



ETHICAL CODE
Values of VYRTYCH a.s.

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A. INTRODUCTION

The Code of Ethics is a summary of moral requirements, rules, principles, and ideals that every VYRTYCH employee should follow in relation to both the external and internal environment. It describes possible violations, provides guidance on identifying and resolving ethical issues, and explains how to report violations of ethical principles. The Code of Ethics, which is based on the core values of VYRTYCH, is a tool that raises the standard of employee behavior, promotes the development of ethics and corporate culture, helps improve interpersonal relationships in the workplace, and contributes to enhancing the reputation of VYRTYCH. The Code of Ethics is binding for all VYRTYCH employees at all levels of company management. Members of company bodies and employees in management positions behave in such a way as to set an example in the application and observance of the Code of Ethics. VYRTYCH expects all suppliers, business partners, and other persons who enter into any cooperation with VYRTYCH to behave in accordance with general ethical principles.

B. BASIC PRINCIPLES

1. Equal Opportunities / Fair Treatment

Relationships between the employer and employees, and between employees at all levels, are based on mutual respect and dignity for each individual and on consistent respect for fundamental human rights.

VYRTYCH is committed to protecting the moral integrity of its employees and guaranteeing their right to working conditions that respect the dignity of the individual. With this in mind, VYRTYCH protects its employees from psychological violence and prevents any attitudes or forms of behavior that result in discrimination or threaten individuals or their beliefs or personal priorities (e.g., attacks, threats, isolation, or excessive interference with privacy, professional restrictions). It is the duty of every employee to create an atmosphere of mutual respect, decency, trust, and solidarity. VYRTYCH does not tolerate any manifestations of physical, psychological, or sexual harassment. Any other forms of behavior or verbal expression that could disturb an individual's feelings are also prohibited.

Employees must not engage in any form of intimidation, bullying, or hostile behavior, especially hostile behavior based on race, skin color, gender, nationality, age, sexual orientation, number of years of service, health status, or religious or political beliefs. Employees are also prohibited from sending, publishing, or distributing any materials in the workplace that incite hostility toward an individual or group on the basis of race, skin color, gender, nationality, age, sexual orientation, number of years of service, health status, religious or political beliefs, or engage in activities that harm another employee, business partner, or third-party representative.

An employee who believes that they have been the victim of harassment or any form of discrimination has the right to report this to the VYRTYCH board of directors, which will investigate whether there has been a violation of the Code of Ethics.

2. Respect for competition laws and rules

Ensuring compliance with laws and relevant legislative standards is a priority for VYRTYCH. VYRTYCH is therefore committed to supporting and creating the necessary conditions to enable compliance through appropriate training and relevant information for its employees.

It is the duty of every employee to familiarize themselves with and subsequently comply with the legislative standards related to the performance of their work.

VYRTYCH pays particular attention to compliance with legal regulations governing the protection of competition in all its commercial contracts and negotiations with third parties. They do not participate in illegal price agreements or unlawful attempts to control market influence among competitors. VYRTYCH does not refuse to provide information, nor does it conceal, distort, or delay the submission of any information requested by regulatory authorities for the performance of their control activities.

3. Protecting the company's reputation

A good reputation is a fundamental intangible asset and valuable commercial value of VYRTYCH, for which we are all responsible without exception.

Through their behavior, actions, speech, and appearance, each employee represents not only themselves, but also acts as a representative of VYRTYCH. Therefore, every employee cares about its good name and protects its interests, and therefore behaves in such a way as to never damage its good name.

4. Social responsibility

A responsible approach to the external environment and society is important for VYRTYCH to ensure and maintain its growth. Through its products and services, investments, and position as an employer, VYRTYCH plays a significant role in society and the economy as a whole. The social acceptance of VYRTYCH in all areas of its operations is important.

VYRTYCH is aware that its activities may have a direct and indirect impact on the economic and social development of society. For these reasons, VYRTYCH strives to ensure that its activities are carried out in an environmentally sustainable manner, respecting local values and the values of society as a whole. Employees act accordingly in the performance of their work.

