

RULES FOR ACCEPTING AND GIVING GIFTS

JUMP soft a. s.

JUMP soft a. s. rejects bribery and corruption. The company accepts and gives gifts, invitations and hospitality only in a reasonable and transparent manner, without expecting anything in return and in accordance with legal and internal rules.

1. SCOPE OF THE RULES

These rules apply to employees, external collaborators and business partners when both accepting and giving gifts and other benefits. Donations and sponsorship are governed by separate rules.

2. PROHIBITION OF IMPERMISSIBLE BENEFITS

It is prohibited to offer, promise, give, request or accept benefits with the aim of influencing decision-making or unfairly favouring anyone. The prohibition also applies to benefits that create such an impression, are unlawful or are contrary to good morals or internal rules.

3. FINANCIAL LIMITS

For both accepting and giving, annual limits of €100 for gifts and €200 for invitations and hospitality apply in relation to any single business partner or third party. Values are aggregated per calendar year, separately for benefits received and benefits given. Compliance with a financial limit does not automatically mean that a gift or other benefit is permitted.

4. MONETARY AND SIMILAR BENEFITS

For ordinary business gifts, monetary gifts (both cash and transfers), interest-free or unreasonably favourable loans and gift vouchers are prohibited. A reasonable tip for ordinary services is permitted.

5. REASONABLENESS AND CONFLICT OF INTEREST

When assessing a gift, its purpose, value, circumstances and frequency are considered, particularly during procurement, contract negotiations and business decisions. Any actual, potential or apparent conflict of interest must be reported without delay.

6. APPROVAL AND INVITATIONS

Benefits received and given are reported and approved in accordance with internal rules. The giving of benefits must be approved in advance. Gifts and benefits exceeding the set limits are not permitted. The responsible person decides on further action and also assesses high-risk cases. Invitations for employees must be in writing, addressed to the company and include a notice that the employer's prior consent is required.

7. PUBLIC OFFICIALS

Gifts, invitations and hospitality for public officials must be approved in advance by the responsible person, regardless of their value. The rules of the recipient's institution and any requirement for approval by the recipient's superior must also be observed.

8. RECORD-KEEPING AND HANDLING OF GIFTS

Every benefit received and given is recorded without delay, including the participants, date, purpose, value and approval. The records are reviewed at least once every six months. A prohibited gift that has been received shall be returned; if this is not possible, the responsible person decides on its further use and the procedure is documented.

9. REPORTING AND CONTACT

Suspected corruption or breaches of these rules can be reported safely through the designated channels. The company protects whistleblowers acting in good faith against retaliation. Questions: compliance@jump-soft.com.

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