



Supplier Code of Conduct



Dear Suppliers,

The objective of Stap a.s. is to become a sustainable supplier in the field of textile product design, development, and manufacturing.

The Supplier Code of Conduct set out below defines the basic requirements and expectations relating to the sustainability practices of our suppliers.

Sustainability requirements within the supply chain are based on relevant national and international laws and conventions. We strive to conduct our business responsibly and ethically, always in compliance with applicable legislation and other relevant requirements.

Our suppliers represent an important part of our efforts to achieve long-term sustainable business practices. Our objectives cannot be achieved without the active cooperation of our business partners and suppliers throughout the entire supply chain. The involvement of all stakeholders is therefore essential to achieving these goals.

We expect our suppliers to demonstrate a responsible approach, actively cooperate, and make an unequivocal commitment to supporting our sustainability goals and principles.

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1. Social Responsibility and Human Rights Protection

Suppliers of Stap a.s. are required to act with respect for human rights and to take measures to prevent human rights violations throughout the entire supply chain.

Each supplier must ensure that its own activities do not result in human rights violations and that it does not directly or indirectly participate in such conduct. At the same time, it is the supplier's responsibility, within its capabilities, to support respect for human rights among its subcontractors and other business partners involved in the supply chain.

Company Stap a.s. expects its suppliers to respect fundamental principles and rights. Suppliers should also have an appropriate due diligence process in place that reflects the requirements set out in the United Nations Guiding Principles on Business and Human Rights.

1.1 Modern Slavery and Forced Labour

Stap a.s. strictly rejects all forms of forced, compulsory, or involuntary labour and has zero tolerance for practices associated with modern slavery. The company requires its suppliers to prevent such practices in their own operations and in relevant parts of the supply chain, and to take measures to eliminate them.

In particular, situations in which work is performed under the threat of a penalty or other form of sanction without the worker's free and voluntary consent are considered unacceptable.



Suppliers must also refrain from using or supporting any form of slavery, servitude, human trafficking, or slavery-like practices. The following are considered examples of violations of these principles:

- Withholding employees' personal identification documents or other documents in order to restrict their freedom;
- Requiring unreasonable employment-related fees;
- Using debt bondage or other mechanisms that may place workers in a position of dependency;
- Using violence, threats, coercion, or other forms of intimidation;
- Any form of servitude or domination and oppression in the workplace;
- Conduct involving extreme economic or sexual exploitation, humiliation, or other serious abuse of workers.

The supplier is required to ensure that its employees can perform their work freely and without any form of coercion. At the same time, the supplier is responsible for establishing conditions that enable the timely identification and elimination of any manifestations of forced labour or modern slavery.

1.2 Child Labour

Stap a.s. considers protecting children from all forms of exploitation to be an essential part of responsible business practices. Therefore, within its supply chain, the company maintains zero tolerance for child labour and expects the same approach from all its suppliers and business partners.

Suppliers are required to take preventive measures to ensure that child labour does not occur in their own operations or in relevant parts of their supply chains.

The following principles must be observed when employing young workers:

- **Minimum Employment Age:** No person under the age of 15 may be employed, or under the age of 14 where such an exception is permitted by local legislation. At the same time, no person below the minimum employment age established by the applicable legislation of the respective country may be employed. In the event of differing age limits, the higher specified age limit shall always apply.
- **Protection of Persons Under 18:** Where persons under the age of 18 are employed, their work must not adversely affect their school attendance or vocational training. Furthermore, the work must not pose a risk to their physical, psychological, or emotional development.

Suppliers are responsible for appropriately verifying the age of their employees and establishing rules and control mechanisms that effectively prevent the employment of children in violation of the principles set out above.

1.3 Freedom of Association and the Right to Collective Bargaining

Stap a.s. recognizes and supports employees' right to freely associate and participate in collective bargaining. These principles must be respected not only within the company's own operations but also throughout the entire supply chain.

Suppliers are required to ensure that workers can, without any form of coercion:

- Establish trade unions or other organizations of their own choosing;
- Join such organizations or freely choose not to become members;

- Participate in collective bargaining;
- Exercise their rights without the risk of discrimination, retaliation, harassment, or intimidation.

