

EMPLOYEE
CODE
OF ETHICS
of Alanata a. s.

Alanata
Technology Meets Business

The background features a gradient from orange at the top to teal at the bottom. Large, rounded rectangular shapes in orange and teal are layered on the right side, creating a modern, geometric design.

BASIC PRINCIPLES OF EMPLOYEE CONDUCT

An employee is loyal to Alanata a. s.; at work the employee takes care to protect the legitimate interests of the company, customers, business partners and colleagues. However, loyalty does not preclude a critical attitude towards what is happening in the company. Criticism should be constructive and objective, presented in a cultured manner so as not to humiliate another person or group of people.

An employee does not accept any action that would in any way damage the reputation of Alanata a. s. and our business partners.

An employee performs his/her duties conscientiously and responsibly, in good faith and in accordance with the mission of Alanata Inc.

An employee follows the applicable laws, other generally binding legal provisions and internal regulations.

An employee behaves politely, correctly, respectfully and in accordance with the principles of decorum towards business partners and other colleagues.

An employee acts in accordance with the aims and objectives of Alanata a. s., not allowing himself/herself to be influenced by the intentions of other persons, not accepting any financial or other advantage that could affect the proper performance of his/her duties and the outcome of his/her decision-making.

An employee protects the property of Alanata a. s. and business partners from damage, misuse and destruction. He/she uses the funds entrusted to him/her as efficiently as possible, in accordance with the purpose for which they were intended, and does not misuse them for personal gain.

An employee does not use company property for private purposes. He/she uses official telephones, mobile phones, cars, computers and other property in compliance with internal regulations. An employee's work time is also company property, so he/she does not use it to handle personal business without the express permission of his/her supervisor.

An employee does not take advantage of his/her position or confidential information obtained in the performance of his/her duties for any pecuniary or other gain. All information not disclosed to the public are considered confidential.

An employee keeps confidential those facts which he/she has learned in the performance of his/her duties and which cannot be communicated to other persons in the interest of Alanata a. s. or a business partner. The obligation of confidentiality does not apply to facts raising suspicions of corrupt conduct.

An employee keeps confidential all internal issues and does not speak out against Alanata a. s. by commenting, or posting materials or photographs.

An employee may only carry out a business activity that is identical to the business of Alanata a. s. with the prior written consent of the statutory body of Alanata a. s.

An employee acts in his/her private life so as to avoid any conflict of interest. A conflict of interest is defined as any situation where the employee's personal interests threaten the performance of his/her obligations or the interests of Alanata a. s. If the employee is in doubt whether any business activities of him/her or any related person of his/her have created a conflict between his/her personal and professional interests, he/she should contact the Compliance Manager as soon as possible and seek a way out of the situation.

An employee involved in a political party or movement does so as a private individual and not as an employee of Alanata a. s.

An employee does not offer, promise or give gifts or other unauthorized benefits to third parties except for routine promotional items approved by the Company's management.

An employee neither solicits nor accepts gifts, favours or other consideration which might influence his/her decision-making.

An employee avoids situations where, in the context of his/her employment, he/she would be obliged to compensate for any service rendered or any other advantage offered, thereby undermining the objectivity and impartiality of his/her decision-making.

An employee respects the human dignity of other people, the principles of courtesy and the prohibition of any discrimination. An employee communicates with colleagues, business partners and others in a courteous, tolerant and honest manner.

An employee does not tolerate any form of physical or psychological harassment, including sexual harassment, humiliation or defamation.

An employee appreciates and respects other colleagues and their work, which is as important as his/her own, and avoids actions that could be described as mobbing (repeated irreconcilable attacks on people's self-confidence and self-esteem, bullying, etc.) or bossing (bullying of a subordinate employee by a superior).

An employee behaves so as to not cause or avoid conflicts in the workplace. However, if a problem or conflict arises in interpersonal relations, every effort must be made to resolve the conflict in a peaceful and cultured manner.

An employee greets other colleagues in accordance with the social rules as well as any visitor he/she meets on the employer's premises.

An employee will respect the decisions of his/her superiors and should he/she have any reservations, he/she will follow the official procedure and address them first with the relevant supervisor.

An employee does not resolve a difference of opinion with personal bias. Any disputes are resolved in a factual, open and as refined a manner as possible.

An employee is aware that he/she represents Alanata a. s. externally and internally, therefore he/she comes to work neatly groomed and dressed appropriately. He/she makes the best possible impression in the workplace, which he/she achieves by being pleasant and professional and by observing the principles of good social behaviour.

An employee will notify a supervisor of any violation of generally binding legislation, internal regulations or the Code of Ethics by another employee as soon as the employee becomes aware of such violation. The supervisor will forward the complaint to the Compliance Manager for investigation in accordance with the rules on the submission, receipt, recording, handling of complaints.

The Code of Ethics is binding for every employee of Alanata a. s. Actions in violation of its provisions are qualified as a violation of work discipline and work regulations with all the consequences under the applicable legislation.

In Bratislava, on 5 May 2023

MIROSLAV DOLEŽAL

COMPLIANCE MANAGER
ALANATA A. S.

MARTIN MURGÁČ

CEO
ALANATA A. S.

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