

SUPPLIER CODE OF CONDUCT



TABLE OF CONTENTS

Compliance with Laws3

Anti-Bribery and Anti-Corruption4

Gifts and Hospitality4

Conflicts of Interests5

Facilitation Payments5

Antitrust5

Fair Labor Conditions6

Health, Safety and Environment7

Confidential Information7

Audit7

Reporting8

Acknowledgment9

The **Sediver Group** (“**SEDIVER**”) is committed to conducting business in full compliance with all laws and regulations and in line with the highest ethical standards.

SEDIVER’s integrity and commitment to maintaining stable and honest business relationships is the foundation of our long-term success. This level of commitment is expected from all employees, partners and suppliers who share **SEDIVER**’s responsibility to uphold and promote these values.

Accordingly, **SEDIVER** expects all of its suppliers to ensure that their operations uphold the same standards of respect for applicable laws, regulations, conventions, and ethical business principles in the management of their companies. When both legislation or regulation and this Supplier Code of Conduct address the same topics with differing standards, the highest standard shall prevail.

Compliance with Laws

All suppliers are required to comply fully with all applicable laws and regulations relevant to their operations. In addition, it is expected that suppliers conduct their business in an ethical, sustainable, and socially responsible manner. This includes taking into account the social, environmental, and economic impacts of their business activities and ensuring that their practices support long-term sustainability.

Furthermore, suppliers must demonstrate respect for internationally recognized human rights. This obligation extends to all aspects of their operations and business relationships. By upholding these principles and requirements, suppliers help ensure that their business activities are aligned with **SEDIVER**’s commitment to integrity, lawful conduct, and the highest ethical standards.

Anti-Bribery and Anti-Corruption

Suppliers must not request, receive or accept any improper advantage with the intent of securing, or retaining business or gaining any advantage in the course of conducting business.

Likewise, suppliers are strictly prohibited from offering, promising, or providing any improper advantage to public officials, private individuals, or corporate entities to secure or retain business or any other advantage. This prohibition extends to any action intended to influence, directly or indirectly, the performance or non-performance of a public official's duties, whether the improper advantage is offered directly by the supplier or through an intermediary or third party.

This expectation applies uniformly, regardless of the manner in which the improper advantage is given or received, and regardless of whether it is offered to a public official or any individual or organization in the private sector. Such conduct is not tolerated under any circumstances and is considered a violation of **SEDIVER's** standards for lawful and ethical business practices.

Gifts and Hospitality

All business entertainment and hospitality involving individuals who represent **SEDIVER** must be kept reasonable, proportionate, must correspond to the market and be compliant with applicable laws and regulations. Such activities should be conducted solely for the purpose of maintaining positive business relationships and must never be used to unfairly influence any future business decisions.

The provision of gifts should be avoided. Gifts should be refused, especially if they are deemed unreasonable, disproportionate in nature, or non-compliant with applicable laws and regulations. In any case, cash or equivalent shall never be offered or accepted. By adhering to these principles, suppliers help to ensure that all interactions are conducted transparently and ethically, supporting **SEDIVER's** commitment to lawful and fair business practices.

Conflicts of Interests

Suppliers are required to avoid participating in or attempting to influence any decision in which there is an actual or perceived conflict of interests. This includes situations where the supplier may have a business or personal interest, whether economic or otherwise, in the subject matter of the decision, either directly or through someone closely related. In the event that a potential conflict of interests arises, suppliers must promptly notify **SEDIVER** without delay. This ensures that all business decisions are made objectively and in accordance with ethical standards, maintaining the integrity of the decision-making process.

Facilitation Payments

SEDIVER strictly prohibits facilitation payments and suppliers shall refrain from making or accepting such payments, regardless of their amount, frequency, or local practice.

Facilitation payments are small sums, not required by law or regulation, paid to public officials to expedite or secure the performance of routine government actions. For example, these payments are considered bribery under UK and French law and are explicitly prohibited under this Supplier Code of Conduct – regardless of their amount, frequency, local practice, or potential tolerance under certain laws (such as the U.S. FCPA in limited circumstances).

Antitrust

SEDIVER is firmly committed to engaging in fair competition within the marketplace. All suppliers are required to strictly adhere to all applicable antitrust and competition laws. These laws are designed to prevent agreements, business practices, or behaviors that are anti-competitive or that unreasonably restrain trade.

It is essential that any information regarding competitors is obtained and managed in full compliance with all relevant competition laws. At all times, such information must be handled in a manner that upholds legal and ethical standards and supports **SEDIVER**'s dedication to lawful business conduct.