Where local legislation restricts freedom of association in any way, suppliers must at least enable the use of alternative and legally permissible forms of employee representation and association.

1.4 Prohibition of Discrimination and Harassment

Stap a.s. expects its suppliers to create a working environment in which every worker is treated fairly, with dignity, and with respect. Any form of discrimination or harassment is unacceptable.

Discrimination must not be based, for example, on sex, age, ethnic origin, skin colour, nationality, religion, political opinions, health condition or physical or mental disability, sexual orientation, marital status, pregnancy, or membership of or affiliation with a particular organization.

All employment-related decisions must be based on objective work-related criteria. These include, in particular, recruitment and hiring, remuneration, the provision of benefits, career advancement, professional training and development, the imposition of employment-related disciplinary measures, and termination of employment. The primary determining factors should be the worker's abilities, professional qualifications, experience, and work performance.

1.5 Rights of Minorities and Indigenous Peoples

Company Stap a.s. recognizes the importance of protecting rights related to the use of land, water, and natural resources. Suppliers are therefore required to respect applicable local, national, and international legal and customary rights and to consider the potential impacts of their activities on the surrounding environment and communities.

Particular emphasis is placed on protecting the rights of indigenous peoples and local communities, which must be respected and protected throughout the entire supply chain in accordance with the principles of the United Nations Declaration on the Rights of Indigenous Peoples.

The supplier is required to assess how its business activities may affect individuals and communities living in the areas where it operates. If potential negative impacts are identified, the supplier must take appropriate measures to prevent or mitigate them.

The protection of the health, safety, and living conditions of local communities and indigenous peoples is a particular priority. Suppliers must therefore actively assess related risks and implement preventive measures to minimize the adverse impacts of their activities.

Any unlawful forced or involuntary resettlement of local communities or indigenous peoples is unacceptable. The supplier must neither carry out such resettlement itself nor contribute to it through any unlawful means.

1.6 Working Hours, Wages, and Employee Benefits

Stap a.s. considers compliance with fair working conditions to be an important part of responsible business practices. The company therefore expects its suppliers to comply with all applicable laws and collective bargaining agreements governing, in particular, working hours, remuneration, and employee benefits.

Suppliers must ensure that workers receive proper and timely compensation for their work and that their statutory entitlements are respected.

The following principles must be observed in particular as part of working conditions:

- **Remuneration and Benefits:** Wages and other employee benefits must be provided properly and within the agreed payment deadlines. Their amount must not be lower than the minimum wage and other statutory entitlements established by applicable legislation.
- **Working Hours and Overtime:** Working hours must comply with applicable legislation. Employees must receive appropriate compensation, including any statutory overtime premium, for work performed beyond regular working hours.
- **Rest Periods and Shift Organization:** Suppliers are required to comply with statutory requirements concerning working hours, breaks, and rest periods. Work and shift schedules must be organized appropriately and must not expose employees to excessive workloads or create risks to their health and safety.
- **Non-Standard Forms of Employment:** Temporary or alternative forms of employment, such as fixed-term employment, agency work, subcontracting arrangements, remote work, or apprenticeship programs, must not be used to circumvent employment-related obligations. Likewise, they must not be used to circumvent rules concerning social security and worker protection.

Suppliers should strive to establish stable and transparent employment relationships and ensure that the form of employment does not result in any restriction of employees' rights and entitlements.

1.7 Occupational Health and Safety

The safety and protection of the health of employees and other persons in the workplace represent one of the important areas of responsible business practices for Stap a.s. All suppliers are therefore expected to establish, maintain, and continuously improve a safe and healthy working environment in accordance with applicable laws and relevant standards.

Suppliers must systematically identify and assess potential risks associated with their activities and implement appropriate preventive measures. Particular attention must be paid to chemical, biological, and physical hazards.

An essential part of prevention is ensuring that workers are adequately informed. Employees and other relevant persons must be demonstrably and comprehensibly informed about potential workplace risks and the procedures to be followed in the event of emergencies or accidents. Suppliers are required to provide regular occupational safety training for all employees in order to promote the prevention of occupational accidents and minimize the risk of hazardous situations arising.

When carrying out all activities related to products, including manufacturing, storage, transportation, and sale, the supplier must comply with applicable legislation, relevant international standards, and other requirements relating to product safety and quality.

Supplier activities that may affect the quality or safety of products manufactured by Stap a.s. must be appropriately controlled and subject to established rules, restrictions, and preventive measures.

To ensure clear allocation of responsibilities, each supplier is required to appoint a competent person responsible for product safety and responsibility (PSCR – Product Safety & Responsibility Officer). This person serves as the supplier's primary point of contact for communication and the resolution of all matters related to product safety.

2. Environmental Protection

A responsible approach to environmental protection is an integral part of Stap a.s. business operations.

The company is committed to continuously improving its environmental performance while promoting the responsible management of limited natural resources.

The company expects the same approach from its suppliers. Suppliers should actively seek opportunities to reduce the negative environmental impacts of their activities, protect available natural resources, and gradually reduce the environmental footprint associated with manufacturing, services provided, and products throughout their entire life cycle.

In all countries where the supplier operates, the relevant national and international environmental protection laws, regulations, and standards must be complied with.



Protection of Natural Resources and Pollution Prevention

Suppliers must prevent environmental interventions in the course of their activities that could have serious negative consequences. These include, in particular:

- Damage to or contamination of soil;
- Pollution of surface water and groundwater;
- Deterioration of air quality;
- Excessive or unjustified use of water resources;
- Generation of harmful noise emissions;
- Other activities that may significantly disrupt the natural conditions necessary for growing and producing food.

At the same time, the right of people to access safe drinking water and adequate sanitation facilities must be respected. Supplier activities must not restrict or prevent such access or otherwise endanger human health.

Suppliers should regularly assess environmental risks and take measures to gradually reduce them. Particular priority should be given to reducing pollution, waste generation, noise emissions, and other negative environmental impacts.

More efficient and economical use of natural resources, particularly energy, water, and primary raw materials, is an important tool for achieving these objectives.

2.1 Environmental Management Systems

A systematic approach to managing the environmental impacts of business activities is an important part of Stap a.s. environmental strategy. We therefore expect suppliers to have an established and functioning environmental management system that is appropriate to the nature and scale of their activities.

This system must be regularly evaluated and updated. Suppliers should continuously review, in particular, identified environmental risks and opportunities and adjust their environmental plans and established objectives in line with current circumstances.

We consider certification according to the internationally recognized ISO 14001 standard to be an appropriate way of demonstrating the level of environmental management. Suppliers should therefore strive to obtain and subsequently maintain the relevant certification or registration.

2.2 Decarbonization / Greenhouse Gas Emissions

Stap a.s. strives to continuously improve its environmental performance and expects the same approach from its suppliers. Suppliers should systematically assess the impacts of their activities and set specific targets aimed at reducing greenhouse gas emissions.

When addressing environmental challenges, suppliers should actively support the development and implementation of technologies and practices that contribute to environmental protection.

Emissions Management

The supplier is required, to an extent proportionate to its size and capabilities, to monitor and gradually reduce its greenhouse gas emissions (Scope 1, Scope 2, and Scope 3) and, where possible, contribute to achieving the objectives of the Paris Agreement. Larger suppliers or suppliers with a significant environmental impact may be required to establish specific emissions reduction targets.

To the extent appropriate to its size and capabilities, the supplier should regularly monitor and assess progress towards achieving its environmental objectives. Efforts to monitor the carbon footprint of its products are also encouraged, where its resources and capabilities allow.

When reducing CO₂ emissions, a hierarchical approach is applied. Suppliers should first seek to prevent emissions from occurring, followed by their direct limitation or reduction. Only when emissions cannot be eliminated or further reduced through these means may offsetting or neutralization be pursued.

2.3 Sustainable and Renewable Resources

Responsible and efficient resource management is an important part of Stap a.s. environmental approach. Suppliers should therefore use available natural and technical resources as efficiently as possible in procurement, manufacturing, and other related processes. This applies in particular to water, raw materials, and energy.

To reduce consumption, suppliers should use appropriate and effective technological solutions and continuously seek further opportunities to improve the efficiency of production processes while minimizing resource waste.

