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1 Introduction

The Company Principles of Ethical Conduct of Italmetal Sp. z o. o. describe the main ways of conducting all interested parties of Italmetal Sp. z o. o. in such a way as to be fully compliant with the Labor Code, applicable legal regulations, specific requirements and codes of conduct of customers and suppliers, as well as accepted ethical standards and coexistence in accordance with society.

This Policy puts these practices into a formal framework and emphasizes that, given cultural differences and legal requirements, we expect all stakeholders to act in a manner consistent with high ethical standards in the execution of processes and in the provision of services to us. In the event of a conflict between applicable law and these Rules, or in the absence of applicable local laws, a more stringent requirement shall apply, provided that it does not violate applicable local laws.

The Management Board of Italmetal attaches great importance to cooperation with reputable partners whose ethical standards and business practices are consistent with those in force at Italmetal.

2 General

The ethical beliefs of Italmetal Sp. z o. o. are guidelines for our employees on how to deal with customers, employees, suppliers and local communities. Deeply rooted beliefs in our culture also form the basis of the standards of business conduct that we expect all suppliers to adhere to. Compliance with these standards is mandatory for all organizations with which we conclude a purchase contract; this also applies to subcontractors.

Italmetal Sp. z o. o. obliges all its employees, including temporary workers, migrant workers, students and contractors, directly and indirectly employed workers who work in the factory/production/warehouse and any other type of worker/worker, to comply with these guidelines.

Employees are obliged to participate in training in the Principles of Ethical Conduct and take part in periodic audits verifying compliance with these Principles of Ethical Conduct.

Italmetal Sp. z o. o. as part of the Integrated Management System (IMS) has developed, maintains and makes available to all interested parties the necessary documentation in the form of written procedures, instructions and rules that meet all aspects of the Principles of Ethical Conduct.

The IMS documentation contains a list of applicable rules and regulations in force in the country, including the required risk assessments in the field of work, human rights, environmental protection, hygiene and occupational safety. In addition to the information contained in the IMS documentation or on [the www.Italmetal.com](http://www.Italmetal.com) website, the practice of informing employees on bulletin boards about rules and regulations, including disciplinary measures and practices, is also used.

All documentation is kept in an accurate, transparent and reliable manner. Italmetal Sp. z o. o. conducts activities aimed at complying with all applicable anti-bribery regulations and anti-

corruption laws and performs regular reviews of the effectiveness of the Integrated Management System to take appropriate actions to improve it.

3 Definitions of basic terms

Salaries and employee benefits

odnoszą się do podstawowego lub minimalnego wynagrodzenia lub pensji oraz wszelkich dodatkowych uprawnień płatnych bezpośrednio lub pośrednio przez pracodawcę pracownikowi i wynikających z zatrudnienia pracownika. Przykłady obejmują płatne dni chorobowe, urlop rodzinny i zdrowotny, płatne nadgodziny itp.

Working time

odnosi się do regularnych tygodni pracy, które nie powinny przekraczać 48 godzin lub 60 godzin w sytuacjach nagłych, w tym nadgodziny. Pracownicy powinni mieć co najmniej jeden dzień wolny co siedem dni.

Modern slavery

to wszelka praca lub usługi wymagane od jakiejkolwiek osoby pod groźbą jakiejkolwiek kary i za które osoba ta nie ofiarowała się dobrowolnie. Przykłady obejmują przymusowe nadgodziny, zatrzymywanie dokumentów tożsamości, a także handel ludźmi.

Freedom of association

odnosi się do prawa do wolności pokojowych zgromadzeń i do wolności zrzeszania się na wszystkich poziomach, co oznacza prawo każdego do tworzenia i zrzeszania się w związkach zawodowych. Obejmuje to również rokowania zbiorowe jako proces negocjacji między pracodawcami a grupą pracowników, których celem jest osiągnięcie porozumienia regulującego warunki pracy.

Harassment

jest definiowane jako surowe i niehumanitarne traktowanie (lub groźba takiego traktowania) w tym wszelki przymus seksualny, psychiczny lub fizyczny lub słowne znęcanie się nad pracownikami.

