Supplier Sustainability Code of Conduct

1. Purpose

This Supplier Sustainability Code of Conduct establishes the minimum sustainability, ethical, environmental, labour and business standards expected of suppliers, contractors and other business partners.

The company recognises that responsible supply chain management is an important part of reducing environmental impacts, protecting workers, maintaining ethical business practices and creating long-term value.

We expect our suppliers to operate responsibly and to continually improve their sustainability performance.

2. Scope

This Code applies to all suppliers, contractors, subcontractors and service providers that provide goods or services to the company.

Suppliers are expected to communicate these requirements, or equivalent standards, to their own relevant suppliers and subcontractors.

3. Compliance with Laws and Regulations

Suppliers shall comply with all applicable local, national and international laws and regulations relevant to their operations.

This includes, where applicable:

- Environmental legislation.
- Employment and labour legislation.
- Health and safety requirements.
- Anti-bribery and anti-corruption legislation.
- Modern slavery and human trafficking legislation.
- Data protection requirements.
- Product and chemical regulations.
- Waste management requirements.
- Import, export and customs requirements.

Where this Code establishes a higher standard than applicable legislation, suppliers are encouraged to meet the higher standard where reasonably practicable.

4. Environmental Responsibility

Suppliers shall seek to minimise the environmental impacts of their operations, products and services.

Suppliers are expected to:

- Prevent pollution.
- Reduce waste and improve resource efficiency.
- Use energy and natural resources responsibly.
- Reduce greenhouse gas emissions where reasonably practicable.
- Increase reuse and recycling.
- Properly manage hazardous and non-hazardous waste.
- Prevent contamination of land, air and water.
- Manage chemicals responsibly.
- Obtain and maintain required environmental permits and licences.
- Identify significant environmental risks associated with their operations.
- Continually improve environmental performance.

Suppliers should establish environmental objectives appropriate to the size and nature of their business.

5. Climate Change and Carbon Emissions

Suppliers are encouraged to measure and reduce greenhouse gas emissions associated with their operations and supply chains.

Where relevant, suppliers should:

- Monitor energy consumption.
- Identify significant sources of greenhouse gas emissions.
- Improve energy efficiency.
- Increase the use of renewable or lower-carbon energy where practical.
- Reduce emissions from transportation and logistics.
- Provide relevant carbon or emissions information when reasonably requested.

Suppliers should support reasonable requests for information relating to the carbon footprint of products and services supplied to the company.

6. Materials and Resource Management

Suppliers shall use materials and resources responsibly.

Suppliers are encouraged to:

- Reduce unnecessary consumption of raw materials.
- Minimise production scrap.
- Maximise reuse and recycling.
- Consider recycled materials where technically appropriate.
- Design products for durability, repair, reuse and recycling where applicable.
- Reduce unnecessary packaging.
- Use recyclable or reusable packaging where practical.
- Provide information on material composition and recycled content when requested.

For significant materials, suppliers should consider environmental impacts throughout the material lifecycle.

7. Chemicals and Hazardous Substances

Suppliers shall manage chemicals and hazardous substances responsibly and in accordance with applicable legislation.

Suppliers shall:

- Properly identify and label hazardous substances.
- Maintain appropriate Safety Data Sheets.
- Store chemicals safely.
- Prevent spills and uncontrolled releases.
- Properly dispose of chemical waste.
- Provide relevant chemical and material information when requested.
- Comply with applicable restrictions on hazardous substances.

Suppliers should seek safer alternatives where technically and commercially practicable.

8. Waste Management

Suppliers shall apply the waste hierarchy wherever reasonably practicable:

Prevent → Reduce → Reuse → Recycle → Recover → Dispose

Suppliers are expected to:

- Minimise waste generation.
- Segregate waste appropriately.
- Maximise recycling and recovery.
- Ensure hazardous waste is managed appropriately.
- Use authorised waste contractors where required.
- Prevent uncontrolled disposal or release of waste.
- Reduce waste sent to landfill where practical.

9. Labour and Human Rights

Suppliers shall respect internationally recognised human rights and provide fair and respectful working conditions.

Suppliers shall not use:

- Forced or compulsory labour.
- Human trafficking.
- Child labour.
- Prison labour where prohibited by law.

Suppliers shall provide workers with:

- Respectful and non-discriminatory treatment.
- Appropriate wages and benefits.
- Working hours compliant with applicable legislation.
- Freedom from harassment, intimidation and abuse.
- A safe and healthy working environment.

Suppliers shall respect applicable rights relating to freedom of association and collective bargaining.

10. Modern Slavery and Human Trafficking

Suppliers shall take reasonable steps to prevent modern slavery, forced labour and human trafficking within their operations and supply chains.

Suppliers shall not:

- Use forced or bonded labour.
- Confiscate workers' identity documents as a means of restricting freedom.
- Charge workers inappropriate recruitment fees.
- Use threats, coercion or deception to obtain or retain labour.

Suppliers should assess modern slavery risks within their own supply chains and take appropriate action where risks are identified.

11. Diversity, Equality and Non-Discrimination

Suppliers shall provide an inclusive working environment and shall not unlawfully discriminate against employees or applicants on the basis of legally protected characteristics.

Suppliers should promote equal opportunities and fair treatment throughout their workforce.

Harassment, bullying and abusive behaviour will not be tolerated.

12. Health and Safety

Suppliers shall provide a safe and healthy workplace appropriate to the risks associated with their operations.

Suppliers shall:

- Identify and assess workplace hazards.
- Implement appropriate risk controls.
- Provide suitable personal protective equipment where required.
- Provide appropriate health and safety training.
- Maintain safe equipment and facilities.
- Have appropriate emergency procedures.
- Investigate significant accidents and incidents.
- Take action to prevent recurrence.

Where suppliers work on company premises, they must comply with applicable site health and safety requirements.

13. Ethical Business Conduct

Suppliers shall conduct business honestly, fairly and transparently.

Suppliers shall not engage in:

- Bribery.
- Corruption.
- Fraud.
- Money laundering.
- Extortion.
- Bid manipulation.
- Anti-competitive practices.
- Conflicts of interest that are not properly disclosed.

Suppliers shall maintain accurate business and financial records.

14. Gifts and Hospitality

Suppliers shall not offer gifts, payments, hospitality or other benefits intended to improperly influence business decisions.

Any legitimate business hospitality should be reasonable, transparent and compliant with applicable laws and the company's policies.

15. Responsible Sourcing

Suppliers are encouraged to understand the origin and environmental and social risks associated with significant materials supplied to the company.

Where appropriate, suppliers should:

- Identify significant supply-chain risks.
- Promote responsible sourcing.
- Avoid materials associated with illegal or unethical practices.
- Provide traceability information when reasonably requested.
- Support responsible sourcing initiatives relevant to their products.

16. Product Quality and Safety

Suppliers shall provide products and services that comply with agreed specifications, applicable legislation and relevant safety requirements.

Suppliers shall:

- Maintain appropriate quality controls.
- Provide accurate product information.
- Notify the company promptly of significant quality or safety issues.
- Cooperate with investigations into product non-conformities.
- Maintain appropriate records supporting product traceability where required.

17. Data Protection and Confidentiality

Suppliers shall protect confidential information received from the company.

Suppliers shall:

- Protect commercially sensitive information.
- Comply with applicable data protection legislation.
- Implement reasonable information security controls.
- Prevent unauthorised access, disclosure or use of company information.

18. Environmental and Social Reporting

The company may request relevant sustainability information from suppliers to assess supply-chain performance.

Depending on the nature of the supply relationship, this may include:

- Energy consumption.
- Greenhouse gas emissions.
- Carbon footprint data.
- Material composition.
- Recycled content.
- Waste generation and recycling.
- Chemical usage.
- Environmental certifications.
- Labour and human rights information.
- Health and safety performance.
- Modern slavery controls.

Suppliers are expected to provide information that is accurate, complete and not misleading.

19. Supplier Assessment and Audits

The company may assess suppliers against this Code as part of its supplier selection, qualification and review processes.

Where appropriate, the company may:

- Request supporting documentation.
- Conduct supplier questionnaires.
- Request corrective action plans.
- Conduct or commission supplier audits.
- Review environmental and sustainability performance.
- Evaluate compliance with applicable legal and ethical requirements.

Suppliers shall cooperate reasonably with legitimate assessment and audit activities.

20. Non-Compliance

Where a supplier fails to meet the requirements of this Code, the company may request corrective and preventive actions.

Depending on the nature and severity of the issue, the company may:

1. Request an improvement plan.
2. Set an appropriate corrective action deadline.
3. Monitor implementation.
4. Conduct a follow-up assessment.
5. Suspend new business.
6. Terminate the supplier relationship where serious or persistent non-compliance occurs.

Serious violations involving forced labour, child labour, bribery, corruption, serious environmental harm or significant health and safety risks may result in immediate escalation and potential termination of the business relationship.

21. Continuous Improvement

The company recognises that sustainability performance develops over time.

Suppliers are therefore encouraged to establish their own sustainability objectives and continually improve their environmental, social and ethical performance.

The company will seek to work collaboratively with suppliers to identify opportunities to:

- Reduce carbon emissions.
- Reduce waste.
- Improve resource efficiency.
- Increase recycling and reuse.
- Improve working conditions.
- Strengthen ethical business practices.
- Improve supply-chain transparency.

22. Supplier Acknowledgement

By accepting an order, contract or other business relationship with the company, suppliers are expected to acknowledge and support the principles contained within this Supplier Sustainability Code of Conduct.

Where a supplier has its own equivalent code or policy, this may be accepted provided that it meets or exceeds the principles contained within this document.

Frantisek Plachy
Managing Director
SEA Enterprises a.s.

1 September 2026

0926-01