



Supplier Code of Conduct

January 2023

**SAFETY,
INTEGRITY
AND RESPECT
IN EVERYTHING
WE DO.**

PURPOSE

CEE Catering HoldCo Kft. (the companies comprising CEE Catering HoldCo Kft. trading under the brands Delirest, Primirest and Deliservices, herein the “Group”) is committed to upholding the highest ethical standards in all its business dealings. The Group prioritizes integrity and transparency, and this has helped cement its position as a market leader. Today, we are Central Europe’s largest workplace hospitality and contract catering company group, proud to provide meals every day for hundreds of thousands of small children, students, employees and people recovering in medical facilities.

Our core values and Business Conduct Policy (“BCP”) underpin the actions and behaviours of all our employees, and form the basis of all our interactions with clients, suppliers, business partners and the communities in which we operate.

The Group’s Global Supplier Code of Conduct (the “Code”) therefore sets out what we expect from our supply chain partners (“suppliers/you”). We understand that many of our partners will have similar policies in place; we do not request that this code supplants yours, simply that you acknowledge and adhere to ours when dealing with the Group.

VALUES



OPENNESS, TRUST AND INTEGRITY



PASSIONATE ABOUT QUALITY



SUCCESS THROUGH TEAMWORK



RESPONSIBILITY & DETERMINATION



SAFETY

OUR FOCUS AREAS

We want to do business with like minded suppliers who share our values. This Code sets out our expectations. These are the minimum standards we call for from you and any of your subsidiaries. The Code allows for the possibility that these minimum standards can, and will, be exceeded.

The five focus areas of engagement with suppliers are:

- Business integrity and ethical principles
- Human rights and labour standards
- Health and safety
- Sustainability
- FaceUp, We Are Listening


END-TO-END RESPONSIBILITY

We request that suppliers promote the Code's guiding principles to their stakeholders, and encourage responsible business practices in their supply chains.

We may ask you to openly and transparently share information, or take part in an audit or review, in order to ensure the Code is being followed in your dealings with the Group.

While we understand that process failures may take time to become known and/or corrected, if the Group feels progress towards compliance is inadequate, or if non-compliance is detected, we may cease to work with you and begin steps to terminate supplier agreements.

This Code may be amended from time-to-time. The most recent version can be found here: <https://ceecatering.com/group-governance-and-compliance>

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GENERAL EXPECTATIONS

We have clear behaviour standards to make sure we operate ethically, legally, and responsibly in all the markets that we are present.

WE EXPECT SUPPLIERS TO:

- comply with all applicable laws and regulations connected to your operations and your dealings with the Group. Should there be a difference between requirements of this Code and applicable laws or regulations, the supplier shall comply with whichever is more stringent,
- uphold principles and commitments set out in this Code: this means embedding them in the way you conduct your daily business and be able to demonstrate processes are in place to meet applicable compliance standards,
- evaluate risks and conduct due diligence, risk assessment and, if necessary, audit your own suppliers, subcontractors and partners with regard to business ethics and integrity risks, including human and labour rights,
- provide the appropriate information, training, and tools so that your workforce can raise any concerns safely and without fear of reprisal,
- promptly report any possible concerns or violations of this Code in a timely manner to your Group contact or via our confidential whistleblowing system, FaceUp We Are Listening.



BUSINESS INTEGRITY

We strive to carry out all our business dealings to the highest integrity standards, and we expect our suppliers to do the same.

WE EXPECT SUPPLIERS TO:

- comply, at a minimum, with all applicable business integrity laws¹,
- adopt and promote clear commitments to ethical business practices,
- never bribe, attempt to bribe, accept a bribe, or be exposed to bribery or corruption in any form, including any payments to government or public officials,
- ensure that any gifts or hospitality accepted, received, offered, requested or given are modest, and do not create an obligation or the perception of an obligation. Do not engage in any gifts or hospitality during or in anticipation of a tender, bid or contract negotiation or renegotiation. Even the suggestion, however unfounded, of improper or unfair advantage or conflict of interest can be damaging to the Group,
- not engage in or facilitate anti-competitive behaviour, including prohibited information exchange,

- ensure there are no conflicts of interest in your dealings with the Group. If you think that such a conflict exists, inform your Group contact immediately,
- take no part in (directly or indirectly) money laundering, terrorist financing, economic or trade sanctions violations, tax evasion, theft or fraud, in any form,
- maintain accurate and transparent financial and business records, in line with all relevant legal and regulatory requirements and accounting practices.

Do not share with the Group:

- ✗ any information you receive from or about our competitors or their business
- ✗ any business you make or bid for with our competitors

Always:

- ✓ inform us in a timely manner about any concerns you might have about the types of business integrity issues outlined above.

¹Applicable business integrity laws may include but are not limited to bribery and corruption, conflicts of interest, competition, anti-trust or anti-monopoly, fraud, theft, financial misstatement, books and records, tax evasion, money laundering, terrorist financing, economic and trade sanctions, export controls, human rights and modern slavery.



INFORMATION SECURITY AND DATA PRIVACY

The Group is committed to protecting confidentiality of information and respecting the privacy rights of its employees, suppliers, customers, clients, and other third parties.

WE EXPECT SUPPLIERS TO:

- comply, at a minimum, with all applicable data privacy and cyber security laws and regulations,
- ensure that the use of proprietary and confidential information relevant to your engagement with the Group is for authorized purposes and is only used by authorized individuals,
- not disclose (without seeking official e consent) any confidential, personal or commercially sensitive information relating to the Group
- ensure that any personal data is only used for the agreed business purposes and has been obtained, processed, destroyed and transferred in accordance with applicable laws and relevant contractual obligations,
- ensure that any data related to business with us is accurate and that any inaccurate data is erased, corrected or amended,
- ensure that appropriate data protection, measures are in place to safeguard data that relates to your dealings with the Group,
- inform us immediately of any actual or suspected data breach, and cooperate with any investigation we may conduct as a consequence of such a breach.



