

# Code of Conduct of Pol-Met Sp. z o.o. for Business Partners

## Preamble

This Code of Conduct defines a set of rules and proper practices binding within our organization – both for employees and for business partners and subcontractors. The purpose of this document is to facilitate ethical decision-making in daily operations by fostering a culture based on integrity, respect, and responsibility. The Code is universal and covers social, ethical, and environmental aspects of doing business. The principles it contains are based on widely recognized standards such as the Universal Declaration of Human Rights and the Ten Principles of the UN Global Compact, as well as good practices derived from the codes of leading companies. Compliance with these standards of conduct is regarded as the key to the long-term success of the organization, increasing stakeholder trust and minimizing ethical and legal risks.

The Code is divided into several thematic sections. Each section contains key principles, supported by practical guidelines that enable their application in everyday work.

## 1. Ethics and Integrity

Our organization attaches the highest importance to business ethics and integrity. We expect all persons acting on behalf of the company to comply with the law, internal regulations, and the principles of fair play. The foundation is reliability – keeping promises, transparency of actions, and avoiding any form of fraud or abuse. Below we outline the key aspects of ethics and integrity that all employees and partners of the organization are obliged to observe:

- **Compliance with laws and regulations:** We strictly require all activities to comply with the law and applicable internal policies. Each employee, associate, or subcontractor is obliged to act legally and in accordance with established procedures – e.g., respecting data protection laws, labor law, occupational health and safety, antitrust regulations, etc.
- **Integrity in business operations:** We expect fair, responsible, and just conduct from all company representatives and contractors. This means, among others, conducting business transparently, truthfulness in internal and external communication, and reliable settlements with clients, suppliers, and partners. We keep financial records and reporting accurately and truthfully. In practice – we honor concluded contracts and commitments, do not mislead stakeholders, and build a culture of trust.
- **Combating corruption and abuse:** The company maintains zero tolerance for corruption. It is strictly prohibited to give, offer, solicit, or accept any undue material or personal benefits in connection with one's role. This applies both to employees (e.g., not accepting bribes, expensive gifts from suppliers) and to business partners (e.g., not offering our employees unethical gratifications in order to obtain favoritism).

- **Avoiding conflicts of interest:** Our employees and representatives must act loyally toward the company, avoiding situations where their private interests conflict with the interests of the organization. A conflict of interest may occur, for example, when an employee or their close relative benefits from a transaction with our contractor or competitor. In practice, we expect disclosure of potential conflicts and the adoption of preventive measures. Business decisions (e.g., supplier selection) should be made objectively, solely based on substantive criteria – it is unacceptable to act on personal ties or private gain. If such a situation arises, the employee must inform their supervisor or the person responsible for ethics (e.g., the compliance officer).
- **Confidentiality and data protection:** Integrity also includes respect for trade secrets, confidential information, and privacy. Any non-public information regarding our company, contractors, or employees (e.g., financial data, strategies, personal data) must be protected against unauthorized disclosure. Employees may not use confidential information for private purposes or share it with third parties. Business partners are obliged to sign appropriate confidentiality agreements and also comply with data protection regulations. For example, no internal documentation should be made available externally without proper authorization – even unintentional negligence in this respect may lead to serious harm (data leaks, loss of trust).

## 2. Equal Treatment and Anti-Discrimination

**Respect for people** is one of the pillars of our organizational culture. We are committed to providing a work environment free from discrimination, harassment, or bullying, where everyone feels safe and has equal opportunities for development. The principle of equal treatment applies both to our employees and to collaborators, contractors, and all persons with whom we maintain professional relations. In practice this means:

- **Zero-discrimination policy:** Without exception, we prohibit any form of discrimination based on gender, age, race, skin color, ethnic or national origin, religion or lack thereof, disability, sexual orientation, gender identity, political beliefs, marital status, or any other legally protected characteristic. Every member of the organization has the right to equal treatment in terms of employment, remuneration, training, and promotion. We do not tolerate situations where one person is treated worse than another in comparable circumstances due to prejudice or stereotypes.
- **Diversity and inclusive culture:** We strive to build an open and inclusive work environment where we value diverse experiences and perspectives. Competence and commitment are what matter – we provide everyone with fair and objective performance evaluations and equal access to development opportunities. We promote an atmosphere in which everyone feels part of the team, regardless of origin or position.
- **Prevention of harassment and bullying:** We categorically prohibit any forms of physical, psychological, or other harassment in the workplace. This also includes sexual harassment (unwanted gestures, comments, sexually suggestive proposals) and bullying (persistent humiliation or intimidation of an employee). Everyone has the right to dignity and respect. We expect managers to remain vigilant and respond to any signs of unacceptable behavior. We do not accept passivity – if you witness discrimination or harassment of a colleague, you are obliged to report it. Our organization guarantees that such reports will be treated confidentially and safely for the whistleblower. Example: The Code of one Polish company explicitly states: “We do not tolerate harassment, bullying, insults, intimidation, or any manifestations of inhumane treatment of employees” – likewise, in our company every case of violation of personal dignity will be promptly investigated and consequences imposed on the perpetrator.
- **Equal opportunities for development:** We ensure that policies regarding promotions, training, and remuneration are transparent and based on clear, substantive criteria accessible to all. All employees have access to development programs and can count on a fair career path dependent on performance. Similarly, we set remuneration according to position, competence, and results – without any pay discrimination. As for contractors and partners, we expect them to respect these same standards within their own organizations (e.g., not discriminating against their own employees).

or subcontractors). We promote partnership relations based on equality – every contractor is to be treated fairly and with respect, regardless of size or country of origin.

