

ČESKO

CODE OF ETHICS of Lesaffre Česko, a.s.

INTRODUCTION

This Code of Ethics of Lesaffre Česko, a.s., ID No.: 258 27 529, with its registered office at Hodolanská 1296/34, Hodolany, 779 00 Olomouc, file number B 2090 kept at the Regional Court in Ostrava (hereinafter referred to as the "Code of Ethics" and "LCZ"), is issued by LCZ in accordance with the norms of international public law and European Union law, in particular in accordance with the United Nations (UN) Universal Declaration of Human Rights, the OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises, and international conventions of the ILO (International Labor Organization) and the UN, and also in accordance with the laws and regulations of the Czech Republic, in particular in accordance with the provisions of Sections 305 and 306 of Act No. 262/2006 Coll., the Labor Code, as amended (hereinafter referred to as the "Labor Code" or "LC").

The Code of Ethics is an internal regulation of LCZ as an employer and, as such, is binding on all LCZ employees. Each employee must familiarize themselves with it, understand it, comply with the obligations set out therein, and strive to the best of their ability to fulfill its content and spirit. Individual managers are responsible for familiarizing employees with the Code of Ethics as part of their legal obligation to ensure compliance with the employer's internal regulations [Section 302(f) of the LC].

This Code of Ethics is also binding on members of LCZ bodies performing activities for LCZ on the basis of a contract for the performance of a function, as well as on representatives of LCZ, suppliers, or service providers of LCZ, to the extent that the binding nature of this Code of Ethics is contractually agreed with the relevant member of the LCZ body, representative, supplier, or service provider. In such a case, the term "employee" also means a member of an LCZ body, a supplier, or a service provider. This Code of Ethics is also binding on temporarily assigned employees of employment agencies, again to the extent that the binding nature of this Code is contractually agreed with the relevant employment agency.

The LCZ Code of Ethics represents a summary of the moral values upheld by LCZ and defines the principles of conduct that should be upheld and respected by employees and, where applicable, representatives of LCZ in various areas, members of LCZ bodies, suppliers, or service providers. The Code of Ethics contains guidelines and principles relating primarily to the rights and obligations of LCZ employees, and possibly also other persons mentioned, in complying with business principles, health, safety, and working conditions, respecting human rights, and protecting the environment.

In order to continuously improve relations with business partners and the LCZ working environment, and to increase not only awareness but also employee responsibility, the Code of Ethics is reviewed and updated at regular intervals. Every employee is familiarized with the content of this Code of Ethics upon joining the company. All employees are provided with all information regarding any changes to the Code of Ethics and, if necessary, appropriate training is provided to employees who deal and come into contact with suppliers, customers, and other employees.

ČESKO

If an LCZ employee finds themselves facing a difficult ethical decision, an unclear situation, or has questions regarding this Code of Ethics while performing their job duties, they are required to contact the human resources department, their direct supervisor, or another member of management. They can be contacted by phone, email, in person, or anonymously via a hotline or mailboxes located at the entrance.

ATTITUDE TOWARDS THE ENVIRONMENT

LCZ's goal is to create and maintain long-term relationships with local residents, public authorities and offices, local media, and all other stakeholders within the framework of partnerships.

Employees are required to always act and behave, even in their non-work activities, with the awareness that they represent LCZ and that their actions, behavior, or statements may damage or discredit the good name of LCZ as an employer. Employees are therefore required to act honestly, fairly, and trustworthily, protect the good name of LCZ, and adhere to the principles of decent behavior and cooperation with other employees and third parties, including public authorities and the media.

BUSINESS PRINCIPLES

Legal regulations

In carrying out all their activities, LCZ and its employees are required to comply with all applicable legal regulations. Compliance with legal regulations is a matter of course for LCZ.

Gifts, financial and other benefits

All business activities and all actions of LCZ and its employees, including dealings with public authorities, must be conducted honestly and ethically. LCZ rejects any form of corruption, including the giving and receiving of bribes or other benefits, or any other influence on business activities or the decisions of public authorities. Therefore, no employee may accept, request, offer, promise, provide, or otherwise support payments, gifts, or other benefits that specifically serve to influence the recipient's business actions or the decisions of public authorities. It is necessary that any participation of employees in meetings and social events be conducted in accordance with proper and appropriate business practices, in a moderate and open manner, without attempting to influence subsequent business or other similar procedures and conduct.

