



ARAKO
ROSATOM

Code of Ethics of ARAKO spol. s r.o.

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CONTENTS OF THE CODEX	Chyba! Záložka není definována.
1. Abbreviations, terms, definitions	3
2. Object and purpose of the Code	3
❖ Human rights and fundamental freedoms	3
❖ Honesty and transparency	3
3. Scope, validity and effectiveness of the Code	4
4. Basic principles and rules of conduct	5
4.2. Equal access and human rights	5
4.3. Protection of confidential information and personal data and confidentiality obligations	6
4.4. Professionalism and professional development	6
4.5. Property management	7
4.6. Conflict of interest	7
4.7. Negotiations with business partners and third parties	8
4.8. Dealing with public authorities	8
4.9. Measures against money laundering and terrorist financing	9
4.10. Integrity and fairness	10
4.11. Occupational health and safety	11
4.12. The environment	12
5. Investigation and resolution of unethical misconduct	13
5.1. Reporting of complaints	13
❖ the Ethics Committee or	14
5.2. Investigation of illegal and unethical conduct at ARAKO	14
5.3. Resolution of illegal actions	15
6. Getting to know the Code	16



1. Abbreviations, terms, definitions

Company ARAKO	ARAKO spol. s r.o., Hvězdoslavova 2897/18, 746 01 Opava, ID: 47152371, registered in the Commercial Register kept by the Regional Court in Ostrava, Section C, Insert 3858
Business partner	customers, suppliers, subcontractors, contracting authorities procurement agents, intermediaries and other entities with whom ARAKO has a contractual relationship
Management ARAKO	Managing Director and Executive Director company ARAKO
Employee of	i.e. the manager and any other employee in an employment or other similar relationship with ARAKO, as well as persons working for ARAKO on the basis of a trade license

2. Object and purpose of the Code

2.1. The Code of Ethics (hereinafter referred to as the "Code") defines ARAKO's core values and corporate culture, which is based on the highest ethical principles and aims to comply with legal regulations, respect the labour and human rights of all its employees, fulfil ARAKO's obligations, as well as prevent potential damages and sanctions against ARAKO, while preventing illegal or unethical behaviour.

The aim of the adoption of these rules and measures is also to increase the motivation of employees and responsible persons to take anti-corruption actions, to increase the likelihood of detecting corrupt behaviour, to prevent the recurrence of similar corrupt behaviour, and thus to minimise property and non-property damage.

2.2. The Code sets out **uniform principles and rules** of business and social conduct and establishes an **ethical framework for the day-to-day activities** of ARAKO and all of its employees, thereby creating the preconditions that the conduct of ARAKO and all of its employees towards each other and towards its business partners and third parties meets the **highest standards** based on the following values:

- ❖ **Human rights and fundamental freedoms**
- ❖ **Honesty and transparency**



- ❖ **Compliance with the law**
- ❖ **Mutual respect and loyalty**
- ❖ **Quality and professionalism**
- ❖ **Occupational safety and health**
- ❖ **Environmental protection**

2.3. The Code also assists the management of ARAKO in the conduct of its business, in making decisions regarding its business management, and in the management of its employees. Together with ARAKO's Memorandum of Association, **the Code is one of the fundamental pillars of responsible management** and good governance of ARAKO.

3. Scope, validity and effectiveness of the Code

- 3.1. The Code applies to and must be adhered to by all ARAKO employees regardless of their status or job title, including ARAKO management. Third parties acting on behalf of or on behalf of ARAKO must also undertake to comply with the Code.
- 3.2. The basic principles and rules of conduct set out in this Code of Conduct shall also apply mutatis mutandis to ARAKO's business partners and other entities with which ARAKO cooperates. When entering into business relationships with other companies or professionals, ARAKO and all its employees shall ensure that one of the selection criteria is whether these entities adhere to basic principles and rules of conduct similar to those set out in this Code.
- 3.3. ARAKO undertakes to endeavour to ensure that potential business corporations and other entities with its shareholdings also adopt their own code of ethics, the basic principles and rules of conduct of which are similar to those set out in this Code..
- 3.4. Within the hierarchy of ARAKO's internal regulations, the Code is superior in value to other internal regulations and all such other internal regulations must always comply with it.
- 3.5. The Code shall take effect on the date of issue and shall be valid for an indefinite period. Updates, revisions, or cancellations of the Code shall be approved by ARAKO's Chief Executive Officer.



