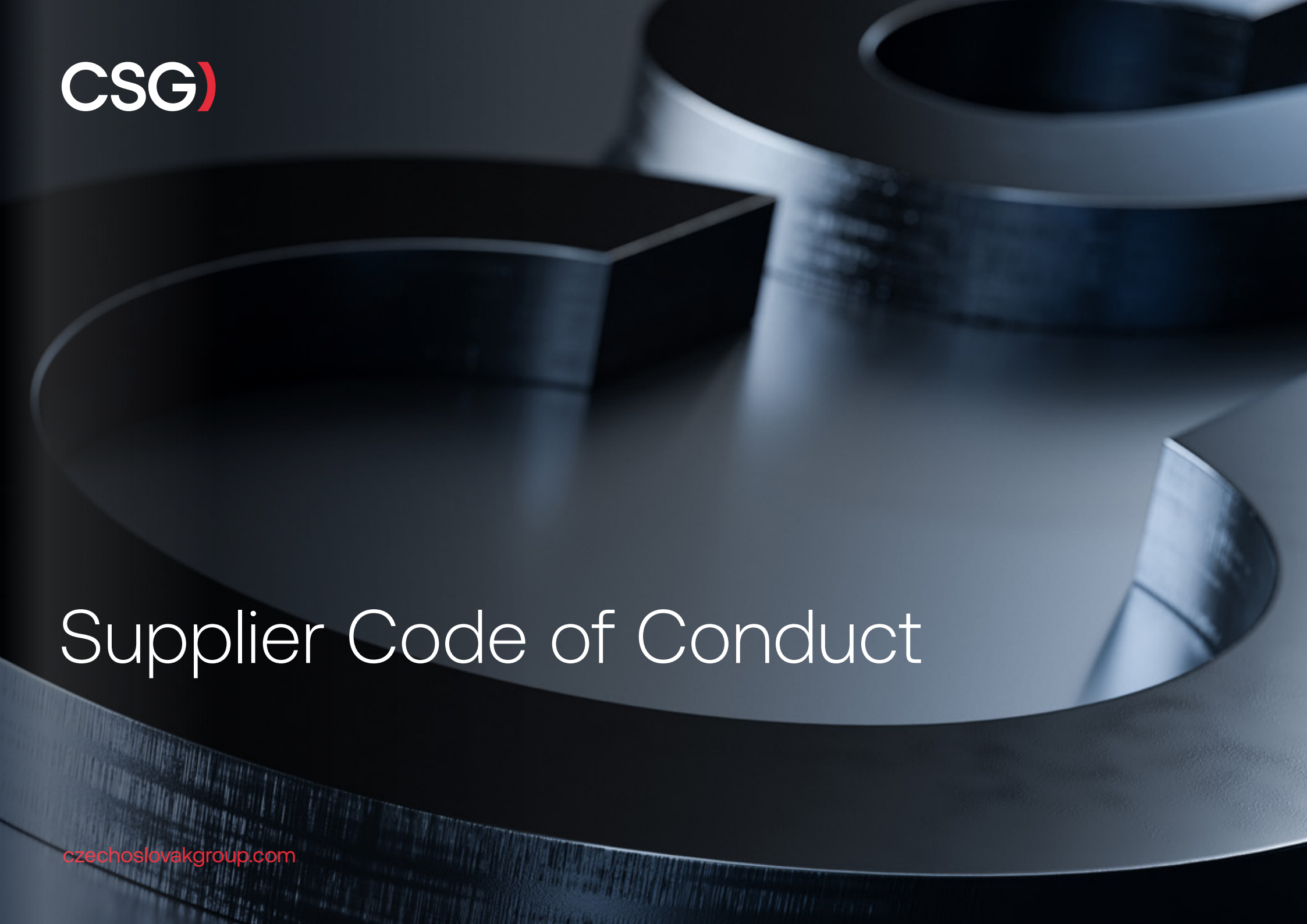


Supplier Code of Conduct

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Introduction

The CZECHOSLOVAK GROUP (“CSG”) and its affiliated companies (collectively, the “Group” or the “Companies”) are committed to the highest standards of ethics, integrity, and social responsibility. CSG expects all its suppliers, partners, and service providers (hereinafter referred to as “Suppliers”) to share these values and to adhere to the principles of responsible and transparent business conduct in their activities.

This CSG Supplier Code of Conduct (the “Code”) sets out the basic principles and requirements that CSG imposes on its Suppliers when they work with the Group Companies.

The Suppliers are required to:

- act in accordance with this Code and all applicable laws in the countries where they operate;
- cooperate with the relevant authorities and institutions in monitoring compliance;
- and ensure that similar principles and requirements are applied to their own subcontractors, business partners, and representatives.

The purpose of this Code is to ensure that relations between the Group Companies and their Suppliers are based on mutual respect, fairness, ethical conduct, and a sustainable approach to business.

Ethics and Integrity

CSG emphasizes honest and responsible business practices. It expects the same approach from its Suppliers – i.e., compliance with applicable laws and regulations, respect for ethical principles, transparency, and fair conduct in all business relationships.





Ethical conduct and responsible business activities

The Suppliers must conduct their business activities honestly, openly, and in accordance with the applicable laws and regulations.
The Suppliers are required to:

- carry out all business transactions transparently and with clearly defined terms and conditions;
- comply with all laws and regulations applicable in the countries where it operates, particularly in the areas of human rights, equal treatment and prohibition of discrimination, personal data protection, labor law, occupational health and safety, and environmental protection;
- protect confidential information and respect intellectual property rights;
- act in a non-discriminatory and honest manner;
- apply ethical and truthful communication and advertising practices;
- provide truthful and complete information about its activities, products, and services;
- take appropriate steps to prevent money laundering and the financing of terrorism, ensuring all transactions are legitimate and traceable;
- perform adequate Know Your Customer (KYC) procedures to verify the identities and legitimacy of clients, partners, and relevant business counterparts.



Prevention of corruption and bribery

CSG applies a zero-tolerance policy towards any form of corruption, bribery, or improper influence. All Suppliers must also accept the same commitment. The Suppliers must therefore not—directly or indirectly—offer, provide, solicit, or accept any bribes, gifts, or other benefits with the aim of gaining a business advantage or influencing decisions.

The Suppliers should have appropriate internal mechanisms in place to prevent corruption, such as codes of ethics, approval process controls, and regular training for employees on ethics and transparent behavior. The Suppliers should also keep transparent records of all payments and business dealings. Any suspected corrupt practices must be reported to CSG without delay.



Conflict of Interest

Suppliers must avoid any situation where personal, financial, or other interests could conflict, or appear in conflict, with the interests of CSG. Suppliers are expected to act with integrity and transparency, disclose any potential or actual conflicts of interest, and in the best interest of all parties involved.

Conflicts or interest include, but are not limited to, relationships with employees, family members, business partners, or competitors that could influence or appear to influence business decisions.

Failure to disclose or address conflicts of interest, or any violation of this requirement, may result in corrective actions or other legal and contractual consequences.

Gifts and hospitality

When giving or receiving gifts and hospitality, the Suppliers must adhere to the principles of appropriateness, transparency, and prohibition of undue influence in giving or receiving gifts and hospitality.

Gifts may only be symbolic in nature and must never be used to gain an advantage or influence decisions. Any offers that could give the impression of undue influence must be rejected.

Human Rights, Employment, and Working Conditions

The Suppliers are required to respect and protect the fundamental human rights of all individuals affected by their activities and to ensure fair and decent working conditions in all areas of their operations. CSG expects its Suppliers to adhere to the principles set out in international documents, in particular the UN Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organization (ILO).