Within the framework of the above, LCZ imposes the following specific obligations on employees:

- a) Employees may not accept from natural or legal persons (or their representatives) who are in a business relationship (whether active or potential) with LCZ, or from competitors of LCZ (or their representatives), any gifts, payments, rewards, services, vacations, hospitality, or other benefits, except that benefits are provided or accepted only if they are directly related to the job duties of the persons involved (e.g., reasonable hospitality prepared for meetings between LCZ representatives and a business partner). In particular, relationships with suppliers and customers in the supply, provision, or purchase of goods or services must be based solely on competitive conditions of quality and price and must be advantageous to LCZ;

ČESKO

- b) Gifts or other benefits that LCZ employees receive or provide in the course of their work duties are considered gifts or benefits provided or received by LCZ. If they are unreasonable or inappropriate, they may be considered an attempt to influence or reward a particular business decision; in such a case, however, it is an expression of the will of the specific individual who provided or received the benefit;
- c) The criteria for a reasonable gift or other benefit vary depending on the job position and region;
- d) A benefit offered in cash is never appropriate and must always be politely declined;
- e) Employees must politely decline inappropriate benefits. If this is not possible, or if the employee is unsure about the appropriateness of the gift or other benefit, or if the employee later realizes that the gift is inappropriate, they shall report the gift or other benefit without undue delay to their direct manager and explain the circumstances under which the gift was or is to be accepted. The direct manager shall decide without undue delay whether the gift may be accepted; if he or she is unsure about this decision, he or she shall refer the matter to the company's management or the sole member of the board of directors (CEO) for a decision. If an inappropriate gift has already been accepted, the direct manager shall inform the company's management or the sole member of the board of directors (CEO) and LCZ shall subsequently donate the gift or the proceeds from its sale to charity, if possible;
- f) Hospitality on the part of LCZ is generally considered a normal part of building LCZ's profile as a business company and its business relationships, but excessive or too frequent (inappropriate) hospitality may influence business decisions or create the impression that it may influence them.
- g) Any hospitality exceeding the usual level must serve a legitimate business purpose and must always be approved in advance by a sole member of the Board of Directors (the CEO).

Economic Competition

No LCZ employee may engage in conduct that constitutes unfair competition or leads to the restriction of others' participation in economic competition, or generally act in such a way as to prevent, threaten, or disrupt economic competition, thereby violating economic competition law, whether by entering into contracts or agreements on price fixing, market sharing, or other practices. If an employee is unsure about what is in accordance with economic competition law, or whether a particular practice or situation is in accordance with economic competition law, they are always required to consult these issues with their direct manager before proceeding with the action in question. If the direct manager is unsure about the issue raised, they shall refer the matter to the company's management or a sole member of the board of directors (the CEO) for a decision.

REQUIREMENTS FOR PROPER PERFORMANCE OF WORK, TEAMWORK, AND THE POSITION OF A MANAGER

LCZ employees are provided with opportunities to develop and take on new opportunities and challenges. All employees are required to treat other employees with respect for their opinions, knowledge, and experience, as well as for their person as such. LCZ employees take responsibility for their own personal development and for the development of LCZ as a whole. LCZ places great emphasis on systematic cooperation in the development of leadership positions and carefully selects, listens to, and further develops its managers at all levels.

ČESKO

Employees are required to always behave in a manner that contributes to creating an atmosphere of mutual trust and cooperation, both among LCZ employees and between employees and members of LCZ bodies (e.g., between employees and members of the board of directors). Employees are therefore required to maintain discretion in all cases where they obtain information about the private life, health, personality, salary, or other income of any other LCZ employee or member of an LCZ body. Employees are required to resolve labor disputes in a factual and civilized manner. Employees are required to respect the decisions and instructions of their superiors and to accept them politely.

