
ANTI-CORRUPTION POLICY and INFORMATION SECURITY POLICY

TART is a leading manufacturer and supplier of packaging materials, machinery and support services to the packaging industry with a broad base of specialists both domestically and internationally.

In its business it complies with applicable legislative and ethical standards.

Scope

This policy is binding on all company employees, agents and their employees, agents, consultants and external suppliers of goods and services who act on behalf of or in the interests of TART. Compliance with this Policy and standards is a prerequisite for maintaining the employment relationship, and violation will not be tolerated. Any suspected non-compliance will be investigated and will lead to appropriate legal and disciplinary action where appropriate. Failure of TART employees to comply with this Policy may expose the Company to serious risk and could jeopardize its operations and reputation.

Corruption

The term corruption can best be described as an abuse of position that involves a violation of the principle of impartiality in decision-making and is motivated by the pursuit of material gain or other advantage. Corrupt behaviour takes many forms, ranging from simple bribes to complex and sophisticated practices.

We follow a zero-tolerance policy against any form of bribery and corruption in both the public and private sectors. In all our

In our business and personal dealings, wherever we operate, we are committed to acting professionally, fairly and honestly.

TART prohibits:

- Offer or accept bribes to or from public officials or private individuals.
- Offer payments for prompt processing to initiate or expedite production (administrative) processes or formalities, or to accept such payments.
- Offer or accept gifts and gratuities to public officials or any third party that violate the provisions of this Policy.
- Make political contributions on behalf of the Company.
- Obtain preferential treatment by using sponsorships or donations as a means to achieve this.
- To use the company's business relationships and contacts for your own or a third party's benefit.
- Engaging in business dealings with third parties without observing the minimum due diligence obligation to become acquainted with them.

Avoiding conflicts of interest

The employee shall avoid all activities that create a conflict of interest with the interests of TART. He/she shall cease activities in companies whose activities conflict with TART's interests, particularly if they are companies that are part of TART's competitive environment. The employee may engage in other gainful employment only if the time commitment or other requirements of the activity do not prevent the employee from properly performing his/her job duties to TART.

The employee shall not obtain financial gain or other benefits for himself or herself or for persons close to him or her at the expense of TART. Such benefit means, in particular, any undue price advantage in the purchase of goods or services traded by TART for the benefit of the employee or a person close to the employee.

An employee shall not take advantage of information and benefits obtained by working for TART, even if his or her activities do not conflict with the preceding paragraph of the Policy.

Employee shall avoid instances and situations in which he or she may have any personal or financial interest in the interests of TART's competitors or suppliers.

In particular, the employee shall not give or accept any preferential or other advantage from any supplier that is not in accordance with TART's internal regulations. Each employee shall immediately notify his or her supervisor should any supplier request such a preference.

Giving and receiving gifts

Employees of the Company may not offer or accept gifts, invitations, prizes, benefits or other inducements from third parties that could affect the impartiality of any party, influence business decisions or lead to poor performance of job duties. Similarly, in no event may they offer or accept payments or gifts of cash or property readily convertible into money (e.g., bearer checks).

Company employees may offer and accept "reasonable" and "matching" gifts, such as invitations to cultural events or sporting events. In determining what is "reasonable" and "appropriate," Company employees must consider the value of the gift or benefit as well as the frequency with which the gift, benefit or similar gift or benefit is offered. They must always make sure that the gift or benefit:

- is given as an expression of goodwill and not in the expectation of a favour in return (a gift intended to secure a favour in return must be viewed as a bribe);
- is consistent with generally accepted standards of hospitality, taking into account standards applicable in the industrial/professional sector where it is offered;
- it is provided in an undisguised and transparent manner and is of such a nature that it would be a good society would not be embarrassed if the information were made public;
- complies with local laws and regulations, including those applicable to the recipient itself;

- meets the limits set by the company and has all necessary approvals. If in doubt, Company employees must consult their supervisor in the position of Director.
- Promotional and advertising items bearing the company logo may be offered and accepted if provided in accordance with this Policy.

TART contributes to the development of the communities in which it operates and authorizes reasonable donations to charitable organizations. However, the Company is aware of the risk of improperly providing donations and sponsorships that may be interpreted as a mechanism for making payments or contributions with the illicit purpose of obtaining preferential treatment. In this sense, the Company must make sure that donations to charities do not mask illegal payments to public officials or other persons and do not exceed anti-corruption standards. The Company must also satisfy itself that the charity in question is not a source of funding for illegal activity that violates anti-money laundering or terrorist financing laws. Any donation or charitable activity undertaken by the Company for the benefit of a charitable organisation must not give rise to the slightest doubt or appearance as to its suitability or adequacy and, of course, must not constitute a failure to comply with any relevant law or regulation.

Antitrust and fair competition cases

TART is committed to buying and selling products and services based on price, quality, terms and service. The Company complies with all antitrust and competition laws and does not enter into any agreements to obtain an undue advantage. Fraudulent and anti-competitive conduct will never be tolerated.

Anti-counterfeiting pins

We comply with anti-counterfeiting laws and condemn all forms of interference with freedom of industrial activity and trade and intellectual property rights. We act in such a way that we only work with trustworthy suppliers and with the relevant valid technical documentation.

Sanctions and export control laws

We comply with all applicable export control laws, including laws that prohibit or restrict business dealings with sanctioned countries, entities, persons or industries.

Information Security

As part of information security, we manage our processes and activities to ensure compliance with applicable ~~Czech~~ legislation:

- 1) Act No. 480/2004 Coll., on certain information society services
- 2) Act No. 110/2019 Coll. on the processing of personal data,
- 3) Act No. 181/2014 Coll. on Cyber Security

and other contractual requirements of third/stakeholder parties.

Whistleblower protection

Under the whistleblower protection clause, employees can report possible fraudulent conduct or other gross negligence at the earliest possible stage without fear of reprisal. As a result, whistleblowers are assured that their allegations will be given due consideration and properly investigated. Whistleblowers can report through Target's internal information system or by contacting their immediate supervisor or any member of the company's management team. Alternatively, use the email address etika@tart.cz , which is monitored regularly and all requests are forwarded to TART's senior management.

Employees must refrain from abusing the whistleblowing process and thereby intentionally harming others. Accusations made with unfair or defamatory intent will be punished.

Prevention, monitoring

Managers are responsible for preventing risks or damage that may result from failure to comply with applicable laws, regulations and internal rules within the scope of the function. Management reviews risk prevention on an annual basis.