

Business Partners Code of Conduct

1 INTRODUCTION

- 1.1 Aim of Accolade is to conduct its business in compliance with all applicable laws and regulations, meeting the highest ethical standards and rules of fair competition. In order to fulfil these main principles, we ask our business partners to adhere to these rules we deem fundamental. This Code of Conduct is not exhaustive and provides only general overview. Violation of this Code of Conduct is considered a violation of mutual business relationship.

2 PROTECTION OF ENVIRONMENT

- 2.1 Accolade does its best to minimize negative impact of its business to the environment. Our business partners should comply with all environmental regulations and take measures to mitigate their environmental impact by promoting recycling, use of sustainable materials and waste and pollution prevention and reduction, limit the use of hazardous substances and operate resource-efficiently with the goal of protecting natural resources, particularly non-renewable ones. We also expect our business partners to prioritize actions that reduce energy and water consumption, and to strive to preserve biodiversity.

3 COMPLIANCE WITH LAWS

- 3.1 During the entire course of business, we expect our business partners to respect all applicable laws and regulations in jurisdictions where they operate. Our business partners are obliged to notify us if their undertakings with Accolade would violate applicable laws and regulations. All business record and financial books should be kept and disclosed in registers with all regulatory requirements.

4 BEING A FAIR COMPETITOR

- 4.1 We expect our business partners to compete fairly with respect to all applicable anti-trust and competition rules. Our business partners should not violate good morals of the competition and abstain from misleading and unfair practices. Our business partners should not abuse their position on the market.

5 ANTI-BRIBERY AND CORRUPTION

- 5.1 Accolade opposes any form of bribery and corruption. Our business partners are strictly prohibited to offer, promise, provide, directly or indirectly anything to gain any personal or business advantage through improper or illegal means. We expect our business partners to respect our gifts policy, and we will ensure that Accolade's employees will respect the gifts policy of our business partners.
- 5.2 Business partners shall get familiar with the **Anti-Bribery and Anti-Corruption Policy** of Accolade.

6 DATA AND INFORMATION PROTECTION

- 6.1 Our business partners are obliged to comply with all data protection laws and regulations when processing personal data of Accolade's employees and other related persons. All personal data should be processed only for necessary purposes. Accolade shall be immediately notified of any data breach related to information it gives to the business partners. Our business partners are obliged to protect all trade secrets of Accolade.

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7 SANCTIONS AND ANTI-MONEY LAUNDERING

7.1 Our business partners are obliged to notify us on all governmental sanctions and embargoes applicable in any jurisdiction. They are also prohibited from conducting any money laundering, and for its prevention they should inform us whether they or their beneficial owners are involved in any criminal activity.

8 RESPONSIBLE EMPLOYER

8.1 Our business partners should be responsible employers and ensure that:

- (a) Any form of discrimination among their employees is prohibited;
- (b) All measures are taken to prevent harassment and bullying in their workplace;
- (c) All applicable labour laws and regulations and basic principles set out by the International Labour Organization are respected. Business partners respect the rules for fundamental labour conditions such as working hours, breaks, holidays, maternity leave and parental leave;
- (d) All applicable health and safety regulations are complied with and all incidents on the workplace are properly investigated;
- (e) No form of retaliation is taken against employees who speak up about issues of the business partners;
- (f) The business partners respect all union rights.

8.2 Business partners shall get familiar with the **Anti-Discrimination and Anti-Slavery Policy** of Accolade, which focuses mainly on measures taken against discrimination, modern slavery and providing equal opportunities.

9 RESPECT FOR HUMAN RIGHTS

9.1 Business partners are obliged to respect human rights of their employees and are prohibited from using any form of forced labour, human trafficking, slavery or child labour. Business partners will prevent cooperation with any business partner using these practices.

10 PREVENTING CONFLICT OF INTEREST

10.1 Business partners are obliged to prevent any conflict of interest with Accolade's employees that might interfere with their decision-making process for the best interests of Accolade. An example would be a financial interest or close personal relationship of an Accolade's employee and the business partner. All such conflicts of interests have to be disclosed to Accolade.

11 VIOLATION OF THIS POLICY

11.1 We expect our business partners to be transparent about any areas where they may fall short, so that we can work together to implement immediate corrective measures.

11.2 In the event of a significant violation of this policy, the business partner will implement a corrective action plan agreed upon with Accolade.

11.3 Business partners and their employees are encouraged to report any suspected violation of this policy using the procedures set out in the **Whistleblowing Policy** of Accolade. All complaints

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will be treated with sensitivity, discretion, and confidentiality.

- 11.4 Business Partners shall also require their next tier business partners and employees to acknowledge and implement the requirements stated under this policy and inform them about the possibilities to report a violation of this policy, especially the procedures set out in the Whistleblowing Policy of Accolade.

12 FINAL PROVISIONS

- 12.1 Accolade reserves the right to require their business partners to submit the questionnaire included as **Annex 1** of this policy at the commencement of cooperation.
- 12.2 The COO and the Group Legal Counsel of Accolade shall ensure that regularly, not less than every two years, this policy is revisited and reevaluated in light of development of the Accolade's business and applicable laws.
- 12.3 This Policy was reviewed by the COO and the Group Legal Counsel of Accolade and approved by the Board of Directors of Accolade Holding, a.s. as the parent company of Accolade on 30 June 2025.

Business Partners Code of Conduct**Annex 1****Code of Conduct Questionnaire****COMPANY DETAILS**

Company name:

Address:

CEO / MD:

Managing Director:

Type of Business:

E-mail/Website:

KEY EMPLOYEE STATISTICS

Number of employees:

Minimum age requirement:

Average age:

Gender balance (Male/Female):

Average weekly working hours per employee:

ENVIRONMENT

Are employees educated on environmental or sustainability issues that are related to the business? Does the company promote a sustainable approach to conducting business? Does the company have dedicated personnel?

If so, please give details.

Are the significant environmental impacts of the business measured and controlled and are environmental impact assessments carried out where necessary? e.g. water use intensity, energy use intensity, CO2 emissions.

If so, please give details.

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Has the company had any significant environmental incidents in the past 5 years?

If so, please give details.

HEALTH AND SAFETY, HUMAN RIGHTS & LABOUR RIGHTS

Does the company provide a safe and healthy work environment?

If so, please give details.

Has the company had any legal actions or convictions for breaches of basic labor rights in the past 5 years?

If so, please give details.

Does the company provide a safe and healthy work environment?

If so, please give details.

Has the company had any fatalities in the last 5 years?

If so, please give details.

Has the company had any legal actions or convictions for breaches of health and safety legislation in the past 5 years?

If so, please give details.

TAXATION, ANTI-BRIBERY & CORRUPTION

Does the company have a code of business conduct setting out adequate standards and processes in relation to anti-bribery, antitrust & corruption?

If so, please give details.

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Has the company ever been sanctioned for any bribery, antitrust or corruption offence?

If so, please give details.

Has the company ever been sanctioned for any Tax evasion?

If so, please give details.

FAIR COMPETITION & CONSUMER RIGHTS

Has the company had any legal actions or convictions for violations of fair competition rules?

If so, please give details.

Has the company had any legal actions or convictions for violations of fair competition rules?

If so, please give details.

Has the company had any legal actions or convictions for failure to protect consumer data?

If so, please give details.

We hereby confirm that we have read and understood the Business Partners Code of Conduct of Accolade, and that we have filled this questionnaire truthfully.

Date:

Location:

Name:

Title: