

# Code of Conduct and Ethics



## Dear Colleagues,

**Let us introduce our concept of company values, particular mandatory rules of conduct and moral principles which are becoming one of the key strategic management and company culture formative tools of the entire Group.**

The document, we hereby present to you, was drafted based on in depth analysis of ethical codes of both Czech and foreign reputable companies with contributions by dozens of employees from all our organisational units.

Our ethical strategy, collectively referred to as ‘the Code of Conduct’, openly declares the commitments of our company to customers, business partners, employees, and the community within which we operate. This Code also provides clear standards of workplace conduct and covers areas we consider crucial for our business. The individual chapters thus cover topics such as ways of enhancing the transparency of our company, for example, by preventing conflicts of interest, corruption, and other cases of wrongdoing, as well as environmental protection, safety, and quality interpersonal relations at workplace.

Alongside the established regulations, currently in effect, the Code also introduces some entirely new issues, such as accepting gifts and treats or providing statements on behalf of the company. We want this document to help promote pleasant operations of our company in general.

By publishing our Code of Conduct, we have clearly declared we consider high standards of conduct to be an integral part of our daily work routine, and at the same time the prerequisite for maintenance and further enhancement of our reputation and trust in Prague Airport.

We are glad we have a compass of strong and clear values to guide us on our journey towards our long-term strategic goals.

*Prague Airport Board of Directors*



# Our commitments

## **To customers**

We treat every customer on an individual basis and with utmost care as every person is important to us. We strive to ensure maximum passenger safety and safe aircraft operations.

## **To business partners**

We build and maintain correct relations with our business partners which are always based on contracts and consistent observation of their execution. We respect our business partners' rights to confidential and personal data protection.

## **To employees**

We adhere to all employee legal rights, including the right to form unions. We create safe and adequate work conditions and support the environment of trust and mutual respect. We enforce fair remuneration, reward high engagement, fairness, transparency and honesty. We will nurture the next generation of managers internally.

## **To shareholders**

We apply recognised principles of Corporate Governance, committing to maintain a balanced relationship between the company and its stakeholders, i.e. shareholders, statutory bodies, executive management, employees and customers as well as other interest groups.

We do everything in our powers to ensure the company's financial stability. We protect company assets and its good name.

### **To communities we live in**

We act in a way to ensure quality neighbourly coexistence. **The three core pillars underpinning our cooperation with communities are:**

- Programmes of financial assistance to villages and municipalities affected by air traffic, and non-profit or public benefit organisations active in the areas
- Open communication and ongoing dialogue with our neighbours to correctly inform them about matters of importance, thus building mutual trust.
- Examining further ways of cooperation and support of the surrounding communities.

### **To society**

Our safety measures are identical to those applied internationally or even higher. We protect passengers and citizens as well as all people around the world involved in civil aviation.

Environmental protection is a priority we try to incorporate into all everyday activities. We are committed to prevent environmental pollution and accept responsibility for the environmental impact of our activities.



## Our code of conduct

Our Code of Conduct (hereinafter also referred to as “the Code”) defines the basic rules of conduct pursued within the company and when acting on its behalf. It is underpinned by respect for the law and high moral standards.

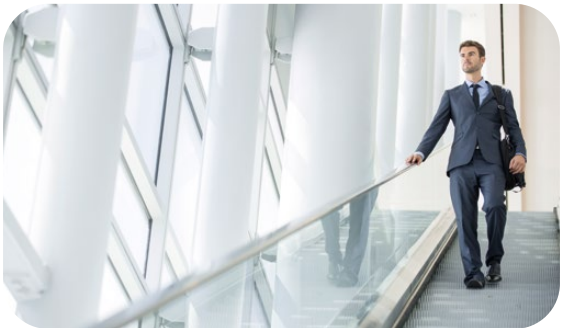
### **Character and validity of the code**

The Code is an integral part of internal directives, binding for all parties involved, irrespective whether in a regular employee or managerial capacity, member of the Board of Directors or other Statutory Bodies, incl. advisory bodies.

As we take our commitment to adhere to the Code seriously, no breaches or violations are to be tolerated. We also strive to make our business partners adhere to the rules and principles herein contained.

### **Code enforcement**

It is a long-term process and a goal set forth by our company to form and enforce a socially responsible and ethical work environment. To achieve this goal, we require that every employee accepts personal responsibility for their enforcement.



## **Guarantor**

The Board of Directors is the Code guarantor. It has appointed the Compliance team to be the enforcer and supervisor of the Code adherence. In this regard, one of the main tasks of the Compliance team is to increase employee awareness about the Code, providing interpretations of the individual rulings and updates. Concurrently, the team regularly informs the Board about all planned activities and their impact.

## **Management role**

As we consider personal example of supervisors at all managerial levels to be the key, we place increased demands on team leaders and managers.

## **Supervisors:**

- Set the example upon the Code of Conduct adherence, answer questions which may arise upon application of the Code and ensure that employees understand the Code
- Point out conduct deemed unacceptable
- Create a work environment where employees are not afraid to ask questions and report Code breaches
- Actively solve reports of alleged Code breaches and in the event that a breach occurs, they apply appropriate disciplinary measures
- Introduce measures preventing Code breaches
- Follow regulations within the area they are responsible for and include them in internal directives, processes and strategies

# Principles influencing our conduct

Employees conduct in the company is formed by three aspects –company values, mandatory regulations and ethical principles which everyone must respect. These aspects combined form our company culture.

## Our company values

We live and breathe values which are the key to our current and future success and company growth, such as:

### 1 Safety

We realise that the main prerequisite for safety in the air is safety on the ground. Our main mission is to provide an above-standard level of air travel safety and keep improving it at all times. Striving to increase safety is a natural part of every employee's job.

### 2 Customer orientation

Our customer satisfaction is the only acceptable measure of our success. We treat every customer on an individual basis with utmost care as every person is important to us.

### 3 Competitiveness

We support creative and innovative ways of thinking and actively look for opportunities for achieving our goals. We work hard and consider high-quality work to be the norm.

### 4 Responsibility

We are a good partner, an inspiring employer and an outstanding neighbour. We require that every one of us assumes personal responsibility. We are aware that all our decisions influence both the company future and the future of our surroundings.



## **5 Transparency**

We stand behind our decisions. We pursue open communication with our customers, business partners, employees and the general public. In all situations, we act correctly, in a trustworthy way and with mutual respect.

### **Mandatory rules**

We follow all rules and regulations related to our work, such as legislation and norms published in a form of mandatory internal directives.

### **Ethical principles**

Company values and mandatory rules govern the majority of our activities. However, there are situations which have to be evaluated from the general ethical principle perspective.

#### **We observe ethical principles by:**

- Being fair and honest, and acting with the utmost decency
- Protecting our unbiased status and treating all issues at hand objectively
- Not approving of behaviour in direct contradiction to our Code of Conduct
- Being loyal to our company and protecting its interests
- Promoting equal opportunities and prohibiting discrimination
- Taking care not to breach our commitments to the groups affected and consider the impact of our conduct when making decisions



## Our shared responsibilities



# Making responsible decisions

When making a decision, we ask ourselves the below questions to choose the best option which will not compromise our strategic goals and will safeguard our reputation and the company value for shareholders.

- ?** Do I have enough details regarding the situation?
- ?** Do I know and understand all internal rules and the state legislation governing the given area?
- ?** Am I aware of all stakeholders influenced or possibly harmed by my decision?
- ?** Have I discussed the potential risks, impact and alternative solutions with the parties involved?
- ?** Have I considered the ways the decision will be interpreted by the press, watchdogs, etc. in due time?
- ?** Will I be able to advocate my decision when confronted by:
  - legal representatives (Is my decision legal?)
  - company management (Is it in line with the Code of Conduct?)
  - my family and I (is it morally justifiable?)

A negative or ambiguous answer to a question means that we need more information, more solution options or appropriate approvals.

If in doubt regarding a suitable approach, we contact our supervisor or the person responsible for the particular area. If we are aware of a breach of the Code of Conduct, we will not hesitate, but act (see the “Speaking up” chapter).