5. Prohibition of child labor

VYRTYCH guarantees the prohibition of child labor. The minimum age for employment at VYRTYCH must not be lower than the age of completion of compulsory schooling. Young people hired by VYRTYCH must perform their work under conditions appropriate to their age and be protected from economic exploitation and from any work that could endanger their safety, health, or physical, mental, moral, or social development, or interfere with their education.

C. CONFLICT OF INTEREST AND ANTI-CORRUPTION ACTIVITIES

1. Corruption

Corruption is a negative social phenomenon and an obstacle to the proper functioning of society. It results in increased costs, reduced economic efficiency, is a sign of a lack of solidarity, and can threaten the dignity and integrity of those who suffer its consequences against their will. Therefore, VYRTYCH rejects and condemns corruption in any form, anytime, anywhere, and under any circumstances.

Corruption is generally understood to mean illegal and antisocial phenomena in the public and private sectors. It is a practice that VYRTYCH does not tolerate. VYRTYCH is convinced that it will achieve success, sustainable results, and growth through fair competition thanks to its high-quality and valuable products and services.

VYRTYCH fights corruption with the will and determination of all employees at all levels and creates tools and conditions for a successful fight against corruption.

Active corruption consists of providing an advantage to another person with the intention of ensuring that this person acts or refrains from acting in a manner that violates their duties arising from their employment, profession, position, or function, in particular with the aim of partially or completely circumventing the decision-making mechanism (to secure a permit, right, delivery, trade, contract, etc.).

In order to maintain the trust of its partners, VYRTYCH avoids all forms of corruption and activities that could be perceived as a form of corruption. It does not offer, promise, or provide illegal benefits in order to secure advantages or

Passive corruption consists of accepting benefits in exchange for influencing decisions. VYRTYCH does not allow business decisions, offers, or promises from its partners to be made in exchange for illegal benefits, nor does it accept any such offers. At the same time, it does not make illegal offers to its partners. They avoid creating the impression that business decisions could be influenced by such offers.

No VYRTYCH employee offers, promises, or accepts any illegal advantage that could subsequently influence business decisions.

In the event of a promise, offer, or request for a bribe, employees are required to inform the VYRTYCH Board of Directors without undue delay through the designated communication channels. The same applies in cases where they become aware of facts indicating corrupt conduct.

Sales commissions, discounts, credits, or rebates are considered normal business payments. Payments made or received by VYRTYCH should:

- Be of reasonable value corresponding to the goods or services provided or industry standards
- Be justifiable from a competitive standpoint
- Be properly documented, e.g., in the form of a negotiated agreement that clearly defines the nature and purpose of the business transaction
- Be made by bank transfer or credit note to the business entity named in the purchase agreement or invoices
- Be paid to the business entity and not to specific employees or intermediaries or another business entity
- Payments should be billed in the name of the business entity or entity that benefits from the payment. VYRTYCH should ensure complete transparency of all payments and should not bill these payments to an account that is not related to the matter in question.

2. Conflict of interest

A conflict of interest is a situation in which the personal interests or activities of an employee or member of their family inappropriately influence or interfere with, or could interfere with, their work or effective performance for VYRTYCH, or in which an employee or member of their family obtains unauthorized personal benefits as a result of the employee's position in the company.

Employees are not permitted to engage in activities that give rise to conflicts of interest or that could give rise to conflicts of interest. Employees must behave in an ethical manner and must not seek or accept any personal benefit at the expense of the company. VYRTYCH has the right to investigate suspicious relationships.

Since it is not possible to list all situations or relationships that create an actual or potential conflict of interest, and each specific situation must be evaluated separately, it is necessary to immediately report any circumstances that could lead to a conflict of interest.

If an employee discovers a conflict of interest, they are obliged to inform their superior without undue delay and in a demonstrable manner, and the superior shall, in accordance with the relevant procedures, inform the Board of Directors of VYRTYCH, which shall assess whether or not there is a conflict of interest, taking into account the circumstances of the specific case. If an employee fails to report circumstances that could lead to a conflict of interest, this fact alone will constitute a violation of these principles.

A conflict of interest may arise, for example, in the following situations:

- If an employee of VYRTYCH or a member of their family is directly or indirectly active in the same or similar business activity that constitutes the main subject of VYRTYCH's business
- owns a controlling interest in a company that has a business relationship or seeks to establish a business relationship with VYRTYCH
- enters into a contractual relationship with VYRTYCH for the sale, lease, or purchase of any kind of property or services
- has a personal benefit from the sale, lease, purchase, or other transactions in which VYRTYCH is a participant

During the term of their employment, employees may not, without the consent of VYRTYCH, engage in any gainful activity within the meaning of legal regulations that is identical or similar to the subject of VYRTYCH's activities. The term "gainful activity" refers in particular to gainful activity performed on the basis of an employment contract, a contract for work, or other contract, or entrepreneurial activity.

Any questions regarding conflicts of interest should be reported or consulted with their supervisor or the VYRTYCH board of directors by VYRTYCH employees.

3. Gifts and rewards

The term "gift" refers to any kind of benefit, such as an item, a token of appreciation, a discount on services or products, hospitality, reimbursement of travel expenses and/or accommodation, an invitation to a sporting or cultural event, an invitation to a trade fair, conference, or educational event without payment of a participation fee, a promise of employment, etc. VYRTYCH only provides gifts and tokens of appreciation that cannot give the impression that certain actions, business or other decisions are expected in return, or that would be contrary to the law, business practices, or ethical codes of partners with whom VYRTYCH has business or other legal relationships.

Provision of gifts, tokens of appreciation, hospitality, and other benefits (hereinafter referred to as "gifts").

VYRTYCH or its employees may only provide gifts that do not exceed the normal understanding of business practice and are appropriate to the circumstances. There must be no suspicion that the gift is being provided with the aim of influencing a person who is currently making or will make decisions concerning VYRTYCH. It is particularly important to consider this circumstance in relation to public authorities in the Czech Republic or abroad.

Gifts in the form of cash, shopping vouchers, stocks, bonds, commissions, or other monetary values are not permitted under any circumstances. Promotional items donated by VYRTYCH to its partners are considered to be a means of promoting its trade name and image. All gifts, with the exception of those of symbolic value, must be documented and recorded in the company's internal regulations.

Accepting gifts

Employees must never solicit gifts.

Employees may only accept a gift if there is no suspicion that the donor expects certain behavior or decisions from the recipient in return. In case of doubt, especially if the recipient is able to influence business decisions affecting the donor's interests, the gift may only be accepted with the approval of the immediate supervisor.

Gifts in the form of cash, shopping vouchers, shares, bonds, commissions, or other monetary values are not permitted under any circumstances.

An employee may only accept a gift if it does not exceed the normal understanding of business practice and is appropriate to the circumstances. Employees shall not allow themselves to be placed in a position in connection with their job in which they would be obliged to repay a service rendered or any other advantage offered, thereby compromising the objectivity and impartiality of their decision-making. If an employee subsequently discovers that a gift contravenes the above rules, they shall inform their superior and return the gift.

4. Sponsorship and donations

Sponsorship represents contractual cooperation with an organization or organizer of a social event, which will provide support for the communication and marketing goals of VYRTYCH for an agreed financial reward.

Donations are understood to be monetary or non-monetary gifts made to support non-profit causes, with no reciprocal performance provided by the recipient or any other third party.

VYRTYCH is committed to social responsibility and therefore supports initiatives in the areas of the environment, social issues, education, culture, and sports through its activities, sponsorship, and donations. These are implemented through events of guaranteed quality that are of national importance or correspond to specific local or regional needs. VYRTYCH supports local initiatives in its areas of interest, involving local citizens and associations with which VYRTYCH cooperates in planning its activities so as to preserve their original purpose, content, and effectiveness.

The allocation of sponsorship or donations must be as transparent as possible. The purpose and recipient of the sponsorship or donation, as well as confirmation of receipt, must be documented and verifiable at any time.

5. Political activities

From the point of view of economic importance, dialogue between representatives of local government authorities, political parties, and VYRTYCH is essential. In accordance with its code of ethics, VYRTYCH does not finance political parties, their candidates, or their representatives. VYRTYCH also refrains from any direct or indirect pressure on politicians or government bodies to promote its business interests, nor does it promote them through the participation of its employees in political parties.

Communicating VYRTYCH's views on political matters to politicians or government officials is considered undesirable. VYRTYCH employees must contact the VYRTYCH Board of Directors before engaging in any business with government officials or politicians.

VYRTYCH does not prevent its employees from engaging in political activities. Employees engage in these activities exclusively as private individuals, not as representatives of VYRTYCH. Political activity in the workplace and during working hours is not permitted. Employees' political sympathies or membership in a political party or political movement must not have any negative impact on the proper and honest performance of their work at VYRTYCH.

Communicating the company's views on political matters to politicians or government officials is considered undesirable. VYRTYCH employees must contact the VYRTYCH Board of Directors before engaging in any business with government officials or politicians.

D. RELATIONSHIPS WITH THE INTERNAL AND EXTERNAL ENVIRONMENT

1. Relations with employees and relations among colleagues

As an employer, VYRTYCH recognizes that its employees are its most valuable asset. Relationships with employees and relationships between employees at all levels are based on respect and dignity for each individual and on respect for fundamental human rights.

VYRTYCH focuses on performance and is committed to achieving the best possible results by supporting and rewarding quality performance. In line with this focus, VYRTYCH creates an environment that provides conditions for the personal and professional growth of its employees, in particular by investing in the development of their abilities, skills, and knowledge. At the same time, VYRTYCH expects its employees to maintain high personal standards in their work performance, employee relations, and in the area of health and safety.

VYRTYCH maintains a culture of open communication. Employees listen to each other, discuss topics openly and professionally, actively seek out the opinions of others, and strive to find the right solutions by exchanging diverse views.

When making decisions and solving problems, VYRTYCH encourages employees to take the initiative. Every employee can and should submit suggestions that could help improve any area of VYRTYCH's operations. All employees are members of the VYRTYCH team, and everyone acts in accordance with the interests and priorities of this team.

In addition, managers have a duty to:

- Set high standards of personal conduct
- Regularly and clearly inform their subordinates about responsible business practices and their compliance with VYRTYCH's values
- Treat all employees fairly
- Inform employees that they can contact their manager if they need help with ethical issues or compliance with legal and company regulations, or if they want to report possible misconduct
- Respond appropriately to conflicts of interest on the part of employees, thereby ensuring that business decisions are made solely in the best interests of VYRTYCH

2. Customer relations

In its business activities, VYRTYCH takes an honest, fair, and responsible approach to its customers, considering the satisfaction of their needs and interests to be a prerequisite for a successful and lasting business relationship. Customer relations are based on discretion and courtesy, without any favoritism or discrimination. VYRTYCH uses only legitimate business methods and considers customer information to be confidential.

VYRTYCH complies with agreed business terms and conditions. If, due to extraordinary circumstances, it is unable to meet the agreed terms and conditions, it initiates negotiations with its business partner as soon as possible in order to find an alternative solution. VYRTYCH employees are required to provide timely, complete, unbiased, truthful, and understandable information about their products and services. They do not spread falsehoods, conceal information, or exaggerate in advertising and other public appearances.

3. Relationships with suppliers

In its business activities, VYRTYCH applies an honest, fair, and responsible approach to suppliers. Through the principle of mutual respect and trust, they create mutually beneficial business relationships based on discretion, courtesy, without any favoritism or discrimination. VYRTYCH creates equal and transparent conditions for all its business partners, uses only legitimate business methods, and treats information from suppliers as confidential.

It creates a safe working environment for its business partners and their employees who perform activities on VYRTYCH's premises.

