

Appointment of intermediaries policy

From time to time, it may be necessary for SEA to appoint an intermediary whose principal responsibility is to represent SEA.

For example, some intermediaries manage and facilitate contact between foreign companies and national or regional governments.

An intermediary may be accustomed to operating in an environment where bribery is commonplace and where laws in this area are not effectively enforced. Historically, some overseas intermediaries have used funding provided by their principals to bribe government officials and others.

SEA must not allow confusion in this area to cause a breach of the law or the Code of Conduct procedure.

In this policy, the term „Intermediaries“ means an intermediary, agent, consultant, adviser, distributor, broker, or other independent party who is retained by SEA to represent it in discussions with third party service providers, governments, government agencies or other companies.

It does not include employees or suppliers providing goods or services to SEA whose function is not to intermediate between SEA and others. However, it may be prudent for certain suppliers to be made subject to the due diligence programme, or some of it, and these matters should be considered in any case where a relationship might cause reputational risk to SEA.

Every appointment of an Intermediary is subject to the prior approval of the CEO.



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1 July 2024