

CODE OF ETHICS

BASIC RULES

- Compliance with laws

Compliance with the law is the fundamental basis of the company's ethical standards. 2 JCP a.s. is always governed by laws, regulations, rules and standards applicable in the countries in which we operate.

- Protection of the company's reputation

Employees are expected to always behave with the knowledge that they represent 2 JCP a.s., and that their actions or statements may damage the reputation and good name of the employer.

- Management

Managers are expected to promote exemplary moral and ethical qualities for other employees and representatives of the company to follow. They are also responsible for monitoring compliance with the Code of Ethics with their subordinates.

Our goal is a satisfied customer who is happy to return to us and continues to recommend our services.

Our goal is a motivated, confident, independent and responsible employee.

SOCIAL RESPONSIBILITY

- We approach the environment and natural resources responsibly.
- We maintain fair business relationships with our customers, suppliers and service providers.
- We are actively involved in socially beneficial activities and charitable events.
- We care for employees, their health, safety and education.

WE PLACE THE CUSTOMER FIRST

- Customer needs have the highest priority in fulfilling the company's strategy.
- The customer is the focus of our attention and our efforts.
- We build long-term relationships with customers based on trust and partnership.
- We understand that the customer is also a member of the team and has his requirements.
- We act professionally.
- We are looking for procedures, methods and ways to meet the requirements of our customers in the best possible way, in the highest quality and within the agreed deadline.
- We protect the privacy of our customers, and we handle their personal data in accordance with the law.
- We treat all clients equally.

WE CARE FOR RELATIONS WITHIN THE COMPANY AND WE ARE LOYAL

- We are happy to share the company's successes, and refrain from any activity which may denigrate the company's reputation and good name.
- We do not divulge company sensitive information
- We take responsibility for our actions in what we do, and we are not afraid to look back critically to learn from our mistakes.
- We respect our fellow employees and value the good work of all.
- We never refuse to help a colleague.
- We support the provision of equal opportunities to all our existing employees and candidates without any discrimination based on age, disability gender, race, sexual orientation, religion or belief.
- We do not tolerate any conduct by our employees that could lead to discrimination, insult, harassment or humiliation of another employee of the Company or any other person or entity with whom the employee is in contact during their work for the Company.
- We recognize the importance of protecting the personal information of our employees, guard our employees' personal information, and respect the confidentiality of personal matters.

WE ARE CAREFUL WITH COMPANY ASSETS

- We recognise that assets and services owned by 2 JCP a.s. serve exclusively to support the performance of our job duties and for the benefit of our company.
- We act in the best interests of 2 JCP a.s. and we do not use property (tangible or intangible), or our own position in the company for personal enrichment.
- We take care of and protect all company property and equipment
- We seek to minimise waste and mitigate any risk of harm.

WE HAVE AN ACTIVE APPROACH

- We actively complete assigned tasks in timely manner
- We strive to meet deadlines and assigned tasks in the required quality.
- We are innovative to ensure we offer the best solutions.
- We take responsibility for our decisions.
- We work as a team to achieve our goals

WE BEHAVE APPROPRIATELY WITH OUR BUSINESS PARTNERS

- We treat business partners with the same ethical standards and comply with applicable laws.
- We avoid all situations where there may be a conflict of personal and business interests.
- We do not tolerate illegal or dishonest means such as accepting or providing bribes or other non-financial consideration to support the company's business interests.
- We do not use the benefits of employment, or information obtained in the course of work for personal gain, or for the benefit of others and we do not influence any person or institution by abuse of employment.

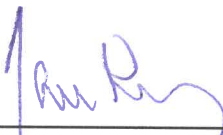
HOW TO SOLVE A CONFLICT WITH THE CODE OF ETHICS

An employee may use the following means to report complaints or comments:

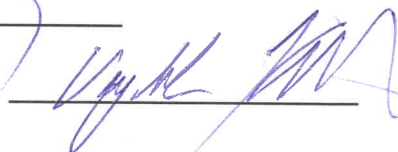
- A box located at the employer's registered office in the canteen building marked "Skoronehody BOZP". The mailbox is located outside the reach of the employer's monitoring system.
- An e-mail message sent to e-mail address ethics@2jcp.cz

2 JCP a.s.

Jan Pačes, Vice Chairman



Ing. Vojtěch Křenovský, Member of the board



Addendum No. 1

DEFINITIONS

Personal data, information - all information related to the activities of 2 JCP a.s. employees, management, customers and business partners that are not publicly known or accessible

Complaint - notification of the notifier's suspicion that a possible illegal act has occurred or may have occurred in the course of the Company's activities

Illegal / illegal conduct - a criminal or other conduct that is in conflict with legal regulations or internal company standards, in particular the rules set out in the Code of Ethics

Bribe - an unjustified advantage consisting of direct property (financial or material) enrichment or other advantage which is or is intended to be paid to the paid person, or with its consent to another person to whom the paid person or other person is not entitled

Customer - an entity that receives services from 2 JCP a.s

Conflict of interest - A conflict of interest occurs when a personal interest interferes with a company's legitimate business interests. Conflicts of interest may arise if your personal, social, financial or political activities (or the activities of your family members or relatives) undermine your professional responsibilities at 2 JCP a.s.

Sensitive information - special categories of personal data that are subject to special protection. These include information on health, sexual orientation, criminal offenses, final convictions, racial or ethnic origin, political opinions, religion or belief, or trade union membership.

Equal opportunities - Equal opportunities mean that everyone considered equal regardless of age, disability, race, gender, religion, or sexual orientation.

Discrimination - different treatment in comparable situations without reasonable justification for distinguishing people or groups of people on the basis of a reasonable scale, most often gender, ethnicity, religion and belief, age or sexual orientation, etc.