### 3. Social Responsibility

As a company, we understand our **social impact** and commit to acting responsibly towards employees, their families, and the communities in which we operate. Social responsibility includes compliance with fundamental human and labor rights. Our key principles are:

- **Respect for human rights:** Our organization respects fundamental human rights in all activities, as derived, among others, from the UN Universal Declaration of Human Rights. This applies both to our employees and to persons employed by business partners or within the supply chain.
- **Labor standards and working conditions:** We provide decent working conditions to all employees and expect the same from our suppliers and contractors. Business partners must guarantee their employees conditions in line with labor law and occupational health and safety standards.

### 4. Environmental Responsibility

Aware of climate and ecological challenges, we commit to conducting our activities in an environmentally responsible manner. Environmental responsibility means not only complying with all legal norms in the field of environmental protection, but also taking proactive actions that go beyond the minimum requirements – in order to minimize the negative impact of our operations on the planet. The main assumptions of our environmental approach are:

- **Compliance with environmental laws and standards:** We comply with all applicable legal requirements concerning environmental protection (emissions, waste management, use of resources, etc.) and verify their observance both internally and among our subcontractors.
- **Minimizing negative impact:** We implement measures aimed at preventing pollution and reducing environmental impact throughout the entire cycle of our operations. We strive to reduce air pollutant emissions (e.g., by modernizing our vehicle fleet to less polluting ones), to limit wastewater and waste produced by our facilities, and to properly dispose of hazardous waste. We seek to monitor and control the consumption of natural resources (water, energy, raw materials).
- **Development of environmentally friendly technologies:** We encourage the development and implementation of eco-friendly technologies. In our investments, we prefer solutions that reduce the carbon footprint (e.g., installing photovoltaic panels on building roofs, investing in more energy-efficient machines).
- **Waste and chemical management:** We have introduced strict rules for selective waste collection in offices and facilities. Hazardous waste (electronics, chemicals) is handed over to specialized companies for disposal in accordance with the law.
- **Incorporating environmental aspects into business decisions:** Every new project, product, or investment is assessed in terms of environmental impact. We strive to consider environmental issues at every stage – from planning, through production/service, to the end of the product life cycle.
- **Cooperation and environmental transparency:** We are open to dialogue with stakeholders (regulatory authorities, local communities, environmental organizations) on environmental protection issues. We cooperate with other industry entities and government agencies to jointly face climate challenges.



## 5. Relations with Partners and Subcontractors

Our organization builds business relationships based on trust, professionalism, and shared values. We expect our business partners, suppliers, and subcontractors to operate reliably and ethically, in accordance with principles similar to those contained in our Code. We believe that working together for these values is the foundation of lasting cooperation.

- **Obligation of compliance with the Code by partners:** Business partners are contractually obliged to comply with the principles set out in this Code (or to have equivalent ethical rules of their own). We expect our suppliers, contractors, agents, and other cooperating entities to actively implement the following standards within their organizations and to promote them among their employees and further subcontractors.
- **Integrity and transparency in relations:** We base relations with partners on fair competition and transparency. We avoid favoritism or unfair competition among suppliers. Tenders and negotiations are conducted according to clear rules, giving equal access to information to all participants. We do not allow bid rigging, price fixing, or other cartel practices – and we expect partners to refrain from such actions as well. Confidential information (e.g., commercial offers) is treated with due secrecy, and we require the same from the other party.
- **Mutual respect and rights in the supply chain:** We treat our partners fairly and expect reciprocity. We ensure timely settlement of our financial obligations towards suppliers and require timely performance of obligations towards us. We do not abuse our market position in relation to smaller suppliers (e.g., by imposing unfair conditions on them). In return, we expect our partners to respect the rights of their employees and local communities, as described in the sections above.
- **Avoiding conflicts of interest in external relations:** When managing relationships with partners, we also observe the principle of avoiding conflicts of interest. Our employees responsible for selecting or supervising a given contractor must remain impartial – e.g., they may not derive private benefits from that contractor.

## 6. Compliance

Business partners **are obliged** to comply with the principles set out in this Code of Conduct of our organization for business partners. At the request of Pol-Met, business partners should present evidence demonstrating compliance with the Pol-Met Code of Conduct for Business Partners, in an open and transparent manner. Such requests should **not be refused without justified reasons**.

Business partners must carefully select suppliers whose services they use in connection with carrying out business activities for Pol-Met, and in addition must inform them about the principles set out in this Code of Conduct of our organization for business partners or about equivalent principles, and must also be able to demonstrate compliance with those principles by such entities if requested to do so.

## 7. Where to Find Further Information

In case of questions or doubts regarding the Code, please contact the Pol-Met Sp. z o.o. team at: [biuro@pol-met.com](mailto:biuro@pol-met.com)

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