

# SOFTIP Code of Ethics

## Preamble

SOFTIP, a. s., a member of the SYNTECA Group, adopts this Code of Ethics as a fundamental document expressing the common values, principles and commitments of all our employees, management and business partners.

IT products and services of SOFTIP, a. s. cover all key business processes, including human resources management, through finance, production, logistics and services. Thanks to its many years of experience, SOFTIP, a. s. is a reliable partner to companies of all sizes in a variety of sectors, including industry, services, retail, utilities, finance, and public administration. SOFTIP, a. s. has successfully established itself on foreign markets.

SOFTIP, a. s. develops its own solutions and tools tailored to clients' requirements and cooperates with global players in the field of digitalization of business processes. Its products and services thus integrate the latest trends, such as cloud technology, artificial intelligence, big data and the Internet of Things (IoT).

Recognizing our responsibility to society, our customers, our partners and each other, we are committed to the highest standards of ethical conduct, transparency and integrity in all areas of our business. We have therefore adopted this Code of Ethics, which applies to all of the Company's employees, all persons acting on its behalf, and all of its business partners.

The Code of Ethics of SOFTIP, a. s. is based on the ethical principles of respect for human dignity, honesty, tolerance, responsibility, duty and justice. The Code of Ethics is a set of interrelated and binding ethical principles, standards of conduct, relationships and rules. It sets the boundaries of corporate culture, behavioural models and attitudes in SOFTIP, a. s. and in the SYNTECA Group.

## **Code of Ethics – General Part**

### **Ethical Responsibility of Management**

Our managers set an example for other SOFTIP, a. s. employees. They adhere to the principles of managerial ethics and uphold their professional integrity. Managers treat their employees as colleagues and create conditions that allow them to use their potential effectively. They create a positive working atmosphere. Through appropriate methods, they encourage employees to feel a sense of belonging, collegiality and loyalty to the company, and to take an interest in its development and prosperity. Managers will familiarise their supervised employees with the rules and principles set out in this Code of Ethics and ensure they comply with it. They will set an example by respecting it themselves. They foster an environment that is socially just, where dialogue can flourish without violating this Code.

### **Protection of Reputation**

The reputation of SOFTIP, a. s. and the SYNTECA Group is an intangible asset and a source of future potential. We build this reputation through open, truthful and purposeful communication with the communities in which we operate. Reputation and trust among all stakeholders are among our most valuable assets. A good reputation can be lost very easily, so it needs to be protected. Every employee has a responsibility to protect it. Every employee acts as both an individual and a representative of SOFTIP, a. s. and the SYNTECA Group. He/she must therefore 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 maintain the highest standards of business and professional conduct.

### **Health and Safety Protection**

In the area of health and safety, we are committed to maintaining and continuously expanding measures that improve health and safety levels at our workplaces. Employees must carry out their work in such a way that they do not increase the risk of harm to the health of others at customer or contractor sites. We do not develop or offer for distribution any technologies, hardware, software or devices whose level of protection of the health and safety of users does not meet the required standards, or which could endanger anyone. We have an established and certified occupational health and safety management system, and we ensure that it is continuously developed.

### **Environmental Protection**

We are not one of the entities whose activities pose a significant threat to the environment. Nevertheless, we pay increased attention to recycling, safe disposal and saving office supplies, as well as reducing our water and energy consumption wherever possible. We adhere to the concept of sustainable development in the environmental field and support programmes that protect and create the environment. When supplying and installing products from other manufacturers, we consider their potential negative environmental impact. We prioritise products with the lowest possible environmental impact. We also assess whether end-of-life disposal or recycling has been addressed when products are included in our portfolio.

## **Information and Cyber Security**

The responsible handling of information is an integral part of our ethical principles. All employees have a duty to protect the confidentiality and integrity of any information to which they have access, whether relating to the company, clients, partners or colleagues. Knowingly abusing, neglecting or circumventing security measures conflicts directly with our values.