Prohibition of discrimination

to równe traktowanie jednostki lub grupy niezależnie od ich szczególnych cech, w tym płci, rasy, koloru skóry, pochodzenia etnicznego lub społecznego, cech genetycznych, języka, religii lub przekonań, poglądów politycznych lub innych, przynależności do mniejszości narodowej majątku, urodzenia, niepełnosprawności, wieku lub orientacji seksualnej.

4 Responsible people

The Management Board of Italmetal Sp. z o. o. appointed a Plenipotentiary for the Integrated Management System dealing with the maintenance of the required documentation and the implementation of periodic reviews. At the request of the Management Board, Crew Representatives were selected to act as contact persons facilitating the information process and fulfilling the tasks of intermediaries between the Management Board and the crew in matters related to compliance with legal requirements, Ethical Conduct Rules or other contentious matters.

5 Prohibition of interference

The Management Board and management of Italmetal Sp. z o. o. will not disturb employees who wish to contact or talk to The Representatives of the Crew regarding the requirements of the Ethical Conduct Rules, nor will they discourage or punish them for such conversations. Such conversations will not violate the confidentiality of conversations with employees.

6 Ethical issues

Under no circumstances will all Interested Parties offer material benefits, including gifts, meal invitations, transportation fees or money, either within the Plant or in relations with external persons and organizations.

Each employee of Italmetal Sp. z o. o. is obliged to inform his immediate superior, the Management Board or the Management Board of any case, if any other person or representative of the organization asks him to transfer a material benefit to him.

7 Awareness and education of employees

The management and each direct supervisor is obliged to inform their employees about their duties and the company. Italmetal Sp. z o. o. resulting from the Principles of Ethical Conduct. Each employee is trained in the requirements of the following documents:

- Social policy and rules of conduct in the field of working conditions and human rights;
- Principles of Ethical Conduct covering social, ethical and environmental aspects;
- Training documentation for its employees in the Principles of Ethical Conduct;

8 Human rights

Human rights are universally agreed minimum conditions that enable all people to maintain their dignity. Human rights are inherent in all of us, regardless of our nationality, place of residence, gender, national or ethnic origin, color, religion or any other status. In accordance with the UN Guiding Principles on Business and Human Rights, Italmetal Sp. z o. o. respects human rights and is responsible for not harming people.

9 Application of ethical principles

The Principles of Ethical Conduct present the basic values of Italmetal Sp. z o. o., which apply to our entire supply chain - from the purchase of raw materials and components to finished products and services. The Management Board of Italmetal Sp. z o. o. takes appropriate steps to inform all its business partners about the Principles of Ethical Conduct and Social Policy. In the event of becoming aware through external or internal sources of information about the violation of the provisions of the Principles of Ethical Conduct at any point of the supply chain, Italmetal Sp. z o. o. will take appropriate steps to investigate the identified case of violation of its provisions.

10 Business Ethics

The Principles of Ethical Conduct apply to employees, independent contractors, consultants and other persons with whom business has been conducted. The Formal Social Policy and Ethical Conduct Principles for Business Conduct and Compliance helps you conduct your business ethically, honestly and in full compliance with all laws and regulations.

At Italmetal Sp. z o. o., all our activities must unconditionally meet exorbitant ethical standards – we expect the same from suppliers. Our policies prohibit the acceptance of gifts, services, and other valuables that are intended to affect the impartiality of the recipient's judgment, or that

could affect them according to a third party. It is forbidden to give cash, property and provide services in order to obtain an order or provide special treatment. If anyone demands a gift or entertainment from a business partner for their own use, they should be refused. We discourage our employees from purchasing goods and services from suppliers for their own use, even though their costs are covered by the employee.

The Management Board of Italmetal Sp. z o. o. knows that in some cultures gifts and the use of entertainment in connection with running a business is considered an important part of building business relationships. Each gift and invitation to participate in entertainment events should be evaluated in terms of compliance with the Principle of Ethical Conduct, legal regulations and local customs, as well as determine whether their acceptance is in the interest of Italmetal Sp. z o. o.