HUMAN RIGHTS AND MODERN SLAVERY

We are committed to the positive development and enhancement of human rights, which includes working towards eradicating modern slavery and human trafficking. We are opposed to any and all forms of human rights violations or abuse.¹

WE EXPECT SUPPLIERS TO:

- comply, at a minimum, with all applicable laws and regulations regarding human rights and modern slavery. These include, but are not limited to, working hours, minimum wages, overtime, breaks, sick leave and annual holidays as well as other mandatory benefits, ensuring that appropriate records are kept,
- treat all employees and workers humanely and ensure that all work is freely chosen,
- ensure you do not use or benefit from any child, forced, bonded or compulsory labour,
- ensure that all employees and workers meet the relevant legal minimum age of employment; implement systems to prevent child labour and exploitation,
- oppose and immediately act on any suspected risk of human trafficking or related activities in your supply chain,
- act immediately on any suspected human rights issues and/or abuses in your business and/or your supply chain.

¹The Group respects the rights enshrined within the United Nations Universal Declaration of Human Rights, the Ethical Trading Initiative (ETI) Base Code, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact 10 principles.



NON-DISCRIMINATION, HARASSMENT, AND INCLUSION

The Group encourages a welcoming, supportive, respectful and inclusive employment culture. We are strongly opposed to any and all forms of discrimination, bullying or harassment.

WE EXPECT SUPPLIERS TO:

- comply, at a minimum, with applicable laws regarding employee and worker rights, fair treatment and employment,
- promote a diverse and inclusive work environment that respects equal opportunities and every employee, worker or applicant's right to be treated fairly and with respect
- ensure that recruitment is free from discrimination,
- not tolerate any form of unfair or unlawful harassment, discrimination or degrading treatment, whether physical, verbal, sexual, or any harmful acts including violence,
- immediately act on any reports and/or instances of unlawful or unfair treatment.



EMPLOYMENT

We are committed to providing fair, equal and ethical employment opportunities and facilities to all employees, workers and applicants. We do not directly or indirectly discriminate against anyone who possesses a protected characteristic. These are aspects of a person's identity that makes them who they are¹

WE EXPECT SUPPLIERS TO:

- embed and promote ethical and positive working conditions which, at a minimum, meet local labour laws and regulations,
- ensure that all work is based on a legally recognized and regulatory compliant employment relationship and that employees receive clear written information about terms, conditions and benefits,
- ensure that recruitment is carried out ethically and responsibly,
- workers, without distinction, have the right to organize freely and to bargain collectively.

¹ Protected characteristics may include but are not limited to race, sex, colour, ethnicity, religion, beliefs, age, disability, sexual orientation, gender identification, background or any other similar distinction.



HEALTH AND SAFETY

We prioritise robust workplace and food safety and quality standards, the safety and well-being of our employees and all those that supply us.

WE EXPECT SUPPLIERS TO:

- comply, at a minimum, with all applicable laws and regulations, and meet relevant industry standards on workplace health and safety,
- prioritize employees and workers health and safety in all your activities, including implementing and maintaining policies, standards, procedures and systems,
- provide employees and workers with a safe and healthy working environment, and, if relevant, safe and secure housing,
- promote and encourage a culture of health and safety; implement risk assessments and systems of management and recording of incidents,
- ensure that any unsafe work is stopped immediately, and only re-starts once the issue is resolved,
- ensure that all employees and workers receive adequate and relevant health and safety training and have the necessary tools and equipment to perform their roles safely and in a compliant manner,
- understand and comply with the Group's food safety and quality standards, where relevant,
- always handle, prepare, store and transport food under sanitary conditions; complying with all applicable regulatory requirements as a minimum
- report any health and safety concerns to your Group contact.



ENVIRONMENT

The Group conducts business in a sustainable way and in compliance with all relevant environmental laws and regulations. We proactively make efforts to lessen any negative impact and strive to maximise our contribution to positive environmental impacts.

WE EXPECT SUPPLIERS TO:

- comply, at a minimum, with all applicable environmental laws, regulations, certifications and specifications relevant to your products or services (including animal welfare),
- operate in a sustainable manner, and embed care for the environment in your business dealings,
- take actions to protect and where possible, restore and enhance the environment impacted by your operations,
- try to reduce the negative environmental impacts of your activities, wherever possible.



We aim to make a positive impact on the communities in which we live and work. We do this by supporting local communities and making sure that we do so ethically, transparently, and in line with our core values.

WHAT WE EXPECT OF SUPPLIERS

- if possible, support local communities and minority group' businesses and organisations, including helping to develop local skills and capabilities,
- whenever possible, act to reduce food waste and actively support the distribution of surplus food to the local community.



SPEAK UP, WE'RE LISTENING

FaceUp, We Are Listening is the Group's confidential and independently operated multilingual whistleblowing programme. All Group suppliers (and all your workers) have access to this tool. We encourage you to use it - talk to us if something doesn't look or feel right, or if you have any concerns about potential misconduct, criminal behaviours, or anything that transgresses this Code and/or the BCP. When reporting confidentially to the FaceUp platform, you can identify yourself or do so anonymously. Any information submitted, as well as your right to anonymity, may be subject to local laws.

We will review and follow up all and any submissions to the FaceUp platform. If an investigation follows from any submission, we expect full cooperation and openness from our suppliers. We also expect that during any investigation, our suppliers continue to uphold the principles and commitments in this Code.

For more information or to raise a concern, visit our FaceUp, We Are Listening portal.

For more information, please refer to the Whistleblowing Policy.



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