4. Basic principles and rules of conduct

4.1. Compliance with legislation and internal standards and prevention of crimeprávních předpisů a interních norem a předcházení trestným činům

4.1.1. ARAKO and all of its employees shall at all times **strictly comply with applicable and effective laws and ARAKO's internal regulations in the performance of their activities**. They must also comply with the basic principles and rules of conduct set out in the Code where these basic principles and rules of conduct go beyond the requirements of the law.

4.1.2. A violation of the law or the basic principles and rules of conduct set out in the **Code by an ARAKO employee cannot be justified by following an instruction from an ARAKO executive officer, managing director or other ARAKO** body, or other superior employee; an instruction that would be contrary to the law or contrary to the basic principles and rules of conduct set out in the Code must be refused by the employee and reported to the Ethics Committee.

4.1.3. ARAKO does **not tolerate** and strictly rejects any violation of the law and the commission of criminal activities on behalf or in the interest of ARAKO and by its employees, the CEO, other ARAKO bodies and senior employees. Anyone subject to this Code who would be subject to criminal prosecution in connection with the performance of his or her activities must notify the Ethics Committee as soon as possible.

4.2. Equal access and human rights

4.2.1. ARAKO and all of its employees, as well as ARAKO's management, shall treat all individuals and legal **entities equally** in the conduct of their business, regardless of age, gender, ethnicity, national origin, religion, sexual orientation, marital status, disability, union membership or political views, or other distinct characteristics, thereby creating a basis for building and maintaining the trust of business partners and the public in ARAKO.

4.2.2. ARAKO does **not tolerate** discrimination or **harassment of any kind**, nor does it tolerate any conduct or attitude that may make any person feel restricted, humiliated or harassed.

4.2.3. ARAKO promotes **equal opportunities** for every employee or job applicant in terms of recruitment, access to training, remuneration and career development. The only relevant factors are professional skills, experience and personal ability.



4.2.4. ARAKO creates a working environment where **trust, friendliness and teamwork prevail**. Employees contribute to maintaining a pleasant and peaceful work environment in which abuse of power and any other behavior that could create an intimidating, abusive or hostile work environment is prohibited.

4.2.5. ARAKO promotes respect **for human rights and fundamental freedoms** and avoids working with organizations that violate them.

4.3. Protection of confidential information and personal data and confidentiality obligations

4.3.1. The protection of confidential information and personal data is a matter of course for ARAKO. This information is always handled in accordance with legal and internal regulations that guarantee **that this information does not reach unauthorized persons and is not disseminated for purposes other than those** of ARAKO. ARAKO employees may not use confidential information and personal data for any purpose other than the performance of their work tasks. Thus, it is **prohibited to** use confidential information or personal data for personal gain or for the benefit of third parties or to pass such information to competitors.

4.3.2. ARAKO shall only request from its employees, business partners and third parties personal data of a nature that serves the purposes of ARAKO's business activities and the fulfilment of its obligations under the law, and shall ensure that it is processed only in accordance with and for the purpose for which it was collected, so as to prevent its unlawful disclosure or misuse.

4.3.3. The rules relating to the restriction of disclosure of information do not apply where the disclosure of confidential information is intended to help prevent the commission of a crime or imminent damage to health or property.

4.4. Professionalism and professional development

4.4.1. ARAKO is committed **to protecting its image and reputation**. ARAKO's employees actively participate in strengthening ARAKO's reputation and strive to prevent any activities that could lead to its compromise or damage. Employees also actively apply this rule outside of their work activities.

4.4.2. ARAKO employees shall work **conscientiously, honestly and properly to the best of their knowledge and abilities**, carry out the instructions of their superiors in accordance with legal and internal regulations, and observe the principles of cooperation. During working hours, employees shall devote themselves exclusively to the performance of their work tasks and duties, which they shall perform in a proper and timely manner.



Employees must always act in such a way that they do not cause harm to any person or group of persons.

- 4.4.3. ARAKO provides funding to support the education, **training and refreshing of knowledge** and skills of its employees in order to maintain their professional skills and provide greater value not only to ARAKO but also to its business partners.
- 4.4.4. ARAKO requires employees to actively participate in training activities and work to achieve their maximum benefit in the performance of their job duties.