Responsible resource management also includes regular monitoring and recording of consumption. Suppliers should collect and document data relating to water, raw material, and energy consumption in order to identify areas with potential for improving efficiency and reducing overall consumption.

Where relevant, these data should be assessed at the level of individual operations as well as the company as a whole. Upon request, the supplier is required to provide the relevant data to Stap a.s.

Energy Efficiency and Renewable Energy Sources

Suppliers should implement measures aimed at reducing unnecessary energy consumption, improving energy efficiency, and reducing the overall energy intensity of their activities.

At the same time, a gradual increase in the share of energy derived from renewable sources is expected, where the supplier's conditions and capabilities allow. Where relevant, energy consumption should be regularly monitored and assessed together with associated greenhouse gas emissions.

2.4 Hazardous Materials and Chemicals

Stap a.s. recognizes the potential environmental and health risks associated with the use of hazardous materials and chemicals. The company therefore expects its suppliers to actively prevent such risks, minimize them to the greatest extent possible, and take measures to protect the environment and soil quality.

Suppliers must have appropriate procedures in place for the safe handling of hazardous substances, taking into account requirements relating to environmental protection, health, and occupational safety.

All hazardous materials, chemicals, and other hazardous substances must be properly labelled and identified in accordance with applicable legislation. The supplier is also required to ensure their safe handling, transportation, and storage in order to minimize the risk of harm to people, the environment, or soil.

When the use of such materials is discontinued, appropriate reuse, recycling, or safe disposal must be ensured. Suppliers are required to comply with all relevant national and international legal requirements applicable in the countries where they operate and in the markets to which they supply their products.

This obligation also includes compliance with applicable regulations governing the handling of chemicals and hazardous materials, such as Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH).

2.5 Protection of Natural Ecosystems and Prevention of Deforestation

Suppliers are required to ensure that their business activities are not associated with the unlawful conversion of natural ecosystems and that they do not directly or indirectly benefit from such activities. Particular attention must be paid to preventing unlawful deforestation, especially in situations where natural forests are converted for use in other activities.

The supplier's responsibility extends beyond its own operations. The supplier is required to implement appropriate processes throughout its supply chain and identify potential environmental risks associated with the origin of the raw materials and products used.

If a risk of conversion of natural forests or other natural ecosystems is identified within the supply chain, the supplier must take appropriate measures to prevent and minimize such risk. The aim of these measures is to support the long-term protection of natural ecosystems, including the preservation of their natural values and natural and cultural heritage.

2.6 Responsible Sourcing of Raw Materials

Suppliers of Stap a.s. are required to respect human rights and ensure that their business activities do not contribute to serious human rights violations. Unacceptable conduct includes, in particular, torture, cruel, inhuman, or degrading treatment, corporal punishment, sexual violence, war crimes, and crimes against humanity.

Suppliers should implement an appropriate due diligence process aimed at identifying, assessing, and mitigating actual and potential adverse impacts associated with the origin of the raw materials used (particularly cotton). This process includes, in particular:

- Identifying risks within the supply chain, especially the risks of forced labour and child labour;
- Assessing the severity of these risks;
- Taking appropriate preventive and remedial measures;
- Continuously monitoring the implementation of such measures.

In the event of non-compliance, Stap a.s. may require the implementation of corrective measures and, in justified cases, the termination of procurement from the supplier concerned.

3. Ethical Business Conduct

Stap a.s. expects its suppliers to act with honesty, responsibility, and compliance with applicable rules. Suppliers must comply with all relevant laws and other binding requirements in the course of their activities, regardless of whether these relate to their own operations or cooperation with other entities within the supply chain.

This obligation applies at the local, national, and international levels, depending on where the supplier or its business partners operate.

Responsible business conduct also includes zero tolerance for criminal activity. Suppliers must not, in any way, whether directly or through third parties, support, facilitate, or actively participate in criminal activity.

Principles of Fair and Transparent Conduct

Suppliers are required to apply generally recognized principles of ethical business conduct in their business relationships. These include, in particular:

- Compliance with fair competition principles and conduct in accordance with applicable competition laws and regulations;
- Responsible handling of confidential and sensitive information and ensuring its protection;
- Respect for and protection of intellectual property and property rights;
- Compliance with other legal, contractual, and commercial requirements applicable to cooperation with Stap a.s.



