thus throughout the continent of Europe. The companies of the MND Group belong to the wider KKCG Group, formed by companies directly or indirectly controlled by KKCG AG ("KKCG Group").

In this Code of Ethics, we set out the core values, principles, ethical rules and principles of conduct of MND Group companies and their employees. Further modification of ethical rules and principles includes compliance systems of individual companies of the MND Group. In such cases where these rules and principles do not expressly apply to certain conduct, all persons concerned shall always be obliged to act in accordance with applicable laws and in accordance with generally accepted and approved rules of decency and conduct.

## 1. KKCG GROUP SHARED VALUES

Although the business activities, employees and business partners of the MND Group companies are different from those of other companies belonging to the KKCG Group, we share common values and opinions within the KKCG Group on how to proceed within these business activities:

- a) **Respect:** Respect is the fundamental value from which everything we do derives, both as individuals and as a whole. Our business is based on respect for the company of which we are members, and respect for our employees, partners, competitors, natural resources, traditions and the legacy of previous generations.
- b) **Responsibility:** All individuals and also the society as a whole are responsible for their decisions and actions. We always try to learn from mistakes, and we are proud of our achievements.
- c) **Stability:** In relation to employees and business partners, we always act reliably. All aspects of our business are based on our long-term vision and the idea of sustainable development.
- d) **Courage:** Our business vision is an inspiration to others, whether individuals or companies, to find the necessary courage and determination within themselves and to work hard to achieve their goals.
- e) **Innovation:** Innovation is the fundamental principle of how KKCG approaches its diversified portfolio. We discover new solutions in traditional industries, and we also identify new opportunities. Innovation is the defining element of our business, thanks to which the KKCG Group is able to grow, develop opportunities and move forward.

## 2. COMMITMENT TO ETHICAL CONDUCT

We always act ethically and in accordance with all legal regulations that apply to the business, that is both domestic and foreign regulations. We also require our business partners to respect the same values and the same ethical rules.

## 3. RULES OF OUR BUSINESS

### a) Compliance with Legislation

We require unconditional compliance with legislation in all the countries in which we operate by each of our employees in terms of activities related to their job positions and their competences. We do not tolerate violations of legislation. Employees are regularly trained in key areas corresponding to the statutory provisions.



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## b) **Compliance with Internal Regulations**

Each of the companies of the MND Group creates its own system of internal standards which follow the current legislation and regulate in detail the rules of the operation of the company and the implementation of its business activities.

## c) **Corruption**

We reject any form of corruption. We do not in any way tolerate the giving of bribes to anyone or the acceptance of bribes from anyone, including any form of suggestion of offering or receiving bribes of any kind.

## d) **Legalisation of Revenues from Crime or for the Financing of Terrorism**

Each MND Group company makes every effort, through adequate control systems, to prevent the legalisation of revenues from crime or for the financing of terrorism. In our business activities, we thoroughly examine individual business partners and customers and at the same time we require them to act in the same way to their business partners and customers.

## e) **Giving and Receiving of Gifts**

We accept the giving and receiving of gifts only in very specific circumstances, even in situations where it may be a normal part of standard business relationships, so as not to overshadow the giving and receiving of bribes, or any waste material. Typically, only gifts of negligible value, suitable in a business context, respecting local cultural traditions and provided transparently without any other obligations are permissible. It is unacceptable to receive or give undue gifts.

## f) **Contributions for Charitable Purposes**

As part of our social responsibility, we provide donations for charitable purposes. We never make any charitable contributions in order to achieve our business goals.

## g) **Contributions for Political Purposes**

We never use any political or social influence to achieve our business goals. We provide contributions for political purposes only in very specific circumstances, and the purpose of any contribution for political purposes must not be to induce any person to commit an infringement or to remunerate such person for his/her infringement.

## h) **Cooperation with Suppliers and Dealers**

Our suppliers and dealers must be reliable and trustworthy; they must always act correctly and ethically; they must not violate their obligations and they must always deliver goods and services of sufficient quality. We check our suppliers and dealers on the basis of risk assessment.

## i) **Prohibition of Market Misuse**

We prohibit any market misuse, attempted market misuse or the encouragement of any other person or business entity to misuse the market.

## j) **Cooperation with Business Representatives, Intermediaries and Partners**

We insist that representatives, intermediaries and partners in joint ventures or activities which we choose must always act in accordance with all legal regulations, comply with the same ethical rules and share our values and standards.



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## k) **Relations with Public Authorities, Media and Competitors**

We cooperate with public authorities and the media fairly and openly, and we respect their independence and impartiality. We do not interfere in the decision-making of public authorities, and we respect their decisions. We communicate with the media through the relevant authorised persons, and our employees and managers must not disclose any confidential information about MND Group companies without prior consent.

Our employees are not entitled to enter into agreements with competitors regarding any elements of competitive struggle or any other agreements that could have a prohibitive effect on competition. We expressly prohibit any action that could be considered as an attempt to achieve an unjustified advantage.

## l) **Suspected Infringement Reporting**

Our employees and managers have the opportunity to immediately report their doubts about how we act to the relevant responsible persons in individual companies, especially in case of violation of the values we share as well as the legislation or internal standards.

## 4. SOCIAL RESPONSIBILITY

### a) **Adopting ESG Group Strategy**

We adopted the ESG strategy at the level of the MND Group. By adopting and by the content of this strategy, we declare our responsibility in the field of the environment, our responsibility toward society and communities in the regions where we operate and toward our employees.

### b) **Environment**

We promote a sustainable and responsible approach to nature and its surroundings. This approach involves reducing our energy and emissions demands, developing sustainable energy projects with an increased focus on the production and use of energy from sustainable and renewable sources.

All our companies are obliged to protect the environment as much as possible.

### c) **Support for Local Communities**

During our operations, we take care of good relations with local communities and regions, and thus we try to contribute actively to their development. Our support for improving the environment is directed primarily to the municipalities and locations where we actively operate.

We support a wide range of projects focused mainly on the development of sports activities, culture, education, environment improvement, etc.

### d) **Human Rights**

We do not accept or tolerate human rights violations. In our companies there is no place for discrimination, inhumane treatment or any action that interferes with human rights or freedoms.

## 5. EMPLOYEES

### a) **Care for Employees**

We respect each of our employees and take care of our employees with increased effort. We guarantee the certainty of a strong employer with tradition, background and future. We strive to build our work environment so that our employees feel comfortable and safe.

We offer our employees a large number of occupational benefits, from reduced working hours and a choice of advantageous products and services from our business partners to various forms of social assistance so that each of our employees can easily overcome any adverse or difficult life situation.



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b) **Protection of Employees**

We effectively protect our employees and their privacy and personal data in accordance with applicable laws. Workplace safety is an essential condition for the development of our business, and it is given increased attention.

c) **Development of Employees**

As a stable and long-term employer, we allow all our employees to develop professionally and realise their ambitions.

d) **Prohibition of Discrimination and Harassment**

We do not accept or tolerate any form of discrimination or harassment in the workplace.

e) **Senior Employees**

All senior employees have increased responsibility and, in addition to the responsibility for carrying out their own tasks, they are also responsible for their assigned organisational units within each company. Senior employees should lead their subordinates by good conduct, both in their approach to work and in the area of rules of conduct and interpersonal relations.