4.5. Property management

- 4.5.1. ARAKO employees are obliged to **properly manage the funds entrusted to them**, to guard and protect ARAKO's property (tangible and intangible) from damage, loss, destruction and misuse. In the event of loss or imminent damage to ARAKO's property, employees are obliged to immediately notify ARAKO's management. Negligence, waste or unauthorized use of ARAKO property is prohibited. Similarly, ARAKO employees must treat property entrusted to their care by business partners.
- 4.5.2. ARAKO's employees may only handle ARAKO's property and use information or communication equipment and systems **in order to perform their duties and in accordance with legal and internal regulations**. ARAKO prohibits the use of unauthorized software and downloading or other actions that threaten information security and lead to infringement of intellectual property rights.
- 4.5.3. ARAKO's property may be used by employees for personal purposes in accordance with and under the conditions set out in the law and internal regulations; if such procedure is not regulated by internal regulations, such property may be used only with the express written consent of the Managing Director or Executive Director of the Company.
- 4.5.4. Any use of ARAKO's property for the commission of criminal activities is expressly **prohibited**. Violations of obligations regarding the use of ARAKO's assets may lead to disciplinary measures or sanctions in accordance with applicable laws and internal regulations.

4.6. Conflict of interest

- 4.6.1. ARAKO does **not admit any conflict of personal interests with the interests of ARAKO**. All ARAKO employees are obliged to behave loyally towards ARAKO, not to damage ARAKO's good name and to act in accordance with ARAKO's legitimate interests. The **duty of loyalty** and the duty to act **with due care arising for members** of ARAKO's bodies from



special legal regulations are not affected.

4.6.2. ARAKO's employees are **obliged to** refrain from any private activity or activity pursuing only their private interests that could give rise to a conflict of interest. In the event of any doubt as to a possible or threatened conflict of interest for himself or herself, or for another employee, with the interests of ARAKO, each employee of ARAKO is obliged to request an assessment of the existence of a possible or threatened conflict of interest from his or her immediate supervisor or the Chief Executive Officer or the Ethics Committee.

4.7. Negotiations with business partners and third parties

4.7.1. ARAKO aims to **build relationships** of mutual trust with its business partners and third parties. ARAKO does **not tolerate** any illegal practices in its dealings with these parties, and ARAKO and all its employees always ensure compliance with legal and internal regulations in their dealings with business partners.

4.7.2. ARAKO shall ensure **transparency** of all economic operations, provision of **true** information on the management and **timely** payment of taxes and payments required by the relevant legislation. To this end, ARAKO strictly adheres to accounting standards and principles, prepares comprehensive financial reports and implements appropriate internal controls.

4.7.3. Business partner selection procedures are **based on the conditions of impartiality and objectivity**. The selection of business partners shall always be in the best interest of ARAKO in terms of quality, timeliness and cost.

4.7.4. Employees must always deal with business partners and third parties **professionally and courteously** with the utmost understanding and helpfulness.

4.7.5. If staff members find themselves in a situation where they are being pressured, they have a duty to inform their line manager or the Ethics Committee immediately.

4.8. Dealing with public authorities

4.8.1. When dealing and communicating with public authorities, ARAKO and all its employees shall act in full compliance with legal and internal regulations.



4.8.2. ARAKO and all of its employees undertake to **cooperate** fully with authorized public authorities in any audit or inspection activities and other forms of investigation and inquiry. To this end, ARAKO and all its employees shall provide the public authorities with the information requested by them in accordance with the relevant legal and internal regulations and all necessary cooperation. However, when providing information, ARAKO and all its employees shall comply with the rules on the protection of confidential information.

4.9. Measures against money laundering and terrorist financing

4.9.1. ARAKO strictly complies with the legal regulations in the area of measures against the laundering of the proceeds of crime (so-called money laundering) and terrorist financing.

4.9.2. ARAKO's anti-corruption rules, which form part of this Code, are adopted in an effort to comply with the legal requirement set forth in Act No. 418/2011 Coll., on Criminal Liability of Legal Persons and Proceedings against them, as amended, i.e. to prevent the commission of criminal activities and, in this context, to prevent and combat corrupt behaviour. Corrupt conduct is regulated in particular by Act No 40/2009 Coll., the Criminal Code, as amended (hereinafter referred to as the 'Criminal Code'), and Act No 418/2011 Coll., on criminal liability of legal persons and proceedings against them, as amended.

