

# CODE OF ETHICS

of Alanata a. s.

Alanata

Technology Meets Business

# PREAMBLE

The company Alanata a. s. (hereinafter referred to as “Alanata”) was established by joining the most experienced experts on the Slovak market of information technologies. We currently have around 300 employees. We have 30 years of experience gained in major projects for a variety of clients – from small and medium-sized enterprises, through large companies and corporations, to public administration. Alanata is not just a supplier. We are a functioning team that helps clients improve and fulfil their business through innovative technology.

Being aware of our position in society, we accept responsibility for our actions and want to set an example for others. We are committed to always acting in accordance with applicable legislation, not being corrupt, respecting competition rules, promoting a fair business environment and other ethical principles.

As an expression of our responsibility for ethical development, we have decided to adopt this Code of Ethics, which is binding on all our employees and all persons acting on our behalf. The Code of Ethics is based on the ethical principles of respect for human dignity, fairness, tolerance, responsibility, duty and justice. The Code of Ethics is a set of interrelated and binding ethical principles, standards of conduct, relationships and rules. The Code of Ethics sets the boundaries of the company’s culture, behavioural patterns and attitudes.

In Bratislava, on 5 May 2023

## ETHICAL RESPONSIBILITY OF MANAGEMENT

Our managers are role models of behaviour and action for other Alanata employees.

They will not be relieved of their responsibilities by virtue of their position. They observe the rules of managerial ethics and keep in mind their professional honour. Managers consider employees as their co-workers, and prepare the conditions enabling them to use their potential effectively. They create a positive working atmosphere. Through appropriate methods, they promote employee solidarity and loyalty to the company and their interest in the company's welfare.

Managers are obliged to make their supervised employees aware of the rules and principles set out in this Code of Ethics and to train them to be able to comply with it. They are obliged to set an example in respecting it. They create an environment that is socially just and in which dialogue can be developed in a way that does not violate this Code.

## PROTECTION OF REPUTATION

Alanata's reputation is an intangible asset and a potential for the future that we have been building through purposeful, open and truthful communication with the environment in which we operate.

The reputation and trust of all stakeholders are among the most important assets we have. A good name can be lost very easily, so it needs to be protected. The protection thereof is a priority task for every employee. Each employee acts not only as a private individual, but also as a representative of

Alanata. Therefore, they must also take care of the company's reputation and protect its interests in public. All employees are required to act in accordance with this Code of Ethics and to maintain high moral standards in business and professional conduct.



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## PROTECTION OF HEALTH AND SAFETY

In the area of health and safety, we maintain and continuously expand measures to improve the level of health and safety at our workplaces.

When performing work tasks at customer or contractor sites, employees work in such a way so as not to increase in any way the risks of harm to the health of other persons. We do not develop and do not offer for distribution any technologies, hardware or software or

other devices that fail to meet the required level of health and safety protection of users, or that endanger anyone by their operation. We have an established and certified occupational health and safety management system and ensure its continuous development.

## ENVIRONMENTAL PROTECTION

Our activities do not pose a significant threat to the environment.

Nevertheless, we pay extra attention to recycling options, safe disposal, saving office supplies and reducing water and energy consumption as much as possible. We consciously adhere to the concept of sustainable development of the environment and we support environmental protection and environment creation programs. When supplying and installing products by other

manufacturers, we consider their negative environmental impacts. We prefer products with the lowest possible impact on the environment. We assess whether end-of-life disposal or recycling is addressed when products are included in our portfolio. We have established a certified environmental management system and we ensure continuous development thereof.



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We have established a certified integrated management system and we ensure continuous development thereof.

## SHAREHOLDER RELATIONS

We treat all our shareholders, including minority ones, fairly, maintain good relations with them and protect their rights.

We consistently apply the principles of openness, honesty and accountability in the company's management. We act openly and

provide all relevant information, including information about the financial status, performance and management of the company.

## RELATIONSHIP TO SOCIETY AND THE STATE

We fully accept and comply with the laws of the Slovak Republic and the EU, respect the rules of competition, do not support corruption and behave in accordance with good manners.

We act only in such a way that the interests of society as a whole are not harmed and laws and other generally binding legal regulations are not violated. We keep accounts that contain true and accurate information. We pay our taxes properly, do not knowingly commit tax evasion and ensure transparency in all financial transactions. We comply with all legal provisions against money laundering and terrorist financing. We cooperate with public authorities, providing the public

with full, clear and true information about our activities and intentions. We systematically develop responsive, highly professional and ethical relations with the media. We do not provide any gifts or benefits to political parties or political movements. We see social responsibility as an integral part of our business. We recognise its importance and we are taking steps to eliminate our footprint. We help those in need. Our priority areas are culture, education and sport.



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## CUSTOMER RELATIONSHIP

We provide our customers with comprehensive services, products and systems to meet their needs and requirements.

We adhere to all agreed terms and conditions. However, if any unforeseen circumstances prevent the fulfilment thereof, we immediately inform the customer and seek a solution that would be acceptable to both parties. We treat our customers professionally, politely, honestly, and we are responsive. We strive to build long-term relationships with our customers. We only use legitimate business methods and treat information obtained from the customer as confidential. We protect

such information, maintain trade secrets and ensure that it is not misused. We regularly survey and evaluate the satisfaction of our customers. We provide customers with timely, complete, unbiased, truthful and understandable information about our products and services. We refrain from providing any benefits or rewards to customers that are not in accordance with legislation or good business practice.

## RELATIONSHIP TO COMPETITORS

We consider competitors to be equal professional partners and competition to be a natural part of business.

We respect and promote fair rules of competition and do not engage in unfair practices. We do not use unfair means to gain information and thereby an advantage in competing against competitors. We do not provide false information about competitors' products and

services. In relations with competitors, we avoid all activities that would be contrary to law and order and declare that we are ready to negotiate a solution to disputes with anyone ready to abide by the basic rules of ethics in a given market environment.



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## RELATIONSHIP WITH SUPPLIERS

We do our best to be an honest, reliable and trustworthy partner for all engaged in our business activities.

We have based our relationships with suppliers on mutual trust and respect. We choose only quality and reliable suppliers. We maintain trade secrets and respect the confidentiality of information about our suppliers. We do not abuse our market position and create a level playing field for all

our suppliers while respecting our customers' requirements. Alanata employees do not accept monetary gifts or other commissions from suppliers. We require our suppliers to strictly adhere to the rules of the *Alanata's Supplier Code Of Ethics* published on our website.



## RELATIONSHIP WITH EMPLOYEES

Employees are our most valuable asset, the carrier of know-how and the guarantee of successful fulfilment of customer requirements.

