

NDC Group s.r.o. and NDC Group Czech s.r.o.


The management of NDC Group s.r.o. and NDC Group Czech s.r.o. places maximum emphasis on compliance with the established anti-bribery principles and standards of business ethics.

In all areas of business, management expects honesty and integrity and does not tolerate any form of corruption, bribery or unethical behaviour. To this end, an anti-bribery management system has been established in accordance with the requirements of ISO 37001:2016 and this policy has been set out, including the provision of an independent anti-corruption oversight function to monitor compliance with all legal requirements and obligations in relation to this system.

The anti-bribery management system contributes to the reputation of companies and helps to avoid potential risks associated with corrupt behaviour and strengthens confidence in the cleanliness and ethicality of companies' business activities. The anti-bribery management system is based on the following principles:

- Comply with all applicable laws and regulations and conduct business in a fair and ethical manner and within the framework of valid competition.
- Not to directly or indirectly offer, pay, solicit, or accept any improper payments, such as bribes or illegal gratuities, in any form.
- Comply with all local requirements and limits, as well as internal and business partner requirements, for reporting and providing gifts and treats.
- Not tolerate any Insider trading, no Insider may purchase or sell any Company security while in possession of Inside Information about the Company, its subsidiaries, or other companies with the Company has contractual relationships or may be negotiating transactions. No Insider who knows of any Inside Information about the Company may communicate that information to any other person.
- Apply the principles to help detect suspicious activity including the predicate offenses to money laundering and terrorist financing, such as securities fraud and market manipulation.
- Keep accurate and honest accounts of all business transactions and report them in accordance with legal requirements.
- Avoid conflicts of interest between the private activities of employees and other persons acting on behalf of other companies and their activities within the scope of their work tasks.
- Proactively communicate the processes for identifying conflicts of interest and for reporting reasonable suspicion of bribery or ethical violations, as well as supporting reporters and protecting them from potential reporting sanctions.
- To create awareness among employees and other persons managed by companies, suppliers and other stakeholders of this anti-corruption policy, the importance of fulfilling all anti-corruption management obligations and the possible consequences of non-fulfilment.

The management of the companies undertakes to apply this policy and the requirements of the anti-bribery management system, to ensure adequate resources and to create the necessary organizational conditions for its effectiveness and continuous improvement. The Anti-Bribery Management Policy is applicable to all employees and other persons acting on behalf of the companies in all activities carried out by the companies. In the event of a violation of this policy or established anti-bribery principles, employees and other obligated persons are required to immediately inform the Compliance Manager. This policy was discussed and approved by the management of the company in Prague on 1 January 2024.



Vladislav Štefaňák
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