Recognising the growing threat of cybercrime, we approach digital security with the utmost responsibility, complying with the international standard ISO/IEC 27001. Each employee must report suspicious behaviour, attempts at unauthorised access or other incidents immediately in accordance with internal procedure.

## **Relationship with Shareholders**

We treat all shareholders fairly, including minority shareholders, and maintain good relations with them while protecting their rights. We consistently apply the principles of openness, honesty and accountability when managing the company. We are transparent and provide all relevant, truthful information and explanations relating to the company's financial position, performance and management.

## **Relationship with Society and the State**

We fully accept and comply with Slovak and EU legislation. We respect competition rules, do not support corruption, and behave in a manner that is considered polite.

We always act in such a way that the interests of society as a whole are not harmed and that no laws or other generally binding legal regulations are violated. Our accounts contain true and accurate information. We pay our taxes properly, do not engage in tax evasion and ensure transparency in all financial transactions. We comply with all legal provisions against money laundering and terrorist financing.

As part of the SYNTECA Group, we adhere to the principles of ethical conduct and have zero tolerance of corruption. Every year, our employees participate in centrally organised training aimed at strengthening ethical awareness and combatting corruption.

We cooperate with public authorities, providing the public with full, clear and truthful information about our activities and intentions. We systematically develop responsive, highly professional and ethical relations with the media. We do not provide any donations or benefits to political parties, political movements or politically exposed persons.

We consider social responsibility to be an integral part of our business. We support those in need, prioritising culture, education and sport.

## **Relationship with Customers**

We provide our customers with a comprehensive range of services, products and systems to meet their needs and requirements. We always honour all agreed contractual terms. However, if any unforeseen circumstances prevent this, we will inform the customer immediately and seek a solution that is acceptable to both parties. We treat our customers with professionalism, courtesy, honesty and helpfulness. We strive to build long-term relationships with our customers. We only use legitimate business methods, and we treat all information obtained from customers as confidential. We protect this information, maintain trade secrets, and ensure that it is not misused. We regularly survey and evaluate customer satisfaction. We provide customers with timely, complete, unbiased, truthful and understandable information about our products and services. We do not offer benefits or rewards to customers that are not in accordance with the law or good business practice.

## **Relationship with Competition**

We view competing companies as professional partners and competition as an integral aspect of business. We respect and promote fair competition, and we do not engage in unfair practices. We do not use underhand tactics to gain information or an advantage over competitors. We do not provide false information about competitors' products and services. We avoid all activities that would be contrary to the law in our relations with competitors and are prepared to negotiate the resolution of disputable situations with anyone who is willing to abide by the basic rules of ethics in a given market environment.

## **Relationship with Suppliers**

We strive to be honest, reliable and trustworthy partners to all those with whom we conduct business. We base our relationships with suppliers on mutual trust and respect. We only choose quality and reliable suppliers. We maintain commercial confidentiality and respect the confidentiality of information about our suppliers. We do not abuse our market position, instead creating a level playing field for all our suppliers while respecting customer requirements. SOFTIP, a. s. employees do not accept monetary gifts or other commissions from suppliers. We require our suppliers to strictly adhere to the rules set out in the 'Code of Ethics', which is published on our website. We strive to be honest, reliable and trustworthy partners to all those with whom we conduct business.

## **Relationship with Employees**

Our employees are our most valuable asset. They carry the know-how that guarantees the successful fulfilment of customer requirements. We provide equal opportunities to all, regardless of race, colour, gender, age, sexual orientation, national origin, religion, ethnicity or other distinguishing characteristics. We do not tolerate any form of humiliation, abuse, bullying or dehumanisation, whether physical, psychological or sexual. We avoid discrimination in hiring, training, career development, compensation and dismissal. We comply with the Labour Code and all other employee relations/human resources laws, standards and regulations. We inform our employees truthfully about our business plans, ensuring that everyone is aware of and can identify with our goals and objectives. We create optimal social

conditions for our employees and a pleasant and peaceful atmosphere in which they can perform their highly qualified work. We support our employees in their career and professional development. We ensure that our 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 and courteously, and to take personal responsibility. We do not discourage our employees from engaging in politics and/or civic activities. However, we consider this to be a private activity that cannot be engaged in during working hours or on our premises. We create space for every employee to freely express his or her own opinion without fear of intimidation or other forms of sanction. We guarantee protection for employees who report illegal, unethical or anti-social activity to the relevant company authorities.

## **Basic Principles of Employee Conduct**

The employee is loyal to both SOFTIP a. s. and the SYNTECA Group. In his or her work, he or she takes care to protect the legitimate interests of the company, its customers, business partners, and colleagues. However, loyalty does not preclude a critical attitude towards what is happening in the company. Any criticism should be constructive and objective, and presented in a way that does not denigrate any person or group.

The employee will not engage in any activity that could damage the reputation of SOFTIP a. s., the SYNTECA Group or our business partners. The employee performs his/her tasks conscientiously and responsibly, in good faith and in accordance with the mission of SOFTIP, a. s.

The employee shall comply with all applicable laws, other legally binding regulations and the internal regulations of SOFTIP, a. s. and the SYNTECA Group. The employee shall behave courteously, correctly and respectfully towards business partners and colleagues, in accordance with the principles of decorum.

The employee shall act in accordance with the objectives, tasks and values of SOFTIP, a. s. and the SYNTECA Group. They shall not be influenced by the intentions of others, nor shall they accept any financial or other advantage that could affect their job performance, duties or decision-making outcomes.

The employee shall protect the property of SOFTIP, a. s. and its business partners from damage, misuse and destruction. He/she shall use the funds entrusted to him/her as efficiently as possible, in accordance with their intended purpose, and shall not misuse them for personal gain or for the benefit of third parties.

The employee uses SOFTIP, a. s. property exclusively for work purposes. He/she complies with internal rules when using official telephones, mobile phones, cars, computers and other property. The employee must not use working hours to conduct private business without the express permission of their supervisor.

The employee must not exploit their position or any confidential information obtained in the performance of their duties and responsibilities for any financial or other gain. All information concerning SOFTIP, a. s. and the SYNTECA Group that is not published or otherwise publicly available is considered confidential. The employee must keep confidential any facts learned while performing their tasks and duties that cannot be communicated to other people in the interest of SOFTIP, a. s. and the SYNTECA Group or a business partner. This obligation shall not apply to facts that give rise to suspicion of corrupt conduct or other anti-social behaviour.

The employee must keep internal matters confidential and must not speak out against SOFTIP, a. s. or the SYNTECA Group by commenting on or posting materials or photos on various platforms, including social networks.

The employee may only carry out business activities identical to those of SOFTIP, a. s., with prior written consent from SOFTIP, a. s.

The employee shall act in his/her private life in such a way as to avoid any conflict between his/her private interests and those of SOFTIP, a. s. and the SYNTECA Group. A conflict of interest is defined as any situation in which an employee's personal interests threaten to undermine his/her ability to fulfil his/her obligations, or to act in accordance with the interests and values of SOFTIP, a. s. If the employee is unsure whether his/her business activities have created a conflict of interest, the employee should immediately contact the Compliance Manager to discuss the situation.

Employees involved in political parties or movements do so in a private capacity, not as SOFTIP, a. s. employees.

The employee shall not offer, promise or give gifts or other undue benefits to third parties, except for standard promotional items that have been registered in accordance with the internal regulations of SOFTIP, a. s., and approved by its management. The employee shall not solicit or accept gifts, favours or other forms of attention that could influence their decision-making.

The employee shall avoid placing themselves in a position where they would be obliged to repay a service or any other advantage offered in the context of his/her employment, thereby undermining the objectivity and impartiality of his/her decision-making.

When communicating with others, the employee shall respect their human dignity and integrity, as well as the principles of courtesy and the prohibition of any kind of discrimination. The employee shall communicate with colleagues, business partners and others in a courteous, tolerant and honest manner, using appropriate language and avoiding abusive and defamatory phrases.

