Compliance Policy Metrostav a.s.

The Compliance Policy is published in support of the implementation of the necessary processes and procedures for fulfilling the principles arising from the standards ČSN ISO 37301 and ČSN ISO 37001 for compliance with the relevant requirements that the company has been obliged to or has elected to adopt in the pursuit of its objectives, while configuring the prevention, detection and response to conduct that may be considered unethical, illegal or contrary to the established rules of the company.

In order to achieve the highest level of compliance, the following framework of principles and commitment is hereby expressed by the management:

- Metrostav a.s. has a wholly negative attitude towards unethical or illegal behaviour and declares zero tolerance for such behaviour on the part of employees or persons acting on behalf of the company. When such behaviour is detected, it will always be followed by an appropriate response in the form of measures that are clearly and demonstrably defined by the company.
- We always ensure compliance with the laws of the Czech Republic and the countries in which we do business or intend to do business.
- Meeting the demands of stakeholders is our goal, but never at the expense of violating ethical or legal standards.
- We do not tolerate corruption, bribery or unfair competition.
- We do not allow the possibility of a conflict of personal interests with the interests of the company.
- The company pays special attention to the area of sponsorship, the provision of financial gifts by the company and the giving or receiving of gifts by employees.

- The company screens and commits its business partners to comply with ethical rules and laws.
- The company screens all applicants for employment, with an emphasis on the selection of employees for management positions.
- All employees, members of the company's bodies and cooperating third parties are allowed to file any complaint related to unethical or illegal conduct through the Ethics Hotline.
- The company guarantees the protection of whistleblowers, except in the case of false accusations or deliberately false and damaging information. By doing so, we will prevent potential damages, criminal legal and moral penalties against the company and against all honest employees of the company.
- An independent person with appropriate status and authority is appointed for the operation of the compliance management system through the function of Compliance Officer.
- The company regularly reviews the suitability, adequacy and effectiveness of the compliance management system and ensures its continuous improvement.

Ing. František Kočí
president of Metrostav Group