

Materials from Conflict Zones Policy

SEA Enterprises has the vision to be a low CO₂ emissions company whenever possible using steel manufactured by steel foundries using recycled steel whenever possible, that is produced using renewable long-term sources of power. It is the goal of SEA Enterprises a.s. to deliver innovative sustainable solutions that provide a competitive advantage to our customers.

SEA enterprises a.s. commits to not purchase any steel from conflict zones, this includes EU/UK laws on purchasing iron and steel products of Russian-origin including those processed in third countries incorporating Russian-origin iron and steel inputs. SEA Enterprises a.s. fully abides by EU Annex XVII to Regulation (EC) 833/2014 (Regulation 833) when processed in a third country incorporating iron and steel products originating in Russia as listed in Annex XVII. Annex XVII similarly contains products with HTS/CN codes falling within Chapters 72 and 73 dated 30 September 2023. In addition, SEA Enterprises a.s. commits to follow Schedule 3B of the UK's Russia (Sanctions)(EU Exit) Regulations 2019.

As per EU/UK Regulations, SEA Enterprises a.s. commits to provide Mill Test Certificates (MTC) to our customers proving full evidence of the origin of all steel purchased by SEA Enterprises a.s.

SEA Enterprises a.s. is also aware of the obligations under U.S. Section 1502 of the Dodd-Frank Wall Street Reform and consumer Protection Act 012010 (Dodd-Frank) placed upon companies having statutory reporting requirements to the U.S. Securities & Exchange Commission.

SEA Enterprises a.s. supports the overarching goal of Section 1502 to identify and ultimately discourage the use of minerals and their derivatives mined in conflict zones, especially the Democratic Republic of the Congo (DRC) and adjacent countries. These minerals include cassiterite and its derivatives, tin, as well as columbite-tantalite and its derivatives and wolframite and its derivatives.

SEA Enterprises a.s. is not a reporting entity under the scope of Dodd-Frank, however, SEA Enterprises a.s. has followed closely the rule making process of this legislation as it relates to Section 1502.

SEA Enterprises a.s. does not knowingly purchase minerals or their derivatives sourced from conflict mines. Suppliers are expected to supply materials to SEA Enterprises a.s. that are "DRC Conflict-Free". This includes the countries of Democratic Republic of Congo, Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda.

Our suppliers are expected to adopt a policy and management systems with respect to conflict materials and to require relevant sub-suppliers to adopt a similar policy. SEA Enterprises a.s. expects suppliers to establish their own due diligence programme to ensure conflict-free supply chains.

SEA Enterprises a.s. continues to work with its suppliers to assure the highest level of confidence in the information it obtains with respect of the country of origin all steel and components used in our manufacturing processes.



Frantisek Plachy
Managing Director
SEA Enterprises a.s.