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

The employee respects and appreciates their colleagues and their work, which the company considers to be equally important. The employee avoids actions that could be perceived as bullying, whether towards colleagues in their own team or in other teams, or towards subordinates or supervisors, whether individually or in a group.

The employee shall conduct himself/herself in such a way as to avoid or avoid conflicts in the workplace. However, if a problem or conflict arises, every effort must be made to resolve it peacefully and culturally.

The employee shall greet other colleagues in accordance with the social rules and shall greet any visitor he meets on the employer's premises.

The employee must respect the decisions of his/her superiors. If he/she has any reservations, he/she must follow an official approach and resolve them first with the appropriate supervisor.

The employee does not resolve differences of opinion based on personal bias. Any disputes shall be resolved in the most factual, open and refined manner possible.

The employee is aware that he or she represents SOFTIP, a. s. and the SYNTECA Group both internally and externally, and therefore comes to work neatly groomed and dressed appropriately. He/she make the best possible impression in the workplace by being pleasant, professional, and observant of the principles of good social behaviour.

The employee shall notify his/her supervisor of any violation of generally binding legislation, internal regulations or the Code of Ethics by another employee as soon as he/she becomes aware of it. The supervisor will forward the notification to the Compliance Manager for investigation in accordance with the policy on the filing, receipt, recording and handling of notifications.

## Supplier Code of Ethics

### Human Rights and Rights of the Supplier's Employees

Supplier:

- acts in accordance with human rights and freedoms, including the social rights of employees, upholds the principles of the Universal Declaration of Human Rights and promotes diversity;
- ensures equal opportunities regardless of race, colour, gender, age, sexual orientation, nationality, religion, ethnicity or other characteristics;
- treats its employees with respect and dignity and ensures that the workplace is free from harassment, physical or verbal assault or any threats or other forms of intimidation and will respect the legal requirements for the employment of minors.
- does not use any form of forced labour and does not knowingly source products and services from supply chains associated with human trafficking
- respects the right of employees to freely associate in accordance with the law, without intimidation, sanctions or harassment;
- ensures safe working conditions and health and safety in the workplace, taking into account applicable laws and regulations;
- ensures that all safety and health risks to which employees are exposed are adequately assessed and the necessary safety measures are implemented;
- complies with all laws governing pay, benefits and working time, including those relating to minimum wages, overtime and other components of pay.

### Environmental Protection

Supplier:

- complies with all relevant laws and other generally binding regulations relating to environmental protection;
- fully understands the environmental impact of its business throughout the entire production cycle, from the design and manufacture of products to their supply, use and end-of-life disposal;

- reduces its negative environmental and climate impact (including its carbon footprint) and promotes the development of environmentally friendly activities, processes and products;
- uses natural resources (including, for example, water, raw materials and energy) responsibly;
- ensures the appropriate management of waste, wastewater and air emissions;
- when handling substances classified as hazardous in the event of a release to the environment, ensures that their purchase, labelling and their handling, transport, storage, recycling or disposal are carried out safely;
- prefers packaging standards that minimise the amount of materials used, and uses materials that contain recycled materials or are recyclable where possible.

## Information Confidentiality

Supplier:

- complies with all applicable laws and generally binding regulations relating to data protection and information security, including special data protection;
- respects and refrains from interfering with the intellectual property rights of other entities, including rights to patents, trademarks, copyrights and other proprietary rights; acknowledges the fact that SOFTIP, a. s. provides or may provide him with information that is sensitive to him (trade secrets and other confidential information) and strictly observes the obligation of confidentiality in relation to such information;
- is obliged to protect sensitive information entrusted to him/her by SOFTIP, a. s., any entity belonging to the SYNTECA Group, customers or other suppliers, and such information may only be used or disclosed in a manner approved by SOFTIP, a. s.