No list of ethical guidelines can be considered exhaustive. Those who are bound by these rules should not be deceived by the misconception that what is legal is also ethical. Proper conduct is possible thanks to the correct assessment of the situation, honesty and high standards.

11 Laws and regulations

Italmetal Sp. z o. o. conducts its activities in a manner consistent with the laws and regulations in force in the country of business and in accordance with the regulations of these Principles of Ethical Conduct. In particular:

- Comply with all applicable laws and regulations;
- Introduces a mechanism for obtaining up-to-date information on applicable laws and regulations;
- Hold government-required licenses and legal certificates for all zones in the production facility;
- In the event of a conflict between applicable law and this Code, or in the absence of applicable local laws, a more stringent requirement shall apply, provided that it does not violate applicable local laws.

12 Corruption

Bribery, extortion and bribery are prohibited by law. Employees are obliged to act with integrity, honesty and transparency and to comply with all anti-corruption laws. Italmetal Sp. z o. o. is subject to several jurisdictions around the world regarding anti-corruption laws, including but not limited to the US Foreign Anti-Corruption Practices Act ("FCPA") and the UK Anti-Bribery Act, which prohibit the giving of bribes or even the offering of bribes to government officials (including employees of state-owned entities). Please note that the intention to give a gift can be seen as an act of bribery.

Italmetal Sp. z o. o. expects everyone to comply with all applicable laws and regulations applicable to their activities, at all levels of management. The use of corporate funds, property or other resources for any illegal or improper purpose is prohibited. Anti-corruption laws require companies to adhere to recommended accounting and internal control standards. Under such rules, severe penalties are imposed on both companies and individuals for certain types of payments and practices. Employees of Italmetal Sp. z o. o. and our suppliers may not grant, promise or authorize any payment, directly or indirectly, to other persons or organizations if this is inconsistent with anti-corruption principles.

13 Child labour

Italmetal Sp. z o. o. complies with local regulations specifying the minimum age of the employee. The minimum age of a worker shall be determined by the largest of the following values:

- a. 15 years or 14 years of age, if local law permits the employment of persons of that age in accordance with the guidelines of the International Labour Organisation, or
- b. Age of completion of general (compulsory) school education, or
- c. Minimum age specified by the laws in force in the country of employment of the employee.

In addition, Italmetal Sp. z o. o. meets all the requirements of the law regarding the work of eligible juveniles, in particular the provisions regarding working hours, remuneration, working conditions and handling of certain materials.

Italmetal Sp. z o. o. documents, maintains and effectively communicates to staff and other interested parties, written procedures and rules regarding the prevention of child labour and the redress of child labour, and provides adequate financial assistance and other support to such children so that they can attend school and continue their education until they no longer meet the requirements of the definition of a child given above. Italmetal Sp. z o. o.:

- Complies with local laws setting the minimum age of the employee;
- It does not employ in its establishment persons who have not exceeded the minimum age of employment required locally;
- It does not employ in its establishment persons who are of the required local school age;
- When hiring employees requires documents confirming their age;
- It shall keep in its database all records relating to the age of the workers;
- Juvenile workers are not allowed to work in unsafe jobs;
- If required by local laws, juvenile workers must only work the permitted hours;
- Small children are not allowed on the premises; the exception is when the plant is not working and open days (e.g. Family Day) are organized and they are in an area located outside the production or warehouse zone;
- By law, young workers under the age of 18 will not work at night or overtime;
- Young workers protect themselves from working conditions that may be detrimental to their health, safety or development in accordance with ILO Convention No 138 on minimum age and the EU and ILO Charter of Fundamental Rights.

14 Trafficking in human beings and forced labour

Human trafficking, forced labour, debt-related labour and slavery are unacceptable, and Italmetal Sp. z o. o. works to prevent such practices in its operations and supply chain. The Principles of Ethical Conduct prohibit brutal or inhumane treatment, including the use of corporal punishment or threats of corporal punishment or forced labor. We expect the same from our suppliers and from acting in accordance with the law, codes and policies.

15 Forced labour

Italmetal Sp. z o. o. has a written Social Policy to counteract forced labor. All employees in the establishment are employed on a voluntary basis. Employees are provided by law with the possibility of voluntary termination of the employment relationship without any reservations, provided that an adequate period of notice is provided for the employer.

