

D e c i s i o n
of the Board of Directors No. 05/2025

**Anti-Corruption Policy at
VÍTKOVICE STEEL, a. s.**

Following the meeting of the Board of Directors of VÍTKOVICE STEEL, a. s. on June 20, 2025

I hereby announce

*** the Anti-corruption policy at VÍTKOVICE STEEL, a. s.,**

(hereinafter referred to as the “Anti-Corruption Policy”), which is attached as appendix No. 1 to this decision.

In connection with this,

I hereby instruct

the technical directors, department heads, and production managers

1 to ensure that all employees of the managed organizational units are demonstrably familiar with the “Anti-Corruption Policy” issued by this decision,

all employees of VÍTKOVICE STEEL, a. s.

2 to comply with the “Anti-Corruption Policy” issued by this decision as a binding standard of conduct.

Manager: Ing. Žaneta Giel Sigmundová, 200.3

Distribution list: in electric form – all employees of VÍTKOVICE STEEL, a. s.

Approved by:

Ing. Radek Strouhal v. r.
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Member of the board of directors

Date of approval: 20. 6. 2025
Date of validity: 1. 7. 2025

VÍTKOVICE STEEL, A. S.**Anti-Corruption Policy****Introduction**

VÍTKOVICE STEEL, a. s. (hereinafter referred to as “**VS**”) has long been committed to transparent and ethical conduct in its business activities and, within this framework, has declared zero tolerance for corruption and bribery in any form. VS complies with the United Nations Convention against Corruption (UNCAC), and anti-corruption standards are a fundamental pillar of its business.

VS considers corrupt conduct to be socially unacceptable, as it causes, among other things, a lack of credibility, undermines the trust of its own employees, and may lead to criminal liability for both the employee and VS.

VS therefore strives to achieve the following objectives:

- strengthening the integrity and resilience of employees against corrupt practices and their loyalty to VS;
- reducing the motivation of employees to engage in corruption and increasing the likelihood of its detection;
- increasing transparency in VS activities – decision-making, information, public procurement, property management and its administration;
- consistent record keeping, especially in the electronic system;
- creating an effective risk management system, ongoing identification and evaluation of risks;
- setting up effective control mechanisms and ensuring effective detection of corrupt practices;
- precise investigation of reports of suspected corrupt conduct, including the adoption of appropriate corrective measures;
- minimising losses caused by corrupt conduct and preventing the recurrence of a similar corrupt scenario;
- compliance with generally binding legal regulations and internal documents;
- regularly updating internal documents in accordance with legal regulations and the current situation at VS, while adhering to moral values.

The company VS has implemented a compliance program and refuses to tolerate any violation of the principles established therein. The company VS is committed to adhering to this anti-corruption policy in order to create conditions for the elimination of corrupt conduct.

Definition of corruption and its forms

Corruption is the abuse of power, position, or authority for personal gain, often at the expense of society or the public interest. It can manifest itself in various ways, including:

Bribery: Offering, promising, or providing financial resources, gifts, or other benefits with the aim of influencing the decisions or actions of another person.

Abuse of power: Using one's position within the structure of the relevant entity to obtain undue advantage or to influence decision-making in favour of an individual or group.

Extortion: Using threats or intimidation to achieve a certain goal.

Nepotism: Favouring family members, friends, or personal acquaintances when filling positions or awarding contracts.

The legal system of the Czech Republic does not define the concept of corruption or corrupt conduct in any way. In general terms, the following crimes can be classified as corrupt crimes within the meaning of Act No. 40/2009 Coll., the Criminal Code, as amended (hereinafter referred to as the "**Criminal Code**"):

- accepting a bribe (Section 331 of the Criminal Code),
- bribery (Section 332 of the Criminal Code),
- indirect bribery (Section 333 of the Criminal Code),
- intrigues in insolvency proceedings (Section 226 of the Criminal Code),
- violation of competition rules (Section 248(1)(e) of the Criminal Code),
- obtaining an advantage in public procurement, public tenders, and public auctions (Section 256(1) and (3) of the Criminal Code),
- intrigues in public procurement and public tenders (Section 257(1)(b) and (c) of the Criminal Code), or
- intrigues in public auctions (Section 258(1)(b) and (c) of the Criminal Code).

Crimes that have characteristics of corrupt behaviour in certain specific situations also include, for example, the following crimes:

- breach of duty in the administration of another person's property (Section 220 of the Criminal Code),
- breach of duty in the administration of another person's property through negligence (Section 221 of the Criminal Code),
- misuse of information in business relations (Section 255 of the Criminal Code) and
- abuse of position in business relations (Section 255a of the Criminal Code).

General warning signs of corrupt behaviour include, in particular, the expensive lifestyle of persons involved in corruption, circumvention or disregard of regulations, failure to respond to suspicious situations, social problems (gambling), a friendly tone when dealing with counterparties, hospitality from third parties, and others.

Definition of acceptable gifts

VS distinguishes between acceptable gifts and unacceptable gifts, respectively bribes, as follows:

Acceptable gifts: Acceptable gifts are characterized by their appropriateness, customary nature, and transparency.

Unacceptable gifts: Unacceptable gifts are any gifts that could be interpreted as bribes or are provided in a non-transparent manner or under unusual circumstances.

Reasonableness: Gifts must be reasonable in both value and frequency and must not compromise the independence or professionalism of the recipient.

Transparency: Gifts must be given and received openly.

Exceptions: There are certain exceptions, such as birthday gifts, Christmas gifts, or invitations to social events, which are in line with customary practices and do not compromise the integrity of the recipient.

A more detailed definition of gifts and the conditions for giving them are set out in the VS Code of Business Conduct.

Internal reporting system and anti-corruption commission

VS has set up an internal reporting system for reporting suspected corruption, which is set out in more detail in the VS internal directive entitled Rules for reporting harmful conduct. VS has established a three-member anti-corruption commission, whose members, in the event of a connection with the reporting of suspected corruption, will be replaced in the investigation by one of the members of the Board of Directors.

Anti-corruption training

All employees and members of the VS statutory body will be trained, as a rule, through the Instruktor online training program, usually once a year. Upon joining the company, all employees will be familiarized with the VS codes and will complete mandatory e-learning related to the criminal compliance program.

Final provisions

This anti-corruption policy is binding on all employees and members of the elected bodies of VS. Adherence to it is absolutely crucial to maintaining the integrity and credibility of VS.

In addition to this anti-corruption policy, the anti-corruption measures adopted by VS and the procedure for reporting suspected corruption are set out in other internal regulations, namely in the VS Code of business conduct, in the internal directive entitled Rules for reporting harmful conduct, the internal directive entitled Overview of the obligations of VÍTKOVICE STEEL, a. s. – Compliance program, and the internal directive entitled Compliance program system at VÍTKOVICE STEEL, a. s., all of which together form an indivisible whole that VS follows in matters of corruption.

In case of uncertainty as to how to proceed in a specific case to prevent corruption, VS employees may contact the VS anti-corruption commission, which was established by VS and which will provide them with its opinion on the matter, usually within 30 days of receiving the request. The activities of the anti-corruption commission are governed by a special internal regulation of the VS.