Suppliers should also ensure that these principles are applied not only within their own organization but also when cooperating with relevant business partners and other entities throughout their supply chain.

3.1 Corruption, Bribery and Extortion

Stap a.s. maintains a zero-tolerance policy towards corruption and bribery and takes appropriate measures to prevent such practices. The company expects the same standard from its suppliers, who are required to act transparently and reject any form of corrupt conduct.

Suppliers must not, either directly or through third parties, offer, provide, request, or accept bribes or other undue advantages. This prohibition also applies to so-called facilitation payments, i.e. payments made to expedite or secure routine official or administrative procedures.

Gifts and Hospitality

As part of business relationships with Stap a.s., employees of the company must not be provided with or offered cash gifts or cash equivalents.

Only modest business gifts may be considered permissible, provided that they meet all of the following conditions:

- They comply with applicable laws and regulations;
- They are consistent with customary and reasonable business practices;
- They are provided only occasionally;
- Their purpose is not to influence the recipient's decision-making;
- They do not create any obligation or expectation of reciprocity.

Any gifts or other benefits that could give the impression of influencing a business decision or create an obligation on the part of the recipient are unacceptable.

3.2 Conflict of Interest

Suppliers are required to ensure that no conflict arises between personal and business interests when establishing and conducting business cooperation with Stap a.s. Any circumstances that could affect the impartiality of business decision-making must be identified and addressed in a timely manner.

Potential conflicts of interest include, in particular, situations where a family, romantic, personal, or other close relationship exists between a supplier representative and an employee or other representative of Stap a.s., which could influence business cooperation or decision-making.

If a supplier becomes aware of such a relationship or other circumstances that may pose a risk of a conflict of interest, it is required to officially inform Stap a.s. of this fact without undue delay.

The objective is to ensure transparent and impartial business relationships and prevent situations that could call into question the objectivity of decision-making by any of the parties involved.

3.3 Money Laundering

Suppliers must conduct their activities in compliance with all applicable legal and regulatory requirements relating to the prevention and combating of money laundering.

3.4 Import and Export Controls

Suppliers must comply with all applicable laws and other binding requirements governing the import and export of goods, services, and information in all their business activities.

At the same time, they are required to verify and comply with the relevant trade and economic restrictions, sanctions regimes, and applicable sanctions lists relating to their activities.

3.5 Fair Competition

Suppliers are required to conduct their activities in accordance with applicable laws and other rules governing competition and fair business conduct. At all stages of the production and distribution chain, they must respect the principles of free and fair competition.

Any conduct that could unlawfully distort or restrict competition is prohibited. Suppliers must not participate, either directly or indirectly, in price-fixing agreements, market or customer allocation, or any other forms of anticompetitive agreements or practices.

Suppliers must also take appropriate measures to ensure that, within their business relationships, there is no disclosure, sharing, or exchange of sensitive information that could affect the competitive environment, nor any other conduct leading to the unlawful restriction of competition.

3.6 Personal Data Protection and Information Security

The protection of personal data, trade secrets, and other sensitive information is an integral part of suppliers' responsible approach. Suppliers are required to handle information securely, responsibly, and transparently and to comply with all applicable laws and other binding requirements relating to personal data protection and information security.

If, as part of their cooperation with Stap a.s., a supplier gains access to data relating to natural persons, it must ensure appropriate protection of such data and take measures to prevent their unauthorized use, misuse, loss, or disclosure. All collection, storage, use, processing, and transfer of personal data must be carried out in compliance with applicable legislation and the terms of the relevant agreements concluded with Stap a.s.

The supplier is also responsible for protecting the personal data of its employees, customers, and business partners. It must implement organizational and technical measures appropriate to the nature and sensitivity of the data being processed.

All information obtained in the course of business cooperation must be used solely for legitimate purposes and protected against unauthorized access. The supplier must ensure that its employees and other authorized persons maintain confidentiality regarding trade secrets and confidential information.

Confidential information must not, without appropriate authorization, be published, provided to third parties, or otherwise made accessible to unauthorized persons.

To strengthen the level of information security, suppliers are encouraged to pursue ISO 27001 / TISAX certification in the area of information security management systems.