## Speaking up (ethical line)

**We strive to make the adherence to the Code of Conduct an integral part of our everyday lives. If we do not speak up at times when the Code is being consciously breached, we will never achieve our goal.**

**The company management guarantees the employees who raise their concerns the following:**

- Protection from retaliation by their supervisors or co-workers even at times when no breach of the Code is verified under the condition that the notification was done bona fide.
- To keep the notification, provided information and identity of the person who has raised the concern confidential should he/she so request.

**The company management will punish any cases of retaliation against employees reporting their concerns.**

All notifications are carefully reviewed and thoroughly investigated – **you will never be turned down.**

More units may be involved in solving the reported situation, unless such an arrangement compromises the position of the person who has raised their concern. At the same time, it is an imperative that all investigators remain unbiased. If it is purposeful and possible, the reporting person is contacted to verify that all available details have been collected and understood. The person will receive feedback regarding the solution unless he/she prefers to remain anonymous.

### **Our responsibility**

Speak up if in doubt about the adherence to the Code of Conduct. We always report criminal conduct and conduct which can significantly compromise company goals or harm its reputation.

**We primarily report:**

- Suspicions of fraud, embezzlement and corruption
- Suspected conflicts of interest
- Situations which can lead to significant financial, business, technical, safety, moral and social harm or, alternatively, harm to the environment

**Ways of reporting our concerns and suspicions**

Using a confidential and anonymous form<sup>1</sup>, labelled “**Ethical Line**”, available on the intranet or the public company’s website.

**You can also direct your concerns at one of the employees or official bodies listed below:**

- Your direct supervisor
- Any manager you trust
- Executive Director of the Audit organisational unit, Risk Management and Compliance organizational units, Supervisory Board or Audit Committee in cases of breach of the Code of Conduct by a member of the top management

**Please, do not share your concerns with the person involved.**

<sup>1</sup> This form is not designed for reporting events which may compromise operational safety. Such notifications should be made via Safety Boxes or in a form of voluntary safety reports.

# Adhering to mandatory regulations

## General principles

The **adherence to legislation and industry regulations** is the key prerequisite to successful trading.

### Therefore, we always:

- Follow all mandatory regulations relevant for our scope of work and ensure that they are incorporated in our internal directives
- Clear any uncertainties with the legal department
- Pursue an open and transparent policy towards supervisory bodies

## Competition law

We reject all processes which distort free and fair competition. As a procurement assigner, we adhere to the transparency, equal treatment and ban on discrimination requirements. We act in line with the competition law, when entering into relations with competitors.

## International trade regulations

We comply with all applied local and international regulations, incl. EU and USA regulations regarding the export and re-export control.

## Financial integrity

We use our funds economically and avoid decisions which decrease the company value. We process our trade and accounting documentation in a way ensuring their completeness, preciseness and timely approval by the appointed worker. We apply sufficient controlling measures to ensure the process.

### It is our obligation to report:

- Transactions and accounting principles in breach or violation of the Code of Conduct
- Other significant unorthodox transactions, agreements, commitments and relations which could negatively influence company financial statements



## **Personal data protection**

We strictly collect personal data in the minimum scope necessary for the designed purposes and never combine data collected for different objectives. We protect the collected personal data against unauthorised access. We never pass the data on or make it available to third parties without respective authorisation.

Upon designing or adjusting products, processes and systems, we always consider the potential impact in this area and ensure an adequate protection of privacy and personal data as well as limit the option of data breach and its incorrect use or abuse.

**The rules of handling personal data are specified in the respective internal directive.**



# Preventing wrongdoing conflicts of interest

## Preventing wrongdoing

We do not tolerate conduct which could be classified as a criminal action – predominantly fraud and corruption. **We must never**, either in person or using a third party, **offer, promise, give, require or accept anything which could be considered as:**

- A bribe
- An unfair advantage
- A compromised objectivity and independence

## Preventing conflicts of interest

Conflicts of interest jeopardise the ability to make objective decisions in favour of our company. The phenomenon can have a number of disguises, but it does not automatically cause unfair conduct. It represents an increased risk of jeopardising our independence which may harm the company reputation.

