

VALAMAR RIVIERA d.d.

**VALAMAR
SUPPLIER CODE OF
CONDUCT**

Poreč, June 2024



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1. INTRODUCTION

As part of its business practices, Valamar Riviera d.d. (hereinafter: Valamar) has established the basic principles and values that it promotes in all its activities, as set forth in the Code of Business Conduct of Valamar Riviera d.d. (hereinafter: the Code), available at

https://esg.valamar-riviera.com/wp-content/uploads/sites/143/2024/01/01_Code_Business.pdf

This Valamar Supplier Code of Conduct (hereinafter referred to as the Code) sets out the basic guidelines for the ethical conduct of Valamar's suppliers in order for them to conduct their business activities in a responsible manner and contribute to the common good. It is based on the general principles and obligations set out in Valamar's Code of Business Conduct and related policies.

Ethics and integrity are the key features of the Company's culture. Transparent business management is a top priority for Valamar, and the most important characteristics of its corporate culture are the promotion of fair, incentive and safe working conditions, responsible and authentic tourism and destination development, environmental management and high ethical standards in the protection of human rights, safety and protection of children's rights, handling confidential information and building relationships with partners, the local community and other stakeholders.

Valamar aims to ensure that its values and principles are also respected by its suppli-

ers, who should promote honesty, integrity, and transparency in their business dealings. In line with our responsible business approach, we work with partners who share our commitment and set standards for our suppliers in the Code of Conduct for Valamar Suppliers. We expect our suppliers to comply with these standards in all their business activities, and to apply them to their supply chains. Valamar intends to gradually introduce sustainability criteria when selecting suppliers.

Valamar requires its suppliers to comply with all the below listed principles as far as possible. The provisions of this Code make an integral part of the contracts with suppliers and the Code will be attached thereto, i.e. each supplier will have access to the Code through a link specified in the contract.

2. PRINCIPLES

2.1. Compliance with laws and regulations

Valamar Riviera expects its suppliers to adhere to applicable laws, other relevant regulations and industry standards in their business activities, both national and international, particularly those related to workers and human rights, children's rights, health and safety, environmental protection, anti-corruption, information security and cooperation with local communities in the areas where they operate, i.e. from/to which they supply goods and services. Suppliers undertake to ensure that their selected sub suppliers, contractors and/or sub-contractors also comply with this policy.

2.2. Protection of human rights and workers' rights, and prohibition of child labour

2.2.1. Fair labour practices

Valamar Riviera expects its suppliers to do the following: respect and protect fundamental human rights, including the right to life, health, dignity and privacy; respect

the prohibition of discrimination on any grounds; ensure equal opportunities and working conditions for all employees; guarantee equality and protection of human rights and promote cultural diversity; provide equal opportunities in the workplace; take effective measures to eliminate any human rights violations; and ensure that employees' salaries comply with all labour laws and regulations, including those that prescribe minimum wages and benefits.

In particular, suppliers are expected to respect workers' rights to freedom of association, collective bargaining and peaceful assembly, in accordance with relevant laws and regulations. When exercising their rights, workers should not be subjected to any form of intimidation or harassment.

Suppliers shall respect the regular working hours of their employees and pay for any overtime worked on a voluntary basis in accordance with applicable regulations.

Suppliers shall not employ persons who are subject to forced labour and shall refrain from all forms of slavery and similar practices, such as servitude or other forms of oppression in the workplace.

Suppliers shall enable workers to file complaints in accordance with the law and shall ensure that this process and the handling of complaints are not obstructed in any way.

2.2.2. Child labour

Suppliers shall not recruit children or promote any form of child labour. Suppliers guarantee to Valamar that they comply with all international conventions related to child labour and the protection of children. Should they become aware that such practices are taking place in their organisation or in the organisation of their sub-suppliers, contractors and or/subcontractors, they shall endeavour to immediately take all measures to prevent them, as well as to report the responsible persons to the competent authorities. Valamar supports youth labour (within the framework of internships,

apprenticeships, student work and other legitimate forms of labour), provided that all legal restrictions are respected.

2.2.3. Health and safety

In order to ensure the occupational health and safety of their workers, suppliers undertake to continuously comply with all health and safety related regulations in their business activities, to consult with their workers in order to improve the health and safety management system, to identify risks and hazards and to implement measures to eliminate them and prevent injuries and illnesses, as well as to continuously improve working conditions.

In particular, suppliers undertake to provide, free of charge, appropriate protective equipment to all their employees, to instruct them in its use, and to sanction any employee whose behaviour endangers themselves or other employees (alcohol and drug use).

2.3. Protection of children

Suppliers undertake and guarantee to pay special attention to the protection of children and the rights of children as the most vulnerable population requiring special care.

Suppliers agree to comply with the Convention on the Rights of the Child, adopted by the UN General Assembly in 1989, and the Children's Rights and Business Principles developed by UNICEF.

