



HAPPY END CZ, a.s. COMPANY CODE OF CONDUCT

Our company culture is based on trust, openness and transparency. These principles form the framework for responsible business conduct and underpin our day-to-day interactions with our stakeholders. At HAPPY END, the Code of Conduct is binding on every employee and none of us tolerates unethical behaviour in any form. We recognise that adherence to clearly defined ethical standards is a key prerequisite for HAPPY END's sustainable success. So let us not only try to understand the content, but also the spirit of this Code and follow it every day.

Roman Šilha
CEO

WHAT IS THE CODE OF CONDUCT

The **Code of Conduct** (the “Code”) is a tool that helps us ensure that the day-to-day activities of our company and the actions of all our employees are consistent with established principles. It is a set of rules based on the values and principles of HAPPY END and defines the standard of professional conduct.

Our values:

EXPERTISE
GROWTH
TRUST
INTEGRITY
COURAGE

These values are reflected in everything we do within the company in relation to our clients and all our stakeholders.

HAPPY END managers are responsible for ensuring that all employees are familiar with the Code, understand its content and spirit, and act in accordance with its rules on a daily basis. Managers are also expected to support team members who raise concerns about behaviour that may be in breach of this Code. HAPPY END shall at all times comply with the laws and regulations of each country in which it operates and shall be governed by its jurisdiction.

THE CODE IN EVERYDAY LIFE

Respecting my colleagues

HAPPY END has a fair HR policy and does not tolerate any form of discrimination. Everyone has an equal opportunity to join the HAPPY END team regardless of nationality, gender, religion, sexual orientation, disability, marital status, age or other specifics. Inappropriate verbal or sexual harassment as well as physical, psychological or other intimidation is not acceptable.

Treating other people's property with respect

The property of HAPPY END is only handled within the scope of one's competence and in accordance with legitimate interests. Entrusted funds may only be used for the purposes for which they are intended and with due care. The commitment not to waste resources and to protect the company's assets and reputation extends to intangible assets and services.

Everyone is equal before the law

Legal norms apply to everyone and their violation leads to adequate punishment, as does immoral, unethical and otherwise inappropriate behaviour.

Feeling safe

HAPPY END ensures equal and safe working conditions for its employees. These include fair and adequate remuneration in the form of proper payment of wages, professional training, regular training and opportunities for personal and professional growth. The working conditions comply with the principles of occupational safety and health, taking into account the physiological conditions and needs of employees. The performance of work activities in accordance with safety principles, as well as compliance with the working time pool, is strictly required and regularly monitored. Where possible, HAPPY END offers employees flexible working conditions, with respect to time and location, to promote a healthy work-life balance.

Being environmentally-conscious

Ensuring and creating conditions to permanently reduce the negative impact of individual behaviour and our society as a whole on the environment is a commitment for HAPPY END over the long term. Employees are held accountable for their behaviour and are required to work together to improve the level of environmental protection.

Maintaining the company's reputation

HAPPY END employees protect the interests and reputation of the employer in their work and non-work activities. They commit to maintain the quality and accuracy of provided services, to fulfil contractual obligations in a timely and transparent manner, to act professionally and to act in accordance with this Code at all times.

THE CODE IN OUR BUSINESS

At HAPPY END we do not tolerate any unethical behaviour. At the same time, we expect our employees to act in the best interests of HAPPY END and not on the basis of personal interests or relationships.

Inappropriate payments

A bribe can be described as giving or receiving something that could influence a decision or transaction. Bribes in any form are unacceptable at HAPPY END as it is a clear breach of ethics. Employees must not offer or accept bribes, commissions, illegal payments or any goods or services of value that could influence a customer, supplier or business partner's decision to order, purchase or use our products and services. This applies whether such donations are made directly, indirectly through a third party such as an intermediary, supplier, business partner or consultant, or in the form of a sponsorship or charitable contribution. Facilitating payments, (often small sums) paid to public officials to expedite mandatory official processes, are considered bribes and must be equally strongly rejected.

Donations and similar benefits

Donations and similar benefits of a personal nature can sometimes be part of business etiquette. Donations and similar personal benefits may only be offered to or accepted by a third party if they are of reasonable value and consistent with reasonable hospitality in the ordinary course of business. It is each employee's responsibility to become acquainted with the rules and policies of third parties regarding the acceptance of gifts, as they may differ from HAPPY END's rules and policies.

Conflicts of interest

It is important that all employees avoid situations where their personal interests conflict or may appear to conflict with the interests of HAPPY END. An example of when a conflict of interest may arise is when a HAPPY END employee participates in or influences a company decision that may result in personal gain, gain for a family member or someone with whom the employee has a close relationship.

Misusing business opportunities and confidential information

Inside information is accurate, non-public information relating to the plans or terms of a company. To avoid ethical and legal complications, employees must treat non-public information relating to HAPPY END's current and future business operations as strictly confidential.

Fair competition

The purpose of antitrust and competition laws is to promote fair competition and thus protect consumers from unfair business practices. HAPPY END respects and supports fair competition. This means, for example, that we always avoid illegal agreements between competitors that aim to restrict or prevent free competition, fix prices or otherwise promote unfair commercial practices.

Responsible communication

All employees must ensure that all communicated information only contains truthful and reliable statements. Our communication must also comply with internal rules as well as social norms. This means that all of our communication channels, including social media, must reflect the spirit of this Code. HAPPY END never disparages the products or services of our competitors.

Accurate records and reports

All of HAPPY END's accounting and reporting is performed in accordance with generally accepted practices, and our accounting records always provide a true and fair view of our financial condition. HAPPY END strives to provide information that is open, fair, relevant, timely and understandable.

Responsible purchasing

HAPPY END expects its suppliers and service providers to adhere to the values and principles set out in this Code. Our requirements for suppliers are described and explained in the document *"CODE OF CONDUCT AND SUSTAINABLE DEVELOPMENT CHARTER FOR SUPPLIERS AND CONTRACTORS OF HAPPY END CZ, a.s."*.

MUTUAL RESPECT IS THE COMMON GROUND

HAPPY END supports and respects all internationally recognised human rights, including the International Convention on Human Rights and the principles relating to fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. All staff, whether internal or external, must know, understand, respect and apply fundamental human rights.

SPEAK UP

Our Code sets high standards that we must all follow to maintain our reputation and conduct our business efficiently, with integrity and professionally. However, this Code cannot describe all possible situations you may encounter while working at HAPPY END. Therefore, compliance with the rules described herein is the responsibility of each employee. You can, and it is your responsibility, to raise concerns that may be in breach of the Code, our rules or the law. If in doubt, speak up! You can report the case to your line manager, HR manager or directly to the CEO.