

CODE OF CONDUCT

PRAGUE, AUGUST 2024



Principles of Conduct

Our business conduct is characterised by integrity and compliance with the law and we expect the same from our partners. In particular, we are committed to the following principles:

1. Human Rights

We support the protection and promotion of fundamental human rights and freedoms and use our influence to prevent their violation.

2. Labour Standards

We respect and support the core labour standards set out by the International Labour Organisation (ILO). We embrace diversity and equal treatment regardless of gender, marital status, ethnic origin, nationality, age, religion, sexual orientation, or physical or mental disability. We uphold the right to freedom of association and recognise the right to collective bargaining. We strive for maximum safety and health protection in all workplaces and premises.

3. Environment

We are committed to the responsible management of natural resources and promote the use of environmentally friendly technologies.

4. Free Competition and Capital Market Law

We advocate free competition and transparent markets and are against unfair competition and restrictions of competition. We handle inside information in accordance with the provisions of capital market law.

5. Data Protection

We take care to handle personal data properly.

6. Protection of Trade Secrets and Intellectual Property

We are committed to protecting the trade secrets and intellectual property of third parties.

7. Taxes, Subsidies and Public Contracts

For us, compliance with legal regulations and procedures for collecting taxes, granting of subsidies and awarding public contracts is a matter of course.

8. Fighting Corruption and Conflicts of Interest

We do not tolerate corruption and take all necessary and appropriate measures to prevent it. We strive to avoid conflicts between the private interests of employees and the interests of the company. We make sure that politicians are not unduly influenced.

9. International Trade Law

We comply with binding national and international sanctions, embargoes and other established restrictions on international trade.

10. Combating Money Laundering

We take all measures that are necessary and appropriate to prevent the laundering of the proceeds of crime.

Code of Conduct

Preamble

Gas Storage CZ, a.s. (the "Company") recognizes its social role and responsibility to its customers, business partners, associates, and employees. This is why we rely on clear principles to frame our business and social activities.

Our actions are determined by our shared values of trust, passion and performance. These values form a common, overarching identity and are specified in this Code of Conduct.

Every employee of our Company is expected to act responsibly, honestly and loyally, and to behave with integrity and respect for others and the environment. In this regard, our leaders must be role models.

Our Company's fundamental goal is to achieve business success by providing our customers with the services they need. We strive to continuously improve the quality of our products and services to achieve a sustainable rate of return for the Company in line with market developments.

To this end, we rely on the following:

- The skills, strength and commitment of our employees;
- Stable social and political environment;
- Opportunities provided by scientific and technological progress;
- Clear customer orientation in the development of innovative products.

This Code of Conduct has three main objectives:

1. It is intended to encourage each employee to act responsibly and to provide them with the necessary guidance to this end.
2. It defines the goals and principles that guide our business conduct.
3. It sets standards for cooperation with contractual partners and provides a common basis for contractual relationships.

I Scope of Application

This Code of Conduct applies to Gas Storage CZ, a.s. and also applies to all areas in which employees are perceived as its representatives.

II Compliance with Laws and Regulations

We consider it important to be successful in the long term. We believe, however, that this is only possible if we maintain our integrity in all aspects of our business activities. We must therefore comply with all laws, directives and comparable regulations. These are the ones that form the framework of our actions. We constantly ensure that we act in accordance with the law, and we expect the same from our partners.

III External Relations

General Principles

We want to achieve our business goals only through legally and ethically appropriate means, and we expect the same from our partners.

Private interests must remain strictly separate from the interests of the Company. Any conflicts of interest arising must be declared and resolved. Indeed, we must avoid even the impression of a conflict of interest.

We manage the Company's tangible and intangible assets appropriately and protect them from being lost, stolen or misused. We also respect third-party property and are committed to protecting trade secrets.

We must not solicit or accept financial donations from third parties. It is also unacceptable to offer or give such gifts. Other types of gifts are only possible within the framework of generally accepted business practices and on condition that they do not give the impression of undue influence.

Cash donations are prohibited.

We make sure that we handle personal data very carefully.

Conduct towards Customers

We offer our customers a wide range of products and services, especially in the field of gas storage. We consider it very important to treat our customers fairly and offer them appropriate and effective solutions.

Conduct towards Shareholders

The capital of our shareholders is the prerequisite and foundation of our business activities. It is therefore our

task to preserve this capital and to achieve returns on it in line with market conditions.