With regard to the above, LCZ hereby sets out the following employer requirements for all employees for the proper performance of their work within the meaning of Section 52(f) of the Labor Code:

- a) The ability to communicate assertively, respecting the opinions of others and using a calm tone and polite, non-offensive language;
- b) The ability to solve work tasks in an innovative and constructive manner;
- c) Loyalty to LCZ, in particular avoiding conflicts of interest, reporting even the threat of a conflict of interest to LCZ when performing work tasks and, in direct connection with this, giving priority to the interests of LCZ over one's own interests or the interests of third parties;
- d) Ability to maintain a professional level of communication with other LCZ employees and customers at LCZ workplaces and during working hours, i.e., adhering to the principles of decent behavior, refrain from ambiguous, vulgar, or sexually suggestive communication in any form (e.g., verbal, written, including electronic—e-mail, WhatsApp, other communicators, and communication channels; communication also includes physical contact).

LCZ hereby also sets out the employer's specific requirements for the proper performance of work by managerial employees within the meaning of Section 52(f) of the Labor Code:

- a) The ability to correctly assess the procedures that must be adopted to achieve the objectives set by the employer, to put these procedures into practice, or to assign work tasks to subordinate employees in an appropriate manner, to monitor the implementation of established procedures, to evaluate their effectiveness, and to revise the procedures if necessary;
- b) The ability to motivate subordinate employees in an appropriate manner to perform their work tasks in a high-quality and timely manner, for example by explaining the importance of the work task, the impact of the employee's work on other processes at the employer, and by giving appropriate praise;
- c) The ability to gain and maintain the trust of subordinate employees, e.g., by protecting employees' personal data, keeping promises, and, if this is not possible, explaining the reasons for not keeping a promise; in the event of complaints or conflicts, listening to all parties involved first and only then responding appropriately;
- d) Presenting oneself in a representative and dignified manner, consisting in particular of using standard language, avoiding any vulgarisms or ambiguous expressions or insinuations, using a calm tone of voice, and expressing oneself professionally;
- e) The ability to resolve conflicts in and outside the workplace amicably, i.e., again using a calm tone of voice and, if the situation allows, not in the presence of LCZ customers or third parties;

ČESKO

- f) High ethical and moral standards, i.e., above all, adherence to the principles of polite behavior and etiquette in dealing with subordinates, superiors, customers, suppliers, third parties, both at work, in business negotiations, meetings, or on business trips, as well as in non-work activities such as team-building events, parties, or relevant parts of events for customers outside the professional program of the event;
- g) High level of communication skills, i.e., above all, the ability to maintain a professional level of communication even in tense or, conversely, more relaxed situations (e.g., stressful business negotiations, the need to reprimand a subordinate for certain behavior; on the other hand, parties or team-building events);
- h) The ability to establish and maintain a professional level of communication with subordinate employees, including the ability to refrain from ambiguous, vulgar, or sexually suggestive communication with LCZ employees or customers in any form (e.g., verbal, written, including electronic—e-mail, WhatsApp, other communicators or communication channels) during and outside working hours (communication also includes physical contact);
- i) A high degree of loyalty to LCZ (corresponding to the position of a senior employee), in particular avoiding conflicts of interest, reporting even the threat of a conflict of interest to LCZ, and in the performance of work tasks and in direct connection with them, giving priority to the interests of LCZ over one's own interests or the interests of third parties.

HEALTH AND SAFETY

In order to ensure a safe and properly secured workplace, LCZ actively and systematically participates in the continuous improvement of the working environment. Each employee must take care of their own safety, but also the safety of other employees or other persons moving around the LCZ premises. The working environment must be kept physically, mentally, and socially healthy, with opportunities for personal growth and development of employees.

HUMAN RIGHTS AND WORKING CONDITIONS

Discrimination and harassment

LCZ fully complies with and supports the observance of internationally and nationally recognized human rights and freedoms. LCZ supports the principles of diversity and equality. Compliance with the principles of equal treatment and equal opportunities must be guaranteed in relation to everyone, regardless of ethnicity, nationality, gender and sexual orientation, religious beliefs or relationship to a different faith, political opinions, social origin, disability, age, and any other status that is subject to protection under applicable law. LCZ does not condone any form of psychological or physical abuse or mistreatment, threats of abuse, discrimination, bullying, harassment, sexual harassment, or any other form of harassment. LCZ does not tolerate any form of forced labor, including slavery or human trafficking.

