



Code of Conduct



SINCE 1825

1. Introduction

The Code of Conduct of Sellier & Bellot Int. a.s., with its registered office at Lidická 667, 258 01 Vlašim (hereinafter referred to as “Sellier & Bellot”), helps ensure that its activities are carried out in accordance with the law, internal rules, and principles of sustainability, social responsibility, and ethics in all areas of our operations.

The Code is the foundation of Sellier & Bellot’s compliance programme. All Sellier & Bellot employees and other cooperating persons act in accordance with its values in their activities.

2. Zero tolerance of corruption

Any form of corruption is unacceptable. We establish open and honest relationships with our partners, adhering to the principle of transparency when selecting suppliers or service providers. We do not accept, give or solicit any gifts, favours or other benefits, regardless of value, that are contrary to Sellier & Bellot’s anti-corruption policies and procedures, or any applicable laws and regulations.

The anti-corruption management system policy is based on the principle that corruption is unacceptable not only because it conflicts with ethics and corporate culture, but also because it may constitute the criminal offence of accepting bribes, bribery or indirect bribery.

The Board of Directors and senior management at Sellier & Bellot are therefore committed to creating and maintaining an environment that rejects any form of corruption, achieving the set anti-corruption objectives, and continuously improving this environment through ongoing measures such as education, the active enforcement of ethical principles, and the promotion of an anti-corruption stance by all senior management at Sellier & Bellot.

Supporting an anti-corruption environment requires setting up a system for reporting suspected corruption, strengthening whistleblower protection and establishing an independent Compliance Officer role to monitor compliance with all legal requirements and obligations within this system.

3. Anti-corruption measures

Sellier & Bellot management is committed to establishing, maintaining and improving an anti-corruption management system that complies with anti-corruption legislation and functions effectively.

Furthermore, Sellier & Bellot management undertakes to familiarise all employees, suppliers and other interested parties with this Code of Conduct, in order to raise awareness of the anti-corruption management system's tools, procedures, reporting and evaluation, and the consequences of non-compliance with this Code. Through the active management of corruption risks, Sellier & Bellot management aims to continuously improve the entire system, preventing the emergence of a potentially corrupt environment or indirect favouritism. This is facilitated by effective control mechanisms and regular corruption risk assessments. A key aspect of fostering an anti-corruption environment is establishing a system for reporting suspected corruption that protects whistleblowers

4. Compliance with the law and ethical standards in business relationships

4.1. Acting in accordance with the law

Transparent communication with partners and other stakeholders, and compliance with the laws and regulations of the Czech Republic and other countries in which we operate, are among Sellier & Bellot's highest values and form the cornerstone of all other principles and values.

4.2. Preventing conflicts of interest

We always act in Sellier & Bellot's best interests.

We avoid situations where there could be a conflict of interest, whether actual or potential, between personal and business interests.

We do not exploit our assets, information or position for unlawful personal gain.

We ensure that private interests and personal relationships do not influence staff or other business decisions.



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4.3. Respect for human rights and freedoms

We consider equal opportunities, equal treatment, non-discrimination and respect for the personal dignity, privacy and rights of every employee to be fundamental values.

We do not tolerate inappropriate behaviour towards employees and strive to promote interpersonal relationships based on mutual respect.

4.4. Respecting competition rules

We do not enter into any agreements that could violate competition rules, such as those relating to prices or market sharing.

4.5. Prevention of money laundering

We do not enter into business relationships with partners who cannot or will not provide full details about themselves, or whose information appears false or suspicious. We comply with anti-money laundering regulations. We verify payment methods and do not accept cash payments or financial transfers from countries with no connection to the business partner. We do not accept payments from virtual or unlicensed banks, nor from other non-bank intermediaries.

4.6. Employee conduct

Employees must comply with all applicable laws, rules and regulations relating to their work, wherever Sellier & Bellot operates or wherever they act on behalf of the company. Employees must maintain the confidentiality of any confidential information they obtain in the course of their employment with Sellier & Bellot and must not disclose it to third parties or exploit it for personal gain.

If in doubt as to whether their required actions may be in conflict with laws and other local regulations, they must seek advice from their superior and, if necessary, consult the legal department.



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4.7. Employee well-being and environmental protection

Employees have the right to equal treatment and fair procedures. Sellier & Bellot promotes an equal environment, fair working conditions and opportunities for communication and improvement in the workplace. The company honours the principles of mutual respect, does not discriminate, respects human dignity and complies with all legal regulations related to labour relations, personal data protection and privacy, setting rules for their observance.

Protecting the lives and health of our employees is our top priority. We set and maintain rules to ensure these interests are never compromised. We provide regular health and safety training, maintain safe workplaces and prevent injuries. We also strive to minimise the environmental impact of our activities

Environmental protection is one of our priorities. We comply with environmental protection regulations and are improving our production processes with the aim of streamlining environmental protection, sustainability and safety management.

5. Reporting corruption and other illegal activities

5.1. Reporting

Any conduct prohibited by this Code must be reported in accordance with the rules set out in the “Principles for Reporting Illegal Conduct and Complaints” under the Internal Reporting System directive and the rules for raising concerns under the anti-corruption management system.

5.2. Verification and investigation

Sellier & Bellot ensures that effective measures are taken in cases of violation of this Code.

If an investigation into a report of prohibited conduct determines that a violation of this Code has occurred, the Compliance Officer will report the violation to the Sellier & Bellot Board of Directors.

Upon receiving notification of a violation of this Code, the Board of Directors or an authorised senior employee shall take appropriate measures depending on the nature of the matter and within the limits set by generally binding legal regulations; these measures may include amending Sellier & Bellot’s internal regulations or taking specific staff measures, such as demotion, dismissal or termination of cooperation, and, in the case of criminal conduct or other serious violations of the law, notifying the relevant state authorities.

Employees must cooperate with internal investigations.



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5.3. Prohibition of retaliation

The company will not tolerate any form of retaliation against any Concerned Person who reports a violation of this Code in good faith.

6. Accessibility and binding nature

This Code of Conduct is accessible to all Sellier & Bellot employees and may be published on the company's website. **It is binding on all company employees.**

In Vlašim on 22 August 2025