

BTG ETHICAL POLICIES

Purpose

This approach forms the basis on which BTG a.s. including its subsidiaries and affiliates engages relationships based on trust and transparency and helps to improve its performance.

The purpose of this approach is to establish management to ensure compliance with all applicable law and regulations stated below, and to ensure our business is conducted in a socially responsible manner. This approach applies to all the countries and territories that we as an organisation operates in. This approach needs to be read alongside our related policies and procedures where appropriate.

Compliance with law

We uphold with all applicable laws, in particular the laws and regulations against:

- (a) Illegal labour;
- (b) Child labour;
- (c) Forced labour;
- (d) Anti-competitive practices;
- (e) Anti-bribery and corruption policy within the meaning of the law of Czech Republic and the OECD Convention in particular, and any other laws or regulations applicable in our partner's country or any other countries concerned.

And more generally, we uphold to the laws and regulations against any breach of human rights. For Anti-bribery and Corruption Policy we have issued separate document named BTG's Anti-Bribery Policy and Corruption Policy.

Employee rights

We provide:

- (a) our employees with a safe working environment;
- (b) equal opportunities and equal treatment in employment matters, avoiding discrimination on grounds of ethnic origin, lifestyle, gender, age, union activities, and political or religious opinions of individuals;
- (c) to promote access to work for disabled workers (subject to local public policy constraints);
- (d) enable the development of social dialogue and collective bargaining by promoting freedom of expression and allowing all employees to be members of a trade union as required by local law;
- (e) In general, we comply with labour laws applicable to our employees.

Prohibition of any fraudulent practice

In relations with our customers, suppliers, subcontractors, service providers, media, partners and government agencies in particular, the we shall refrain from any fraudulent practice, "involvement in" or any act of corruption, whether active or passive, direct or

indirect, in any form whatsoever, and with regard to any person (public official or private entity of any nationality whatsoever), for the purpose of obtaining preferential treatment or influencing the result of any negotiations.

It is strictly forbidden to accept or offer any undue advantage, including sums of money "originating from" or for the benefit of a customer, supplier, contractor, service provider, partner or any third party

Corporate governance

We shall manage our business in accordance with all applicable standards in respect of corporate governance and agree to give as it may impact us, accurate and truthful information with regards to our financial position, strategic orientations and management policy

Import - Export

All or some of the products and or services that we perform are subject to restrictions relating to military equipment.

We ensure to comply with all regulations applicable to possession, manufacturing and marketing of military equipment, export controls and import controls for any component, subassembly or document containing technical data in the countries where it applies.

Record-keeping

BTG a.s. including its affiliates and subsidiaries will keep detailed and accurate records in particular financial ones and will have appropriate internal controls in place to act as evidence for all payments made.

Responsibilities

Our employees must read, understand and comply with this approach. Employees follow procedures (including HR, procurement, and financial procedures) to minimise the risk of actual or perceived bribery or corruption by employees or third parties.

Our employees will notify their line manager and or Security Director of any concerns regarding compliance with this approach.

CEO and Security Director has overall responsibility for reviewing and approving this approach which is implemented within each business.

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