



CODE OF CONDUCT

Dear reader,

We are proud to present to you the new Code of Ethics of SPP Storage, s.r.o.

We consider the Code of Ethics as a key document containing the most important rules of conduct applied by our Company. Our goal is to express the Company's commitments concisely, clearly, and comprehensively.

The Code of Ethics requires that all employees, members of management or supervisory bodies, as well as our business partners adhere to its principles.

We believe that consistent adherence to not only legislative but also ethical principles is the key to the successful and responsible business of SPP Storage.

COMPANY'S VALUES

The following values are crucial for the responsible business of our Company and quality relations with employees or the wider community:

- ❑ **RESPONSIBILITY**
- ❑ **FAIR TREATMENT**
- ❑ **TEAMWORK**
- ❑ **PROFESSIONAL PERFORMANCE**
- ❑ **INITIATIVE**

RESPONSIBILITY

"We always make decisions and act responsibly towards our employees, customers, and other partners."



CODE OF CONDUCT

Occupational safety and health protection of employees, along with ensuring high-quality customer service, is a fundamental criterion in SPP Storage's decision-making and operations. These requirements are reinforced by efforts to use resources efficiently, taking into account the interests of other stakeholders in protecting the environment and operational safety.

FAIR TREATMENT

"We treat our employees, customers, and other partners with respect and dignity."

At SPP Storage, we support the free expression of each employee's opinion. Our goal is to keep communication and internal as well as external relationships honest and respectful. Therefore, our partners are always provided with timely and complete information, limited only for confidentiality of business, technological, and personal data. Clear, understandable, and transparent rules apply to all employees of the Company.

TEAMWORK

"We achieve better results by working together."

The management of the Company creates conditions for equal communication and encourages close cooperation of employees, subordinates, supervisors and departments. Every feedback and opinion are building blocks of a pleasant working atmosphere and contribute to the development of individuals and the entire Company. All employees are members of a team and act in line with the goals and priorities of that team.



CODE OF CONDUCT

PROFESSIONAL PERFORMANCE

" We want to be the best at what we do and how we do it."

The Company's management creates opportunities for the education and continuous development of its employees and expects each employee to be willing to continually improve and effectively apply their knowledge and skills in daily work. The high level of expertise of our employees is linked to observing principles and rules of professional conduct, both within the Company and in external relations.

INITIATIVE

" We are proactive and seek ways for continuous improvement and innovation."

We expect active engagement in work and a willingness to contribute to the further development of SPP Storage from every employee of the Company. The management builds atmosphere encouraging new ideas and proposals to bring about progressive change and innovation.

COMPANY'S PRINCIPLES

Equal opportunities

Our relationships are based on mutual respect, dignity, and respect for fundamental human rights. We protect our employees from any actions or attitudes that could lead to discrimination or harm to individuals. We strive to create an atmosphere of decency, trust, and empathy.



CODE OF CONDUCT

We do not tolerate any form of physical, psychological, sexual, or other harassment. In our Company, we do not discriminate based on race, skin colour, gender, nationality, age, sexual orientation, length of employment, health status, religious or political beliefs. We treat all employees, business partners, and third parties with courtesy and respect.

Respect for the laws and rules of competition

Compliance with legal standards in all our activities is a priority. We provide the necessary conditions for compliance with applicable legislation by conducting training, monitoring legislative changes and providing timely information.

Our employees, suppliers, and business partners are obliged to comply with legal standards related to the performance of their work. Employees must not engage in any activities that even remotely suggest a violation of legal regulations. We pay special attention to compliance with legal regulations concerning competition protection and unbundling rules. We do not engage in any illegal or unlawful attempts to influence market competition among competitors. We provide information transparently, comprehensively, and on time.

Good reputation of the Company and social responsibility

Our employees, through their behaviour, actions, speech, and appearance, not only represent themselves but also act as representatives of the Company. For this reason, they protect its interests and behave in a way that does not damage the good name of SPP Storage. However, the Company primarily builds its good name through responsible practices and reliable gas storage operations. Therefore, in our activities, we focus on the satisfaction of gas storage customers, environmental protection, and support for the communities and regions, in which we operate.



CODE OF CONDUCT

Rejecting corruption

We reject corruption in any form, at any time, anywhere and under any circumstances. We believe that success, sustainable results and growth will be achieved through fair competition, our professional experience and quality service. We welcome and support the determination and willingness of employees to fight against corruption. We never offer, promise or accept unlawful benefits that could influence the decisions of third parties.

Conflict of interest

A conflict of interest arises when an employee's personal interests or activities could inappropriately influence their work. Involving employees in activities that could theoretically lead to a conflict of interest is not allowed. Employees act ethically and do not seek or accept any personal gain at the expense of the Company or third parties.

During their employment, employees shall not, without the prior written consent of the Company, engage in any gainful activity identical or similar to the Company's business.

Gifts and rewards

We only give and accept gifts and favours that cannot give the impression that they are expected in return for any action contrary to law, business practice or ethical rules. Promotional items that we offer to our partners are presented as support for the image and business name of SPP Storage. Gifts must not exceed the ordinary understanding in business practice and must be proportionate to the circumstances. Gifts in the form of cash, gift certificates, shares, bonds, commissions, or other financial or material benefits are not permissible under any circumstances. We also never request gifts. If we find that a gift is contrary to the Company's principles, we are obliged to return it.