Conduct towards Business Partners

We advocate free competition and transparent markets and are against unfair competition and restrictions of competition. Compliance with tax, subsidy and public procurement regulations is a matter of course for us.

We strive to set an example by our actions. We also aim to promote the set of principles set out in our Code of Conduct. We therefore expect partners who enter into a business relationship with our Company to adopt the Code of Conduct as a fundamental pillar of the cooperation. If we find that any of our partners have violated this policy, we will investigate the business relationship and take all necessary and appropriate actions.

When choosing consultants and agents, we pay particular attention to their qualifications and integrity.

In all business relationships, we comply with binding national and international sanctions and embargoes and other established restrictions on international trade. In addition, we take all necessary and reasonable measures to prevent money laundering.

Conduct towards the Public

We publish objective and truthful information in accordance with the law. All communications to the public are complete, unbiased, accurate in content and clarity and provided in a timely manner. We also respect the professional independence of journalists and the media.

Only authorised persons are allowed to disclose information concerning the Company to the public, the media or other third parties.

IV Conduct towards the Political Sphere

Dialogue with representatives of state authorities and political parties is indispensable, but our task is to prevent even a hint of undue influence from our Company. To this end, we remain politically neutral and avoid donations to political parties, organizations or foundations with close ties to political parties.

We also do not enter into consultancy contracts or similar agreements for remuneration with persons who hold public office.

V Commitment to Corporate Responsibility

Social and environmental responsibility are essential in sustainable business success. The Company is

aware of this and therefore promotes social engagement, especially in the social, environmental and cultural fields. We seek to engage in dialogue with groups that are affected by our business activities or whose activities may in turn have an impact on our business activities.

We welcome private involvement by our employees in civic, political, democratic and social activities - especially charitable and social activities, as long as these activities do not conflict with our business interests. The Company does not pursue any of its own business interests in this activity.

VI Internal Relations

Equality of Opportunity and Mutual Respect

We respect the dignity and individuality of every employee. Our interactions with each other are characterised by mutual respect, fairness, team spirit, professionalism and openness.

No employee or applicant for employment will be discriminated against on the grounds of gender, marital status, ethnic origin, nationality, age, religion, sexual orientation, or physical or mental disability. In hiring, training and developing our employees, their skills and qualifications are the main criteria. We promote equal opportunity and diversity.

Our goal is to help employees achieve a life balance, with a particular focus on harmonizing their professional careers with family responsibilities.

Health and Safety at Work

We work towards constantly improving the occupational health and safety conditions for our employees and the safety of our facilities.

Each employee is co-responsible for the protection of persons and the environment in their work area. Each manager is required to instruct and assist their employees in fulfilling these responsibilities.

VII Code of Conduct - Implementation and Compliance

General Principles

This Code of Conduct forms the basis of our corporate culture and is a natural part of our daily work. Nevertheless, managers in particular must actively support and demand its implementation and compliance at all times. Compliance with the Code of

Conduct is the focus of the Company's audits and its principles are part of the audit criteria. The Code of Conduct also forms the base of other Company regulations.

Compliance Management System

With a view to minimising the risks of breaching the Code of Conduct, our Company has implemented a CMS (Compliance Management System). This system serves to detect possible structural risks of corruption within the Company. We regularly adopt and communicate the necessary measures to eliminate or minimise these risks, and we continuously monitor and improve these measures. In this way, we want to ensure a culture of compliance with the Code of Conduct that meets the highest standards of our Company.

Company Reporting Channel

The CMS includes an internal reporting channel that provides whistleblowers with an environment in which they can communicate their concerns and information confidentially and without fear for their position or reputation. This system contributes to protecting the integrity of our Company, increasing transparency in all areas of our business, and serves to prevent and detect violations or other unfair practices. Last but not least, it helps the Company ensure compliance with all laws and other generally binding regulations and our ethical standards.

Compliance Officer

Any employee may contact their line manager or the relevant Compliance Officer with questions regarding the Code of Conduct and compliance with it. The same applies when a breach of the Code of Conduct is suspected.

Compliance Officers are available at all times as contact persons for the above matters, especially in the area of corruption prevention. Every query, alert and suggestion is treated with the utmost confidentiality and handled according to the specific circumstances. Upon request, the employee will be informed about how his or her report is being dealt with and what measures will be taking place. No employee will face recrimination for contacting a Compliance Officer unless the employee has breached the Code of Conduct in some way.

The contact details of the Compliance Officer are listed on the Company's intranet.