

## POL-MET Sp. z o.o. – Business Ethics Policy

### 1. Purpose of the Document

This Business Ethics Policy defines the principles of conducting business activities by POLMET Sp. z o.o. (hereinafter the "Company") in a responsible and lawful manner. The document has been approved by the Management Board of the Company and constitutes a commitment to comply with applicable Polish law and international ethical standards throughout the entire value chain.

The Policy is based, among others, on the Universal Declaration of Human Rights, ILO conventions, OECD guidelines, the UNCAC convention, and the Global Automotive Sustainability Guiding Principles (ASGP), which in the "Business Ethics" section require suppliers to implement an ethics management system covering anti-corruption, data protection, information disclosure, avoidance of conflicts of interest, counterfeiting prevention, and respect for intellectual property rights.

### 2. Scope of Application

The Policy applies to all employees, members of the Management Board, associates, suppliers, and business partners. The Company requires its contractors to apply ethical standards at least equivalent to this Policy and reserves the right to audit their compliance.

### 3. Core Ethical Principles

#### 3.1 Anti-Corruption and Anti-Bribery

- **Definition of corruption** – Anti-corruption organizations define corruption as "the abuse of entrusted power for private gain." The UN Global Compact adds that corruption can take many forms – from minor influence-peddling to institutionalized bribery – and includes not only financial but also non-financial benefits. Examples include bribes, gifts, "facilitation payments," nepotism, indirect benefits, or using a position to secure employment for family members.
- **Zero-tolerance principle** – The Company does not accept any form of corruption, bribery, or extortion. Every employee and partner is obliged to refuse to accept or provide personal benefits in connection with business activities, including the prohibition of financing political parties for the purpose of gaining influence.
- **Gifts and hospitality management** – Only minor gifts and occasional hospitality of small value, which do not affect decision-making impartiality, are permissible. Doubtful cases must be reported to a supervisor.
- **Avoiding conflicts of interest** – Employees must disclose any circumstances that may affect impartiality (e.g., family relationships, shares in contractors' companies). The Company maintains a conflict-of-interest register and implements preventive measures.
- **Record-keeping and reporting** – The Company maintains accurate accounting records reflecting all transactions in a manner that allows for control. Forging documents or failing to record payments is strictly prohibited.

#### 3.2 Data Protection and Security

- **Definition of personal data** – Under EU law, personal data means any information relating to an identified or identifiable natural person.
- **Data privacy** – Data privacy ensures proper use of personal data by granting individuals control over how their data is collected, used, and shared. This includes the right to consent to data processing, to object to direct marketing, and to request data erasure in accordance with Article 21 of the GDPR.

- **Processing principles** – The Company processes data in accordance with the GDPR and the Polish Data Protection Act. We collect only data necessary for business purposes and store it no longer than required by law. Processing is based on consent, contract, or another legally justified basis.
- **Data outsourcing and sharing** – Entities processing data on behalf of the Company are obliged to conclude data processing agreements and comply with GDPR requirements. Data is not shared with third parties without a justified legal basis.

### **3.3 Integrity in Business Operations**

The Company complies with all applicable laws, including the Act on Combating Unfair Competition, anti-money laundering regulations, and tax regulations.

### **3.4 Product Responsibility and Intellectual Property**

- **Intellectual property** – We respect intellectual property rights and commit to using licensed software and technologies. We do not disclose confidential information without the owner's consent.
- **Secure supply chains** – We require suppliers to implement systems enabling traceability and verification of products as well as to report incidents of intellectual property violations.

### **3.5 Fair Relations with Stakeholders**

- **Business partners and suppliers** – We select partners based on objective criteria of quality, price, and ethical compliance. We require them to implement anti-corruption procedures and respect human rights. Contracts include ethics clauses and allow audits.
- **Employees** – We build a culture of openness, respect, and diversity. Discrimination based on gender, age, origin, religion, or any other criterion is prohibited. Salaries are paid reliably, and working conditions comply with the law.
- **Relations with clients** – We operate based on truthful product information. We do not mislead customers and protect their personal data. Customer complaints are recorded and analyzed for continuous improvement.

### **3.6 Whistleblowing Mechanism**

- **Confidential reporting channels** – The Company maintains an independent channel for reporting misconduct. Reports may be anonymous. Each report is investigated without undue delay.
- **No retaliation rule** – Whistleblowers are protected against retaliatory actions.
- **Investigation procedures** – In case of a violation, the Company implements corrective measures and reports the matter to competent authorities if required by law.

## **4. Implementation and Accountability**

- **Management Board** – Responsible for approving, implementing, and periodically reviewing the Policy. Provides appropriate resources and aligns organizational structures for compliance functions.
- **Managers** – Required to promote an ethical culture, monitor compliance within their teams, and conduct training.
- **Employees** – Every employee must comply with the Policy, report violations, and participate in training.
- **Suppliers and partners** – Must sign a commitment to comply with the Company's ethical standards and allow audits.

#### 4.4 Sanctions for Violations

Violations of ethical principles may result in disciplinary liability, including dismissal, termination of cooperation with a supplier, and, in extreme cases, reporting the matter to law enforcement authorities. The scope of sanctions is adjusted to the seriousness of the violation and applicable law.

#### 5. Final Provisions

This Policy is effective as of the date of its approval by the Management Board and will be subject to regular reviews – at least once a year – or more frequently in the event of legal changes or significant developments.

Prezes Zarządu  
Piotr Polkowski

A handwritten signature in blue ink, appearing to be 'P. Polkowski', written over the printed name.

**POL-MET Sp. z o.o.**

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