Italmetal Sp. z o. o. does not employ prisoners.

Italmetal Sp. z o. o. does not retain the employee's original, official identification documents or travelers. If necessary, copies of data from the employee's official identification and travel documents shall be made, also when using employment agencies.

Italmetal Sp. z o. o. does not restrict employees' freedom of movement within the place of production or social facilities, including access to drinking water, toilets, rooms in service and residential premises, except when it is necessary for the safety of employees and allowed by applicable laws and regulations.

Italmetal Sp. z o. o. ensures that employees are not charged, directly or indirectly, with any fees or commissions related to the recruitment and/or employment process, either in their home country or in the country where the work is performed.

Italmetal Sp. z o. o. respects the employee's right to exclude himself from the situation related to work based on a reasonable assessment that this situation poses a direct and serious threat to his life or health. In such cases, it shall not retaliate or discipline any employee for exercising this right.

16 Bullying and harassment

Italmetal Sp. z o. o. has established procedures and rules of conduct to describe preventive and remedial actions against persecution and abuse, as well as the regulations of disciplinary proceedings containing the requirements of:

- All employees should be treated with respect and respect for their personal dignity;
- Management may not inflict corporal punishment or violence on employees;
- Physical, verbal, psychological and sexual harassment abuse is prohibited;
- Each employee is informed about the principles of counteracting persecution and harassment applied in the Establishment;
- Procedures and disciplinary measures for unethical conduct do not include fines deducted from the employee's remuneration.

17 Wages and supplementary benefits

Italmetal Sp. z o. o. pays employees at least the minimum wage specified by local law and provides them with all the benefits required by law. In addition to the payment for normal working time, employees receive overtime pay in the amount specified by applicable law and regulations - in an amount equal to at least the basic hourly rate. All employees have insurance against accidents at work and the provision of compensation in the event of permanent disability of the employee caused by an accident at work. Zakład Italmetal Sp. z o. o. has additional insurance for its operations. In addition to normal remuneration, a bonus system for quality, attendance or performance at work is used. Employees receive full remuneration for overtime, calculated in accordance with applicable law, payments are punctually and on a regular basis as required by law.

Each employee shall have accurate and reliable documentation of the working hours and remuneration of employees, the documentation shall include at least the following elements:

- Each Employee signs a written employment contract before starting work, which sets out the terms of employment in a way that the Employee understands. The minimum information contained in the contract includes the name of the employer, the name and

surname of the Employee, date of birth, position, remuneration, working hours, overtime pay, privileges and the period of notice of the contract. Information on working hours, overtime pay, privileges and notice period are described in the Rules of Procedure. If the employment contract is terminated in accordance with the agreed notice period, no deductions shall be made in the remuneration of the Employee who leaves work.

- Payroll containing data on: remuneration at the normal rate, overtime pay, calculation of the amount of benefits due, such as holiday pay, annual leave, sick pay, deductions, certification by the employee of receipt of payment. In the case of job registration in the piecework system, relevant confirmation records made by the employee.
- A pay slip drawn up in writing, with detailed information on employment and remuneration: normal working hours, overtime (payable at a certain rate), gross earnings or amount of earnings for piecework, net earnings, bonuses and allowances and deductions provided for by law.
- Additional benefits guaranteed by law. For example: paid annual leave and holidays in accordance with the law.

All voluntary deductions require documentation confirming the employee's consent to their execution.

18 Working hours

Italmetal Sp. z o. o. has procedures, rules and records in the field of working time management, as well as measures to control excessive overtime work and an appeal mechanism.

Workers themselves record their working hours using an automatic job registration system that ensures:

- Correct records of working hours, specifying working time and breaks, including meal breaks, on each working day;
- Scheduled working hours and overtime;
- Normal working hours on a weekly basis which are determined by national and local regulations;
- The amount of overtime not exceeding the maximum amount laid down by national or local law;

During regular working hours, the worker should not work more than 60 hours per week (including overtime) or no more than the normal working time and overtime in force in a given place.

Employees are provided with rest breaks in accordance with applicable law, the right to refuse to work overtime, for every seven-day period of time the employee should have at least one day off.