## Corruption and Bribery

Supplier:

- acts honestly, ethically and in accordance with applicable laws and regulations in the conduct of their business, establishing open business relations with business partners and promoting zero tolerance for all forms of corrupt behaviour;
- prohibits and avoids any form of bribery, corruption and money laundering;
- prohibits and avoids offering, giving, demanding or accepting any direct or indirect bribes, payments or other inducements for the purpose of influencing business decisions;
- reports any employee or member of the SOFTIP, a. s. authority, or any other person acting on its behalf, who requests the promise and/or provision of any gift or other benefit, to the email address [compliance@synteca.sk](mailto:compliance@synteca.sk) without delay.
- is responsible for all financial transactions of SOFTIP, a. s., maintaining accounting records in accordance with accounting principles and regulations to ensure all statements, documents and invoices are correct and complete.

## Conflict of Interest

A conflict of interest, or the risk or potential for a conflict of interest, arises when the private objectives or activities of a business partner, a member of their statutory or controlling body, or any person acting on their behalf, or their close associates, threaten or are in direct conflict with the interests of SOFTIP, a. s. and the SYNTECA Group.

Supplier:

- must avoid conflicts of interest that could have a negative impact on SOFTIP, a. s./ SYNTECA Group;
- is obliged to inform SOFTIP, a. s. of any such conflicts;
- takes all necessary measures to prevent conflicts of interest.

## Competition Rules

Supplier:

- promotes fair competition and complies with applicable competition law;
- does not engage in anti-competitive negotiations and does not participate in any form of cartel;
- shall not engage in collusion, price fixing or price discrimination, nor any other agreement or conduct that could be considered anti-competitive or perceived as unfair competition.

## Supply Chain

Supplier:

- takes appropriate measures to ensure that the principles set out in this section of the Code of Ethics are similarly implemented in the Supplier's supply chains;
- does not tolerate any form of corruption or bribery within their supply and procurement chain, and only conducts business with partners who comply with all applicable legislation regarding working hours, overtime, remuneration, and social benefits.

We expect all suppliers to adhere to the above and to actively seek to achieve the required standards from their own suppliers. We reserve the right to request proof from the supplier that they are operating in accordance with all applicable laws relating to the above rules. We may also conduct a compliance review of these policies ourselves or through a selected independent third party. Suppliers must therefore maintain up-to-date, detailed records to demonstrate their compliance with the Code. Throughout the duration of the contractual relationship, SOFTIP, a. s. may request documents and information relating to the aforementioned facts, and the supplier is obliged to provide everything requested in the agreed format.

## Final Provisions

This Code of Ethics applies to all SOFTIP, a. s. employees and SYNTECA Group employees, as well as to any other individuals acting on their behalf. Everyone is obliged to observe, act in accordance with, and support the Code. Employees must report any violations of the Code immediately. Reports can be made verbally, in writing or by email at any time. For the sake of prompt and efficient processing, notifications should be made in person to the Compliance Manager during business hours (Monday to Friday, 8 a.m. to 3 p.m.). Reports may also be made in writing by email to [compliance@synteca.sk](mailto:compliance@synteca.sk) at any time, i.e. 24 hours a day, 7 days a week. The employee has the right to make the report anonymously. It is possible to use the "VOX POPULI" box, which is located out of the view of the camera system. Submitting a notification shall not be considered a breach of the obligation of confidentiality under employment and other legislation, or under the company's internal directives and regulations. Any breach of the Code of Ethics will be investigated thoroughly by the Compliance Manager. In the event of a proven violation of its provisions, disciplinary proceedings will be initiated against the employee in accordance with labour law. These proceedings may result in a reprimand, a reduction in pay or immediate termination of employment. In addition to employment law, criminal law may also be invoked by filing a report with the relevant authorities.

In Bratislava on 1.7.2025

Ing. Branislav Šebo  
President of the SYNTECA Group

Ing. Martin Vlčko  
Chairman of the Board of Directors  
and CEO of SOFTIP, a. s.