## We always act in the best interest of our company and try preventing situations which could result in even an alleged conflict of interest:

- We prevent situations in which we could affect the decision in our favour or benefit from a person close to us (e.g. upon the new employee selection process or remuneration)
- We do not provide competitors and third parties with internal information
- We do not accept gifts and hospitality above the scope or in conflict with the internal directives
- We do not use time (our own as well as that of our colleagues), information, assets or company status for our personal gain or to support third parties without previous formalised approval

## We seek advanced approval for:

- Activities generating monetary gains which are identical with those of our employer
- Memberships in Statutory Bodies of companies outside the Group with the same scope of business as that of our employer

**We always report activities which may be considered or may seem to be a conflict of interest, primarily the fact that:**

- An employee is a member of a Statutory Body of a company outside the Group irrespective of the company's scope of work
- Activities generating monetary gains which are An employee is a shareholder or has other vested interests in a company which is a business partner or is attempting to become a business partner to one of the companies within our Group
- Activities generating monetary gains which are An employee is actively involved in a non-profit organization which is in a business relation with one of the companies within our Group
- Activities generating monetary gains which are An employee manages, reviews and/or evaluates employees who can be considered to be his/her close person

To obtain an approval or to report the previously-listed activities, we fill in the **“Conflict of Interest”** form, available on the intranet. Approval granting or denial is based on a viewpoint provided by an assigned employee from the Compliance team.

**The approval itself is then, upon evaluation of a particular situation and connected risks, granted by:**

- a) The Board of Directors – for employees directly supervised by one of its members.
- b) Direct B-1 level supervisor – for employees of the B-2 and lower management status, unless the approval granting is contrary to the view provided by the Compliance team. In such an event, the approval is granted or denied by the Board of Directors.

# Rules for gifts and hospitalities

**Our company considers the rule for accepting gifts and hospitalities to be one of the key policies preventing corruption.**

**We pursue the following principles:**

- We never require gifts and hospitalities
- We try to avoid accepting gifts and hospitalities

In the event that a refusal to accept a gift or hospitalities could be considered as severely indecent behaviour, we can accept them under the below-listed conditions. If the conditions cannot be met, we refuse the offer or return the already-received gift in a provable manner.

- a) We know the identity of the donor/provider (e.g. the name and registered seat of a legal entity)
- b) The donor/provider is our current or potential business partner
- c) The nature of the gift/hospitality, the frequency of delivery and its value (individually or cumulatively) does not exceed the usual and reasonable scope – considered to be a standard and accepted business practice
- d) Acceptance of the gift/hospitality does not convey the impression of undue influence, conflict of interest or corruption
- e) The gift/hospitality is not unsuitable or even repulsive in its nature
- f) The gift is not in cash or its equivalent

We can accept hospitality and keep a gift, in a form of promotion and marketing materials at a usual value equal to or lower than amount stipulated by the respective internal directive, a document which further specifies the conditions of acceptance of other than promotion and marketing gifts.

**We provide or offer gifts solely under the conditions that:**

- The recipient of the gift belongs to the group of approved gift recipients or the gift was approved by the appointed employee
- The recipient is not a family member or a close person
- The gift is available from a product catalogue (under the category of marketing objects) or a Christmas gift catalogue

We apply all measures not to give the impression of undue impact, alleged conflict of interest or even suspected corruption by offering a gift/hospitality.

**We record acceptance or provision of gifts/hospitality using the respective forms available on the intranet.**



# Protecting our reputation

## - rules for public announcements

### **Safeguarding our reputation**

We always act in a way ensuring that our conduct and behaviour, incl. social media activities, do not harm the good name of our company or that of our business partners. We bear in mind that the company reputation could also be harmed by our private indecent conduct.

### **Making statements on behalf of the company**

If we are not authorised to speak on behalf of the company, we refrain from such activity at work and outside work. We refrain from giving personal opinions related to the company, its business partners, competitors, etc. We refer all inquiries placed by third parties which we are not authorised to answer to the company Board of Directors or the Spokesperson.