CODE OF CONDUCT

Sponsorships and donations

At SPP Storage, we are committed to social responsibility, which is why we support initiatives in the areas of environment, social issues, health, education, culture, and sports. Our support focuses mainly on projects with regional significance. All our sponsorship and donation activities are as transparent as possible.

Political activities

Given the position of SPP Storage in the natural gas storage market, a dialogue between government representatives or political parties and the Company is essential. However, we do not provide financial support or engage in any other way with political parties, their candidates, or their representatives. We refrain from any direct or indirect attempts to pressure politicians to promote our business interests. We do not allow employees to actively participate in top-level political activities, but these rules do not restrict their right to engage in personal political activities. However, employees engage in such activities solely as private individuals and not as representatives of the Company. Political sympathies or membership in political parties must not affect the proper and honest performance of their work.

Relations with business partners

We always apply an honest, fair and responsible approach to our business partners and strive to meet the needs of all stakeholders. We base our relationships on discretion and courtesy, without any favouritism or discrimination. We create the same transparent conditions for all business partners.



CODE OF CONDUCT

Relations with institutions

With public institutions we deal in accordance with the law and ethical principles. We do not make room for unlawful support, incitement, or inappropriate influence that could jeopardize the Company's reputation. Employees communicating with institutions are obliged to provide truthful, understandable and timely information to a reasonable extent.

Relations with the sole shareholder

We conduct our business activities in a manner that enhances the value of the Company and with the objective of providing the sole shareholder with a reasonable reward for the risk associated with investing capital in the Company. We create conditions that allow the sole shareholder to actively participate in managing the Company. We protect his interests in accordance with the Company's articles of association.

Public communication

We fully respect and adhere to the principles of freedom of expression, media independence, protection of personal rights, and the right of access to information. In line with our communication policy settings, we are committed to providing unbiased and understandable information at the right time. The Company is only represented by persons empowered or authorized to do so.

Personal data protection

We respect and protect the personal data of all individuals whose data is available to SPP Storage. Personal data is collected upon consent of the individuals concerned, for a defined or specified purpose, and processed only to



CODE OF CONDUCT

the extent necessary to achieve the purpose of processing in accordance with internal procedures and applicable legal regulations.

Information protection, confidentiality and secrecy

At SPP Storage, we protect the confidentiality of financial, operational, business, technical, and other information related to our business activities. Employees maintain confidentiality regarding confidential information entrusted to them by the Company, except where the disclosure of information is approved or required by applicable legal regulations. Employees protect Company information from unauthorized access by unauthorized persons. The duty to protect Company information also applies to employees who have already terminated their employment.

Financial statements

All financial records and statements of SPP Storage are prepared accurately, on time, in an inspectable manner and they reflect reality. They comply with generally binding legislation and internal rules. We prepare them in cooperation with both internal and external auditors. In activities related to financial reporting, we always provide cooperation to ensure that records of our business transactions are current, complete, and reflect the true state of affairs.

Health and safety protection

Our Company places great emphasis on compliance with and promotion of safety rules. We apply fire safety regulations, relevant mining regulations, and create a safe working environment. We raise awareness of potential risks and strive to eliminate or significantly reduce them. We encourage responsible employee behaviour. Our business activities are carried out safely and rely on responsible preparation, systematic prevention, and the implementation of



CODE OF CONDUCT

necessary sanctions and penalties. Each employee is familiar with valid safety regulations and work procedures and is obligated to adhere to them. We all act so as not to endanger our own health or the health of others. We take care to ensure that all other individuals in the Company's premises or technological facilities also act in this manner.

Environmental commitments

We are committed to protecting the environment with respect to the rights and expectations of future generations. In our business activities, we strive to balance economic and environmental interests. We take a number of preventive measures to reduce environmental risks and seek to minimize the impact of our activities on the environment. The Company implements measures to reduce methane and carbon dioxide emissions.

Use of Company assets and their protection

In its business activities, the Company uses only assets acquired legally. We comply with applicable licensing rules and legislation. It is the duty of employees to protect and efficiently use all tangible and intangible assets of SPP Storage. The use for other than work-related purposes must be in accordance with the Company's internal regulations.

Compliance with the Code and reporting

Employees and members of all Company bodies are obliged to report any violation or suspicion of a violation of the principles of the Code of Ethics without undue delay. We believe that compliance with the principles contained in this document is essential for the proper functioning of our Company, and therefore, we are willing to provide any additional or clarifying information. The Code of Ethics applies to all SPP Storage employees, including members of the



CODE OF CONDUCT

Company's bodies. Each employee is required to become familiar with it. We expect our partners to comply with this Code, which is why it is also available on the www.sppstorage.cz website.

Reports may be submitted to:

□ By letter to:

Dolní Bojanovice 891, Dolní Bojanovice 696 17

□ By submitting a report into the mailbox at the same address

□ Using the data box: ID: q9vzb6z

No person reporting a violation or a suspected violation of this Code will be sanctioned or disadvantaged in any manner. We undertake to maintain confidentiality regarding the identity of the individual who provided the notice and, until the notification is investigated, also regarding the identity of the person against whom the notification is directed (except as provided for by generally binding legislation). At the same time, we take measures to protect whistleblowers from possible discrimination or other forms of negative consequences associated with reporting violations or suspected violations of the Code of Ethics.

Any obviously false report submitted with intention of harming another employee or a third party will be considered a violation of the Code of Ethics.