4.9.3. ARAKO only does business with established and reputable business partners that conduct lawful activities financed by legal sources. In order to prevent the commission of criminal activities related to the laundering of proceeds of crime and terrorist financing, ARAKO processes data on its business partners to a reasonable extent and appropriately assesses whether ARAKO has been used to launder funds derived from criminal activities, conceal their illegal origin and transfer them back into the legal business environment.

4.9.4. ARAKO in relation to business partners introduces its anti-corruption policy to the contracting party in the form of a contractual instrument - anti-corruption contractual clause, which is included in the model contracts - purchase contract - model purchase, framework purchase contract - model purchase, purchase contract - model sale, framework purchase contract - model sale, contract for work - model contractor and in the framework works contract - model client. These provisions are binding on third parties and may be used to distance themselves from their actions. The company's lawyer is responsible for updating the anti-corruption clause in contracts concluded by ARAKO.



4.10. Integrity and fairness

- 4.10.1. ARAKO does **not tolerate** any form of corruption, bribery or unfair competition.
- 4.10.2. Employees shall not engage in conduct that may constitute an abuse or illegal restraint of free competition or a violation of the rules of fair dealing.
- 4.10.3. ARAKO shall **not solicit, accept or give bribes or other benefits to achieve its objectives**, either directly or through its employees or third parties. ARAKO's employees shall not engage in any activities related to the giving or receiving of bribes or other benefits for the purpose of violating legal regulations, obtaining their own benefit or influencing the decisions of other persons leading to the adoption of decisions for or in the interest of ARAKO.
- 4.10.4 ARAKO employees shall not, in the performance of their duties, give, accept or solicit gifts, favors or any other benefits that could influence their objectivity or the objectivity of their counterpart in making business decisions and that would be contrary to legal and internal regulations and moral and ethical values. Except as provided in the Code, any gifts, favors or advantages offered to an ARAKO employee must be refused and the employee must immediately notify his or her immediate supervisor or the Ethics Committee. Accepting or giving monetary gifts is prohibited. Offering, promising or giving gifts or other undue benefits to third parties or persons is prohibited, unless it is a small gift or treat in the normal course of business. Gifts, treats and invitations to social events may only be offered or accepted if they are offered or accepted in the normal course of business. Monetary gifts are absolutely prohibited. The acceptance of undue benefits from third parties or other entities must be viewed in the same way.

The term "bribe" is defined as an undue advantage consisting of direct pecuniary enrichment or other advantage given or intended to be given to the person bribed or, with his consent, to another person, to which he is not entitled. ARAKO applies the principle of zero tolerance towards corruption committed by employees or responsible persons and does not in any way encourage, even passively, a corrupt environment.

Employees or responsible persons must not engage in any conduct that would be associated with corruption. It is forbidden to offer, promise or provide, directly or indirectly, any undue advantage to third parties for the purpose of influence or reward for services rendered, or to solicit, accept or accept such benefits, except for customary token gifts given or accepted in the ordinary course of business.



If an employee reports in good faith a corrupt act or attempted corrupt act to ARAKO, the employee's report will not adversely affect the employment relationship. If ARAKO receives a report or any information about suspected corrupt conduct allegedly committed by an employee or responsible person, the investigation of the report or information will be promptly and objectively addressed by the Human Resources Director.

4.10.5 It is permissible to accept or offer advertising or promotional items or reasonable and reasonable casual invitations that may be considered business courtesy in the context of the basic principles and rules of conduct set forth in this Code.

4.10.6 The sponsorship of public artistic, cultural, educational, scientific or sporting events or charitable causes shall not be considered an impermissible gift or benefit; however, it shall not be used to circumvent the rules set forth in the Code.

4.10.7 All employees or responsible persons must act in accordance with applicable laws against the laundering of the proceeds of crime.

In order to detect and prevent suspicious payment patterns or customer or transaction patterns that may involve the laundering of proceeds of crime, employees must be vigilant and report any suspicious behaviour by customers, consultants and business partners to Human Resources. Employees must also follow all relevant accounting procedures in relation to money and payments as well as other transactions and contracts.

4.10.8 In the case of participation in public procurement, ARAKO shall always act in accordance with Act No. 134/2016 on Public Procurement, as amended, respecting the principles of transparency, equality and non-discrimination. If any non-standard practice is detected, employees and authorised persons are obliged to report this fact to the Human Resources Department.

4.11. Occupational health and safety

4.11.1. ARAKO actively ensures the conditions of occupational health and safety in order to minimize risks to the life and health of employees and other persons in the course of its activities.



