

Code of Conduct

nám. 14. října 642/17 150 00 Praha 5 www.arete.eu



CODE OF CONDUCT

ARETE Group

The Code of Conduct (the "**Code**") of the ARETE Group ("**ARETE**"), which includes, among others, ARETE INDUSTRIAL SICAV a.s., ID No.: 080 31 444, with registered office at náměstí 14. října 642/17, Smíchov, 150 00 Praha 5, sets out the fundamental principles, values and standards of conduct for the members of ARETE in their dealings.

Target

The Code aims to establish a clear framework for acting in accordance with ARETE's values and principles. It aims to strengthen credibility and build a culture of ethical behaviour, ensuring that we maintain the trust of our partners, prevent ethical issues, and create an environment where moral values are an integral part of our identity and operations.

Scope

The Code is binding for all ARETE members, regardless of their position or level. It contains rules for interactions with internal and external stakeholders, such as investors, employees, partners, and the community. Last but not least, it encompasses commitments to comply with relevant laws and regulations in all operational areas.

Violations

Violations of the Code may occur when an individual fails to act in accordance with the defined values and principles of ARETE. Individuals affected by such conduct are entitled to contact the ESG Officer with suggestions or complaints regarding possible violations of the Code. Each report will be carefully investigated, and consequences will be drawn in the event of a violation of the Code.

Effectiveness

The Code is effective as of 1 January 2023, in the current version dated 30 September 2024.



1. Core Values and Principles

Our fundamental values drive our commitment to upholding the highest level of integrity in all our activities. This means we act with honesty, trustworthiness, and in accordance with the highest standards of moral and professional conduct. We will not engage in deceptive practices, falsification of information, or abuse of the trust of others.

We are committed to acting with integrity and transparency. We encourage open communication and provide information accurately and completely.

It is crucial for us to respect the rights, dignity, and diversity of all individuals we come into contact with. We aim to create respectful relationships that support and protect all members of our society, regardless of their gender, age, race, nationality, religion, sexual orientation, or other differences.

We are aware of the impact of our actions on society and the environment. Therefore, we accept full responsibility for our decisions and actions. We will strive to minimize negative impacts and actively participate in solving problems that may arise in the environmental area.

2. Professionalism and Investor Interests

We act with professionalism. Our team consists of highly qualified professionals who are dedicated to upholding the highest standards. We stay updated on the latest trends and knowledge in the industry to provide our clients with top-quality services based on independent and objective analysis.

The interests of our investors are our primary concern. When managing their funds, we act with expertise, care, and loyalty, always prioritizing the protection of their investments and achieving optimal results.

3. Employees and Working Environment

Our employees follow all laws and adhere to the codes and standards that our Group subscribes to. They actively collaborate with others to achieve the best possible outcomes and take responsibility for their decisions. For our employees, the priority is to create a working environment for their colleagues, investors, and partners where we act with trust and mutual respect.

We are committed to providing a safe working environment where all our employees' rights are respected, including but not limited to, protection from discrimination and harassment.

We support the professional development of our employees by offering learning and development opportunities, aiming to enhance not only their individual success but also their overall team performance.

4. Relations with Investors, Partners and Public Authorities

Our goal is to provide the highest quality service that delivers real value. We firmly believe in maintaining long-term and trustworthy relationships with investors and partners.

We respect the privacy and confidentiality of our investors and partners. We will not breach the confidentiality of our partners. We will handle this information responsibly and in accordance with the law and best practices.

We maintain professional relations with public authorities, respect their powers, and reject any form of bribery or other fraudulent behaviour.



5. Environmental Protection and Social Responsibility

We acknowledge our responsibility for the environmental impact of our activities. We are committed to reducing our environmental footprint and, in addition to meeting legal requirements for environmental protection, we actively seek new ways to minimise negative impacts and promote sustainable development in our areas of operation.

Recognising that we are part of a broader community, we regularly support local projects, initiatives, and volunteering activities that benefit and strengthen the areas in which we operate.

We encourage open communication about our activities, decisions, and practices.

6. Compliance with the Law and Respect for Good Morals

We adhere to all relevant laws and regulations that apply to our business. We not only make an effort to comply with legal requirements, but we also proactively monitor changes in the legal landscape to ensure compliance with new regulations.

We believe that ethical and moral values are fundamental to respecting others and fostering mutual cooperation.

We do not tolerate any kind of fraud, dishonesty, or unethical behaviour.

