

Introductory Statement

Sense8 Digital Technology is an investment group which is broadly diversified by geography and sectors. Despite this diversification, Sense8 Digital Technology is united in respect of its commitment to comply with legal regulations, international treaties, rules of ethics, morals, and fair commercial conduct.

The purpose of this code of ethics is to identify the fundamental rules that are complied with by Sense8 Digital Technology and during its day-to-day activities and establish corresponding obligations for Sense8 Digital Technology and its Staff in relation to them. Sense8 Digital Technology Code of Ethics also establishes a framework in respect of which all other applicable internal regulations adopted within Sense8 Digital Technology shall be interpreted.

Sense8 Digital Technology and all its Staff, without exception, are required to follow Sense8 Digital Technology Code of Ethics. The Sense 8 Digital Technology Code of Ethics contains fundamental principles and values that Sense8 Digital Technology complies with and intends to comply with in the future. The Sense 8 Digital Technology team ensures compliance with such principles and values and does not tolerate any failure to comply with them.

Sense8 Digital Technology Code of Ethics has adopted in order to ensure compliance with legal regulations, international treaties, rules of ethics, morals, and fair commercial conduct. The Corporate Compliance programme allows for compliance monitoring in regard to all applicable rules and for remedies in relation to any deficiencies or wrongful acts.

Sense8 Digital Technology Code of Ethics does not and cannot cover all rules and situations that may arise. In matters, situations, and relationships that are not expressly covered by Sense8 Digital Technology Code of Ethics, Sense8 Digital Technology and its Staff are obliged to behave and act in accordance with the principles and objectives of Sense8 Digital Technology Code of Ethics, legal regulations, international treaties, rules of ethics, morals, and fair commercial conduct in order to comply with the good name and reputation of the Sense8 Digital Technology.

Definitions

In the text of Sense8 Digital Technology Code of Ethics, the following terms with meanings stated are used:

Corporate Compliance – the system of control mechanisms the purpose of which is the prevention of illegal and/or unethical conduct of Sense8 Digital Technology and its Staff;

Corporate Compliance Internal Investigation – the investigation of Submissions;

Person Concerned – a person concerned by the Submission; i.e. particularly a person who has allegedly committed conduct described in the Submission or a

person who has allegedly participated in it in a certain manner or a person who has allegedly received certain unjustified economic or non-economic benefit from conduct described in the Submission;

CC Department – department (or a responsible person) of the Relevant Company (usually legal or compliance department), which is designated to receive and assess the Submissions relating to this Relevant Company; if no department (or no person) within the Relevant Company is charged with activities of receiving and assessing the Submissions relating to this Relevant Company, the ultimate supervisory body of this Relevant Company shall be deemed to be the CC Department and where supervisory body is established, the ultimate management body of this Relevant Company shall be deemed to be the CC Department, unless the respective activities are outsourced;

Breach of Sense8 Digital Technology Code of Ethics – a breach of a full material implementation of Sense8 Digital Technology Code of Ethics on the level of a Relevant Company (or a breach of Sense8 Digital Technology Code of Ethics in case Sense8 Digital Technology Code of Ethics is not implemented/materially fully implemented), including but not limited to a breach of any applicable internal policy, legal regulation or international treaty;

Special Mechanism for Solutions – a special mechanism designated to processing filings and findings of a certain type (e.g. claims in respect of defective goods or services) in accordance with all applicable law and regulations (if any), and standard market practice provided that all such filings and findings are always processed through the given mechanism;

Bribe – any act of receiving or providing with unfair benefit, unauthorized performance or performance without legal grounds, regardless of form or manner of providing such benefit or performance.

Manager – a person who is on individual levels of management entitled to define and impose on subordinate Staff working tasks, organize, manage, and inspect their work, and provide them with binding instructions for this purpose;

Compliance with Fundamental Values of Sense8 Digital Technology

Sense8 Digital Technology strictly commits that legal regulations and international treaties are complied with in all areas of its operation within all its activities and in relation to any third parties and public authorities and in relation to its Staff.

Sense8 Digital Technology respects national legal orders of those countries where it operates and where its companies and Staff perform activities or any territories which may be affected or influenced by activities or conduct of the Sense8 Digital Technology.

Within each of their acts in which they act on behalf of the Sense8 Digital Technology, its activities, or for its benefit, Sense8 Digital Technology and the Staff are obliged to comply with and respect the relevant legal regulations and represent Sense8 Digital Technology through their behaviour, so its good name and reputation is preserved and not to give rise to any doubts concerning the activities of the Sense8 Digital Technology. Also, within their private activities, the Staff acts only and strictly in compliance with the principles and values outlined in Sense8 Digital Technology Code of Ethics, so their acts do not cause any harm to the Sense8 Digital Technology, its good name and reputation.

Sense8 Digital Technology strictly condemns and rejects any behaviour or activity that is not in accordance with applicable laws and regulations. Sense8 Digital Technology and its Staff are obliged to refrain from any acts or activities that could be considered as acts or activities that are contrary to applicable public laws and regulations, and thus could be regarded as a criminal offence, administrative offence or infraction.

In the event of any doubts regarding the application of laws and regulations to their acts/activities of the Staff, they are obliged to consult the matter with their Manager, legal/compliance department (if established) of the Relevant Company, responsible person (if any) or the legal department, or with the Integrity team of Sense8 Digital Technology always in accordance and within the meaning of an internal regulation designated as the Corporate Compliance Internal Investigation. In order to ensure that Sense8 Digital Technology Code of Ethics is observed effectively, a system that will allow the Staff and third parties to file the Submissions has been introduced; if the complainant so intends, anonymously as well. Sense8 Digital Technology will process all Submissions regardless of the complainant and the nature of their filing. Filing the Submission is not sanctioned by Sense8 Digital Technology in any manner whatsoever. However, knowingly materially false or vexatious notifications that complainants deem to be the Submissions will not be tolerated by the Sense8 Digital Technology.

For justified reasons or in case it is not possible to file such notification via the Relevant Company.

If a Staff member finds out or has a suspicion that, within activities of the Sense8 Digital Technology, on its behalf, or to its benefit, a person intends to commit or commits any acts that are in conflict with Sense8 Digital Technology Code of Ethics, the Staff is obliged to communicate it through any of the abovementioned ways without undue delay. While performing this obligation, the Staff should ensure that any legal regulations related to the matter are not breached, namely regulations related to the protection of confidential, classified, and similar information.

The procedure applied to the internal processing of the Submissions is further set out in the internal regulation adopted on the level of Sense8 Digital Technology or on the level of the Relevant Company.

Fundamental Principles of Relationships between Sense8 Digital Technology and Third Parties

Relationships with third parties are understood, however, not exclusively, to be relationships between Sense8 Digital Technology and public authorities, business partners, suppliers, customers, media, and the public – i.e. any relationship that involves Sense8 Digital Technology or an Staff member on behalf of the Sense8 Digital Technology, within its activities or to its benefit, and that also affects any third party. The term customer also covers potential customer for the purposes of Sense8 Digital Technology Code of Ethics.

Sense8 Digital Technology does not tolerate and strictly rejects any match fixing of its economic results for any purpose.

Relationships with Public Authorities

Sense8 Digital Technology cooperates with public authorities according to all relevant rules and openly. Sense8 Digital Technology respects the independence and impartiality of public authorities.

Sense8 Digital Technology and its Staff never and under no circumstances attempt to illegally influence decisions and procedures of public authorities. Any potential attempts in this regard are absolutely rejected and not tolerated by the Sense8 Digital Technology.

Sense8 Digital Technology respects all legally effective decisions and binding instructions of public authorities.

Sense8 Digital Technology and its Staff are obliged not to enter into any acts or activities that could give rise to any doubts about the nature of their relationships with persons acting for public authorities, specifically in situations where officials are awarding contracts on behalf of public authorities.

Sense8 Digital Technology and its Staff are obliged to cooperate with public authorities in relation to compliance with all applicable laws. On the basis of cooperation, Sense8 Digital Technology and its Staff must provide public authorities with accurate, true, and up-to-date information and supporting documents as required.

Business Relationships and Activities of Sense8 Digital Technology

Sense8 Digital Technology has an interest in free development of markets where it operates, and, within its business activities, it complies with all laws and regulations.

Within their dealing with suppliers, business partners, and customers, Sense8 Digital Technology and its Staff must always comply with all applicable laws and regulations.

In its relationships with suppliers, business partners, and customers, Sense8 Digital Technology and its Staff, as a part of their business or marketing activities, provide only true and accurate information. In particular, the Staff is obliged to provide true information on performance and results generated by Sense8 Digital Technology and information on facts relevant to a decision of a supplier or

business partner of Sense8 Digital Technology and not to conceal any decisive circumstances.

Prior to entering into a transaction, the relevant Staff is obliged to obtain assurance within their means that their potential business partner is not involved in any illegal activity and that resources and profits of this business partner are legal. Prior to entering into a transaction, the relevant Staff is also obliged to learn within their means what attitude a potential business partner has towards its compliance and control mechanisms (its operation and effectiveness).

In order to learn this, the relevant Staff shall use all their reasonable efforts and means available to them.

The Staff obtains information on competitors and customers only in a manner that complies with legal regulations and from legal sources. Within their activities, Sense8 Digital Technology and the Staff never knowingly state untrue or distorted information on competitors, their products, services or performance.

The Staff is prohibited from entering into any agreements with competitors, no matter whether an agreement is oral, written or implied, formal or informal, in relation to any aspects of competition, namely with price, sales conditions, product range, preferential terms of supply of goods or services or any agreement that could have prohibited impacts on competition. The Staff is obliged to avoid any act that could be assessed as an attempt of Sense8 Digital Technology to achieve an unjustified advantage in an award of a public contract in a public tender or a public auction, or of affecting their course.

While entering into contractual relationships with suppliers and business partners, Sense8 Digital Technology and its Staff always attempt to include in each contractual provision an obligation to comply with applicable laws and regulations, a minimum standard of rules of ethics, morals, and principles of fair commercial conduct. For this purpose, Sense8 Digital Technology has prepared boilerplate clauses that should be used when possible. The samples of recommended boilerplate clauses are included as a schedule of Sense8 Digital Technology Code of Ethics.

It is the Sense8 Digital Technology's preference that given boilerplate clauses should be enshrined in contracts/agreements. Depending on the nature of a contractual relationship, the appropriate sanctions (e.g. an obligation to compensate damage caused, or potentially a possibility to terminate a contractual relationship with suppliers and business partners) should be laid down in order to prevent a contractual partner from failure to comply with an obligation arising from the recommended boilerplate clauses or other similar subject clauses. The Staff shall keep records of negotiations held with suppliers and business partners in relation to contractual terms.

Prevention of Corrupt Practices

Sense8 Digital Technology absolutely rejects any act of receiving or providing with unfair benefit, unauthorized performance or performance without legal grounds, regardless of form or manner of providing such benefit or performance

(hereinafter referred to as a “Bribe”). Any cash or non-cash performance, (provided directly or indirectly) without any legal basis, the goal of which is to generate profit or maintain business in other manner than through own economic activity or performance, influence a business or other decision, and/or arranging any other unfair benefit are deemed to be a Bribe.

Prior to giving or accepting an invitation, gift or any other performance (e.g. payment of services), the Staff is obliged to learn the relevant rules of legal regulations, internal regulations of Sense8 Digital Technology and the applicable and available internal regulations of the business partner, or cultural and social conventions.

It is not deemed to be a Bribe if a gift is: received or given in accordance with standard market practice in order to promote or support the good name of the Sense8 Digital Technology; if its giving is not related to illegal or unethical acts (i.e. in return of which no unfair benefit or unauthorized performance is expected); if the character, value, and frequency of giving such a gift is not inappropriate in view of the relevant circumstances. Similarly, an attendance at cultural, sport or any other event, or any other performance (e.g. payment of services) shall not be deemed to be a Bribe provided that all prerequisites previously referred to in this paragraph are met.

The Staff is obliged to inform the relevant Manager of any attempt of a third party to influence the Staff’s activities, attitudes, or decisions within the Sense8 Digital Technology. The Staff is also obliged to notify their Manager or also CC Department or also Main CC Department that acts have been made or could be made which, on the basis of their character, are acts of corruption.

Anti-Money Laundering Measures

Money laundering is any activity or procedure intended to hide profits or funds from illicit activities, and which makes impossible to find sources of such profits or funds and their beneficial owner, or a through which characteristics of those profits or funds are changed so that they appear to be legal profits or funds.

Sense8 Digital Technology and its Staff strictly avoid all activities that could be deemed as hiding, transferring, holding or using of goods that could stem from illicit activities, and all activities that could be deemed to be as a concealing of the origin of such goods or creating obstacles to trace the origin of such goods.

Sense8 Digital Technology and its Staff strictly comply with all legal regulations related to anti-money laundering, financing any illegal activities, and combating terrorism and support of terrorism.

Sense8 Digital Technology cooperates only with customers and business partners whose business plans are, according to knowledge of the Sense8 Digital Technology/the Staff, financed from legal sources. Within their means, the Staff is obliged to verify whether activities of a business partner selected is legal and whether funds of such a business partner originate from legal sources. For this

purpose, the Staff collects and maintains documents and information related to business partners and transactions performed.

During any transfer of assets performed by Sense8 Digital Technology within its activities or interest, the relevant Staff is obliged to duly designate the recipient of performance and the purpose of performance provided.

All transfers of assets performed by Sense8 Digital Technology within its activities are duly recorded in the relevant documentation.

Restrictive Measures and Other International Sanctions

As a precaution Sense8 Digital Technology acts so as not to unreasonably expose itself, directly or indirectly, at risk of breach of the Sanctions.

Relevant Companies, through their CC Departments or in a different way, maximize their best effort in the process of monitoring of Sanctions and related risks for them. Relevant Companies shall adopt and implement measures and procedures in case such measures and procedures are necessary to prevent and avoid risks relating to the Sanctions.

If an Staff member is aware of any risk relating to the Sanctions or have any suspicions about it, even if it is only hypothetical risk, she or he is obliged to notify the his or her Manager or also CC Department or also Main CC Department.

Disclosure of Information

Sense8 Digital Technology discloses information that is required by legal regulations, in a due and timely manner. Other information is disclosed by Sense8 Digital Technology while observing the principle of openness to the extent that is deemed to be appropriate in the relevant situation. Sense8 Digital Technology observes the fact that information disclosed should always be accurate, true, and verified.

The Director of Public Sector Relations of Sense8 Digital Technology is the only person authorised to communicate with the media for the Sense8 Digital Technology; the Relevant Companies, and the Staff of the relevant departments established for this purpose on the basis of internal regulations of the Relevant Companies.

The Staff members are not individually entitled to provide media with any information on the Sense8 Digital Technology, or to disclose such information through any communication instruments, including social networks.

The Relevant Staff is obliged to inform the Manager, legal or compliance department of the Relevant Company, Legal Department of PPF a.s. or directly Director of Public Sector Relations of Sense8 Digital Technology of request to an Staff member for a statement to the media the subject of which is a request to provide information on Sense8 Digital Technology or its activities and cooperation with business partners.

Fundamental Principles for Relationships in Sense8 Digital Technology

Sense8 Digital Technology and its Staff comply with applicable legal and internal regulations affecting internal relationships in Sense8 Digital Technology and relationships between the Staff members. Sense8 Digital Technology does not allow any form of discrimination of the Staff, not even in relation to work allocation and its pricing. All Managers are obliged to comply with these principles within their approach towards the Staff.

Sense8 Digital Technology respects privacy of its Staff.

Sense8 Digital Technology does not allow any form of harassment, intimidation, forced labour, or illegal labour.

The Managers are obliged to arrange due onboarding and professional training for subordinated Staff, including the participation of the Staff in trainings organised by the Relevant Companies within the prevention of acts and activities breaching principles and rules of Sense8 Digital Technology Code of Ethics. The Managers are obliged to ensure that their subordinates perceive relevance and importance of the Corporate Compliance programme in the Sense8 Digital Technology.

Managers reinforce within their means subordinates' confidence in functioning of Corporate Compliance programme in the Sense8 Digital Technology.

The Staff save and respect the integrity and privacy of their colleagues as much as possible. It is prohibited to talk inappropriately, offensively, or pejoratively about other Staff members or harass, intimidate, or humiliate them verbally or physically. It is prohibited to discriminate against the Staff in any manner whatsoever if they referred to a potential breach of labour, internal, or other legal regulations and if they filed the Submission or any proposal for the improvement of activities and procedures of the Sense8 Digital Technology.

Safety at Work

Sense8 Digital Technology sees safety at work and the protection of health of the Staff as a priority. Sense8 Digital Technology and the Staff ensure that all legal and internal regulations relating to safety at work are complied with and thoroughly prevent damage and harm caused by breaching such regulations. The Managers and the Staff thoroughly eliminate potential risks related to employment activities.

Sense8 Digital Technology adopts and regularly verify appropriate, preventive, security measures in order to protect health of the Staff, and these are updated as necessary. For this purpose, Sense8 Digital Technology also arranges suitable courses, trainings and exams for the Staff relating to safety at work.

Sense8 Digital Technology accepts at any time proposals from the Staff to increase the level of safety at work and the protection of health at work, it processes and evaluates them, and it adopts relevant measures in this area if they are justified. Every Staff member is entitled to file the proposal under the previous sentence.

If the Staff has a suspicion that legal regulations relating to safety at work have been breached or that such breach is an imminent risk, the Staff is obliged to notify the relevant Manager or/and CC Department/Main CC Department.

Protection of Interests of Sense8 Digital Technology, its Staff, Customers and Business Partners

Sense8 Digital Technology adopts appropriate measures to protect all confidential internal information and it handles data acquired on the Staff or third parties strictly in compliance with legal regulations and international treaties, with maximum caution and responsibility, even if it concerns communication with third parties.

Sense8 Digital Technology maintains confidentiality on sensitive and private data on its Staff, customers, and business partners that it has obtained in relation to its activities.

Sense8 Digital Technology adopts appropriate measures to protect rights that follow from intellectual property, and it respects copyright.

Neither Sense8 Digital Technology nor the Staff promote interests by using illegitimate or illegal means. Neither Sense8 Digital Technology nor Relevant Companies support any organizations or associations with illegal business or activity.

Sensitive and Confidential Information Protection

The Sense 8 Digital Technology ensures not only the protection of sensitive and confidential information on the Sense8 Digital Technology, but also the protection of any other information on its Staff, customers, and business partners.

The Staff members ensure that, within its activities and while discussing business transactions, they communicate to third parties only data that is strictly necessary and related. The Staff ensures that an

obligation of a third party to maintain confidentiality in relation to sensitive and confidential information becomes a part of communication with a third party or a contractual relationship. The Staff ensure that, within their activities, they do not interfere in any communication that is not addressed to them.

If the Staff has a suspicion that sensitive or confidential information has been disclosed or misused, or such a disclosure or misuse is an imminent threat, the Staff is obliged to notify these facts to the relevant Manager or/and CC Department/Main CC Department.

Personal Data Protection

Personal data is deemed to be any personal data obtained by Sense8 Digital Technology on the Staff, customers, and business partners or any other data subjects. Sense8 Digital Technology and the Staff thoroughly comply with all regulations related to the personal data protection.

Every Staff member is obliged to thoroughly protect all personal data that the Staff member has learned in his or her activities and provide it only to persons who are

entitled pursuant to the relevant legal regulation or written consent of the relevant person.

If the Staff member has a suspicion that personal data has been disclosed or misused, or that such a disclosure or misuse is an imminent threat, the Staff member is obliged to notify such facts without undue delay to the relevant Manager or/and CC Department/Main CC Department.

Intellectual Property Protection

Sense8 Digital Technology and the Staff thoroughly protect intellectual property rights, and it complies with all legal regulations and international treaties affecting this area.

All Staff members are obliged to protect intellectual property rights owned by the Sense8 Digital Technology.

All Staff members are obliged to respect copyright of other entities and always ensure that they are entitled to use the certain work.

If the Staff member has a suspicion that intellectual property rights have been misused or could be misused, the Staff member is obliged to notify said facts without undue delay to the relevant Manager or/and CC Department /Main CC Department.

Staffing requirements; conflict of interest

Sense8 Digital Technology strictly insists on hiring quality and trustworthy staff. Recruiters, human resources specialist or any other similar staff who is involved in the process of staffing thoroughly, in compliance with applicable law and regulations, examine whether job applicants meet all important job requirements (e.g. education, competence, experience, absence of conflict of interest).

A conflict of interest arises in a situation in which a Staff member has an interest that interferes with his or her working duties in Sense8 Digital Technology.

The Staff strictly avoids each situation that could be regarded as a conflict of interest. In case there is a threat of conflict of interest or a conflict of interest, a Staff member is obliged to notify the relevant Manager or/and CC Department /Main CC Department of such a threat or conflict without undue delay.

Environment Protection

Sense8 Digital Technology is fully aware of its environmental responsibility, and it strictly complies with all applicable legal regulations that regulate environment protection.

Sense8 Digital Technology regularly analyses the effects of its activities on environment and adopts corresponding measures for the protection of the environment. The Group regularly updates on these measures.

Sense8 Digital Technology minimizes the use of toxic or other hazardous substances and materials within its activities, and it ensures the relevant management of toxic or other hazardous substances and materials. Sense8

Digital Technology attempts to use only procedures and technology that are environmentally friendly.

If the Staff member registers at the workplace an event that could have a negative effect on the environment, the Staff member is obliged to notify such a fact without undue delay to the relevant Manager or/and CC Department/Main CC Department.

Final Provisions

The Staff is provided with regular trainings in the area of Corporate Compliance programme in order to ensure their knowledge in this area. They are required to regularly undergo a test for verification of their knowledge of Corporate Compliance programme.

Sense8 Digital Technology reviews and updates Sense8 Digital Technology Code of Ethics, so it reflects the current social need, the need of Sense8 Digital Technology and its Staff.