



# Business Partner Code of Ethics

# Introduction

Companies associated in the Prague Airport Group (hereinafter “the Company”) have voluntarily committed to the integration of the principles of social responsibility as part of their activities and business conduct. As one of the tools of strategic management and formation of the Company ethical culture, we openly declare company values and the commitment to behave in accordance with these values, ethical principles, and binding rules. We can appreciate that our business partners play a significant role in our ability to comply with these commitments.

We are interested in working with business partners and organizations that, like us, not only perceive the need to comply with ethical principles and binding rules, but also approach the environment and society in a responsible manner.

We have drafted this Business Partner Code of Ethics as a summary of the minimum requirements needed for fostering correct relationships. We expect our business partners to respect them as we do.<sup>1</sup>

**The Business Partner Code of Ethics was approved by the Board of Directors of Letiště Praha, a.s. on 15. 11. 2022.**



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<sup>1</sup> The Code meets the requirements of the ten principles of the UN Global Compact international initiative, as well as the platform created by the International Forum on Business Ethical Conduct for the Aerospace and Defence Industry (IFBEC).

# A Thing Shaping Our Conduct

The behaviour of every Company employee is shaped by three components: company values, binding rules and regulations, and ethical principles, to which the employee must always adhere.

## Company Values



### Safety

We realise that the main prerequisite for safety in the air is safety on the ground.



### Customer Orientation

Our customer satisfaction is the only acceptable measure of our success.



### Competitiveness

We support creative and innovative ways of thinking and actively search new opportunities for achieving our goals.



### Responsibility

We are aware that our decisions also affect our surroundings, and therefore the Company requires personal responsibility of each individual.



### Transparency

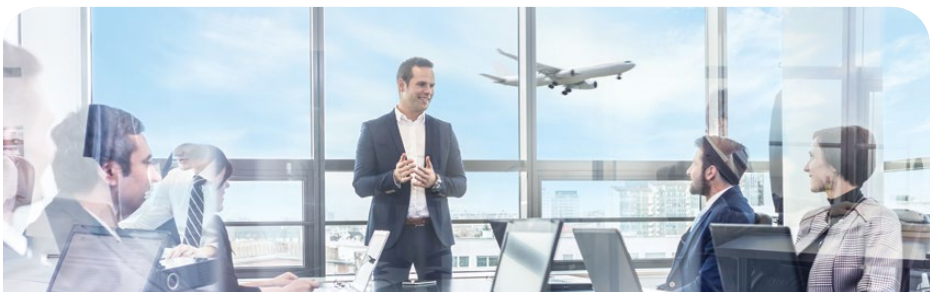
We pursue open communication with our customers, business partners, employees, and the general public, act correctly, in a trustworthy manner, and with mutual respect.

## Binding Rules and Regulations

We follow all legal and industry rules and regulations, including mandatory internal directives related to our work.

## Ethical Principles

We act in a fair, honest, and decent manner, safeguarding our impartiality. We are unbiased, do not discriminate, and do not leave unnoticed any conduct contrary to our code and ethical principles.



## **B** Scope and Monitoring

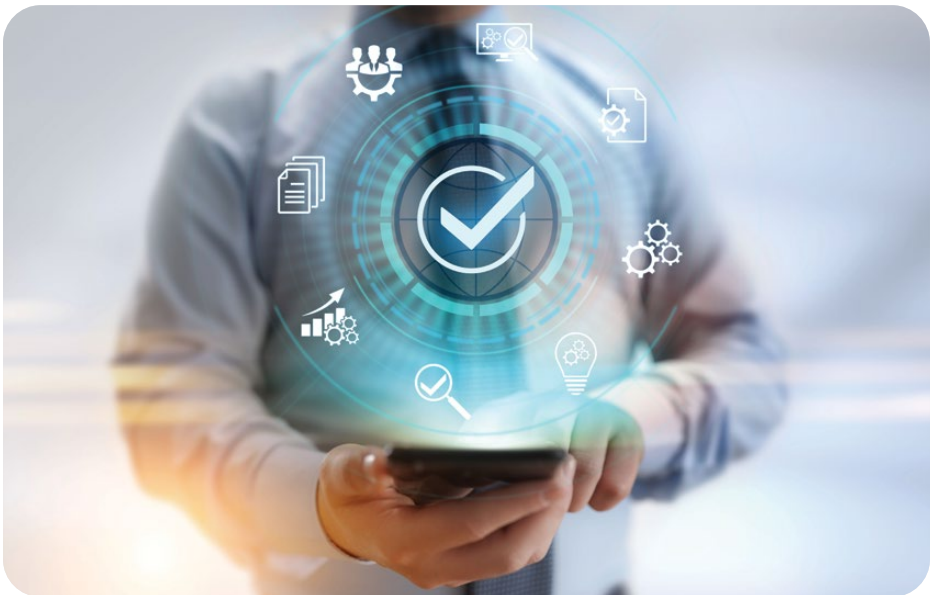
We value all our business partners, both suppliers and customers. In cases where we have the opportunity to more fundamentally influence the nature of the contractual relationship, and provided the relationship with the business partner may significantly influence our declared obligations and corporate values, we consider it correct to subject such relationship to the principles contained in this Code of Ethics.

The Code of Ethics principles do not replace the provisions of legal or other binding regulations and are not to be in conflict with the obligations pursuant to the agreement with the Company. However, should a conflict with the agreement occur, the provisions of the agreement take precedence and the wording of the principle contained in this Code of Ethics is applied to the extent to not cause a conflict.

When selecting business partners, we check the compliance of the business partner with this Code of Ethics. We may ask potential business partners to fill out a Business Partner Questionnaire, to the extent given in particular by the relevance of the contractual relationship for the Company.

The manner in which they ensure or demonstrate their compliance with the principles contained in this Code of Ethics is up to each business partner.

The Company reserves the right, at its own discretion and to a reasonable extent, to verify compliance with the principles set forth in this Code of Ethics by the business partner, or by their subcontractors. If the agreement so stipulates, the Company may organise a verification procedure for this purpose, either by itself or through a third party.



# **C** Requirements for Business Partners

In 2022, the Company adopted a comprehensive ESG strategy including environmental, social, and governance aspects of management. We promote, monitor, and evaluate relevant factors falling into these categories both internally within the Company and externally in relation to business partners.

## **1. Human and Labour Rights**

The business partner always supports and enforces internationally recognised rules for the protection of human rights and never participates in their violations.

### **1.1 Child and Forced Labour**

The business partner never uses and does not tolerate the use of child labour. Employing persons under the age of 18 is only possible under the stipulated conditions and after reaching the legally set age limit.

The business partner never demands the performance of forced labour, nor does it condition the performance of the employee's work by submitting any guarantee in the form of the custody of a public document, pledge, security, etc.

### **1.2 Work of Migrant Workers<sup>2</sup>**

The business partner applies a strictly equal approach to all employees, including migrant workers, especially with regard to human and labour rights, as well as working and boarding conditions in cases where accommodation is provided.

### **1.3 Harassment and Cruel and Inhumane Treatment**

The business partner never tolerates physical or psychological harassment or abuse, including rude and inhumane treatment. This means behaviour such as sexual harassment, sexual coercion, physical punishment, and verbal attacks, including threats to resort to such conduct.

The business partner establishes clear sanctions for breach of employment obligations, which shall be in accordance with the laws of the country where the work is performed and in accordance with this article.

### **1.4 Working Hours and Remuneration for Work**

The business partner pays employees remuneration for work performed pursuant to relevant legal regulations, including regulations regarding wage claims, minimum wage, overtime work, and mandatory contributions to the social and health insurance system.

### **1.5 Discrimination and Equal Opportunity Principle**

The business partner does not tolerate discrimination against people especially for their race, skin colour, gender, sexual orientation, ethnicity, religion, political beliefs, association membership, physical disability, and marital status. The business partner is obliged to ensure that discrimination does not occur in their workplaces.

<sup>2</sup> A migrant worker is a person who is engaged in a paid activity outside the state in which they have the right of residence.

### 1.6 Freedom of Association – Trade Unions

The business partner respects the rights of employees to freely associate and to join, but also to not join, trade unions and associations, and to participate in employee councils under conditions specified by the legal regulations of the country where the work is performed. The employee must be able to communicate with the management about the conditions of employment openly without fear of possible coercion, bullying, and threats of subsequent retaliatory measures.



## 2. Employee Health and Safety

The business partner protects its employees during the performance of their work from adverse effects on their health, especially chemical, physical, and biological, as well as from unreasonable physical stress.

The business partner ensures a safe and healthy working environment and working conditions for their employees, at least to the extent required by the relevant legal and mandatory regulations.

## 3. Environmental Protection

The business partner behaves as environmentally friendly as possible and complies with all relevant legislation, especially in the areas of waste management, air, climate, water, and landscape protection.

Furthermore, the business partner acknowledges that the Company has implemented a certified environmental management system (EMS) according to the ISO 14001 standard. The Company actively monitors, manages, and evaluates its activities in relation to the environment and requires the same approach be adopted by its business partners when fulfilling their obligations to the Company.

As part of responsible procurement, the Company requires, taking into account the nature of the job, such solutions that contribute to the Company's environmental goals, in particular the reduction of CO<sub>2</sub> emissions and pollutants in the air and wastewater, the reduction of the amount of waste, the compliance with the waste management hierarchy, the support of biodiversity, the reduction of the noise burden, etc.

## 4. Ethical Business Practices

### 4.1 Business Integrity

The business partner conducts business in an ethical manner, acts honestly, fairly, with an appropriate degree of decency, and does not harm the good name of the Company.

Damage to the good name means, in particular, the deliberate dissemination of false claims or accusations among the Company's customers and business partners or through mass media and social networks.

### 4.2 Transparency

In the business relationship with the Company, the business partner always acts transparently, following clearly and comprehensibly defined conditions which are equal and fair for all parties involved.

The business partner provides, at the Company's request, a list of their beneficial owners.

When supporting and financing political parties and movements, the business partner proceeds in accordance with legal regulations and always provides funds through transparent accounts.

### 4.3 Conflict of Interest

The Business Partner avoids any contacts with employees or persons acting on behalf of the Company in situations which could cause a conflict of interest or the mere appearance of it.

Throughout the course of the business relationship with the Company, the business partner may not employ or otherwise contractually bind the Company's employees, nor pay them unreasonable financial rewards or provide gifts and rewards of a non-financial nature, unless previously agreed between the business partner and the Company.

If the business partner is in a family or similar relationship or in another relationship (e.g., personal or work relationship), which could represent a conflict of interest or the mere appearance of it, with any employee of the Company, they are obliged to inform the Company about this without delay via its Ethics Line.

### 4.4 Gifts and Hospitality

The business partner does not provide gifts to the Company employees, except in cases where failure to provide a gift would be perceived as a gross violation of cultural customs in the country of origin of the business partner's company.

<sup>3</sup> In line with Act No. 37/2021 Coll., on the registration of beneficial owners.

We consider the provision of small refreshments and symbolic gifts, e.g., promotional items of the business partner, which must not be a source of undue influence, conflict of interest or, in extreme cases, corruption, or a hint at it, permissible. Gifts and hospitality are unacceptable in situations comprising decisions on the terms of a job order, business partner selection procedures, and subsequent negotiations on contractual relationship aspects.

## 5. Binding Rules and Regulations Compliance

The business partner is obliged to comply with the legal regulations which are part of the legal system of the Czech Republic, directly applicable EU regulations, and other regulations which are generally binding or which the business partner has undertaken to comply with. Concurrently, the business partner complies with laws and mandatory regulations in other countries where they conduct business activities.

### 5.1 Personal Data Protection

The business partner always processes personal data in accordance with the regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons in connection with the processing of personal data and the free movement of such data and the repeal of the directive 95/46/EC (the General Data Protection Regulation).

### 5.2 Intellectual Property Protection

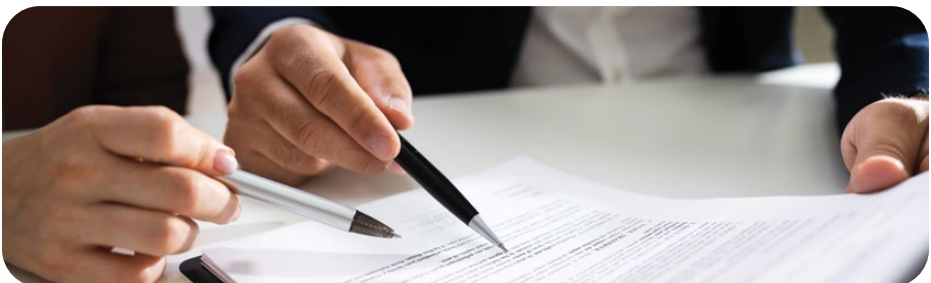
The business partner respects intellectual property rights. To fulfil their obligations to the Company, they always use technology, equipment, and products the use of which they are authorised with regard to the protection of intellectual property rights.

### 5.3 Financial Integrity

The business partner keeps their books and records accurately and transparently so that they are a true reflection of the transactions performed and, if possible, in accordance with the accounting standards.

### 5.4 International Trade Regulation

The business partner complies with legal regulations, international agreements, and EU international trade regulations, as well as observes any sanctions imposed by the UN, the EU, and the Czech Republic.



## 6. Misconduct Prevention

The business partner does not tolerate any misconduct of criminal nature, especially corruption or fraud, including embezzlement. Such actions are in complete contradiction to the possibility of the creation and development of a correct business relationship and as such may be a reason for the termination of the Company's cooperation with the business partner.

The business partner supports and implements procedures that prevent misconduct, e.g., in the form of programmes and employee trainings covering the areas of prevention, detection, and investigation of misconduct, including adequate subsequent responses.

### 6.1 Corruption

The business partner complies with laws and international conventions against corruption. They must not offer, provide, and demand nor accept anything that could be considered a bribe, an undue advantage, or a violation of objectivity and independence.

The business partner does not provide any illegal contributions, payments, and benefits to employees and representatives of the Company, third parties, and public officials, either directly or indirectly.

### 6.2 Fraud

The business partner does not obtain or benefit from any kind of fraudulent conduct, such as lying or making false claims in relation to consumers, business partners, and public institutions. Fraudulent conduct includes not only exploiting the mistake of another entity, but also any kind of illegal misappropriation of assets.

### 6.3 Money Laundering and Terrorist Financing

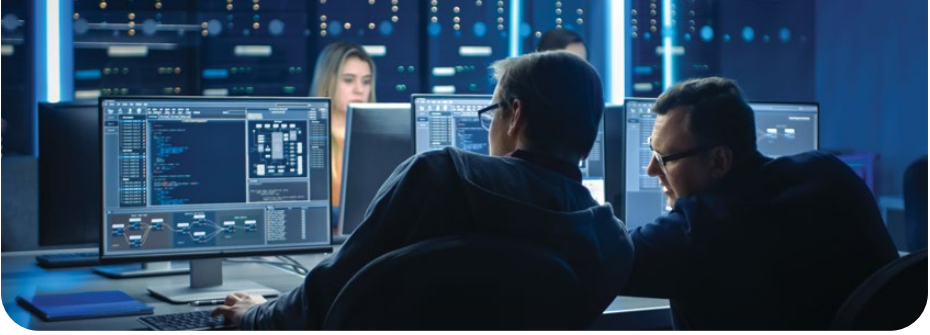
The business partner does not participate in and does not tolerate actions aimed at concealing the illegal origin of any economic benefit resulting from criminal activity, the aim of which is to give the impression that it is a proprietary benefit obtained in accordance with the law.