- 4.11.2. ARAKO does not accept that ARAKO employees perform prohibited work or work whose difficulty is not commensurate with their abilities and health. ARAKO employees have the right to refuse and discontinue work that is unsafe for them.
- 4.11.3. ARAKO shall take all measures leading to occupational health and safety as required by law and undertakes to provide its employees at all times with appropriate and adequate information and instructions to ensure occupational health and safety, in particular to deal with fires and other natural disasters, first aid and evacuation of individuals in the event of emergencies.
- 4.11.4. ARAKO shall oversee the health and well-being of its employees through regular occupational safety training, the allocation of appropriate work equipment and a system of occupational medical examinations. ARAKO shall allow its employees to undergo vaccinations, examinations and examinations to the extent required by law or by decision of the competent public health authority.
- 4.11.5. ARAKO works with employees to create a healthy and safe environment not only for themselves but also for all others who have access to ARAKO's workplace. In this regard, ARAKO employees have a duty to report to their immediate supervisors any deficiencies or defects in the workplace that threaten the safety or health of employees at work, and any incidents in which health or safety violations occur on ARAKO worksites.
- 4.11.6. ARAKO's employees are **strictly prohibited** from consuming alcoholic beverages and narcotic and psychotropic substances at the workplace and outside the workplace during working hours, or entering the workplace under the influence of such substances. It is also prohibited to use narcotic drugs and psychotropic substances outside working hours if this could affect the performance of work duties or impair health and safety at work in the workplace. Employees shall never smoke in workplaces or other areas where non-smokers are also exposed to the negative effects of smoking.

4.12. The environment

- 4.12.1. ARAKO strictly complies with all environmental legislation and follows the standards applied in the Environmental Management System (EMS) in order to **minimize** the environmental impact of its business activities to the maximum extent possible.



- 4.12.2. ARAKO supports activities that improve environmental protection processes and ensures appropriate training of its employees in environmental management.
- 4.12.3. ARAKO's employees shall conduct themselves in a manner that protects and respects the environment while complying with all environmental laws and regulations.

5. Investigation and resolution of unethical misconduct

5.1. Reporting of complaints

- 5.1.1. ARAKO's core interest is to ensure that there is no illegal conduct in connection with its activities. In order to prevent illegal conduct, ARAKO **strictly monitors** compliance with legal and internal regulations, carries out internal controls and takes appropriate measures. In the event of an infringement, ARAKO undertakes to make every effort to **detect and effectively prevent or avert the consequences** of the infringement and to investigate its causes accordingly.
- 5.1.2. ARAKO employees are obliged to report any suspected illegal conduct by employees and business partners. Employees are also obliged to report any violation or suspected violation of the basic principles and rules of conduct set out in this Code or other internal regulations. In the event that a violation is detected, ARAKO employees are also obliged to make every effort that can be reasonably required to stop the violation or to avert its negative consequences.
- 5.1.3. If a whistleblower reports a good faith suspicion that an illegal act or violation of the basic principles and rules of conduct set forth in this Code has occurred or is occurring in connection with ARAKO's activities, ARAKO shall ensure that the whistleblower is afforded maximum **confidentiality and protection**. Any retaliatory action against persons who in good faith make a report of conduct in violation of legal or internal regulations is unacceptable and will be considered a violation of the basic principles and rules of conduct set forth in this Code, for which disciplinary sanctions may be imposed.
- 5.1.4. ARAKO has created conditions for employees to report suspicions of committing any criminal offence, including suspicions of corrupt behaviour. Such reports can also be made anonymously. ARAKO will ensure that such reports are dealt with confidentially. Such notifications may also be made to the head of the relevant department whose subject of activity is the subject of the notification, or to the employee's immediate superior. If he/she indicates a submission as confidential or otherwise demonstrates the need for confidentiality, the person to whom the confidential information is communicated shall ensure that the identity of the person making the



submission or the content of the submission is not disclosed. If an employee makes a good faith disclosure of a colleague's wrongdoing or of wrongful conditions at ARAKO, the disclosure will not have a negative effect on the employment relationship. However, only communications made in good faith are entitled to the protection cited, not cases of deliberate conduct intended to harm others. In the case of legitimate notifications, ARAKO undertakes to provide appropriate remedies and to take measures to prevent recurrence.

5.1.5. Whistleblowing is completely **confidential**. ARAKO employees may report complaints:

- ❖ to their **immediate manager**,
- ❖ **the Ethics Committee** or
- ❖ via the following **email address** ethics@arako.cz

5.1.6. If a complaint is reported to a supervisor, the supervisor shall promptly forward the complaint to the Ethics Committee, which shall review all reported complaints.

5.1.7. ARAKO's business partners are also entitled to report violations of the basic principles and rules of conduct set out in this Code by ARAKO employees.

5.1.8. The Ethics Committee is entitled to initiate an investigation into whether there has been a violation or infringement of the basic principles and rules of conduct set out in this Code within the activities of ARAKO or its employees, also on its own initiative.

5.2. Investigation of illegal and unethical conduct at ARAKO

5.2.1. Upon receipt of a complaint or on its own initiative, the Ethics Committee shall promptly initiate an investigation to determine whether there has been any illegal conduct or violation of the fundamental principles and rules of conduct set forth in this Code in connection with the activities of ARAKO or its employees.

5.2.2. The Ethics Committee is obliged to treat information that it becomes aware of in the course of an investigation as confidential information.

5.2.3. As part of the internal investigation, the Ethics Committee shall examine whether a violation of the fundamental principles and rules of conduct set out in this Code has actually occurred, or what the causes of such conduct were, and the extent and degree of involvement of the persons involved in such conduct. The Ethics Committee may contact the persons concerned and seek explanations from them in order to ascertain the details of the circumstances; this shall not apply if such action would have the effect of jeopardising a proper investigation.



- 5.2.4. The Ethics Committee will draw up a report on the facts found, including a conclusion as to whether the facts found indicate that there has been an illegal act or a violation of the basic principles and rules of conduct set out in this Code.
- 5.2.5. If, during the investigation, the ethics committee reaches the conclusion that there has been no illegal act or violation of the basic principles and rules of conduct set out in this Code, the ethics committee will file a report on the facts found together with the reported initiative in its records. If the ethics committee deems it appropriate, it will present this report on the facts found to the management of ARAKO.
- 5.2.6. If, during the investigation, the ethics committee reaches the conclusion that all the circumstances of a specific case indicate that an illegal act or a violation of the basic principles and rules of conduct specified in this Code has actually occurred, the ethics committee will submit a report on the facts found, including all secured documents and decisive evidence together with a proposal for a solution and possible measures by ARAKO, the company's executive or the executive director.

5.3. Resolution of illegal actions

- 5.3.1. On the basis of a report on discovered facts indicating that there has been an illegal act or a violation of the basic principles and rules of conduct set forth in this Code, the executive or executive director of ARAKO shall take **immediate and consistent measures** to end such an act and to avert its adverse or harmful consequences and will require an internal audit.

After the internal audit, the company's management will prepare a written report to ARAKO, which will contain:

- a report on the facts found and all secured documents and decisive evidence,
 - ❖ a list of the measures taken to end the illegal act or violation of the basic principles and rules of conduct set out in this Code, and to avert its harmful consequences,
 - ❖ internal audit report and
 - ❖ proposal of solutions and possible measures by ARAKO.
- 5.3.2. The CEO of ARAKO or the executive director, on the basis of a written report submitted to him by the management of ARAKO, will make a binding decision in accordance with the legal and internal regulations of ARAKO companies on the adoption of measures or on the imposition of sanctions for illegal actions or violations of the basic principles and rules of conduct specified in this Code. The managing director or executive director of ARAKO is also



authorized to decide on the next course of action in a specific matter, i.e. in particular the filing of a criminal complaint, the initiation of cooperation with law enforcement authorities, or other public authorities.

6. Getting to know the Code

- 6.1. The Executive Director of ARAKO is responsible for familiarizing ARAKO employees with the Code, for its implementation and for employees' compliance with it.
- 6.2. All employees of ARAKO, including new employees, are required to familiarize themselves with the contents of the Code. The Code is available in paper form from ARAKO executives and in electronic form on the ARAKO Intranet.
- 6.3. In the event of any questions regarding the content of the Code or related to behavior in accordance with the Code, employees may contact their direct superiors or the ethics committee.
- 6.4. All employees and all responsible persons of ARAKO are obliged to follow the rules contained in this code. Violation of the rules by employees or responsible persons will be considered a violation of work duties and will be punished as such in accordance with the relevant provisions of the Labor Code. **ARAKO employees are aware that provable violations of the Code may result in disciplinary action and, in extreme cases, termination of employment or the initiation of legal proceedings.**