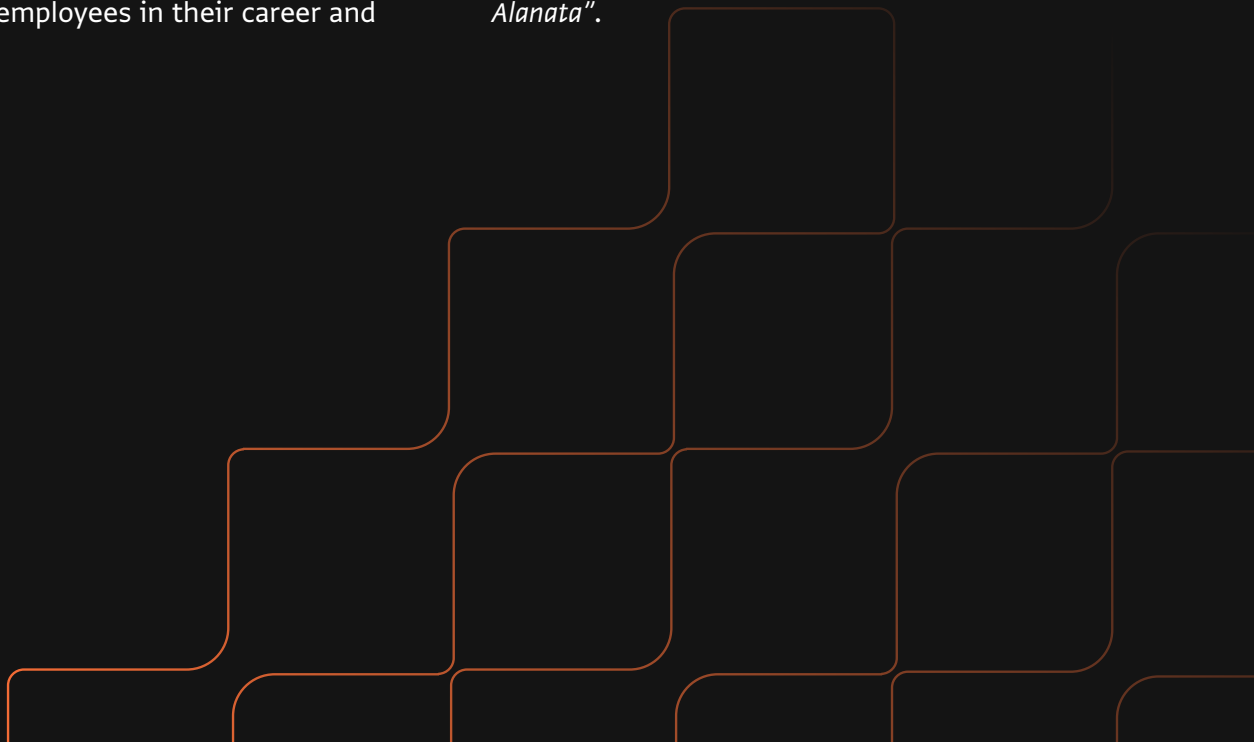
We provide equal opportunities to all of them regardless of their race, skin complexion, gender, age, sexual orientation, national origin, religion, ethnicity, or other distinctive characteristics. We do not tolerate physical, psychological, sexual or any other form of humiliation, abuse, bullying or dehumanization of the human personality. We avoid discrimination in hiring, training, career development, compensation and dismissal. We comply with the Labour Code and all other legislative rules, standards and regulations in the field of human resources.

We inform our employees about our business plans in a timely and truthful manner so that everyone knows our goals and objectives and can identify with them. We take care to create optimal social conditions for our employees, a pleasant and peaceful atmosphere for their highly qualified work. We support employees in their career and

professional development. We ensure that the reward system is fair and realistic. We apply the principle of fair remuneration according to the quality, expertise and quantity of work performed. We encourage our employees to act ethically, be polite and take personal responsibility.

We do not discourage political engagement by our employees. However, we consider it to be their private activity which they cannot engage in during working hours and on our premises. We create space for every employee to freely express their own opinion without the risk of intimidation or sanctions. We guarantee protection to an employee who reports illegal or unethical conduct to company authorities.

We require our employees to strictly adhere to the rules of the *"Employee Code of Ethics of Alanata"*.





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## FINAL PROVISIONS

This Code of Ethics applies to all employees of Alanata as well as other persons acting on its behalf. All are obliged to observe the Code, act in accordance with it and promote it.

Employees are required to report violations of this Code immediately. Such notification may be made orally, in writing or by e-mail at any time. In order to ensure prompt and efficient processing, the notification should be made during working hours, Monday to Friday from 8 a.m. to 3.00 p.m. in person to the Compliance Manager or by **telephone on +421 2 32 112 503**. Notification may also be made in writing by **email to [compliance@alanata.sk](mailto:compliance@alanata.sk)** at any time, i. e. 24 hours a day, 7 days a week. An employee is entitled to make the notification anonymously. The **“VOX POPULI” mailbox** available for such purpose is located out of the view

of the camera system. The submission of a notification will be considered neither a breach of the obligation of confidentiality under employment and other legislation, nor a breach of the obligation of confidentiality under the internal directives and regulations of the company.

Any non-compliance with the Code of Ethics will be rigorously reviewed by the Compliance Manager. In the event of a proven violation of any provisions hereof, the employee will be subject to disciplinary proceedings at the employment level, which may result, for example, in a reprimand, a reduction in pay or immediate termination of employment. In addition to the employment level, the employee can also be subject to proceedings at the criminal law level through a report to the law enforcement authorities.



# Alanata

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## TELEPHONE

+421 2 321 12 500

## INFORMATION

[info@alanata.sk](mailto:info@alanata.sk)

[www.alanata.sk](http://www.alanata.sk)

## Alanata a. s.

Krasovského 14  
851 01 Bratislava  
Slovak Republic