19 Working hours – Extraordinary economic circumstances

Exceptional economic circumstances are circumstances in which the limit of 60 hours of work per week may be exceeded or one day off from work may not be granted within a period of seven days, cover only the following cases:

- Natural disasters, including but not limited to earthquakes, typhoons, hurricanes and fires, which have a direct impact on the operations of the Plant.
- Unforeseen interruptions in production due to a natural disaster at the supplier's production site (e.g. interruption of work at the supplier due to lack of energy supply, fire, flood, etc.).
- Unforeseen economic events at the Plant, including but not limited to machine failures during the peak production period.

Exceptions constituting extraordinary economic circumstances shall in no way entitle to exceed the local provisions governing the limitation of working hours or the number of days worked without a day off from work.

20 Clean, safe and healthy working environment

The Management Board of Italmetal Sp. z o. o. ensures a clean, safe and healthy working environment that meets all relevant provisions of local law, the basic areas requiring attention in this respect are the following issues:

- Fire safety;
- Machine guards;
- Personal protective equipment;
- Lighting, temperature conditions and ventilation;
- Toilets.

Italmetal Sp. z o. o. does not use materials that are subject to regulations from state offices or materials, including chemicals that are considered harmful to the natural environment or subject to special regulations that require documentation.

Italmetal Sp. z o. o. provides employees with a clean, safe and healthy working environment, meeting all safety and health regulations in the workplace in force in the country. This also applies to buildings made available for social or residential purposes. The Integrated Management System of Italmetal Sp. z o. o. is subject to certification in the field of quality, environment, occupational health and safety by accredited specialized certification bodies.

All required occupational health and safety licenses, permissions and permits, including individual licenses and permissions, are documented, systematically reviewed and valid. Regular risk assessments are carried out annually to identify health and safety hazards and to assess the level of risk. The scope of the risk assessment covers the entire plant and all workplaces. In the case of high risk, reasonable measures are taken to reduce them.

The internal and external communication system ensures precise communication regarding occupational health and safety between all levels of the hierarchy of employees, as well as contractors and external guests. The following communication channels are used: announcement, publication, training, colours, signs, safety labels and signalling. Regular training on occupational safety and health issues for workers shall be carried out, as well as effective training on health and safety at work, including on-site training and, where necessary, on-the-job training and practical exercises on how to deal with an emergency. The above training shall be carried out for new employees and those changing workstations when events have occurred and when changes in technology and/or the introduction of new machinery pose new risks to the health and safety of workers. All trainings should be evaluated to monitor their effectiveness.

The designated OHS worker identifies, analyses, evaluates and lists the main hazards of accidents and initiates appropriate actions aimed at controlling the risks associated with the main hazards related to accidents, recommended actions may include: elimination and replacement, technical control measures, monitoring and administration.

Zakład Italmetal Sp. z o. o. provides good working conditions. Working conditions requiring monitoring include noise, vibration, lighting and air quality, among others.

All machines have built-in safety devices and meet all legal and regulatory requirements. Safety devices include fixed guards, two-hand controls, electronic safety devices (e.g. light curtains, safety switches, etc.), etc. Protective devices shall be so designed and installed that they function properly during operation and prevent any unauthorized persons (above, below, around or through) from accessing a particular hazard. All safety devices shall be periodically inspected, tested and maintained in an appropriate manner.

All chemicals delivered to the plant have safety data sheets, and those in contact with them are trained by health and safety personnel checking and allowing substances to be used. Chemicals that have not been approved by health and safety personnel cannot be brought into the plant by employees or contractors. Substance inventories are maintained and updated on a regular basis together with valid material safety data sheets (MSDS) used in manufacturing, activities or services. All substances and their containers shall be labelled ensuring their unambiguous identification, appropriate storage conditions and the use of the required personal protective equipment. Chemicals shall be stored or used in such a way as to ensure that their release does not occur into sanitary installations or storm sewerage or contaminate surrounding soils and groundwater. It is forbidden to use open sewer systems with secondary settling tanks.