4. Relations with institutions

All relations with Czech or international institutions are based on the need to assess the impact of legislative and administrative measures on VYRTYCH, the inevitability of cooperation with regulatory authorities, etc., and the need to familiarize them with VYRTYCH's positions on relevant issues.

VYRTYCH acts in accordance with legal and ethical principles in its relations with public institutions and does not create opportunities for illegal support, incitement, or inappropriate influence that could jeopardize VYRTYCH's good reputation. Employees authorized to act on behalf of the company in its relations with public institutions are required to act in accordance with the law and morality in order to avoid even the slightest hint of inappropriate behavior. When communicating with institutions, employees are required to provide truthful, comprehensible, and timely information within a reasonable scope.

5. Relations with shareholders

VYRTYCH conducts its business activities in such a way as to protect its economic and financial performance and further increase its value in order to provide its shareholders with a reasonable return on their investment in the company. VYRTYCH strives to create conditions that enable shareholders to participate in decisions affecting them, ensure equal access to information, and protect the interests of the company in accordance with its articles of association.

6. Communication with the public

VYRTYCH respects and adheres to the principles of freedom of expression, media independence, and protection of personal rights and rights of access to information. In accordance with its communication policy, VYRTYCH is committed to providing complete, unbiased, understandable information, published at the right time. Only authorized persons may speak on behalf of the company.

An employee who wishes to speak publicly, publish, or participate in discussions related to VYRTYCH or the subject of its activities must obtain the consent of the VYRTYCH Board of Directors, except in cases specified by generally binding regulations.

Employees are required to immediately address all requests for communication with external parties to the VYRTYCH Board of Directors.

E. PROTECTION AND CONFIDENTIALITY OF INFORMATION

1. Personal Data Protection and Privacy

VYRTYCH respects and protects the personal data of all persons whose data it has at its disposal. Personal data is obtained exclusively with the consent of the agreed person for a defined or specified purpose and is processed only to the extent necessary to achieve the purpose of its processing in accordance with internal procedures and generally binding legal regulations of the Czech Republic. Only employees who need to know the personal data for their job have access to it.

The right to privacy of VYRTYCH employees is respected through the application of generally binding legal regulations of the Czech Republic. It is prohibited to examine data relating to the private lives of employees.

Employees are not permitted to engage in behavior that could lead to the illegal use of personal data and information relating to privacy, including its use by any other persons who are not authorized to do so.

VYRTYCH protects the privacy of its customers by carefully protecting the information it has about them and providing this information only to persons who are authorized to obtain it.

2. Information protection, confidentiality, and secrecy

The term “confidential information” includes all non-public information that could be used by competitors or whose disclosure could harm the company.

VYRTYCH protects the confidentiality of financial, operational, commercial, and other information that belongs to it or is related to its business activities. Employees must maintain confidentiality regarding confidential information entrusted to them by the company, except where disclosure of the information is approved or required by applicable law. Employees may not use such information for their own benefit or for the benefit of any other person.

VYRTYCH collects information about its competitors only through fair means and never through theft or misrepresentation of information.

Non-public information that has economic value to VYRTYCH is considered a trade secret. Trade secrets and other confidential information may only be disclosed to others on the basis of a written agreement on the disclosure of confidential information. The disclosure of such information must be limited to information that is strictly necessary to fulfill a business purpose. In order to ensure the protection of confidential information, every employee of the company is required to protect the interests of VYRTYCH, i.e., employees must not disclose internal company information in an external environment during personal and telephone conversations in public, must maintain the confidentiality of information, and must protect company documents from unauthorized access by unauthorized persons.

The obligation to protect VYRTYCH information also applies to employees who have terminated their employment with the company.

3. Reporting – financial statements

All VYRTYCH records and reports are prepared accurately, timely, comprehensibly, comparably, and truthfully. They comply with the generally binding legal regulations of the Czech Republic and the internal regulations of VYRTYCH.

All information created by VYRTYCH is considered a record, regardless of how this information is stored. Examples include financial, accounting, technical, and sales reports; production information; research and development records; employee personnel files; information relating to health, safety, and the environment; contracts; marketing information; and business plans.