### **Media relations**

Unless formally appointed to do so, we never make public announcements in the media, especially not in cases of extraordinary events. In the event that we are asked to provide a statement of behalf of the company, we refer the person requesting the statement to the company Board of Directors or the Spokesperson.

**We notify our supervisor or the Internal Communication Department about comments or messages harmful to the good name of the company.**

## Social media use

When using social media:

- We always act in a professional way and stay polite to others
- We consider the content of every published piece of information thoroughly as there is always a risk that one of our colleagues, customers and partners could come across the content of our social media posts
- We never publish internal information regarding the company or its business partners
- We do not engage in speculating and spreading rumours
- We do not make comments on behalf of the company and we always inform our supervisor or the Internal Communication Department about comments and messages harmful to the good name of the company



# Protecting assets, information and intellectual property

## **Tangible asset protection**

We use our company assets in a conservative and economic way, in line with their purpose, our internal directives and instructions. We pay attention not to use the assets in a way which could violate the rights of third parties (e.g. when using computer technology to spread defamatory, discriminatory or obscene materials). We work in a way to prevent any material damage to company assets.

## **Information protection**

We protect confidential information regarding our company, our customers and business partners primarily against leaks and misuse. We do not share internal information with unauthorised entities.

We refrain from carrying conversations at places where internal information could be intercepted by unauthorised people (in lifts, on buses, in restaurants).





We adhere to rules and follow processes regarding information classification and handling as well as information security principles. We provide internal information to authorised third parties only, applying measures ensuring safe handling of such information.

### **Intellectual property protection**

We use copyright works licensed to our company only. We do not use company electronic means to make copies of work protected by copyright, neither do we use these means for activities above the scope of our license or legal authorisations.

After terminating our employment in the company, we do not use or provide internal information to third parties without a written approval provided by the authorised employee.



# Promoting correct relationships

## **Workplace relations**

We promote an environment in which we personally feel good – an environment of trust, mutual respect and effective co-operation. We set an example for others, act honourably and with respect to others.

We refrain from behaviour which could be considered humiliating, insulting, (sexually) harassing, coercing and intimidating.

In the event that we witness or become the subject of unacceptable behaviour or discrimination, we must not be afraid to contact a supervisor we trust or the HR organizational unit.

## **Relations with business partners**

We do not provide anyone with unauthorised advantages or special conditions to the detriment of others, neither do we require or accept unauthorised advantages or special treatment for ourselves. We avoid conflict of our personal interests with interests of the company. We protect all confidential information and personal data we are entrusted with. We do not allow any other way of selecting business partners than in line with the respective internal directives – any deviations must be approved in advance.

We strive to gain information that may suggest unlawful conduct or malpractice pursued by our suppliers and their representatives. In case of a suspicion or doubts, we raise our concern.

# Promoting safety, security and environmental protection

## **Protecting Civil Aviation Against Unlawful Interference (SECURITY)**

We attend security trainings and adhere consistently to set security measures. We consider any information regarding security measures to be confidential.

We protect our work ID badges against misuse, do not lend them to others and immediately report any lost or found IDs. We follow the rules of entry, primarily by wearing our ID badge visibly, do not provide unauthorised access to third parties and monitor all persons guided around the premises. We respect and try to facilitate the operation of all standard security procedures at the airport, primarily the detection control of people and objects entering the premises.

We follow the instructions of the security personnel – we are aware that when dealing with security incidents and extraordinary events, seconds can become the decisive factor. We are vigilant to any suspicious behaviour – we know our workplace the best and thus have the best chance of detecting it. We always take measures when encountering suspicious behaviour or presence of unauthorised people, e.g. by immediately reporting the fact to the security unit.

We do not allow routine to lead us to bypassing security rules. If we make a mistake following the security protocol, we immediately notify the security unit which is able to react to the situation accordingly and apply appropriate measures.

