Compliance Policy Metrostav CZ s.r.o.

This Compliance Policy is a document of Metrostav CZ s.r.o. (hereinafter referred to as the „Company“) through which the Company implements the processes and procedures necessary to fulfill the principles arising from the ČSN ISO 37301 and ČSN ISO 37001 standards in order to achieve compliance with the relevant requirements which the Company has implemented in order to fulfil its objectives while setting up instruments for the prevention, detection, and reaction to conduct that may be considered unethical, illegal, or contrary to the Company‘s established rules.

In order to achieve the highest possible level of functioning of the internal compliance management system, the Company‘s management hereby expresses the following framework of principles and commitments:

- The Company adopts a clearly negative approach to unethical or illegal conduct and declares zero tolerance for such conduct on the part of employees or persons acting on behalf of the Company. The detection of such conduct will always be followed by an adequate reaction 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.
- Fulfilling the requirements of interested parties is our goal, but never at the risk of violating ethical or legal standards.
- We do not tolerate corruption, bribery, or unfair competition.
- We do not allow the possibility of a conflict between personal interests and the interests of the Company.
- The Company pays increased attention to sponsorship, financial donations from 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 regulations.
- The Company screens all job applicants, with an emphasis on selecting employees for management positions.
- All employees, members of the Company‘s governing bodies, and cooperating third parties are allowed to submit any reports relating to unethical or illegal conduct via the Ethics Line.
- The Company guarantees the protection of whistleblowers who submit reports, except in cases of false accusations or deliberately false and damaging information. This procedure prevents potential damage, criminal and moral sanctions against the Company and all honest employees of the Company.
- The Company has appointed an independent person with the appropriate position and authority to oversee the functioning of the compliance management system, namely the Compliance Officer.
- The Company regularly reviews the suitability, adequacy, and effectiveness of the compliance management system and ensures its continuous improvement.

Ing. Jaroslav Heran, MBA
CEO

effective from 1. 7. 2026