# **Supplier Code of Conduct**

#### Preamble

GIVET Czech s.r.o., as well as GIVET SRL (jointly hereinafter referred to as "GIVET"), aim to conduct business responsibly and with respect not only for legal regulations but also for ethical principles and values that promote sustainability and respect for people and the planet. We recognize that selecting business partners and suppliers is both a moral and professional responsibility, and that only cooperation with partners who share the same values enables us to conduct business in accordance with these principles. Therefore, we have established this Supplier Code of Conduct (hereinafter the "Code") as a fundamental framework of values, rules, and expectations required of all entities with whom we cooperate.

# 1. Compliance with Legal Regulations

GIVET emphasizes compliance with legal regulations as a fundamental prerequisite for responsible business conduct. The Supplier undertakes to comply with all applicable laws in the countries where it operates – particularly in areas such as environmental protection, health and safety, labor law, data protection, taxation, competition, and business transparency.

In addition to the legal framework, we consider the fulfillment of broader values and standards reflecting sustainability principles, fair conduct, and corporate social responsibility to be important. Suppliers are encouraged to commit to voluntary obligations that go beyond the legal minimum – whether in quality, ethics, or environmental impact.

In cases where any provision of this Code conflicts with applicable law in the Supplier's country of operation, the Supplier undertakes to comply with the applicable laws while striving to meet the fundamental principles outlined in the Code to the greatest extent possible.

#### 2. Personal Data Protection

The Supplier undertakes that all processing of personal data on its part and on the part of entities or individuals it cooperates with is carried out in accordance with applicable legislation, including Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR). Suppliers are required to implement appropriate technical and organizational measures to ensure protection against data misuse, loss, or unauthorized access.

If any breach of confidentiality occurs – whether related to business, technical, or personal data – the Supplier is obliged to inform GIVET without undue delay and take all necessary measures to mitigate consequences and remedy the situation.

# 3. Respect for Human Rights and Prohibition of Child and Forced Labor

GIVET fully respects human rights and is committed to ensuring that all its activities are conducted in line with these principles. Suppliers expressly declare that they fully respect human rights in their operations. The Supplier undertakes to act in accordance with these principles and to contribute to the prevention of any human rights violations.

GIVET does not tolerate any form of child labor. The Supplier is obliged to ensure that no person under the age of 15 (or younger than the minimum legal employment age stipulated by the applicable laws of the country) is employed at any stage of their business operations. In cases involving young workers (persons under the age of 18), the Supplier is obliged to ensure working conditions that do not endanger their health, safety, or development. The Supplier must ensure that no form of forced or bonded labor occurs in its operations.

GIVET aims not only to comply with these rules but also to actively promote the prevention of such practices.

In view of the above, the Supplier undertakes to act in accordance with the principles set out in the Universal Declaration of Human Rights, the European Convention on Human Rights, and the Convention on the Rights of the Child.

## 4. Working Conditions

GIVET is committed to providing its employees with a healthy, safe, and fair working environment and rejects all forms of abuse, harassment, or discrimination in the workplace.

The Supplier undertakes to ensure equal treatment and decent working conditions for its employees. The Supplier commits to comply with legal working time limits set in the respective country. Where such specific limits are not defined, working time must not exceed 60 hours per week. All employees are entitled to at least one day off in every seven-day period. Suppliers are required to pay their employees a fair wage that meets the minimum requirements set by law or collective agreements. In addition to wages, Suppliers must provide all legally mandated benefits. Any financial penalties, unlawful wage deductions, or other forms of monetary punishment for low performance are unacceptable.

### 5. Environmental Protection

GIVET emphasizes a responsible approach to environmental protection. The Supplier shall act in accordance with the applicable local and internationally recognized environmental protection standards and with the applicable local laws of the country in which it operates, always applying the strictest standard, particularly in the development, manufacturing, and distribution of its products.

Suppliers are encouraged to monitor the sourcing of minerals from conflict areas to promote transparency across their supply chains and to implement appropriate measures for this purpose.

The Supplier undertakes to continuously strive to improve its environmental impact through sustainability initiatives, such as energy and water efficiency, pollution prevention, waste minimization, and support for material reuse and recycling.

GIVET welcomes its Suppliers' efforts to adopt ecological measures that go beyond the basic legal requirements and encourages them to implement initiatives that contribute to environmental protection and sustainability.

#### 6. Subcontractors

The Supplier undertakes to make every effort to commit its suppliers and/or subcontractors (hereinafter "Subcontractors") to the principles set out in this Code if they are involved in significant supplies under the contractual relationship with GIVET. The Supplier undertakes to avoid unreasonable use of subcontractors or any third parties for services under the contractual relationship with GIVET for the purpose of circumventing relevant legal requirements and any standards set by this Code.

The Supplier shall ensure that its suppliers undertake to:

- promote and ensure compliance with the principles set out in this Code by their own suppliers and subcontractors;
- implement a monitoring system enabling them to prevent and address any risks with environmental and/or social impacts throughout the entire supply chain.

# 7. Transparency and Communication

GIVET places great importance on honest conduct and transparency in all aspects of its operations. In this sense, the Supplier undertakes to provide clear, accurate, and timely information regarding all aspects of the cooperation, including information about production processes, the supply chain, legal compliance, and any potential changes or circumstances that may affect the cooperation. Information and documents must not be falsified or distorted. This transparency enables effective and timely responses to potential challenges and opportunities and ensures that all contractual parties have access to the information needed for sound decision-making.

### Compliance with the Code

GIVET aims to cooperate only with Suppliers who fully respect this Code.

Supplier is required to make all reasonable efforts to ensure compliance with this Code of Conduct and undertake to familiarize all their employees with its content. The Supplier further undertakes to regularly monitor compliance with the Code and assess the effectiveness of measures preventing its violations.

The Supplier acknowledges and agrees that in the event of any breach of this Code, GIVET reserves the right to take appropriate action, including reassessment or termination of the business relationship.

## **Consent to Compliance with the Code**

The Supplier confirms that it has read and understood the content and requirements of GIVET's Supplier Code of Conduct and hereby declares its agreement to comply with it in the context of its business relationship with GIVET.

The Supplier undertakes to act in accordance with the principles of the Code not only within its own organization but also throughout its entire supply chain.

This Code forms an integral part of the contractual relationship with GIVET. By entering into a supply agreement or similar contract with GIVET, the Supplier agrees to comply with it, and any breach of the Code shall be considered a material breach of contract and may result in termination of cooperation.

GIVET may conduct audits of the Supplier's and, in some cases, its Subcontractors' compliance with this Code, as well as of the information provided by the Supplier. If the Supplier or Subcontractors violate this Code, GIVET will initiate a dialogue and shall be entitled to request the implementation of an improvement plan to ensure full compliance with this Code by the Supplier and/or Subcontractor.

The Code may be unilaterally amended or supplemented by GIVET.

This Code enters into force on 15.5.2025