

ANTI-CORRUPTION POLICY of the Company DEKONTA, a.s.

Declaration

DEKONTA, a.s. pledges to carry out all its business activities duly, honestly, openly, and on principle. We refuse any and all forms of corruption and we expect that all parties we trade and/or cooperate with behave in the same way. We pay due attention to ensuring that we do not cooperate with entities standards of which, concerning corruption, could damage our reputation.

Any and all forms of corruption are unethical and illegal. We shall investigate every accusation of corrupt behaviour, and adopt disciplinary, and, optionally, also legal steps against the offenders.

This policy expresses the attitude of the company DEKONTA, a.s. to corruption, fraudulent and pressure practices during carrying out business activities. These practices may include bribery with the purpose to influence awarding a contract, theft or misappropriation of public property, falsification of books in order to conceal transfers of public funds to private accounts, abuse of confidentiality, and provision of classified information with the purpose to help friends or relatives.

The management pledges to implement and enforce efficient procedures to prevent, monitor, and eliminate corruption.

Applicability

This policy applies to all employees of the company DEKONTA, a.s., entities, activities, actions, and suppliers. It also includes behaviour of workers and any and all persons or entities representing the company DEKONTA, a.s., in any position.

Corruption, Bribery, and Acceptance of Gifts

DEKONTA, a.s. enforces zero tolerance policy in situations when investigation reveals that its employees or persons acting as its representatives have participated in corruption, bribery, and/or pressure practices.

DEKONTA, a.s. does not tolerate any form of gifts to politically or publicly active persons and to political parties, that are in contradiction to valid legal regulations.

DEKONTA, a.s. enforces zero tolerance policy in relation to its employees, in the case of giving an instruction, recommendation or tolerance to corrupt behaviour of an employee by his/her superior. Simultaneously, it does not tolerate cases when an employee's rejection to commit corrupt behaviour causes a damage to him/her within the company.

Payments (financial transfers) with the purpose to speed up a common or ordinary administrative act are prohibited. If such payments cannot be avoided, this fact has to be reported to the top management of the company DEKONTA, a.s. immediately.

Any case of corruption and/or non-compliance with the requirements of anti-corruption legislation and this policy shall be punished in accordance with the relevant employment contract and legal regulations relating to employment.

Anti-Corruption Principles

The Czech Republic has adopted legal regulations prohibiting direct and indirect providing, offering, and approving provision of bribes and/or any benefits to an official, if the intent is to influence behaviour or decisions of the official with the purpose to obtain or maintain a business order.

Anti-Corruption Principles Regulating Interaction with Offices and Officials

For the purposes of this Policy, the term „official“ means:

- Any elected or appointed public administration official (e.g., employee of a ministry);
- Any employee or person acting for or on behalf of a public administration official, authority or entity executing the public administration functions;
- Any political party, candidate for a public position, person in authority, employee, or a person acting on behalf of a political party or a candidate for a public position;
- Any employee of a public international organisation or a person acting on behalf of such an organisation.

For the purposes of this Policy, the term „public“ means any and all levels and sectors of public administration, i.e., local, regional and national levels, and judicial, legislative, and executive branches.

In connection with work for the company DEKONTA, a.s., the employees must not directly or indirectly provide or offer bribes and any benefits to any official, and to approve such providing, if the purpose is to persuade the official to carry out any official step or to adopt a decision that could help the company DEKONTA, a.s. to obtain or maintain a business order.

The employees must not provide or offer any payment, gift, or benefit, regardless of their value, to an official, if the purpose is to make the official to approve, compensate, prescribe or purchase services and products of the company DEKONTA, a.s., to influence results of inspections, tests or audits, or to make any improper steps for the benefit of business activities of the company DEKONTA, a.s.

Anti-Corruption Principles in Private Sector

Bribery and corruption may occur in private business sector, too. Most states, including the Czech Republic, have adopted legal regulations prohibiting providing, offering, demanding, accepting or approving provision of payments or any benefits with the purpose to get an unjustified business advantage. Examples of prohibited acts include, among other things, providing unjustified gifts, food and drinks, and providing a business opportunity, if the purpose is to make certain person to purchase goods or services.

In connection with work for the company DEKONTA, a.s., the employees are not authorised to offer, provide, demand and/or accept bribes, and observance of the same principles is expected from business partners of the company DEKONTA, a.s., and from persons acting on their behalf, in connection with performance for the company DEKONTA, a.s.

The employees are not authorised to accept any gifts, services, perquisites, entertainment, and other performance, of higher than symbolic or negligible financial value, from business partners and from persons acting on their behalf, in connection with performance for the company DEKONTA, a.s. Moreover, gifts of negligible value are only allowed if accepted rarely and on suitable occasions.

Reporting of Corrupt and Harmful Behaviour

„Corrupt behaviour” is regarded to be direct or indirect offering, providing, accepting, offering of things of certain value with the purpose of dishonest financing of action or non-action of another person.

Reporting of harmful behaviour applies to all kinds of fraudulent behaviour or gross negligence, in relation to gross breach of internal and external regulations or rules against market abuse, abuse of information in business relations, breach of bank secret or confidentiality, concerning insurance, money laundering, thefts, fraudulent behaviour, corruption, and bribery.

The employees are obliged to report any and all kinds of corrupt and harmful behaviour and another gross negligence in connection with corrupt behaviour to their superior, or, if this is not possible, to the contact person in the company DEKONTA, a.s., by an e-mail to the address cepelakova@dekonta.cz or by telephone to the number +420 602 377 009.

On the basis of this Policy, the management of the company DEKONTA, a.s. enables its employees to report possible fraudulent behaviour or another gross negligence in the earliest phase, without the fear of revenge. On its basis, the reporting persons are also assured that their reports will be paid due attention to, and that they will be duly investigated. Simultaneously, the management of the company DEKONTA, a.s. ensures that the reporting person who reports, in good faith, fraudulent behaviour or gross negligence, will not face negative consequences for the reason of submitting such report in accordance with this Policy.

The employees have to refrain from abuse of the reporting procedure, and from wilful damaging of other persons through it. Accusations expressed with unfair or calumny intentions will be duly punished.

We expect from business partners and persons acting on their behalf in connection with performance for the company DEKONTA, a.s., that they will notify us of any potential breach of these anti-corruption principles of the company DEKONTA, a.s. The business partners may submit such notifications to the contact person in the company DEKONTA, a.s., by an e-mail to the address cepelakova@dekonta.cz or by telephone to the number +420 602 377 009.



Date: January 2, 2012

Mgr. Karel Petrželka

General Manager, Chairman of the Board of Directors
DEKONTA, a.s.