The business partner does not participate in and does not tolerate the financing and support of terrorism, consisting in the provision of funds, property, and other support for the commission of a terrorist act or other criminal act intended to facilitate the commission of a terrorist act, as well as the support of a person or group that prepares such a criminal act, e.g., in the form of remuneration or compensation.

### 6.4 Economic Competition Protection

The business partner respects and abides by the rules of economic competition, rejects all procedures that would distort competition, and promotes procedures observing the principles of transparency, equal treatment, adequacy, and non-discrimination.





## 7. Safety and Security

### 7.1 Operational Safety and Protection against Illegal Acts (Security)

The business partner ensures that their employees and representatives, as well as other persons they involve in the fulfilment of their obligation, who move around the airport premises and in particular the apron areas, undergo safety training, strictly comply with the safety rules, the instructions of the airport operator, and the security personnel. Furthermore, they need to be sensitive to what is happening around them, notice suspicious behaviour and the presence of unauthorised persons in the workplace, maintain order in workplaces, clean up all waste they generate, and remove or report the occurrence of objects that may endanger aircraft, vehicles, and people.

### 7.2 Information Security

The business partner protects the information obtained in connection with the contractual relationship with the Company, especially information marked as confidential, trade secret, and information containing personal data. This information can be provided to a third party only in the cases and under the conditions stipulated by the agreement or legal regulations. The business partner ensures the adoption of sufficient technical and organizational measures to ensure the protection of the listed information.

## 8. Rule Breach Consequences

The business partner is responsible for the actions of the people they hire to fulfil their obligations to the Company.

The Company emphasises cooperation within the framework of a fair relationship with business partners. From this point of view, in the event of a less serious violation of this Code of Ethics, the Company generally agrees that the business partner seeks and implements remedy within a reasonable time. In the event of a substantial violation of the Code of Ethics, the Company reserves the right, in accordance with the agreement, to impose sanctions on the business partner or to terminate the contractual relationship. We consider substantial violations of the Code of Ethics to be the commission of criminal acts, damage to the Company's reputation, and the provision of false information vital for assessing whether the Company enters into a contractual relationship with the business partner.

## 9. Code of Ethics Familiarisation

### 9.1 Trainings of Business Partner Employees and Representatives

The business partner ensures their employees and representatives, as well as other persons they employ to fulfil their contractual obligations, are familiarised with the contents of this Code of Ethics.

### 9.2 Supply Chains

The business partner promotes the adoption of similar principles and standards among their suppliers, through which they fulfil their obligations to the Company.

## 10. Contact Us

As part of the fulfilment of their contractual obligations, the business partner informs the Company of violations of legal and mandatory regulations and rules specified in this Code of Ethics, especially in cases where there is a risk of damage to the Company, a violation of the Company's obligations in the area regulated by ISO 14001 (EMS), damage to its good name, and in the case where illegal conduct could be attributed to the Company in accordance with Act No. 418/2011 Coll., on the criminal liability of legal entities and proceedings against them, as amended.

### 10.1 Right to Report

Everyone has the right to communicate their reasonable doubts and suspicions about unfair and unethical behaviour that violates the principles set forth in this Code of Ethics.

The business partner ensures that their employees have the opportunity to report their concerns regarding violations of legal and mandatory regulations.

### 10.2 Whistle-blower Protection Guarantee

The business partner undertakes to refrain from any retaliatory measures against the whistle-blower.



If you have questions regarding the Code of Conduct, please do not hesitate to contact the Compliance Team at [compliance@prg.aero](mailto: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](mailto: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 located at [www.prg.aero/compliance](http://www.prg.aero/compliance).



at +420 220 118 006,



via the e-mail address of [ethics.handling@prg.aero](mailto: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 located at [www.czechairlineshandling.com/compliance](http://www.czechairlineshandling.com/compliance).



at +420 220 118 007,



via the e-mail address of [ethics.technics@csatechnics.com](mailto: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 located at [www.csatechnics.com/compliance](http://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 Zelinger.