The warehouse of hazardous chemicals is equipped, among others, with:

- Adequate ventilation;
- Appropriate fire-fighting equipment and fire protection installations;
- Secondary settling tank;
- Electrostatic protection equipment and explosion-resistant electrical equipment and storage facilities for flammable chemicals;
- Appropriate personal protective equipment;
- Emergency equipment; including safety shower; eye wash kit and leak removal kit, etc.

In Italmetal Sp. z o. o. there are specified high-risk works (e.g. work at heights, work on electrical installations, lifting constituting a threat) and appropriate measures are taken to supervise them in order to reduce the occupational risk associated with these works. The works are non-routine and concern mainly Maintenance, product transport and Logistics, therefore a system of authorizations is used to perform these works in order to confirm that they are performed in a safe manner by:

- Maintenance of designated transport routes in the factory for vehicles, forklifts, suitably designed, having sufficient width, marking, dry, clean, delineated, well lit and without damage and separated from pedestrian paths.
- All trolleys and vehicles are regularly inspected and maintained.
- Where hazards persist despite their reduction or elimination of the main causes of hazards in the workplace, workers receive free of charge all necessary personal protective equipment according to the type and critical level of hazards they come into contact with (including but not limited to masks, protective gloves, earmuffs, helmets and safety goggles). Personal protective equipment is used, maintained in an appropriate technical and sanitary condition, ensuring their reliability.
- The process areas are properly designed for proper fire protection and meet all legal requirements and the requirements of the Principle of Ethical Conduct. Fire protection devices include, but are not limited to: fire extinguishers, hydrants, fire detection and fire alarm systems, sprinkler systems, escape routes, etc. All fire protection equipment shall be

properly maintained in good condition by carrying out inspections and periodic checks. Review and test data shall be documented.

- Italmetal Sp. z o. o. has identified and described predictable emergency situations (for example: failures of key equipment, threat to the IT network, injuries, fire, spillage/release of chemical substances, implications related to media loss, natural and weather-related disasters, workplace violence, etc.) and has emergency plans to reduce these risks. The Plant has specified emergency equipment (such as: leak removal kits, washers, fire extinguishers, medical supplies, backup generators, fire pumps, alarm systems, emergency eye wash equipment/emergency showers, evacuation plans, first aid kits, personal protective equipment, automatic external defibrillator, etc.) that can be used, this equipment is arranged and marked in the right way, and periodic inspections and / or tests to check the correctness of the operation of the equipment and its correct condition in accordance with the requirements of the law.
- All employees in each area of work, covering all shifts, have been trained to deal with specific emergency situations, e.g. the use of fire-fighting equipment, first aid and personal protection.
- At least once a year, trial evacuations and regular emergency exercises shall be carried out. Records of these activities shall be maintained, including the dates and time of the trial evacuation, information on the change, how long it took to carry out the evacuation and the participants in the evacuation and the required corrective actions.
- Internal procedures for the investigation of all potentially dangerous accidents/incidents (serious, less serious, etc.) require their reporting in order to identify the root causes of their occurrence and to take action to prevent their recurrence. These procedures clearly define who should be notified in the organization, in what time frame, and who is involved in the direction and implementation of corrective and preventive actions.
- All accidents are documented by accident reports and action plans along with monitoring their effectiveness.
- All aspects of the chemical, biological, physical and ergonomic environmental hazards associated with hygiene in industry are systematically reviewed and evaluated for appropriate preventive action and monitoring.
- Italmetal Sp. z o. o. has a documented occupational medicine supervision system to determine employees who are routinely exposed to occupational risk, workplaces, the period of time they worked at the positions, medical supervision records before work, during work, after work and post-crisis. The system meets the requirements in accordance with local regulations. Medical supervision is carried out by a reliable health care facility. The results of medical supervision are made available to the examined Employees.

All workers routinely exposed to increased occupational risks shall be provided with:

- Medical supervision before starting work for all new Employees starting work.
- Medical supervision during the performance of work for Employees at least every two years.
- Medical supervision after the end of work for Employees who have left the workplace.
- Medical supervision for Employees prior to the Closure of Operations by the Supplier, merger with another company or separation from the Company.
- Medical supervision for Employees exposed to hazardous chemicals after emergency situations occur.

In the event that the Employee has oversized medical supervision results related to work in his position in the Department:

- The management immediately removes the employee from his current job and offers him another position in the plant.
- The establishment cannot terminate the employment contract with him due to the results of medical supervision.

Each employee has access to water of appropriate quality, quantity and pressure to meet the demand. Water quality meets regulatory requirements. Water dispensers shall be kept in proper condition and placed at an appropriate distance from the workplaces.

All areas are regularly cleaned and maintained in good condition. A sufficient number of suitably equipped toilets and bathrooms are available.

Italmetal Sp. z o. o. ensures that canteens or dining areas meet the following requirements:

- They are isolated from all potentially hazardous areas in production and related activities.
- They are equipped with clean, easy-to-wash tables and chairs.
- They are designed and maintained in a way that provides comfortable conditions in terms of temperature, airflow, lighting and ventilation.
- They have appropriate equipment (sinks, refrigerators, stoves, etc.)

The plant shall ensure that the storage stocks are properly stored and managed (e.g. by properly storing stocks and maintaining the required storage heights).

Accommodation spaces made available to workers shall comply with health and hygiene requirements and shall also meet the following additional requirements:

- There are enough of them in relation to the number of people living in living quarters;
- The premises are separate for each sex;
- They are regularly cleaned;
- Designed and constructed in such a way as to ensure an adequate level of privacy;
- Equipped with bathrooms;
- An emergency exit is provided;
- They have impermeable, washable non-slip floors;
- They have heating systems to ensure comfortable conditions of stay;
- They have access to drinking water on each floor;
- They have a suitable place to store personal luggage in each room;
- They are sufficiently illuminated and ventilated;
- They have a roof made of impermeable and non-flammable material, etc.

21 Non-discrimination

Italmetal Sp. z o. o. ensures that the employment of an employee, including recruitment, remuneration, receipt of additional benefits, promotion, termination of employment and retirement, is based solely on the employee's abilities, and not on his views or other personal characteristics, such as skin color, race, membership of a caste or church, age, maturity, citizenship, social or ethnic origin, status, sexual orientation, pregnancy, political affiliation, military service (veterans), trade union membership, invalidity or any other status or characteristic that does not relate to the merits of the worker or the requirements specific to the workplace.

When hiring employees, they are guided by their abilities. Discrimination in any form is not tolerated, and the Management Board of Italmetal Sp. z o. o. declares appropriate provisions defining the principles of anti-discrimination policy.

22 Women's rights

Italmetal Sp. z o. o. ensure equal treatment of women in all aspects related to employment. Taking a pregnancy test is not a condition of employment. Workers must not be forced to use contraception. The salary and salaries of workers who return from maternity leave must not be reduced.

The Department complies with legal regulations or requirements regarding the working environment regulating the protection of the health and safety of pregnant, postpartum and/or breastfeeding women.

23 Freedom of association and collective bargaining

The Management Board of Italmetal Sp. z o. o. declares to recognize and respect the statutory right of employees to ensure their freedom of association, including the right to join or not to join any organization. Italmetal Sp. z o. o. also respects the statutory rights of employees to conduct a collective dispute. Italmetal Sp. z o. o. does not hinder employees from creating their own organizations, does not dismiss from work or threatens to dismiss employees who have taken steps to associate or conduct a collective dispute with the employer.

Italmetal Sp. z o. o. does not prohibit the creation of organizations of employees and / or trade unions provided for in the law.

At Italmetal Sp. z o. o. there is a documented system for resolving disputes in the workplace, both between the employees themselves and between employees and superiors, each employee is informed about it orally and in writing. There is also a system of anonymous reporting of complaints, comments or problems using the box for written requests of an employee or there is a designated function of Crew Representatives to whom such an employee can report the problem in person.

24 International purchases and sales

Italmetal Sp. z o. o. works to comply with all customs, commercial and import or export regulations. Suppliers are also expected to:

- Comply with and comply with applicable export and import laws and regulations when transferring goods, services, software or technology, whether within or outside of their home country;
- Comply with national and international sanctions and embargoes; and to ensure that all duties, fees and tax liabilities are properly settled.

