Working Conditions Policy

SEA Enterprises a.s.
Chomutov, Czech Republic

Document No.: HR-POL-01
Version: 1.0
Effective Date: 1 Aug 2026

Approved by: Managing Director
Review Date: 12 Aug 2026

1. Purpose

SEA Enterprises a.s. is committed to providing safe, healthy, fair and respectful working conditions for all employees and persons working on behalf of the Company.

The Company recognises that good working conditions are fundamental to employee wellbeing, operational performance, product quality and sustainable business development.

This Policy establishes the Company's principles and minimum requirements concerning working conditions and is intended to ensure compliance with applicable Czech employment legislation, in particular **Act No. 262/2006 Coll., the Labour Code (Zákoník práce), as amended** (see References).

The Labour Code establishes, among other principles, the protection of employees, satisfactory and safe working conditions, fair remuneration, equal treatment and the prohibition of discrimination.

2. Scope

This Policy applies to:

- all employees of SEA Enterprises a.s.;
- temporary and agency workers, where applicable;
- apprentices, trainees and other persons undertaking work at SEA Enterprises a.s.;
- managers and supervisors;
- contractors and other persons working on Company premises, to the extent
- applicable to their activities.

The requirements of this Policy apply to both the Company's manufacturing operations and administrative offices.

3. Legal and Other Requirements

SEA Enterprises a.s. shall comply with applicable Czech legislation and other binding requirements concerning working conditions, including, as applicable:

- **Act No. 262/2006 Coll.**, Labour Code (Zákoník práce), as amended;
- **Act No. 309/2006 Coll.**, concerning further occupational health and safety requirements;
- **Government Regulation No. 361/2007 Coll.**, concerning conditions for protection of health at work;
- applicable legislation concerning occupational health examinations and occupational health services;
- applicable legislation concerning working time, rest periods, holidays and remuneration;
- applicable requirements concerning equal treatment and non-discrimination;
- applicable collective agreements and internal Company regulations.

Act No. 309/2006 Coll. supplements the Labour Code with requirements concerning workplaces, working environments, equipment, organisation of work and safe working procedures.

The Company shall monitor changes in applicable legislation and shall update its policies and procedures where necessary.

4. General Principles

SEA Enterprises a.s. shall provide working conditions based on the following principles:

1. **Safety first** – no production or commercial objective shall take precedence over the health and safety of employees.
2. **Respect and dignity** – employees shall be treated with dignity, fairness and respect.
3. **Equal treatment** – employment decisions shall be based on objective and job-related criteria.
4. **No discrimination** – discrimination, harassment, bullying and inappropriate workplace behaviour are not tolerated.
5. **Fair remuneration** – employees shall receive remuneration in accordance with applicable legislation, employment agreements and Company arrangements.
6. **Reasonable working hours** – working time, overtime and rest periods shall be managed in accordance with the Labour Code.
7. **Employee participation** – employees are encouraged to raise concerns regarding working conditions, safety, health and workplace behaviour.
8. **Continuous improvement** – the Company shall periodically review working conditions and implement improvements where reasonably practicable.

5. Health and Safety at Work

SEA Enterprises a.s. shall provide and maintain safe and healthy working conditions appropriate to the nature of its activities.

The Company shall:

- identify workplace hazards and assess occupational risks;
- implement measures to eliminate or reduce identified risks;
- maintain machinery, equipment and workplaces in safe condition;
- provide appropriate personal protective equipment (PPE);
- provide employees with appropriate safety information and training;
- establish safe working procedures;
- investigate accidents, incidents and near misses;
- provide appropriate occupational health examinations where legally required;
- provide appropriate emergency arrangements;
- monitor relevant workplace health factors;
- review occupational risks when processes, equipment or working conditions change.

Under §101 of the Labour Code, employers are required to ensure occupational safety and health with regard to risks associated with work. §102 further requires employers to create a safe working environment and working conditions and to systematically identify hazards and assess risks.

6. Employee Responsibilities for Health and Safety

Every employee is responsible for acting in a manner that protects their own health and safety and that of others who may be affected by their actions.

Employees shall:

- comply with applicable safety rules and Company procedures;
- attend required health and safety training;
- use machinery and equipment only when authorised and trained;
- correctly use required PPE;
- not disable, remove or bypass safety devices;
- report unsafe conditions, hazards, accidents and near misses;
- follow established emergency procedures;
- cooperate with occupational health and safety requirements.

Employees have the right to receive understandable information regarding workplace risks and protective measures. Employees may refuse work where they reasonably believe that the work presents an immediate and serious threat to life or health, in accordance with the Labour Code.

7. Working Time

SEA Enterprises a.s. shall organise working time in accordance with the requirements of the Labour Code.

The Company shall appropriately manage:

- normal working hours;
- shift arrangements;
- working-time schedules;
- breaks;
- overtime;
- night work;
- standby arrangements, where applicable;
- holidays;
- rest periods;
- work performed on weekends and public holidays.

Working time shall be planned so as to support both operational requirements and the health and wellbeing of employees.

Employees shall accurately record working time where required by Company procedures.

8. Overtime

Overtime shall only be performed where necessary and in accordance with applicable legislation and Company procedures.

SEA Enterprises a.s. shall monitor overtime to ensure that:

- statutory limits are respected;
- employees receive applicable compensation or compensatory time off;
- excessive or systematic overtime is identified and addressed;
- overtime does not create unacceptable health or safety risks.

Managers are responsible for ensuring that overtime is properly authorised and recorded.

9. Breaks and Rest Periods

SEA Enterprises a.s. shall provide employees with legally required breaks and periods of rest.

The Company shall organise work so that employees receive appropriate:

- breaks during working shifts;
- daily rest;
- weekly uninterrupted rest;
- public holiday and other statutory rest periods.

The Labour Code establishes minimum requirements for daily and weekly rest, including specific requirements for uninterrupted weekly rest.

Managers shall take appropriate action where working patterns or production requirements could adversely affect employees' ability to obtain required rest.

10. Holidays and Leave

Employees shall receive annual leave and other statutory forms of leave in accordance with the Labour Code and applicable employment arrangements.

SEA Enterprises a.s. shall operate a transparent process for requesting, approving and recording leave.

Employees shall not be disadvantaged for exercising statutory rights to leave.

11. Equal Treatment and Non-Discrimination

SEA Enterprises a.s. is committed to equal treatment of employees.

Employment decisions concerning recruitment, remuneration, training, promotion, allocation of work, performance management and termination shall be based on legitimate and objective criteria.

The Company prohibits unlawful discrimination or unequal treatment based on characteristics protected by applicable legislation.

The Company shall also take reasonable steps to prevent:

- harassment;
- bullying;
- intimidation;
- victimisation;
- sexual harassment;
- abusive or degrading behaviour.

Employees who raise genuine concerns shall not be subjected to retaliation.

Equal treatment and prohibition of discrimination are expressly identified among the fundamental principles of Czech labour relations under §1a of the Labour Code.

12. Respectful Workplace

SEA Enterprises a.s. expects all employees, managers, contractors and other persons working on Company premises to behave professionally and respectfully.

The following behaviours are prohibited:

- threats or violence;
- bullying;
- harassment;
- humiliation;
- intimidation;
- discriminatory behaviour;
- unwanted sexual behaviour;
- deliberate creation of a hostile working environment.

Managers have a particular responsibility to address inappropriate behaviour promptly and fairly.

13. Remuneration and Employment Conditions

SEA Enterprises a.s. shall provide employees with employment conditions and remuneration in accordance with:

The following behaviours are prohibited:

- applicable Czech legislation;
- individual employment agreements;
- applicable collective agreements, where applicable;
- internal Company policies.

Employees shall receive clear information concerning their principal employment conditions.

The Company shall maintain appropriate records concerning employment, working time, leave and remuneration as required by law.

14. Child Labour and Young Workers

SEA Enterprises a.s. shall comply with all applicable Czech legal requirements concerning the employment of young workers and persons under the applicable minimum working age.

Young workers shall not be assigned to work that is prohibited or inappropriate due to their age, health or level of experience.

Where young workers are employed or undertake training, the Company shall apply the additional legal protections applicable to them.

15. Forced Labour and Freedom of Employment

SEA Enterprises a.s. prohibits forced labour, bonded labour, human trafficking and any form of involuntary labour.

Employment shall be based on freely agreed employment relationships.

Employees shall retain their legally protected rights and shall not be subjected to coercion, threats or unlawful restrictions relating to their employment.

16. Employee Consultation and Raising Concerns

SEA Enterprises a.s. encourages employees to raise concerns relating to:

- health and safety;
- working conditions;
- excessive workload;
- working hours;
- workplace behaviour;
- discrimination or harassment;
- unsafe equipment or procedures;
- breaches of Company policies;
- potential breaches of law.

Employees may raise concerns with their immediate manager, HR, senior management or through the Company's established reporting/whistleblowing channels.

Concerns shall be treated appropriately and, where appropriate, confidentially.

No employee shall suffer retaliation for making a genuine report or raising a legitimate workplace concern.

17. Training and Competence

SEA Enterprises a.s. shall provide employees with appropriate information and training necessary to perform their work safely and effectively.

Training shall be appropriate to the employee's:

- job responsibilities;
- level of authority;
- exposure to workplace risks;
- use of machinery and equipment;
- emergency responsibilities.

Mandatory occupational health and safety training shall be completed as required by applicable legislation and Company procedures.

Training records shall be maintained where required.

18. Workplace Facilities and Working Environment

SEA Enterprises a.s. shall maintain appropriate workplace conditions, including, as applicable:

- adequate lighting;
- appropriate ventilation;
- suitable temperature conditions;
- clean and maintained workplaces;
- appropriate sanitary facilities;
- drinking water;
- suitable welfare facilities;
- safe access and egress;
- appropriate emergency arrangements.

Manufacturing areas shall be maintained in a condition appropriate to the Company's industrial activities and associated occupational risks.

Relevant workplace health factors shall be assessed and controlled in accordance with applicable Czech requirements. Government Regulation No. 361/2007 Coll. establishes requirements concerning workplace health risk factors and minimum protective measures.

18. Workplace Facilities and Working Environment

Only appropriately trained and authorised employees may operate machinery and equipment.

SEA Enterprises a.s. shall:

- maintain machinery and equipment appropriately;
- implement guarding and safety systems;
- provide PPE where required;
- replace defective or unsuitable PPE;
- provide appropriate instructions and training;
- prohibit the intentional bypassing of safety devices.

Employees shall use PPE and safety equipment in accordance with Company requirements. Particular attention shall be given to risks associated with manufacturing activities, including lifting operations, machinery, welding, cutting, grinding, handling of steel products, material movement, vehicles and other industrial processes.

20. Emergency Preparedness

SEA Enterprises a.s. shall maintain appropriate procedures for responding to foreseeable emergencies, including, as applicable:

- fire;
- serious workplace injury;
- machinery accidents;
- chemical incidents;
- spills;
- electrical incidents;
- severe weather;
- other emergencies affecting employees or Company premises.

Employees shall receive appropriate information and training concerning emergency procedures.

Emergency exits, escape routes, fire equipment and first-aid arrangements shall be maintained and kept accessible.

21. Contractors and Temporary Workers

Contractors, agency workers and other third parties working at SEA Enterprises a.s. shall be required to comply with applicable Company health, safety and workplace requirements.

Where multiple employers operate at the same workplace, SEA Enterprises a.s. shall cooperate with the relevant employers regarding occupational health and safety and the exchange of information concerning workplace risks, as required by applicable legislation.

22. Management Responsibilities

The Managing Director has overall responsibility for ensuring implementation of this Policy.

Managers and supervisors shall:

- provide appropriate working conditions;
- ensure employees understand relevant requirements;
- monitor compliance;
- address unsafe or inappropriate working conditions;
- ensure appropriate training;
- encourage employees to report concerns;
- investigate workplace incidents and concerns;
- ensure that working practices comply with applicable legislation.

Responsibility for occupational health and safety shall form an integral part of management responsibilities.

23. Employee Responsibilities

Employees are expected to:

- comply with this Policy and related procedures;
- work safely and responsibly;
- treat colleagues with respect;
- attend required training;
- use PPE and safety equipment correctly;
- report hazards and incidents;
- comply with working-time arrangements;
- protect Company property and equipment;
- cooperate with investigations and risk assessments.

24. Monitoring and Continuous Improvement

SEA Enterprises a.s. shall periodically review working conditions and assess whether improvements are required.

The Company may monitor:

- workplace accidents and near misses;
- sickness absence;
- overtime;
- employee turnover;
- training completion;
- health and safety inspections;
- employee complaints;
- reported workplace concerns;
- risk assessments;
- corrective and preventive actions.

Where deficiencies are identified, corrective actions shall be established and monitored to completion.

25. Policy Review

This Policy shall be reviewed at least annually and whenever significant changes occur in:

- Czech labour legislation;
- Company operations;
- manufacturing processes;
- organisational structure;
- significant workplace risks.

The Company shall ensure that the current version of the Policy is communicated to relevant employees.

26. Management Commitment

SEA Enterprises a.s. is committed to maintaining working conditions that protect the health, safety, dignity and rights of its employees while supporting a productive, professional and sustainable working environment.

The Company recognises that compliance with the Labour Code is a minimum requirement and that effective working conditions require continuous management attention, employee participation and improvement.

Frantisek Plachy
Managing Director
SEA Enterprises a.s.