Prohibition of forced labor and human trafficking

The Suppliers must not use any form of forced labor, slavery, or human trafficking in any part of their supply chain.

The Suppliers must comply with all applicable laws and regulations relating to the prevention of modern slavery. The Suppliers are required to implement internal processes and control mechanisms that ensure full compliance with these laws and regulations.

Prohibition of child labor

The Suppliers may not employ persons younger than 15 years of age, or younger than the minimum age for employment or completion of compulsory education as stipulated by law, whichever is higher.

Employees under the age of 18 must not be exposed to dangerous or health-threatening work.

Supplier are required to comply with the relevant standards set by the International Labor Organization (ILO), including the Minimum Age Convention 138, ensuring the protection, safety, and development of young workers.



Respect for human dignity

The Suppliers must ensure a working environment based on respect, safety, and equality.

They are obliged to prevent and not tolerate any form of physical or psychological violence, threats, corporal punishment, coercion, verbal abuse, humiliating treatment, bullying, or harassment.

Non-discrimination and equal treatment in the workplace

The Suppliers must comply with all applicable laws and regulations prohibiting discrimination, harassment, bullying, victimization, or retaliation against employees.

They are required to create a work environment that is free from any form of unequal treatment, discrimination, harassment, persecution, or other abuse for any reason - including age, health status, disability, ethnic or social origin, sex, gender identity, nationality, race, sexual orientation, marital status, parenthood, pregnancy, political affiliation, religion, belief, union membership, or veteran status.

Unequal treatment also includes different remuneration for work of equal value. The Suppliers must promote equal opportunities for all employees and ensure that their work processes, selection procedures, and remuneration systems are fair, transparent, and based solely on skills and performance.



Freedom of association

The Suppliers must respect the right of employees to freedom of association, including the right to join trade unions, establish them, or participate in the activities of works councils, in accordance with applicable laws. Employees shall not be subject to retaliation, harassment, or discrimination as a result of these activities.

Labor relations and fair remuneration

The Suppliers must comply with all applicable laws and regulations regarding working hours, remuneration, overtime, annual leave, and occupational safety.

They are required to provide employees with a comprehensible pay slip enabling them to verify the accuracy of the salary paid. Remuneration must always meet or exceed the legally mandated minimum wage in the respective country or region and include payment for all overtime, bonuses, and benefits as required by law. All work must be voluntary, fairly compensated, and in full compliance with labor regulations. The use of agency, temporary, or external workers is only permissible in accordance with applicable legislation and must not be abused to circumvent labor law obligations.



Occupational health and safety

The Suppliers are required to comply with all applicable laws and regulations in the field of occupational health and safety. The Suppliers are required to implement and maintain internal measures and procedures that:

- minimize health and safety risks for everyone in the workplace;
- prevent occupational injuries and accidents;
- ensure a safe and healthy working environment for all employees, contract workers, external colleagues, and other third parties.

The Suppliers must regularly assess risks, train employees in occupational safety, and respond to all potential threats or incidents to ensure the health and safety of all persons affected by their activities.

Environmental Protection

The Suppliers must apply the principle of environmental responsibility and minimize the impact of their activities on the environment.





The Suppliers are required to:

- minimize the environmental impact of their activities;
- use resources (energy, water, and raw materials) efficiently;
- reduce emissions and waste;
- implement processes for recycling, reuse, and safe disposal of hazardous materials;
- demonstrate compliance of their activities with relevant environmental standards and certifications;
- ensure that minerals and raw materials used in their products are sourced responsibly and do not originate from conflict-affected or high-risk areas, in line with international guidelines such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, the European Union Conflict Minerals Regulation, ensuring transparency, traceability, and avoidance of human rights abuses.

Protection of Personal Data and Information

CSG considers the protection of personal data, confidential information, and information security to be an essential part of responsible business conduct. The Suppliers are required to ensure that all data and information is handled with the utmost care, in accordance with the law and the principles of confidentiality, which protect both CSG and its business partners, employees, and customers.





Confidential information and trade secret

The Suppliers must protect confidential information, trade secrets, documents, systems, and other assets of CSG and its partners from unauthorized access, loss, misuse, or disclosure.

The Suppliers are required to implement and maintain processes that ensure an adequate level of protection for this information throughout its processing and storage. Any use or sharing of this information is only permitted to the extent necessary to fulfill contractual obligations and in accordance with CSG guidelines.



Personal data and privacy

The Suppliers are required to process personal data in full compliance with all applicable data protection laws, including Regulation (EU) 2016/679 (GDPR) where applicable, and in accordance with the relevant national laws in other countries where they operate.

Personal data entrusted to them by CSG or third parties may be used, disclosed, or further transferred only to the extent necessary to fulfill the purpose of the cooperation and solely in accordance with the contracts concluded.

The Suppliers must also:

- apply appropriate technical and organizational measures to ensure data security and prevent unauthorized access;
- establish procedures for reporting and resolving security incidents;
- regularly train their employees in the area of information protection and confidentiality principles.



Cyber and information security

The Suppliers must have information and cybersecurity standards in place that correspond to the nature of the services or products provided. The Suppliers are required to ensure the protection of data and information systems against cyber attacks, loss, or unauthorized manipulation, and to actively cooperate with CSG in resolving the security incidents, if any.

Responsible use of social media

The Suppliers must conduct themselves on social media and public platforms with respect, professionalism, and in accordance with the good reputation of CSG. The Suppliers shall not:

- disclose confidential or internal information about CSG, the Group Companies, or partners;
- use the name, logo, or trademark of CSG without prior written consent;
- spread false, misleading, offensive, or discriminatory information about CSG or its employees.

Competition

The Suppliers are required to comply with fair competition principles and all applicable competition and antitrust laws.





Specifically, this means that the Suppliers are required to:

- not enter into any formal or informal agreements with competitors on prices, market sharing, or customers;
- not disclose or share sensitive business information with other entities if this could undermine the principle of fair competition;
- make independent decisions on their business strategies and business decisions;
- have internal mechanisms in place to prevent and control competitive behavior;
- immediately report any suspected violations of competition rules to the Group Company.

Compliance with these rules is the responsibility of the Supplier, and failure to comply may be grounds for review or termination of cooperation.

Trade and Sanctions Regulations





Compliance with international trade regulations

The Suppliers are required to fully comply with all applicable laws and regulations and international obligations relating to international trade, exports, imports, transportation, and dual-use goods. This obligation applies to all countries in which the Supplier operates, trades, or from which it provides its supplies or services. The Supplier must have internal processes and control mechanisms in place to ensure compliance with these rules and prevent any unauthorized business conduct.

Export controls and sanctions

The Supplier shall comply with all applicable laws and regulations relating to export controls, embargoes, customs regulations, and sanctions, including those issued by the European Union, the United Nations, the United States of America, or other relevant authorities. The Supplier shall not directly or indirectly trade with individuals, entities, or countries listed on sanctions lists, nor participate in activities that could lead to a violation of these measures.



Responsibility and duty to cooperate

In the event of a change in legislation or sanction rules, the Supplier is obliged to ensure that these changes are immediately reflected in its business processes and to inform the relevant Group Company employees if such changes may affect deliveries or the performance of contracts carried out for the Group Company. The Supplier is also obliged to provide the Group Company, upon request, with assistance and cooperation, information, or documents necessary to verify compliance with export and sanctions rules, without undue delay.

Monitoring and Compliance with Rules

The Suppliers are required to comply with all principles of this Code and all applicable laws and regulations. CSG expects the Suppliers to implement internal processes and mechanisms to ensure compliance with the Code, ethical standards, and laws.





The Suppliers are expected to comply with the following:

1. **Internal mechanisms for reporting violations** – Establish and maintain procedures for reporting violations of the Code, applicable laws and regulations, or ethical standards (whistleblowing) and ensure the protection of whistleblowers from any form of retaliation or discrimination.

2. **Employee training and instruction** – Regularly train employees on the principles of ethical conduct, obligations arising from the Code, and other internal policies.

3. **Documentation and inspection** – Keep well-organized documentation of inspections, measures taken, and corrective actions in the event of detected violations.

4. **Reporting violations** – The Suppliers also have the option of reporting any instances of conduct that violates this Code to CSG via the CSG Ethics Hotline.

5. **Obligation to cooperate in the event of legal requests** – where permitted by law, promptly forward to the Group Companies any subpoenas, regulatory requests, media inquiries, or other third-party requests relating to CSG.

6. **Compliance with international sanctions** – do not trade with sanctioned entities and comply with all applicable international sanctions.

Compliance with these rules is the responsibility of the Supplier, and failure to comply may be grounds for reconsideration or termination of cooperation with CSG.



Reporting unethical conduct

CSG expects the Suppliers to create a safe and understandable environment for reporting potential unethical, illegal, or otherwise inappropriate behavior. Whistleblowers and persons participating in investigations must be protected from any form of retaliation or discrimination.

Agreement to the Code

As part of the registration or certification process, the Suppliers may be asked to confirm their agreement to and compliance with this Code. The Suppliers may be asked periodically to re-confirm compliance and to provide written information on their internal policies and procedures related to the Code.

Furthermore, in justified cases, CSG reserves the right to request that the Supplier demonstrate compliance with the Code through a third-party assessment supported by evidence or, where appropriate, to subject the Supplier to on-site audits to verify compliance with the Code and promote continuous improvement.



Cooperation and corrective measures

CSG is committed to working with the Suppliers to improve performance in areas covered by the Code. The Suppliers are required to actively cooperate in addressing identified deficiencies and to take appropriate corrective action where reasonably requested by CSG. The aim is to jointly ensure compliance with standards of ethics, human rights, working conditions, and sustainability throughout the supply chain.

Procedure to Be Followed in Case of Violation of the Supplier Code

The Suppliers are required to ensure that all their employees, subcontractors, and representatives comply with this Code and all applicable laws and regulations. Any violation of the Code, whether intentional or negligent, is considered a serious breach of contractual obligations and may result in termination of the business relationship, corrective action, or other legal action.





The Supplier‘s obligations upon discovery of a violation

Upon discovering a violation of the Code, the Suppliers shall do the following:

1. **Immediately inform the Group Company** of any suspected violation of the Code, applicable laws and regulations, or ethical principles, including violations committed by their subcontractors, employees, or representatives.
2. **Cooperate in resolving violations,** including taking appropriate corrective measures as determined by CSG.
3. **Ensure that their subcontractors, agents, and other associates** are also bound by the obligations arising from this Code or similar principles.



Procedure to be followed in case of violation of the Supplier Code

In the event of a breach of the Code or applicable laws and regulations, the Group Company has the right to:

- provide the Supplier with a reasonable opportunity to remedy the situation through agreed measures;
- suspend or terminate cooperation with the Supplier if the breach is serious, irreparable, or constitutes a violation of the law.

Reporting suspected violations

To report suspected violations of the Code or other unethical behavior, the Suppliers can use the CSG Ethics Hotline via a secure online form: Ethics Hotline | CSG

All reports are assessed independently, confidentially, and with the utmost respect for the protection of the identity of the whistleblower. The Group Company ensures that the whistleblower will not be subjected to any form of retaliation.

Precedence of the Code and its Amendments

In the event of a conflict between this Code and applicable laws and regulations, the Suppliers must always comply with applicable laws. If the Code imposes obligations beyond the scope of legal requirements, the Suppliers must comply with these requirements in accordance with applicable law.



CSG reserves the right to update or amend this Code.

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