Code of Ethics

01/04/2025

Foreword

The Code of Ethics requires all employees, including management, associates, suppliers, and business partners of SPORTISIMO and the Sportisimo Group* (hereinafter referred to as "Sportisimo"), to adhere to standards of conduct and uphold the following values and principles. These shared values are fundamental to our daily practices and the continued growth and perception of our company.

The Sportisimo Code of Ethics provides guidance on ethical principles and decision-making, rather than outlining every potential situation.

"Dear colleagues,

I'm proud to introduce our new Code of Ethics, which embodies the key principles and values that form the foundation of our work, cooperation, and external relationships. Our company has consistently pursued success alongside fostering positive outcomes for everyone we engage with — including employees, customers, partners, and the greater community.

This Code guides us in acting according to our values, respecting one another, and adhering to the principles of accountability. This document is here to guide us in our daily choices, ensuring that our community stays a place where trust, honesty, and justice are lived values, not just empty words.

I'm certain that by embracing this code, we will not only reach remarkable outcomes but also build a culture that we can all be proud of. I urge all of you to read this document closely, reflect on its significance, and incorporate its values into your daily work.

Thank you for your hard work and for contributing to a company that values doing the right thing, no matter how big or small the decision.

František Gregor, CEO

It is mandatory for all Sportisimo employees to familiarize themselves with the Code of Ethics and certify in writing their commitment to its principles.

Sportisimo actively monitors adherence to the Code of Ethics and the values outlined within it.

the Sportisimo group includes SPORTISIMO s.r.o., SPORTISIMO SK s. r. o., ID: 44156979; SPORTISIMO RO SRL, ID: 34185884; Sportisimo retail Kft., ID: 01-09-327987; SPORTISIMO BG EOOD, UIC/PIC 205834370; KLIMATEX a.s., ID: 27734528; PICCOLLO SPORT s.r.o., ID:06706649

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1 Sportisimo's Values

At Sportisimo we share these values:

Fair play
We commit to fairness, honesty, and adherence to the rules, while maintaining openness and integrity in our actions.

Respect
We respect others and value diversity

Effectiveness
We focus on optimizing efficiency and economy to deliver the best results.

Customer
Everything we do is driven by a focus on the customer, both outside and within our organization.

Accountability
Our actions reflect a deep responsibility toward each other and the environment we share.

Trust
We provide people with the space and support they need to grow and develop their talents.

2 Approach (not only) towards employees

Approach towards employees

Our employees are a priority, and we strive to be one of the leading employers in the industry.

We build a welcoming environment where honesty is valued, and everyone has the opportunity to be heard. A space where we speak honestly to one another, but with mutual respect. We focus on enhancing the expertise and skills of our employees.

We are committed to providing equal working conditions and remuneration for all employees at Sportisimo.

Customer approach

We prioritize our customers at Sportisimo, aiming to meet their needs and desires, and encouraging them to embrace an active lifestyle. Employees are expected to always engage with customers in a courteous and professional manner. We focus on building lasting relationships with our customers, so they'll always want to come back. We are committed to always being honest and open in our actions. We ensure that customers get the goods they need, along with helpful advice and valuable information.

Approach to suppliers and business partners

We require that our suppliers and business partners adhere to the same ethical and moral values as Sportisimo, ensuring their operations and stores comply with all applicable laws and regulations. We maintain this Code of Ethics in our relationships with business partners and suppliers, both during and after the partnership.

Approach to public authorities

Our focus is on developing lasting partnerships with government entities to work together for better living conditions. We maintain open communication and always cooperate with public authorities. Following applicable legislation is a given for us.

3 Ethical behaviour

We are committed to a workplace free of discrimination, ensuring equal treatment for all employees regardless of race, sex, sexual orientation, religion, political views, nationality, age, health status, or family responsibilities, in line with applicable European regulations. At Sportisimo, we strictly prohibit inappropriate behaviour — including bullying, harassment, offensive remarks, undue pressure on employees or colleagues, and unprofessional associations. Such conduct will not be tolerated. We are committed to protecting our employees from all forms of inappropriate behaviour. Employees are encouraged to raise concerns about inappropriate behaviour during regular meetings with their supervisor.
Sportisimo promotes a culture of decency and mutual respect. All conduct within the workplace must adhere to internal rules and regulations.

Conflict of interest
Conflict of interest arises when an employee's or third party's interests are at odds with the legitimate interests of Sportisimo. Employees must always act in a way that avoids conflicts of interest, keeping their professional and personal lives separate while maintaining independence.
Employees are expected to behave objectively and make decisions without the influence of external parties during business negotiations. Specifically, employees must refrain from participating in transactions where they have personal interests or connections with third parties. Conflicts of interest are most likely to arise in situations such as giving or receiving gifts, sponsorship contributions, or having close ties with the counter party.
Should there be any uncertainty about a conflict of interest, the employee is required to contact their direct supervisor or compliance representative. Employees experiencing a conflict of interest may not engage in negotiations or other activities with the relevant counterpart. Breach of these principles may endanger the good name of Sportisimo. Such behaviour will be regarded as contrary to the legitimate interests of Sportisimo and a breach of employment duties, with all resulting consequences.

Anti-corruption principles
We take steps to prevent and avoid any situations that might suggest corruption or other forms of unlawful behaviour. We uphold high moral standards and strongly condemn bribery and corruption. Our Anti-Corruption Policy at Sportisimo applies to employees, and we expect it to be followed by our suppliers and business partners as well.

Receiving and giving gifts
Sportisimo prohibits the acceptance or offering of any gifts, whether financial or non-financial, that could affect business decisions. Gifts are given without expecting any form of compensation or counter-service, consistent with their ethical value. Those receiving gifts should not put themselves in a position of expecting obligatory counter service.
The intent behind a gift or business event should be to establish or sustain professional ties or to convey gratitude in the context of cooperation. Any donations or actions taken must be of reasonable value, as specified in the rules of this Code of Ethics.

Details regarding the acceptance and provision of gifts are provided in the Anti-Corruption Policy, which is followed by both employees and, we expect, our cooperating suppliers and business partners.

Competition rules

SPORTISIMO follows the applicable laws and regulations related to competition. We have a zero-tolerance policy for inappropriate conduct, such as coordinating with competitors to establish terms or prices.

We engage with competing companies in a professional manner. When negotiating with competitors, we ensure that no discussions take place that could jeopardize the reputation or integrity of Sportisimo.

4 Protection of information and security

Protecting know-how and maintaining confidentiality

Sportisimo highly values its know-how and expertise in private label products. Employees are required to uphold confidentiality concerning employment matters and all non-public information encountered in the course of their work.

The release of trade secrets to third parties or their unauthorized disclosure could have serious consequences for Sportisimo.

Revealing trade secrets to third parties or disclosing them without authorization may result in significant damage to Sportisimo.

Health and safety

Each employee will undergo training on occupational safety, health, and fire safety regulations as part of their onboarding process. We continuously offer training tailored to the employee's role and needs, ensuring compliance with legislation and internal policies. Employees use appropriate protective equipment while performing their duties.

The use of addictive or psychotropic substances and the consumption of alcohol are prohibited at the workplace and during working hours. Employees must also avoid such actions outside the workplace if they pose a risk to safety, health, Sportisimo's reputation, or financial stability.

Employees are required to contact their direct supervisor if they identify any workplace deficiencies that could lead to a safety hazard.

Personal data

We handle the personal data of employees and customers—collecting, processing, using, and storing it—strictly as needed and in line with legal requirements. We implement appropriate measures to protect personal data from misuse or leaks. Personal data is stored for the required duration, according to its nature and the legal purpose of its use.

Employees should reach out to the compliance representative if they have any questions about using personal data in accordance with legal requirements.

Company property

Employees are provided with the necessary tools and technical equipment for their job duties. They are expected to use, manage, and safeguard the entrusted property,

protecting it from damage, loss, destruction, or misuse. All employees are responsible for helping to protect Sportisimo's assets, including tangible property (equipment and goods), financial resources, intellectual property, trade secrets, and confidential information.

5 Communication

We have established clear and transparent communication channels at Sportisimo, both within the company and with external parties. We pledge not to deliver false or misleading information.

Communication with the public and media
Only authorized individuals from Sportisimo's management or communications department are permitted to provide information to the public and media on behalf of Sportisimo. We provide the media with accurate, relevant information and consistently communicate in a truthful manner.

Behaviour on social networks
Sportisimo operates accounts on various social networks, with management entrusted only to selected members of the management or communications department.
Employees ensure their personal social media posts do not harm or insult Sportisimo, its business partners, suppliers, or customers.

Behaviour at social events
Employees must inform their supervisor if they are attending an event hosted by business partners or suppliers as an official representative of Sportisimo.
At events, employees maintain a representative demeanour, understanding that they are representing Sportisimo. Refrain from making inappropriate or disparaging comments about Sportisimo or its business partners or suppliers. At events, employees are expected to keep internal matters and plans that could harm Sportisimo confidential.
Events provide an opportunity to represent Sportisimo and foster or promote strong business relationships. Participation does not imply an obligation for further cooperation or activities that have not been formally approved by Sportisimo.

Whistleblowing
Employees, suppliers, or business partners who suspect violations or conduct contrary to the Code of Ethics or legal, ethical, or moral regulations can submit an inquiry to: compliance@sportisimo.com, or in writing to: Sportisimo s.r.o., Compliance, Řevnická 170/4, 155 21 Praha 5 – Třebonice.
The anonymity and confidentiality of the notifier are ensured in all such matters. All submissions will be thoroughly investigated and addressed without unnecessary delay. Upon detecting errors or deficiencies, appropriate measures will be implemented to correct them. Should the investigation determine that an offence has been committed, appropriate sanctions will be enforced, including notifying the relevant authorities.

Sportisimo is recognized as a liable entity under Act No. 2019/1937, which governs the protection of whistleblowers. Persons who perform work or other similar activities for Sportisimo as specified inSection 2 (3) (a, b), h) or i) of the Whistleblower Protection Act, i.e.

in particular employees, traineeships, can make notifications within the scope of the Whistleblower Protection Act via the internal Sportisimo notification system (the Don't Let It Be app: www.nntb.cz (access code: simo6378) or through the Ministry of Justice.

6 Social responsibility

Environmental protection
The environment and its accessibility are important to us Our goal is to foster a better everyday life for both ourselves and future generations. Our goal is to minimize the environmental impact of our operations.

Charitable activities
We support projects in chosen areas, working to improve conditions for a better life. In doing so, we foster a positive social perception of Sportisimo.

Equality of access and remuneration
We are committed to equitable wages and remuneration for all employees, irrespective of age, gender, and other factors.
We expect the same approach from our suppliers and business partners.

The employee's working hours are specified in the employment contract. At Sportisimo, employees are given working hours that include breaks for meals and rest, along with sufficient vacation time for relaxation.
We are committed to not supporting child labour, the hiring of individuals under 15 years old, or any form of forced labour. We reject any restrictions on employees' freedom of movement, the withholding of documents, or similar practices. Sportisimo requires this standard from all suppliers and business partners.

Employees ensure they represent Sportisimo well with both their attire and behaviour. Employees' dress and attire during working hours should not reflect political, religious, or personal beliefs.

7 Conclusion

Not complying with the principles in the Code of Ethics constitutes a violation of the employee's duties. If there is any confusion or doubt, the employee may contact their direct supervisor or the Compliance department.
Violating the policies and principles of the Code of Ethics by an employee, associate, supplier, or business partner harms Sportisimo and will result in consequences according to the seriousness of the violation.