All employees are required to adhere to the following principles:

- a) Provide equal opportunities to all people regardless of race, color, gender (including pregnancy, maternity, paternity, and gender identity), nationality, religion, belief, worldview, sexual orientation, age, disability, ethnic origin, or other distinguishing characteristics;

ČESKO

- b) Not tolerate any form of unequal treatment or discrimination, whether direct, indirect, harassment, sexual harassment, bossing, mobbing, staffing, persecution, instruction to discriminate, or incitement to discriminate.

None of the above may be interpreted as limiting the obligations arising from the relevant legal regulations in relation to the principle of equal treatment and the prohibition of discrimination, in particular from the Labor Code and Act No. 198/2009 Coll., on equal treatment and legal means of protection against discrimination and on amendments to certain acts (Anti-Discrimination Act), as amended.

Working conditions

LCZ respects and complies with its obligations towards employees under the law, including social security legislation. Working hours and remuneration must comply with all relevant laws, collective and individual contracts and agreements.

Child labor

The employment of minors in violation of legal regulations is strictly prohibited, and LCZ does not cooperate with business partners who use prohibited child labor. The minimum age for employment is governed by and complies with all relevant national and international legal regulations.

Freedom to organize

LCZ fully respects the right of all its employees to form or join trade unions and is aware of its obligations under collective bargaining legislation. Employee representatives must be able to perform their functions, and any discrimination on the basis of trade union membership or activity is unacceptable.

ENVIRONMENT AND SUSTAINABLE RESOURCE DEVELOPMENT

LCZ is committed to paying special attention to safety and emphasizing health and environmental protection. Employees are required to ensure that the negative impact of their activities and decisions on the environment is as low as possible, and they are fully aware that their behavior in the workplace, their approach to performing their duties, and their habits must lead to the highest possible level of environmental protection. Systemic measures are being introduced within LCZ to put into practice the principles of preventing and reducing environmental pollution. Environmental issues have become an integral part of LCZ's decision-making processes, including decisions on organizational and/or technological changes. LCZ keeps waste and emissions to a minimum, ensuring minimal negative impact on the environment in order to reduce air, soil, and water pollution. LCZ and its employees are required to act in a manner that builds trust with public authorities, customers, business partners, and the public, including through open debate on environmental issues. One of the responsibilities of the managers of individual departments is to act in such a way that LCZ continuously maintains and improves the level of safety in the workplace and ensures the protection not only of the health of employees and other persons, but also of the environment. All employees are required to act in such a way as to protect the good name of LCZ as an employer and to prevent any damage to LCZ, and this obligation also applies to the actions of employees that have an impact on the environment.

COMPLIANCE WITH THE CODE OF ETHICS

LCZ managers are expected to ensure that their subordinates, sales representatives, and partners are provided with relevant information regarding the content of the Code of Ethics and to monitor and enforce compliance with the obligations arising therefrom. All LCZ employees are expected and required to comply with and apply the guidelines set out in the Code of Ethics in the performance of their daily work.

Any violation of the LCZ Code of Ethics will always be considered a serious offense and, in addition to legal sanctions, may result in disciplinary proceedings at LCZ, including termination of employment.

Any violation of the Code of Ethics or mere suspicion of a violation of the Code of Ethics must be reported without undue delay by the person who became aware of this fact to their direct manager, or other manager of LCZ, or to the sole member of the Board of Directors (CEO). If a manager receives such a report, they are obliged to refer it without undue delay to the company's management or the sole member of the Board of Directors (CEO). They can be contacted by telephone, email, or in person.

VALIDITY AND EFFECTIVENESS OF THE CODE OF ETHICS

This Code of Ethics shall take effect on November 1, 2025, and is issued for an indefinite period. This Code of Ethics also fully replaces the Code of Ethics issued by LCZ on January 20, 2022.

In Olomouc on October 6, 2025

Tomáš Podivinský
Chief Executive Officer
and sole member of the Board of Directors

In Olomouc on October 6, 2025

Stanislav Klívar
Chairman of the Committee
ZO NOS PPP Lesaffre Česko, a.s.