Employees are required to cooperate in activities related to financial reporting so that records of business transactions are always up to date, complete, and reflect the actual state of affairs. Employees must cooperate with internal and external auditors. Records relating to accounting transactions and financial reporting must comply with VYRTYCH's accounting procedures and standards. Employees must never intentionally create false, distorted, misleading, confusing, deliberately incomplete, or otherwise concealed records.

F. SAFETY AND SECURITY

1. Health and Safety

Employee health and safety (H&S) is a top priority for VYRTYCH. VYRTYCH therefore places great emphasis on compliance with and support for related rules and principles, applies fire protection regulations (OPP), creates and provides a safe working environment, develops awareness of potential risks, makes efforts to eliminate them, and promotes responsible behavior among employees. VYRTYCH conducts its business activities safely, based on responsible and safe preparation of each activity, systematic prevention, but also the implementation of unavoidable sanctions and penalties in the interest of occupational safety, in order to ensure the safety and health of its employees and the interests of other stakeholders. It applies these principles not only within the company, but also in cooperation with other stakeholders involved in its activities.

VYRTYCH creates conditions for employees to be familiar with applicable safety regulations, as well as regulations concerning health and fire protection. Every employee is required to comply with these regulations.

Every employee shall act in such a way as not to endanger their own health and life or that of others, in particular by using the prescribed personal protective equipment that is capable of performing its function properly. They shall ensure that other employees and other persons on the premises of VYRTYCH act in the same manner. In the event of identifying dangerous or health-damaging working conditions, employees are obliged to report them immediately to their supervisor in order to quickly and effectively prevent possible dangers and limit damage.

The consumption of alcohol, drugs, or other intoxicating substances is prohibited at all VYRTYCH workplaces. At the same time, it is unacceptable to come to work under the influence of alcohol, drugs, or other intoxicating substances.

2. Environmental issues and environmental commitments

VYRTYCH is committed to protecting the environment and, with regard to the rights of future generations, strives to achieve a balance between economic and environmental interests in its business activities. In order to comply with this commitment, VYRTYCH takes preventive measures to reduce environmental risks and strives to eliminate or mitigate the impact of its business activities on the environment by complying with generally binding legal regulations and professional practices in its field of business.

VYRTYCH strives to ensure that the goals and results of its environmental activities are also known to its employees, shareholders, business partners, regulatory authorities, and the general public.

It is the duty of every employee to comply with all applicable environmental protection regulations. VYRTYCH raises the environmental awareness of all its employees through environmental training. Every employee is required to familiarize themselves with the adverse effects their work has on the environment and to perform their work with respect for the environment and established procedures. If an employee becomes aware of any facts or possible harmful effects on the environment caused by the company's activities, they should immediately notify the relevant supervisor so that corrective measures can be taken without delay.

3. Use and protection of company property

Every employee is obliged to protect and make effective use of all tangible and intangible assets of VYRTYCH. Use for purposes other than work must be in accordance with the company's internal regulations.

Company assets consist of tangible and intangible assets, information, data, and intellectual property, such as trademarks, inventions, and copyrights. VYRTYCH employees are required to comply with the following obligations when managing assets:

- Acquire and dispose of assets only on the basis of the relevant authorization and in accordance with approved procedures, and only if it is not illegal to do so.

- When using and handling property, proceed with caution and ensure that these important resources do not lose value as a result of improper use
- Share VYRTYCH property with persons outside the company only if they are authorized to do so and if this activity does not jeopardize the value of the property or violate applicable prohibitions and regulations
- Protect company property and other assets against unauthorized use, removal, or loss as a result of criminal activity or breach of trust.
- Protect intellectual property that VYRTYCH publishes through many tools, such as trademarks, patents, and copyrights
- Employees are required to familiarize themselves with the VYRTYCH brand identity system and use it properly
- Report any misuse or breach of brand protection to your immediate supervisor
- An employee who discovers or believes that measures to protect VYRTYCH's property are insufficient must inform the person who has the authority to remedy the situation.

The same applies in the event of theft or attempted theft, copyright infringement, sabotage, or other damage to VYRTYCH's property interests.

VYRTYCH uses only legally acquired intangible and tangible assets for its business activities.

G. ENFORCEMENT AND REPORTING

1. Compliance with the Code of Ethics and ensuring compliance

The VYRTYCH Code of Ethics applies to all VYRTYCH employees, including members of its bodies.

All VYRTYCH employees are aware that violations of the Code of Ethics undermine trust in VYRTYCH. All employees are expected to familiarize themselves with this Code of Ethics and to comply with and apply the principles set forth herein in the performance of their daily work. In order to ensure this obligation, a copy of the Code of Ethics will be distributed to each VYRTYCH employee.

Managers are expected to actively participate in the implementation and enforcement of the Code of Ethics. Managers are responsible for ensuring that their subordinates are familiar with the content of the Code of Ethics and act in accordance with its principles in their daily work.

As VYRTYCH expects its partners to comply with this code and further develop its principles together with its employees, this code will be available on the VYRTYCH website.

2. Reporting non-compliance with the Code of Ethics

Employees and members of all bodies of VYRTYCH are required to report any violation or suspected violation of the Code of Ethics to the Supervisory Board of VYRTYCH without undue delay. Reports of violations or suspected violations of the Code of Ethics (by employees or external partners) may be submitted to the Supervisory Board of VYRTYCH through any of the following communication channels:

- a) electronically by email to stancik@sentinel-capital.cz,
- b) in writing by letter sent to the attention of Supervisory Board member Ing. Bedřich Stančík at the registered office of VYRTYCH a.s. as recorded in the Commercial Register,
- c) by telephone at +420 604 838 709, or
- d) in person, after prior telephone agreement with Supervisory Board member Ing. Bedřich Stančík; in such a case, the Supervisory Board member shall propose a date for a personal meeting without undue delay, which shall take place no later than 14 days from the date of the request.

An employee who reports a suspected violation of this code will not be sanctioned or disadvantaged in any way.

VYRTYCH undertakes to maintain confidentiality in relation to the identity of the individual who provided the report and, until the report is clarified, also in relation to the identity of the person to whom the report relates (except in cases specified by generally binding legal regulations of the Czech Republic). At the same time, it shall take measures to protect these persons from possible discrimination or other negative consequences associated with reporting a violation or suspected violation of the Code of Ethics.

Any clearly false report submitted with the intention of harming another employee will be considered a violation of the Code of Ethics.

A member of the Supervisory Board of VYRTYCH submits reports to the Board of Directors of VYRTYCH on suggestions, cases of violations, and measures taken as a result.

The CEO and Vice-Chairman of the Board of Directors of VYRTYCH or a member of the Supervisory Board of VYRTYCH provide advice to employees in cases that are not described in sufficient detail in the Code of Ethics. Employees may contact the Executive Director and Vice-Chairman of the Board of Directors of VYRTYCH in person with questions or requests for clarification, or contact him by email at karasek@vyrtych.cz, by phone at +420739429206, or use any of the communication channels designated for reporting. They may also request explanations and advice from their immediate superior.

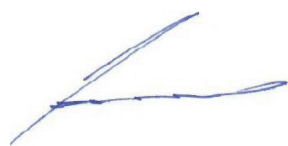
The culture of the VYRTYCH Group companies is based on the principles of trust and mutual respect, not on regulations and control. Any behavior that could lead to a breach of trust and mutual respect will be strictly assessed and consequences will be imposed.

3. Final provisions

Amendments and additions to this Code of Ethics may only be adopted on the basis of a decision by the Board of Directors of VYRTYCH a.s.

The Code of Ethics shall take effect on October 1, 2025.

In Židněves, on September 30, 2025

A handwritten signature in blue ink, consisting of a stylized 'L' followed by a horizontal line and a small flourish at the end.

Dr. Ing. Luděk Karásek, MBA
Executive Director of VYRTYCH a.s.



VYRTYCH

www.vyrtych.cz