

Code of Ethics

Quantcom a.s.

Quantcom a.s., business ID: 28175492, with its registered office at Křižíkova 36a/237, Prague 8 - Karlín, ZIP code 18600, registered at the Municipal Court in Prague under File n. B 12529 (hereinafter referred to as the "Company") is proud of its achievements, which it does not see only in its economic results, but also in its dealings with integrity and respect for all stakeholders, because it has this approach not only in internal relations, but also in external relations. The Company proceeded to adopt this Code of Ethics, which is first and foremost an internal regulation of the Company, but it also expresses the essential values by which the Company is guided and it declares its moral and ethical principles. It therefore serves not only employees, but also current and future business partners, suppliers, clients, as well as the general public, which is why it is presented on the Company's website, where everyone can familiarize themselves with it. This Code of Ethics represents the Company's commitment to act and make decisions in accordance with its values and principles, which are transparently expressed herein. This is an extension to the obligations imposed on the Company by legal and subordinate regulations, which guarantees a higher standard in the conduct of the Company as a whole, both in internal and external relations.

Integrity and credibility of the Company

In accordance with the principle of legality, the Company and all its employees continue to be bound by all legal and subordinate regulations that apply to them, as well as other internal regulations of the Company.

The representatives of the Company and all its employees are obliged to act in accordance with the rules of decent behavior and professional ethics in all their professional conduct and with the knowledge that this is not only their personal image, but also the image of the entire Company. At the same time, they are obliged to refrain from any action that could potentially endanger the reputation or good name of the Company. They must always act honestly, with due diligence and with respect for all parties involved. In the same way, they are obliged to comply with commitments and promises on time.

In the event that a situation arises in which there could potentially be a conflict of interest, whether of an individual employee, a group of employees or the entire Company, a procedure for dealing with such information is set within the internal organization of the Company. According to the internal guidelines for this purpose, each employee and the Company proceed in a timely and transparent manner in such a way as not to jeopardize the integrity or credibility of the Company.

Last but not least, part of the integrity and trustworthiness of the Company is also its ability to bear responsibility for possible errors. Should the Company or its employee commit any misconduct, the Company and possibly an employee will be held responsible, and further steps will lead to the fastest possible correction and specific consequences, including the updating of existing rules or the setting of new rules, so as to prevent further similar problems.

Adherence to the rules is of fundamental importance to the Company, as it helps to build a positive reputation and maintain long-term relationships with clients and partners. Therefore, the company consistently adheres to these rules and principles so that a sustainable and successful business is strengthened.

The company has zero tolerance for any corrupt or fraudulent behavior.

Responsibility towards employees, clients and business partners

The company is committed to creating a safe environment for its employees. Consistently and regularly trains employees on safety and health protection at work and complies with all other standards regarding health and safety. The Company considers the protection of the mental health and well-being of its employees to be equally important. The Company considers any form of so-called bossing, mobbing, bullying, humiliation or attacks on human dignity to be unacceptable. Sexual harassment of any kind, whether directed at an individual or a group, is also unacceptable.

In the event of any incident, the company has set internal standards so that the situation can be resolved quickly, with as much consideration as possible for the victim and to avoid secondary harm. In the event of an incident spilling over into the criminal or administrative sphere, the Company stands by the victim and provides, with the victim's consent, all cooperation and relevant evidence at its disposal.

Any form of discrimination is unacceptable. The Company believes in the principle of equal treatment and equal access to opportunities in the management of the company or in other management positions. It provides its employees with opportunities for further education and deepening of knowledge, especially through trainings. The Company tries to accommodate employees trying to balance their personal and work lives and guarantees fair working conditions.

The Company also applies the principle of equal treatment when remunerating for work, which is fair and at a decent amount.

The Company respects the privacy of employees, business partners and clients and protects their personal data in accordance with applicable legal standards. When handling personal data, it follows the principles of minimization and legality.

The Company also ensures a pleasant working environment and conditions and provides its employees with an above-standard environment even during breaks.

Requirements for actions of the Company's employees

In order not to conflict with the principles of this Code of Ethics, employees are obliged to comply with legal and internal regulations and to act in accordance with them and to act in such a way as to avoid any possible violations.

The common features of these rules are: not creating space for corrupt behavior, not tolerating violations of rules and contractual obligations, reporting undesirable behavior in a way that is governed by legal or internal regulations.

The company does not tolerate corrupt behavior in any form. The Company's employees have a duty to prevent a situation in which they would feel obliged for a service, gift or favor provided or feel the need/obligation to pay them back.

The Company's employees are prohibited from demanding any improper benefits in order to obtain a business opportunity or a more favorable position in the market, and may not use any third parties for this purpose.

The Company's employees are prohibited from accepting gifts of unreasonable value, which can be financial or non-financial gifts, which are most common (e.g. tickets to cultural or sport matches, vouchers, etc.).

The Company itself does not provide any gifts or benefits of unreasonable value to its business partners, suppliers or customers, nor does it accept anything similar from business partners, suppliers or customers. It is permitted to give or receive gifts and benefits of small pecuniary value that cannot influence the judgment of the recipient and cannot be considered an attempt to influence the judgment of the recipient. It can be said that gifts of small pecuniary value are up to CZK 1,500.

Responsibility towards society and the environment

In its activities, the Company uses honest business practices and always approaches everything with due caution, care and respect. This contributes to the cultivation of the business environment and professional ethics.

The Company consistently complies with legal and subordinate regulations, including those in the area of tax obligations and contributions to public budgets.

The Company adheres to the values of nature and environmental protection as well as sustainable development. In its activities, the Company tries to proceed as carefully as possible and not to harm nature.

Part of the Company's corporate policy is also social responsibility, as it is not only an economic entity, but it also has a moral and ethical obligation to support and develop the community. The Company tries to cooperate with local organizations and public institutions to solve important social and environmental issues.

Final provisions

As stated above, this Code of Ethics is not only binding for the Company, but also for all its employees. In addition to all legal regulations and internal regulations of the Company, it has a supporting character, forming the essential moral and ethical rules that are observed, controlled and consistently enforced in the Company. In the event of any incidents, adequate consequences are drawn and measures are taken to prevent their recurrence. The Company does not take this commitment lightly, which is why it makes sure that all employees are trained in this regard, and works in such a way that its activities contribute to the proper running and direction of the Company, as well as to the cultivation of a professional environment.