

## **Code of Conduct**

A set of moral and social rules that establishes the principle of professional behaviour of the employees



### Purpose and status of the Code of Conduct



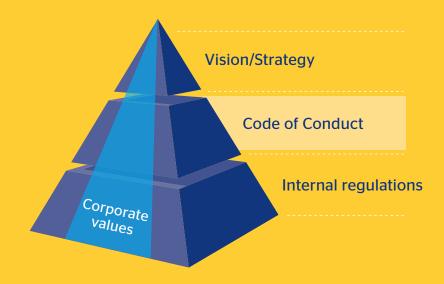
The Code of Conduct (hereinafter referred to as "the Code") is a set of moral and social rules that establishes the principle of professional behaviour of the employees in the exercise of the rights and obligations arising from their employment with Czech Post (hereinafter referred to as "CP"). It is mandatory for all employees of CP. This means that every employee, i.e. all of us who work for CP, is obliged to comply with its content.

The purpose of the Code is to define the limits of desirable conduct of CP employees in relation to the employer, colleagues, customers, business partners of CP and government institutions in order to create, maintain and enhance confidence in the operations of CP.

Our duty is to use sound judgment to make correct decisions during our professional or private activities in order to ensure that our conduct does not lead to a breach of the Code. At any time we can ask our superior for more details and explanation about how the content of the Code is reflected in our work.

In we have any doubt about some conduct that could be inconsistent with the content of the Code, we can consult the situation with our supervisor, the Human Resources personnel or the CP Compliance team, whose contact details are listed at the end of this document.

The status of the Code of Conduct in the governance documents



### Binding principles of ethical behaviour



### We comply with laws and internal regulations

- We have an obligation to comply with legal and internal regulations.
- We know the legal and internal regulations related to the performance of our activities within CP.
- As part of our work activities we respect the decisions of the state authorities.
- By our behaviour we strive to create
   an environment that supports the compliance
   with legal and internal regulations.

### We behave equally and without discrimination

- We are all equal in our fundamental rights and freedoms, and we have the right to be treated accordingly.
- We treat everyone equally regardless of their race, skin colour, ancestry, nationality, ethnic origin, religion, political affiliation, gender, sexual orientation, age or marital status.
- We do not tolerate discrimination or harassment.
- In civic life, we avoid such actions, behaviour and actions that could reduce the confidence in CP, damage its reputation or give rise to doubts about the moral, ethical and human standards of CP employees.

## We protect the personality of human beings

- The protection of our personality and personal integrity is a necessary condition for our dignified existence and free overall development.
- CP ensures the protection of fundamental human rights and freedoms as an integral part of the mental and physical integrity of us, the employees.
- We comply with the obligation to respect and preserve human dignity, personal honour and good reputation of the other employees.
- We do not use violence or threats of violence against others in order to force them to a certain behaviour, which also includes omission or toleration of any action or behaviour.



### Binding principles of ethical behaviour



### We act professionally, honestly, in good faith and with due diligence

- We perform our work according to our strength, knowledge and abilities, always well, with the utmost politeness and willingness, without any prejudice, and in the interests of CP.
- We deal correctly with our colleagues,
   business partners, employees of the public authorities, institutions and other entities.
- In relation to members of the public, customers or business partners of CP, we act with the utmost courtesy, friendliness and willingness.
- We make sure that any provided information is true, complete, unbiased and understandable, and is provided only for the purposes for which is is intended.
- In public, we always act so as not to disrupt the reputation of CP, and we do not do anything that might damage the image of CP.

### We behave economically to the entrusted resources

- We make every effort to ensure that during our work we use the property of CP and entrusted values in an effective, efficient and economical way.
- In carrying out the entrusted tasks, we proceed so as to avoid any unnecessary costs on the part of CP.

#### We prevent damage

 We comply with the obligation to act during our work so as to avoid any damage to health, property, nature and the environment.

### We collaborate and openly communicate

 We always act fairly, responsibly and helpfully towards other employees and always try to approach them so as to create an atmosphere of partnership in the workplace and thus contribute to the creation of an environment of trust, respect and cooperation.

## We provide cooperation in all investigationsh

- We adhere to the obligation to cooperate
  with the authorized bodies in the context
  of all the control and audit activities and other
  forms of investigation and inquiry (e.g. criminal
  proceedings, administrative proceedings)
  as prescribed by the law, internal regulations
  or decisions of the superior.
- In criminal proceedings, we provide
  the competent authorities with relevant
  cooperation and maintain the confidentiality
  of information within the limits required by
  legal regulations.
- We are aware that CP does not tolerate any denying or obstructing of collaboration, knowingly providing false information, or otherwise misleading internal or external auditors, investigators, the CP Compliance or other organizational units of the company or any public authority.



#### Intolerable conduct



### Zero tolerance of crime

- We acknowledge that CP rejects any criminal activity on the part of the company, its management and employees.
- If any wrongdoing or irregularity is found, we will make every effort that can be reasonably required from us with regard to the particular circumstances of the case, to stopand prevent its harmful consequences.

# Theft, embezzlement or damage to the assets and intellectual property of CP

- We do not appropriate any funds, resources or assets of CP, the other employees, customers or business partners, either for our own use or for the needs of others.
- Without the permission of CP, we do not use any material and information of CP for private purposes including business activities.
- We properly manage any intellectual property

   (i.e. we treat it in accordance with legal and
   internal regulations and properly protect it)
   created by CP as part of its operations.
- We follow the rule that copying, selling, using or distributing information, software or other data or intellectual property in violation of the laws protecting intellectual property rights or license agreements is strictly prohibited.

# Abuse or disclosure of confidential information to third parties

We maintain the confidentiality of any information that we learned in connection with the fulfilling of our tasks and that could harm or endanger the operations of CP or the interests of other persons, unless we were relieved of the obligation of confidentiality in accordance with legal regulations. In particular, this applies to the protection of personal data, trade secrets and mail or postal secrecy.



#### Intolerable conduct



#### **Corruption and bribery**

- We comply with the prohibition of receiving or giving bribes and other forms of corruption.
- In connection with our work for CP, we do not accept gifts or other advantages otherwise than in accordance with the internal regulations of CP.
- During the performance of the tasks entrusted to us, we act so as to avoid getting into a position in which we would be bound or feel obligated to reciprocate a service or kindness that was shown to us.
- During the performance of our work activities, we always act solely in the interest of CP instead of for our own personal benefit or the benefit of others.
- when selecting a supplier of goods or services, we comply with the rules for the awarding and performing of public contracts, in particular the principle of non-discrimination, transparency, equal treatment and efficient use of the funds of CP. We do not scheme or negotiate advantages in the process of awarding public contracts.

#### **Fraudulent behaviour**

- We do not cheat, i.e. we do not knowingly
  mislead anyone, do not use someone else's
  mistake or withhold material facts in order to
  enrich ourselves or someone else.
- We do not abuse our position, knowledge, confidential information obtained in connection with our employment at the detriment of CP or for personal gain.

### Working under the influence of alcohol and drugs

 We comply with the prohibition of work under the influence of alcohol, drugs or other narcotic or psychotropic substances.

#### Acting in a conflict of interest

- We prevent situations in which we would be exposed to a possible conflict of our private interest and our position at work. A private interest includes any advantage for us, our family, close and other relatives, legal or natural persons with whom we have had or have business or political relations.
- We must not engage in any gainful activity
  whose character is the same as the main object
  of CP, i.e. provision of postal services; in other
  cases we proceed in accordance with the
  internal regulations of CP.



# Contacts for resolving ethical dilemmas and contradictions with the Code of Conduct



If you have a reason to suspect or if you know that the Code has been violated, please report the case to the CP Compliance team using the contacts below.

If you are not sure whether a conduct is inconsistent with the Code or if you have doubts about its violation, talk to your superior, the CP Compliance team or the Human Resources personnel.

When a conflict with the Code is reported, any suggestions will be dealt with on a confidential basis. This means that the reporter's identity will be protected as far as possible. CP will not punish any employee who will in good faith have reported a suspected unethical conduct without its being subsequently confirmed.

Your report will be referred to the relevant organizational units whose competence covers the reported matter. The CP Compliance team resolves the matters of corruption, bribery, conflicts of interest and fraudulent behaviour as well as other cases where a breach of the Code may result in the corporate criminal liability of CP. The Inspection personnel resolves those reports that have the character of property and violent crime, such as mail thefts, robberies of post offices and postal vans. The other reports are resolved by the Human Resources personnel.

#### THE CP COMPLIANCE TEAM



#### **CP Compliance Representative**

Politických vězňů 909/4, 225 99 Prague 1, Czech Republic



The Compliance Line - phone: 221 132 352



By letter with the following text on the envelope:

"CONFIDENTIAL - A MATTER OF COMPLIANCE"

#### **Mailing address:**

Česká pošta, s.p. odbor CR/tým compliance Poštovní přihrádka 99 225 99 Praha 025



Email address

(technological mailbox):

compliance@cpost.cz