Export control measures and economic sanctions govern when, where and to whom our products, services or technical data may be sold, transferred or otherwise transferred.

25 Environment

Italmetal Sp. z o. o. meet all local environmental protection laws relating to the workplace, manufactured products and production methods. In addition, it is forbidden to use materials that are considered harmful to the natural environment, preference is given to the use of processes and materials that do not disturb the ecological balance of the environment.

The management and environmental protection system is certified in the scope of the requirements of the PN-ISO 14001 standard by an accredited certification body.

The Plant complies with all applicable laws and regulations regarding the level of pollutant emissions, noise emissions, sewage disposal and soil pollution. Italmetal Sp. z o. o. provides:

- Having an appropriate system of training and record keeping in the field of waste management and handling of chemicals, including documentation on proper disposal.
- Proper handling of the storage, transport and handling of chemicals and waste should be handled in an appropriate manner to control the risk of accident and to ensure the visibility of the labelling of these materials.
- All hazardous chemicals have additional protection (e.g. drip baths).
- Mandatory permits and certificates are kept to demonstrate compliance with applicable environmental legislation.
- Waste disposal companies have appropriate licenses, enjoy a good reputation and are periodically inspected.
- The Plant does not use materials considered to be harmful to the environment or materials that are prohibited in the list of materials excluded from use by customers or outlets.
- Italmetal Sp. z o. o. complies with the rules for the supply of raw materials used in products or production processes only on condition that it is demonstrated that it has exercised due diligence and control measures in accordance with the OECD Due Diligence Guidelines for the Establishment of Responsible Supply Chains of Minerals from Conflict and High Risk Areas and the presentation of documents confirming the maintenance of proper Care. These documents are disclosed in response to any indication, warning or punishment of a government body as a result of non-compliance with the requirements of specific customers.
- In Italmetal Sp. z o. o. there is a appointed representative of the Management Board who understands and is aware of the applicable requirements in the field of environmental protection and has certificates required by law.
- Pollution/waste export records are complete, accurate and up to date.
- All required equipment for environmental protection is available and their smooth operation is ensured.
- Italmetal Sp. z o. o. and/or authorized external organizations perform regular tests of all contaminants in accordance with local legal requirements and permit requirements, where applicable.

26 Engaging subcontractors

Italmetal Sp. z o. o. does not commission subcontractors to manufacture products or components containing trademarks or trade names of the final customer without first obtaining his consent and acceptance of this Principle of Ethical Conduct by the subcontractor. It is ensured that the business practices and ethical standards of their suppliers, service providers and other entities and persons with whom they maintain business contacts are similar to those of final customers.

All documents relating to suppliers/subcontractors (and, where applicable, sub-subcontractors), service providers and supply channels shall be kept for a period of at least 2 years and, in the case of legally required characteristics or security, for 15 years.

27 Information

All employees are informed about the requirements of the Principles of Ethical Conduct, including the specific requirements of customers or markets to which products are delivered.

28 Monitoring and Compliance

Italmetal Sp. z o. o. provides authorized customer representatives with full access to facilities, documents, employee files and enables confidential conversations with employees on the terms set out in local regulations.

Annual internal audit plans allow monitoring of compliance with the guidelines of Company Policies and Codes and Regulations.

The Integrated Management System of Italmetal Sp. z o. o. is subject to annual certification audits of a third party by accredited organizational units.

Italmetal Sp. z o. o. keeps personal files of all employees currently and in the past. Personal files of employees who worked in the plant are kept for the period required by law for the storage of payroll documentation. The employee's personal file should include the following elements:

- Document confirming the age of the employee;
- Document confirming the employee's citizenship or work permit (if required by law);
- Health records (if required by law);
- Employment contract (if required by law);
- Termination of the employment contract (if required by law);
- Information on disciplinary measures and;
- Consent to make any voluntary deductions from remuneration.

Conditions of employment for a probationary period should be specified in the employment contract (if the contract is required by law) and placed in the employee's personnel file.

29 Approval

Crew Representative

CEO

Ceo

Jelcz-Laskowice, 2021.09.22