

## CODE OF ETHICS

### PRVNÍ CERTIFIKAČNÍ AUTORITA, A.S.

#### Foreword

První certifikační autorita, a.s., (hereinafter also I.CA) is the longest operating provider of certification services in the Czech Republic and the first that was accredited according to the Electronic Signatures Act. It also operates as an accredited provider in Slovakia. Its services are also used by clients in other countries.

In the long run I.CA is perceived as a trustworthy and reliable company with an exceptional level of care for clients, flexible in meeting their requirements. I.CA always follows its motto : "Connected with Trust".

This corresponds to the achieved economic results that enable meeting the legitimate expectations of shareholders, timely settlement of liabilities to other entities, adequate remuneration of employees and further development.

I.CA always acts in accordance with the laws and other legal, regulatory or other generally applicable standards. Likewise, it ensures compliance with internationally recognized technical standards related to provided products and services.

#### Basic Principles

##### 1. Correctness and honesty

I.CA conducts its activities in accordance with applicable laws and regulations, professional ethics and internal rules. I.CA's interests are never superior to the principles of fairness and honesty. It is therefore unacceptable for I.CA's employees to receive or offer any benefits or gifts that could be considered an attempt to influence the independent judgment or action by interested parties. The staff always cares about the reputation of the company.

##### 2. Prohibition of discrimination

In relationships with all internal and external partners I.CA rejects any discrimination in terms of age, racial or ethnic origin, nationality, political opinions, religion, gender, sexual orientation or health status of the people.

##### 3. Professionalism and Human Resources Development

I.CA ensures an adequate level of professionalism of its staff necessary to perform the assigned tasks. Therefore it is fully dedicated to professional growth, providing the tools for education, organizing professional workshops and supporting further staff training.

##### 4. Confidentiality and Data Protection

I.CA guarantees the confidentiality of the information that is available and its protection according to the relevant legislation. Employees shall not use confidential information for any purpose other than performing their job duties.

##### 5. Conflict of interests

I.CA prevents both real and potential conflicts of interests in all situations. Possible conflicts of interests include not only all cases stipulated by the law, but also situations in which the employee acts in order to obtain personal benefit or in the other interest than the interest of the company.

##### 6. Free competition and market behavior

I.CA considers free competition on the market as a key factor for growth and continuous improvement of the business environment. When exposed to the market I.CA refrains from any unfair practices. In terms of price policy I.CA does not make any steps that would seriously affect the balance on the market. The basis for determining the price are the costs associated with the product and a reasonable profit. Price could be determined so that it draws attention to the introduction of the

particular product on the market or to respond to the current market situation. This, however, only provided that the pricing is in accordance with the relevant legislation.

The pricing is a responsibility of the management and I.CA's employees are not authorized to offer different prices than those approved by the company's management .

## **7. Transparency and completeness of the information**

All information provided by I.CA is complete, transparent, understandable and accurate in order to assist the recipient in decision making.

## **8. Occupational health**

I.CA protects the health of their employees and therefore working conditions respect the dignity of the individual and fulfill the requirements for health and safety.

## **9. Environmental protection**

I.CA is committed to protecting the environment and respects both the legislation and the general requirements in this area. Particular attention is paid to the proper disposal of hazardous waste.

## **Relations with clients**

I.CA doesn't favor its own interests above the interests of its clients and doesn't abuse its position in order to force the client unequal or unfair conditions. It doesn't offer a product or service if it is clear or highly probable, that it doesn't match client's needs or it is impossible to meet contractual obligations.

### **1. Contractual relationships with clients**

The principles of fairness, honesty, professionalism, transparency and the highest possible degree of cooperation are the basis of all contractual relations and communication with I.CA's clients.

I.CA creates solid and long lasting relationships with its customers based on trust and equal partnership.

### **2. Customer satisfaction**

I.CA emphasizes a reliability, responsiveness, sensitivity and clarity in relation to their customers.

I.CA focuses on compliance with the high quality standards for service delivery and continuous improvement of customer satisfaction. Internal processes and computer technology help to reach those goals.

Customer opinions are continuously monitored and evaluated. The findings are the base for the measures that are taken to further improve a high level of customer satisfaction.

## **Relations with shareholders**

One of the main objectives of I.CA is creating value for its shareholders. It is realized by a trade policy that ensures adequate return in time by increasing competitiveness and financial stability of the company.

I.CA is a business entity, which always acts in its name and on its own responsibility in order to make a profit.

## **Transparency in relation to the market**

I.CA publishes an annual report, which lists all the relevant data. In accordance with the law, particularly the Act on business corporations, I.CA also publishes the relevant information on its website.

## Management and protection of information

I.C.A. protects the privacy of its clients. Their personal information is handled with care and in accordance with applicable laws and regulations. Personal data are always protected against unauthorized use and disclosure. The same level of protection is ensured for other data that clients or potential clients share with I.C.A. that are not intended for publication.

Client data are published or disclosed for the purpose of providing references on the activities of I.C.A. to third parties only with the consent of the affected clients.

## Relations with employees

I.C.A. achieves maximum customer satisfaction thanks to the quality of its human resources. Therefore I.C.A. hires and develops a highly qualified staff. I.C.A. pays special attention to motivational aspects and specific educational needs that are necessary to maintain a professional level of employees. At the same time I.C.A. supports the creation of a constructive, motivating and pleasant working environment.

### 1. Human Resources Management

All employees are recruited on the basis of regular work contracts. Professional profile of the candidates is solely judged by how they match the interests of the company.

I.C.A. disclaims any conduct that could constitute an abuse of power or more generally the violation of human dignity and physical and mental integrity.

I.C.A. consistently refuses phenomena which could cause disruption to a good working environment. Any form of coercion, discrimination and sexual harassment is unacceptable.

Employees of I.C.A. loyally and conscientiously perform all the duties associated with their jobs. Professional behavior that is consistent with established principles protects company assets.

### 2. Occupational health and safety

I.C.A. ensures that the working environment is in accordance with the legislation on occupational health and safety.

### 3. Personality protection

Confidential employee information, especially personal information is handled in accordance with the relevant legislation. Appropriate measures to prevent access to the information to third parties that do not have legal reasons to access it are consistently applied.

## Relations with the contractual partners

Cooperation with contractual partners, mainly the registration authorities, allows specific implementation of everyday business activities. I.C.A. is aware of the importance of their contribution and agrees to negotiate with them on the basis of mutual respect. I.C.A. also respects their legitimate expectations in terms of clear instructions to obligations that they have to meet, and also the rewards they should be paid. I.C.A.'s contractors are required to apply the principles of this Code when acting on behalf of I.C.A.

## Relations with public institutions and other external entities

### 1. Public administration and independent authorities

All relations between I.C.A. and public institutions are based on the principle of fairness, transparency, cooperation and non-interference and the full respect of the roles that both sides hold.

In relation to the Ministry of Interior, which is the guarantor of the Electronic Signature Act, I.CA is always ready to offer professional advice or participate in other similar activities upon the request of the Ministry. This similarly applies to other public authorities, if the request for consultation relates to certification services.

## **2. Political parties, trade unions and associations**

I.CA doesn't support actions or initiatives with exclusive or predominant political goal. I.CA does not make contributions to trade unions or associations, with which it may come into conflict of interests.

## **Media relations and external communications**

### **1. Press relations**

I.CA maintains good relations with the media and always provides them with accurate and truthful information.

### **2. Communication and Advertising**

Institutional and product advertising of I.CA is always in compliance with fundamental ethical principles. Content of communication must always be true without any gross language, as well as misleading or inaccurate information.

Content of I.CA operated websites corresponds to legal requirements and market demands.

## **Implementation**

### **1. Acceptance and distribution of the Code**

This Code as well as all of its changes is defined and approved by the board of I.CA. The Code is published on the I.CA's website. Each employee, including newly admitted, shall be familiar with the Code and sign it to confirm the commitment to follow it.

### **2. Violation of the Code**

Any violation of this Code is considered a breach of discipline and is dealt with in accordance with the relevant legislation. At the same time measures are taken to minimize the possibility of re-infringement.

In Prague, on 1st March 2014

Board of Directors of První certifikační autorita, a.s.