Fair Labor Conditions

Suppliers are required to provide all employees with a safe and healthy work environment that fully complies with all relevant local laws and regulations. It is strictly prohibited to engage in any form of forced labor or human trafficking within business operations. Under no circumstances should identification or residency documents be withheld as a condition of employment.

Employees must be recognized as having the right to join or not join unions and to be represented in collective bargaining agreements. Suppliers are not permitted to employ children under the age of 15, or below the minimum legal age for employment as established by applicable laws. In regions where these rights are limited, suppliers must nevertheless ensure that employees can exercise minimum rights.

Recruitment, selection, and promotion of employees must be based exclusively on qualifications and skills. Any form of employment discrimination—whether in hiring, compensation, promotion, discipline, termination, or retirement—on the basis of race, color, religion, gender, sexual orientation, national origin, age, or disability is strictly prohibited.

Wages paid to employees and hired labor must adhere to all applicable laws. Working hours must not be excessive and should comply with local regulations regarding working time. All employees must be free to leave their employment or assignment after providing reasonable notice.

Suppliers are responsible for ensuring that every employee is provided with a written employment agreement outlining the terms and conditions of their employment. These agreements must be presented in a language that the employee understands. In addition, all employees should have access to effective mechanisms for addressing grievances.

Health, Safety and Environment

SEDIVER expects suppliers to maintain a healthy and safe work environment for all employees. This involves adhering to internationally recognized health and safety management principles and practices, as well as meeting all requirements established by applicable laws. Supplier operations must be conducted in a manner that prioritizes the well-being of employees, ensuring their safety and security at all times.

In addition to workplace safety, suppliers must operate their business in a way that actively protects the environment. Compliance with all relevant environmental laws, regulations, and standards is mandatory. Every aspect of supplier operations including sourcing, manufacturing, product distribution, and the provision of services, should be carefully managed with the goal of preserving and safeguarding the environment for current and future generations.

Confidential Information

Suppliers are required to safeguard all intellectual property and confidential information provided by **SEDIVER**. Any information received from **SEDIVER** that is not publicly available must be treated as confidential. Such information should be used solely for its intended purpose and must not be disclosed or utilized outside the scope of the business relationship with **SEDIVER**.

Audit

SEDIVER shall have the right to conduct at regular intervals (or have conducted by an external auditor or service provider) an audit. Suppliers shall accept to be audited with respect to potential non-compliance issues relating to Anti-Corruption Laws, non-compliance of the Code of Conduct, or questionable business ethical behavior. Suppliers shall fully cooperate in case of internal or external investigations and audits and produce documents and other relevant evidence requested in this respect.

Reporting

Suppliers shall report suspicious behaviors or non-compliance with any laws or regulations and in particular in relation to this Supplier Code of Conduct via the Integrity Line established by **SEDIVER** at its website (<https://www.sediver.com/company/compliance/>). The contact person at the Integrity Line is an external law firm, so that any report and correspondence of the Supplier with the law firm remains confidential and if required by the reporting individual, the reports can be made anonymously (unless not permitted under local law). The reported facts, if forwarded by the law firm, are to be so without disclosing the identity of the reporting person. The report should be made regardless of the position of the person being responsible for the matter of non-compliance. All such reports will be promptly investigated, and appropriate corrective measures will be implemented if necessary.

This Supplier Code of Conduct constitutes an integral part of all contractual documents entered into between **SEDIVER** and our Suppliers. The obligations imposed hereby shall be cascaded to supplier's own suppliers and contractors who shall implement a similar continuous improvement and compliance approach.

By adhering to this Supplier Code of Conduct, suppliers accept to be assessed or audited by **SEDIVER** or by a third party mandated by **SEDIVER** on the above-mentioned principles upon reasonable notice. Upon request any supporting documentation or information attesting compliance with this Supplier Code of Conduct must be provided.

Acknowledgment

Supplier has thoroughly reviewed and fully understood the contents and requirements outlined in the above document. The undersigned supplier confirms and certifies that the supplier company is fully compliant with the **SEDIVER** Supplier Code of Conduct and all associated requirements and will continue to adhere to all its established principles and requirements.

Please refer to the Compliance section on the **SEDIVER** website (<https://www.sediver.com/company/compliance/>) for further details on all principles set out above.

As a condition of conducting business with **SEDIVER**, the undersigned supplier certifies its commitment to comply with this Supplier Code of Conduct and all associated requirements and acknowledges that they are an authorized representative of the company identified below.

Supplier company name:

Supplier authorized representative:

Signature and company stamp:

Date: