



## MEOPTA

### CODE OF CONDUCT FOR SUPPLIERS

The purpose of this document is to set the principles and requirements of Meopta Group companies (Meopta s.r.o., Meopta Systems, s.r.o. and Meomed, s.r.o.; hereinafter each may be referred to as “**Meopta**”) to its suppliers of goods and services (hereinafter referred to as “**Suppliers**”) to ensure that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that all business operations are environmentally friendly, conducted ethically and in accordance with applicable laws, legal regulations and restrictions imposed by international sanctions.

By conducting business with any of the Meopta Group companies, the Supplier hereby commits to uphold this Code of Conduct principles and confirms having implemented the necessary measures to be compliant, and passed on its content to all its suppliers and sub-suppliers for them to comply with.

#### MEOPTA’S COMMITMENT

As part of its sustainable development initiative, Meopta commits to deploy a Corporate and Social Responsibility (“CSR”) strategy based on following six key principles:

1. To promote and respect human rights and keep international labor standards;
2. To protect the environment
3. Legal Compliance
4. To keep highest standards of integrity through ethical conduct
5. To continuously innovate products and processes
6. To request its Suppliers to implement these principles

In accordance with its CSR strategy, Meopta is implementing this policy for its supply chain, purpose of which is to turn purchasing into a sustainable competitive advantage over competitors, while also maintaining a balanced relationship with its Suppliers.

#### 1 HUMAN RIGHT AND LABOR STANDARDS

Supplier undertakes to respect the human rights of workers and will treat them with respect and dignity.

##### 1.1 Employee health and safety

The Supplier shall:

- Act in accordance with the relevant legal and international standards regarding safety and health at work and ensure safe working conditions;
- Provide training and ensure that all employees are trained in health and safety, fire protection and other health and safety standards;
- Establish or use an appropriate safety management system.

##### 1.2 Prohibition of discrimination and disrespect for employees

The Supplier shall:

- Promote equality of opportunity and equal treatment of employees, regardless of their color, race, nationality, ethnic origin, political beliefs, social background, disability, sex and gender, sexual identity and orientation, marital status, religion or age, or any other legally protected characteristic;
- Not tolerate unacceptable treatment of employees, such as psychological pressure, sexual harassment or discrimination involving such behavior (such as gestures, expressions and physical contact) that is sexually harassing, coercive, threatening, offensive or abusive.

### **1.3 Prohibition of Child Labor**

The Supplier undertakes that:

- Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is strictest;
- Workers under the age of 18 (“young workers”) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

### **1.4 Freely Chosen Employment**

The Supplier undertakes that:

- Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used and is strictly forbidden.

### **1.5 Protection of Identity and Non-Retaliation**

The Supplier shall ensure:

- Programs that ensure the confidentiality, anonymity and protection of employees are to be maintained, unless prohibited by law. Supplier should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## **2 ENVIROMENTAL PROTECTION**

The Supplier undertakes to act in accordance with legal and international standards associated with environmental protection (ISO 14001) and energy efficiency (ISO 50001) and at the same time undertake to minimize how their business and other activities burden the environment.

Development of innovative products and processes with a lower environmental impact (CO<sub>2</sub>, energy, chemicals and waste):

- Supplier must use their best endeavors to develop and produce innovative technologies, processes and items that have the lowest possible environmental impact throughout their life cycle. In particular, the Supplier shall:
  - deploy a strategy to reduce greenhouse gas emissions, monitor the success of compliance with such strategy, continuously lower its greenhouse gas emissions
  - conserve natural resources, including energy sources, water and virgin raw materials,
  - limit the use of chemicals and processes that pose a risk to health or the environment,
  - limit waste production and improve recycle and reuse materials,
  - control production-related emissions and discharge,
  - adopt an eco-design approach for new products and for upgrades of existing products.



### **3 LEGAL COMPLIANCE**

The Supplier undertakes to act in accordance with the applicable local, EU and US laws, legal regulations and restrictions imposed by relevant international sanctions.

#### **3.1 Compliance with Import and Export Regulations**

- The Supplier must implement business practices that comply with applicable laws, directives and regulations on the import and export of technology, items, components, services and technical data. They must provide accurate and precise information and obtain import licenses or permissions where necessary;
- The Supplier must comply with all laws, directives and regulations on sanctions and embargoes that apply to exports, imports and associated financial flows, in particular, UN, US and EU sanctions.
- The Supplier undertakes not to cooperate with (i) the states of Cuba, Iran, North Korea, Sudan, Syria, Ukraine (including the Crimea region, Donetsk People's Republic and Luhansk People's Republic), Russia, Venezuela, Myanmar, Belarus, or (ii) with any person classified as an SDN ("Specially Designated National") by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") or with persons and/or entities on other sanctions lists (i.e. any asset freeze list or investment ban list that designates specific persons, entities or bodies subject to economic sanctions promulgated by the UN, EU, UK or other non-US jurisdiction in which the Supplier may conduct business).

#### **3.2 Intellectual property**

- The Supplier must comply with applicable laws concerning intellectual property rights, including disclosure protections, patents, copyrights and trademarks;
- The Supplier commits to using only genuine and verified materials and parts in all products and services provided. The Supplier shall ensure that no counterfeit parts are used at any stage of the production or supply process.

#### **3.3 Information security and personal data protection**

- IT system security and security of any data provided by Meopta is an essential requirement for Meopta.
- Suppliers must comply with any security requirements that Meopta requests of them. In order to ensure the security and integrity of confidential information, personal data and media provided by Meopta in accordance with Meopta security requirements, Suppliers shall take all necessary organizational measures requested by law and/or by Meopta to protect them, particularly by using computer access control methods and/or encryption of confidential information and personal data.
  - Suppliers must process any personal data in accordance with the principles of privacy by design and by default. Suppliers must make sure that appropriate computer, hardware, software security and other organizational measures are in place in order to protect personal data from any loss, alteration or unauthorized access, and they must comply with the applicable legislation on personal data protection, at least with European Union standards to the processing of any and all personal data, namely the European General Data Protection Regulation ("GDPR").

### **4 ETHICAL CONDUCT**

The Supplier undertakes to maintain the highest standards of integrity in all business dealings.

#### **4.1 Prohibition of Corruption and Bribery**

- The Supplier must comply with all anti-corruption laws, directives and regulations applicable in the countries where they operate. They must not offer or make inappropriate payments in the form of cash or objects of value to representatives of government or political parties, candidates for public office, or any other person. This includes payments that are intended to expedite or secure the performance of actions by the government, such as the granting of visas or customs clearances. This also applies to regions where such actions are not punishable by local law. Suppliers must show due diligence with regard to preventing and detecting corruption in all commercial contracts;
- The Supplier must not under any circumstances offer or accept illegal payments from customers, suppliers, their agents, their representatives, or from any other party. The direct or indirect acceptance, payment, or promise of cash or objects of value intended to exert influence or procure an unfair advantage is prohibited. This is also forbidden in regions where such activities do not violate local law.

#### **4.2 Fair competition, antitrust laws and intellectual property rights**

- The Supplier must act in full compliance with applicable competition law. Any consultation or dialogue between Suppliers concerning price, bids or business conditions in violation of competition and anti-trust laws is strictly prohibited. Participation in any cartel or conspiracy agreement, or price fixing, market and/or customer redistribution, market sharing or tender manipulation is strictly prohibited.

#### **4.3 Conflict of interest**

- The Supplier and their business and/or legal representatives must ensure the absence of any conflict of interest and avoid any situation that could lead to a conflict of interest. In the event of a actual or potential conflict of interest, they must notify all concerned parties. This includes conflict between Meopta's interests and personal interests or those of close relatives, friends or associates.

#### **4.4 Money laundering**

- The Supplier must comply with all applicable anti-money-laundering laws, directives and regulations in the countries where they operate and global international standards..

#### **4.5 Protection of Confidential Information**

- The Supplier must appropriately process sensitive, confidential, exclusive, proprietary and personal information. This information must not be used for any other purpose (e.g. publicity, promotion or other) than the one intended, without prior written authorization from its owner.

#### **4.6 Responsible Mineral Sourcing**

- The Supplier undertakes to make every effort to avoid using raw materials in their products that come from conflict-affected and high-risk areas and that contribute to human rights abuses, corruption, financing of armed groups or similar negative consequences.

### **5 SUPPLY CHAIN**

The Supplier shall comply with any and all international, European and locally applicable supply chain due diligence principles including but not limited to human-rights and environmental related expectations. Meopta expects all its Suppliers to be aware of human rights, environmental and social responsibilities and to always follow basic ethical principles in their activities in accordance with the present Code of Conduct and to establish monitoring, due diligence and training mechanisms, as well as communication and grievance mechanisms to promote and protect above mentioned rights and responsibilities, involving all relevant areas of their company and affiliates.



The Supplier shall conduct regular risk assessments to monitor, identify and evaluate compliance with this Code of Conduct inside his company and affiliates and also in his supply chain.

The Supplier undertakes to comply with the content of this Code of Conduct and to require compliance with this Code of Conduct throughout its supply chain.

This Code of Conduct is applicable as of 1 March 2025.