## **Aviation Operational Safety**

We are aware of things happening around us. If we notice something which is deemed unsafe for aircraft, passengers or staff, we report it. We prevent dangerous situations. We are not afraid to report dangerous situations as by so doing we help prevent damage or injuries. We are not going to be punished for such reports. We always report incidents, damage, injuries and breach of protocol without any delay.

We use machinery only within the scope of our authorisations. We keep the apron areas and hangars clean, disposing of any waste produced. If we encounter foreign objects which could harm aircraft, vehicles or people, we dispose of them or immediately report their location.

We are considerate to people and machinery. Aircraft dispatch is team work and damages to aircraft are costly. We follow the approved procedures and standards. We take increased care on foggy days, at night, when it is snowing or icy and upon closures and operational limitations. Every activity we perform around aircraft is thoroughly planned in advance. We are careful and observant.

**We follow the 5-step rule:**

**breathe**

**act**

**think**

**check**

**draft a report**

## **Environmental protection**

We observe our surroundings closely and report everything we consider to be harmful to the environment. We recycle trash using special bins available at the workplace and in public areas of terminals.

We never dispose of dangerous substances using the public sewage system. If we detect a leak of substances dangerous to water or an incident, we apply appropriate measures to limit the spread of the hazardous substance and report the incident immediately. We always consider the impact of our operation on the environment.



# The ten code of conduct commandments and ethical principles

## **p. 4, 8**

**We promote company values** and act in a way to **help fulfilling our company commitments** towards groups affected by our operations.

## **p. 12**

**We make responsible decisions:** We ask questions which can help us obtain enough information allowing us to evaluate all potential risks and impact on all parties involved.

## **p. 14**

**We do not tolerate criminal acts – always filing a report.** We also report acts which could significantly influence the company ability to achieve its goals or harm its reputation.

## **p. 16**

**We follow rules and regulations related to our work.** If in doubt, we consult our attempted steps with those accountable for the respective area.

## **p. 18**

**We protect our objectivity.** We do not provide or request anything that could be considered a bribe. We prevent situations which could escalate into conflicts of interests. We act in a transparent way both towards the company and our business partners.

**p. 22**

**We act and behave in a way that does not harm the reputation of our company or that of our business partners.** We make statements on behalf of the company only if authorised to do so.

**p. 24**

**We use our company assets in a conservative way and in line with the respective internal directives.** We only use copyright works licensed to our company. We protect confidential information against leaks or misuse.

**p. 26**

**We promote a work environment in which we ourselves feel good.** We are fair and respectful. We do not provide unauthorised advantages or preferential treatment to anyone to the detriment of others, neither do we accept such treatment for ourselves.

**p. 27**

We help protect passengers and citizens worldwide by our **everyday due diligence and strict compliance with safety and security measures.**

**p. 29**

**We constantly strive at protecting the environment:** by recycling, acting in an economical way and considering environmental impact of every activity in which we engage.

If you have questions regarding the Code of Conduct, please do not hesitate to contact the Compliance Team at **compliance@prg.aero**.

Please submit your initiatives via the Ethics Lines of the individual Group-member companies as follows:



- at **+420 220 118 008**,
- via the e-mail address of **ethics@prg.aero**,
- in writing addressed to **Compliance**,  
**P.O. Box 536, K letišti 1019/6, 161 00 Praha 6**,
- via the ethics line form available at  
**www.prg.aero/compliance**.



- at **+420 220 118 006**,
- via the e-mail address of  
**ethics.handling@prg.aero**,
- in writing addressed to **Compliance**,  
**P.O. Box 505, K letišti 1019/6, 161 00 Praha 6**,
- via the ethics line form available at  
**www.czechairlineshandling.com/compliance**.



- at **+420 220 118 007**,
- via the e-mail address of  
**ethics.technics@csatechnics.com**,
- in writing addressed to **Compliance**,  
**P.O. Box 537, K letišti 1019/6, 161 00 Praha 6**,
- via the ethics line form available at  
**www.csatechnics.com/compliance**.

The above-listed Ethics Lines are a part of the Company's Internal Reporting System. The appointed administrators are Pavel Javůrek, Daniel Mazur, and Filip Zelingr.