3.7 Intellectual Property

Suppliers must respect all applicable national and international rules governing the protection of intellectual property in the course of their activities. This area includes, in particular, patents, trademarks, industrial designs, and other registrable rights, as well as domain names and copyrights. Suppliers are also required to take into account related requirements arising from competition law.

Before using any intellectual property, the supplier must verify that it has the necessary authorizations and licenses for such use. Its activities must not result in the unauthorized use of or any other infringement of the intellectual property rights of Stap a.s. or third parties.

The supplier is responsible for ensuring that all intellectual property used in connection with the products and services supplied is used legally and in accordance with the applicable rights of its owners.

3.9 Accurate and Proper Recordkeeping

The supplier must ensure the proper, truthful, and complete maintenance of all business records and documentation. The content of such records must not be intentionally altered, modified, or otherwise distorted with the aim of concealing or misrepresenting facts related to business transactions.

Any documentation serving as a basis for or evidence of a completed business transaction or other relevant event, regardless of its form, must faithfully and fully reflect the actual course of the transaction or event.

The supplier is also required to retain all records for a period corresponding to the retention periods stipulated by applicable laws and other relevant requirements governing document retention and archiving.

4. Implementation of Sustainability Requirements

Stap a.s. considers respect for social and environmental principles to be a fundamental prerequisite for establishing and maintaining business relationships. Suppliers and business partners are therefore required to comply with the requirements of this Supplier Code of Conduct and to seek to implement them throughout their own supply chains.

Scope of Application

This Code applies to all suppliers and business partners of Stap a.s. The term “supplier” refers to any third party that provides Stap a.s. with goods or services for consideration. This includes, in particular, direct and indirect suppliers, contract manufacturers and packaging companies, labour providers, logistics companies, distributors, and licensees, as well as their parent, subsidiary, and affiliated companies.

The supplier is also responsible for ensuring that the principles of this Code are appropriately implemented by its subcontractors and other relevant business partners. Suppliers are expected to actively communicate these requirements throughout their supply chains and support their implementation through appropriate internal policies, management systems, processes, and training.

Compliance with Laws and Regulations

Every supplier must comply with all relevant local, regional, national, and international laws and regulations and other binding requirements applicable to its activities and the markets in which it operates.

Where the requirements of this Code are more stringent than those established by local legislation or applicable standards, the supplier is expected to follow the more stringent rules and principles. The same approach applies where different requirements are in force in individual countries or regions.

5. Whistleblowing System

Suppliers are required to establish and maintain an accessible mechanism for submitting reports and complaints that enables employees and other persons within the value chain to safely raise concerns about potential violations of rules or other inappropriate conduct.

Such a mechanism must, in particular, meet the following requirements:

- be transparent and easy to understand;
- enable the effective handling of concerns and an appropriate response;
- provide the option of anonymous reporting;
- ensure impartiality and confidentiality in the receipt and assessment of reports.

The supplier must ensure that employees and other relevant persons are properly informed about the existence of these channels and have genuine and easy access to them. Reports must be assessed, and any identified violations addressed, without undue delay, in accordance with a predefined and clearly understandable procedure.

Whistleblower Protection

Persons who in good faith raise concerns about suspected unlawful or unethical conduct must not, as a result of their report, be subjected to retaliation, reprisals, discrimination, or any other disadvantage.

6. Verification of Compliance with Requirements

Stap a.s. is entitled to verify on an ongoing basis whether its suppliers comply with the requirements set out in this Supplier Code of Conduct. For this purpose, it may use various appropriate methods of verification, taking into account the nature of the relevant business relationship.

Verification may be carried out, for example, through self-assessment questionnaires or in the form of an audit conducted directly at the supplier's premises. The audit may be performed by Stap a.s. through its professionally qualified personnel.

Any on-site inspection or audit will always be announced to the supplier in advance, will be conducted with the participation of its designated representatives, and must be carried out in compliance with all applicable laws and regulations.

Thank You for Your Cooperation

Thank you for sharing our commitment to responsible, fair, and sustainable business practices.

We believe that mutual trust, respect, and shared values form the foundation of long-term partnerships. Together, we contribute to creating a positive environment for our employees, business partners, communities, and future generations.