

ANTI-CORRUPTION POLICY

MGVIVA a.s.



PREAMBLE

MGVIVA a.s. is a trading company acting as a distributor, importer and person servicing medical devices and gastronomic technologies (hereinafter referred to as the "Company"). The company's services and supplies are mainly directed to public contracting authorities. In accordance with its context, the Company continuously responds to the continuous development of the economic and legal environment in which it operates.

THE PURPOSE OF THE ANTI-CORRUPTION POLICY

The Company announces an anti-corruption policy, which builds on and complements the Company's Code of Ethics, and its purpose is primarily to prevent criminal law risks associated with participation in corruption, as well as to strengthen and build corporate culture and ethical rules in all activities of the Company.

At the same time, the company wants to influence business partners to adopt a philosophy of zero tolerance towards corruption and other forms of illegal conduct, such as concluding agreements that distort competition.

COMMITMENT TO MEETING THE REQUIREMENTS OF THE ANTI-CORRUPTION MANAGEMENT SYSTEM

AND THE PROHIBITION OF CORRUPTION

The Company has a **zero-tolerance policy towards corrupt conduct** and criminal activity in general in any form and requires compliance with related legislation. By adopting this anti-corruption policy, the company declares its **commitment to meet the requirements of the anti-corruption management system**.

The Company **prohibits** all employees, as well as other persons acting on behalf of or for the Company, **from any corruption** and conduct that could be understood as a means of "facilitation" in relation to competent authorities or competent persons of the state or municipal sphere, or any third parties, in connection with their decision-making processes that relate or may relate to the Company's activities.

Corrupt conduct is in particular accepting a bribe, bribery or indirect bribery. A bribe is understood to be an unjustified advantage consisting of direct property enrichment or other advantage that is or is to be received by a bribed person or with his consent to another person, and to which he is not entitled.

OUR PREVENTION, DETECTION AND RESPONSE RULES:

1. WE ACTIVELY COMMUNICATE

The company's management manages and supports active communication within the anti-corruption management system and has appointed an independent authorized compliance *manager* to supervise compliance.

Anyone may in good faith, based on reasonable belief, submit a **report** of an attempted or violation, threat of violation or weakness of the Company's anti-bribery management system, **even anonymously**. The **ethics line is available to everyone**: compliance@mgviva.cz, or the report can be sent in writing to the company's address with the note "*exclusively for the attention of the compliance manager*".

The Company shall maintain the confidentiality of information regarding the whistleblower, other persons and information provided in the report to the maximum extent possible. At the same time, he declares that he will not take any retaliatory measures against the whistleblowers that would cause or could cause him unjustified harm.

2. AWARE OF THE CONSEQUENCES

The Company manages the risks associated with its activities. Any sanction of the company caused by a breach of legal or ethical standards by the employee may result in the loss of the company's reputation, market position and competitiveness, in some cases the company's own activities may be limited or terminated, which would result in the loss of employment for all its employees.

Therefore, the Company assumes that all employees who have decided to connect their professional life with the Company and thus participate in its development will voluntarily act in accordance with this policy. To a large extent, the anti-corruption policy only specifies the generally binding legal obligations of employees. The enforceability of the provision is then ensured mainly by means of labour law norms, but in extreme cases it may also involve the use of criminal law means.

The Company reserves the right to oblige business partners to comply with the rules of the Anti-Corruption Policy and to terminate the contractual relationship with those who do not comply with their commitment.

If the law so provides, the Company will forward the specific matter to the relevant authorities for investigation.

3. WE ARE CONSTANTLY EVOLVING

We perceive the anti-corruption management system, which is part of the integrated management system, as a living organism that, with the full support of management, supervision by an independent authorized person and properly set goals, the Company continuously reviews, improves and actively enforces both internally and externally towards third parties.

The company places great emphasis on employee education, is interested in their personal development and at the same time makes sure that all employees are continuously trained in accordance with the requirements of generally binding legal regulations. Regular training within the anti-corruption management system is a preventive step and helps to establish an appropriate anti-corruption culture in the Company.

The Company welcomes comments from any employee or other person on the functionality of the anti-corruption management system or suggestions for its improvement.