In this regard, suppliers agree to have zero tolerance for violence, abuse and exploitation of children; protect children from all forms of harassment, including sexual abuse; respect children's rights; prohibit child labour; ensure the protection and safety of children in relation to their business activities; provide safe products and services that promote children's rights, etc.

Suppliers must comply with the UN Guiding Principles on Business and Human Rights:

“Protect, Respect and Remedy Framework” as well as by the conventions of the International Labour Organization, including the Declaration on Fundamental Principles and Rights at Work, adopted in 1998.

Suppliers undertake to keep up to date with and comply with national and international regulations, conventions and guidelines relating to the protection of children, and well as to implement them in their business operations.

2.4. Environmental protection

Valamar expects its suppliers to be environmentally responsible and to take measures to reduce the environmental impact of their business activities, as well as to comply with all legal regulations related to environmental protection.

In particular, suppliers shall endeavour to reduce and recycle waste; reduce the use of packaging materials (especially single-use plastic and other types of packaging); take measures to reduce water consumption and protect biodiversity; where possible, take steps to calculate and/or reduce greenhouse gas emissions; and carry out any other activities to protect and preserve the environment.

Suppliers shall systematically invest efforts into improving environmental protection and set measurable goals to reduce their environmental impact.

Suppliers shall work with Valamar to identify opportunities and participate in joint activities to reduce the environmental impact of the supply chain.

2.5. Cooperation with the local community

Valamar expects all its suppliers to do the following: establish and maintain close, long-term relationships with the local community, ensuring in the process that all key issues related to such cooperation or the

needs of both the local community and the supplier are resolved to mutual satisfaction, whenever possible; purchase products and services from local suppliers; encourage their employees to participate in voluntary programmes, including those related to environmental protection, charity events and donations; and, whenever possible, to allocate a portion of their income to local projects, and humanitarian and environmental programmes.

2.6. Prohibited business practices

2.6.1. Anti-corruption

Suppliers shall refrain from, and actively work to prevent, any form of corruption or activities that might be associated with corruption, such as taking or offering of bribes. In addition, suppliers shall handle donations and gifts with due care.

Suppliers will avoid activities that could lead to a conflict of interest with Valamar or give them an unfair advantage over other suppliers or competitors, and will inform Valamar in a timely manner of any financial interests, and family or personal relationships that could affect the suppliers' procurement of products and services for Valamar.

Suppliers shall take all available, legally required measures to prevent money laundering, in accordance with their capabilities.

2.6.2. Protection of personal data and confidential information

Valamar's suppliers are obliged to keep personal data confidential and handle it with due care, in accordance with all applicable regulations.

Suppliers undertake to maintain the confidentiality of all confidential information they come across in the course of their business relations with Valamar and to ensure that such information remains confidential internally.

Suppliers shall implement internal security measures and technical and organisational measures to protect personal data and other confidential information from any breach, unauthorised access, disclosure or destruction, and regularly train their employees on the importance of data protection and confidentiality, and to notify Valamar immediately of any violation of confidentiality or misuse of confidential information.

3. COMPLIANCE CHECK

Valamar encourages its suppliers to adhere to these high standards of business conduct and to ensure that their suppliers and subcontractors do the same, in order to maintain a positive and ethical business relationship with Valamar. As part of its commitment to creating a better future for all, Valamar will give preference to suppliers who demonstrate a responsible approach to the environment and society as a whole.

Valamar encourages its suppliers to apply the principles of this Code to their sub-suppliers, contractors and/or subcontractors.

Suppliers undertake to make available to Valamar, upon its request, all documentation regulating and verifying compliance with all business standards covered by the Code.

If Valamar, or an independent third party engaged by Valamar, discovers a violation of any of the provisions of this Code, Valamar may suspend the order of contracted goods and/or services and terminate the contract with the supplier in question, with immediate effect. If Valamar should sustain any damage because of such termination, the relevant supplier shall compensate Valamar in accordance with the applicable regulations.

4. REPORT OF ILLEGAL ACTIONS

At Valamar, we take seriously cases of exploitation and abuse of children, exploitation of workers and their work, and human trafficking, so we regularly educate our staff on how to recognize and report child exploitation and abuse, signs of worker exploitation and abuse, and human trafficking. Valamar, in case it suspects illegal activity on the part of the supplier, and especially in case it suspects violation of the rights of children and workers, abuse of children and workers or human trafficking, will report such suspicion to the competent authorities, inform suppliers about such action without delay, and terminate cooperation with the supplier that violate the rules of this Code.

5. FINAL PROVISIONS

This Code is an integral part of each supplier contract.

Suppliers shall immediately report to Valamar any violations of the Code or laws within their organisation and take appropriate measures to remedy such violations whenever possible.

Reports shall be sent to the following address:

odrzivi.razvoj@valamar.com

Date of adoption/enactment:
June 11th, 2024.