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## Introduction

At Severotisk s.r.o. and Svoboda Press s.r.o. we are aware of our social role and responsibility towards our owners and employees, customers and business partners.

Long-term success can only be achieved through integrity in all areas of business conduct. We therefore honor ethical and moral principles, comply with current legislation and act in accordance with the principles of sustainability, which are the basis of our corporate strategy.

#### **Goals and expectations**

The Code of Conduct for Suppliers of Severotisk s.r.o. and Svoboda Press s.r.o. (hereinafter referred to as the Code) applies to natural and legal persons and their affiliated companies that provide goods or services to Severotisk s.r.o. or Svoboda Press s.r.o. (hereinafter referred to as the Supplier).

Each Supplier is obliged to comply with the rules of this Code, which forms the basic element of any business relationship between Severotisk s.r.o. or Svoboda Press s.r.o. and the Supplier.

Severotisk s.r.o. and Svoboda Press s.r.o. reserve the right to monitor and verify the Supplier's compliance with the Code, in particular by way of assurance, compliance questionnaire or external audit. By entering into a contractual relationship with Severotisk s.r.o. or Svoboda Press s.r.o. and Suppliers undertake to comply with the Code and to provide Severotisk s.r.o. or Svoboda Press s.r.o. with all necessary assistance to verify compliance with this commitment.

Violation of the Code may result in termination of the contractual relationship between Severotisk s.r.o. or Svoboda Press s.r.o. and the violating Supplier, or the assertion of other claims against the Supplier. The Supplier is obliged to ensure compliance with the provisions of this Code by its employees and contractors used by the Supplier to fulfill its obligations to Severotisk s.r.o. or Svoboda Press s.r.o.

## **Basic obligations**

# Compliance with legal regulations and binding technical standards

Suppliers are obliged to comply with all applicable legislation and binding technical standards of the countries in which they carry out their activities for Severotisk s.r.o. or Svoboda Press s.r.o.

Suppliers are obliged to maintain appropriate control systems within their activities to prevent breaches of legislation and binding technical standards and to enable verification of compliance with such legislation and technical standards.

#### Respect and protection of human rights

Suppliers shall respect and protect internationally recognised human rights and treat each employee fairly, with dignity and respect. They must also respect the personality rights, dignity rights and privacy rights of employees.

Each Supplier must take appropriate measures to prevent the use of raw materials in its products that directly or indirectly finance non-state armed groups that violate human rights.

#### **Compliance with labor rights**

In their employment policies, Suppliers must respect the right to freedom of association, the right to collective bargaining, as well as the principles of equal opportunity, and must commit not to discriminate against employees on the basis of sex, age, ethnic origin, nationality, color, disability, sexual orientation, religion, political opinion or other similar grounds. No physical or psychological violence, sexual harassment, or other inappropriate behavior shall be tolerated against employees.

Suppliers must ensure that they do not use or benefit from any type of child or forced labor. All legislation and binding international

agreements and conventions setting out the minimum age of workers and subsequent working conditions must be complied with.

Contractors using foreign labor to fulfill their activities for Severotisk s.r.o. or Svoboda Press s.r.o. are obliged to comply with the legislation governing the employment of foreign nationals.

The remuneration and working hours of the Supplier's employees must comply with the legal provisions.

The Supplier must ensure occupational health and safety protection for its employees and create a working environment that actively promotes the prevention of occupational accidents and diseases and minimizes health risks for employees. Suppliers must comply with occupational health and safety regulations and require their employees and contractors to comply with them.

#### **Fair competition**

Suppliers must comply with competition rules and must not enter into any prohibited agreements that are contrary to competition rules.

#### Fight against corruption

Severotisk s.r.o. and Svoboda Press s.r.o. pursue a zero-tolerance policy when it comes to corruption and bribery.

Severotisk s.r.o. and Svoboda Press s.r.o. suppliers are prohibited from giving or promising benefits to Severotisk s.r.o. or Svoboda Press s.r.o. employees with the intention of obtaining a commercial or other advantage. Especially in the case of consultants and intermediaries, the service provided and the financial consideration must always be balanced.

Under no circumstances may suppliers solicit or agree to a bribe or other unlawful payment or other non-monetary consideration (e.g. gifts, entertainment, favors) in order to pursue business or other opportunities with Severotisk s.r.o. or Svoboda Press s.r.o.

In connection with contractual relationships with Severotisk s.r.o. and Svoboda Press s.r.o. and Suppliers shall not offer any undue advantage to employees of these companies or their family members from Suppliers or companies forming a concern with them. Severotisk s.r.o. and Svoboda Press s.r.o. expect their Suppliers not to tolerate any unlawful practices in dealing with administrative authorities or courts. In the case of public procurement, the legal provisions applicable to public procurement and fair competition must be complied with.

#### **Money laundering**

Suppliers shall comply with all legal requirements for the prevention of money laundering and shall not engage in any form of money laundering

#### **Avoidance of conflicts of interest**

Suppliers must act with transparency and integrity in relation to their activities. The Supplier shall inform Severotisk s.r.o. or Svoboda Press s.r.o. of any direct or indirect close relationship between the Supplier and an employee or employees of Severotisk s.r.o. or Svoboda Press s.r.o. or similar cases that have or may have an impact on the contractual relationship. Conflicts of interest must be disclosed prior to the commencement of negotiations or as soon as the conflict of interest arises.

#### Support and sponsorship

The provision of support and sponsorship may only be made on a voluntary basis, in accordance with applicable law, and may not be used to obtain unlawful advantages.

#### **Protection of personal data**

Suppliers must respect and comply with the applicable data protection regulations.

#### Import and export rules

Suppliers shall comply with all applicable import and export control regulations, sanctions, embargoes, laws, government regulations, government decrees and directives relating to the transportation, import, export, transit, transfer, transport or shipment of goods and transfer of technology.

#### **Environmental protection**

Suppliers shall comply with all applicable laws and mandatory technical standards and minimize the negative impact of their activities on the environment. Suppliers shall put in place appropriate management systems leading to the economical and rational use of natural resources, reduction of energy consumption and greenhouse gas emissions in order to eliminate risks to the environment.

# Confidential data and intellectual property

Suppliers shall ensure that confidential information and trade secrets of Severotisk s.r.o. and Svoboda Press s.r.o. obtained in the context of business cooperation are securely protected and not used or disclosed to third parties without the prior consent of the relevant person from Severotisk s.r.o. or Svoboda Press s.r.o.

Suppliers are obliged to protect the intellectual property rights of Severotisk s.r.o. and Svoboda Press s.r.o. The intellectual property of these companies may only be used on the basis of relevant agreements concluded with Severotisk s.r.o. and Svoboda Press s.r.o. or their parts who are authorized to dispose of the intellectual property.

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# How to proceed in case of doubt

If you encounter a situation that raises suspicions of unfair conduct, violation of legal or ethical rules or this Code of Conduct for Suppliers of Severotisk s.r.o. and Svoboda Press s.r.o.:

State the information that defines your suspicion (who, what, when, where).

Use our trust box www.severotisk.cz/en/sustainability or www.svoboda.cz/en/sustainability.



By my signature I confirm that I have read and understood the Code of Conduct for Suppliers. I also agree to its wording and conditions, which I undertake to comply with.

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ddress:
ate and place:

