
ZAMET GROUP

CODE OF ETHICS FOR SUPPLIERS

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INTRODUCTION

As ZAMET Group and its community, guided by the principles of responsible business and sustainable development, we have committed to:

1. shaping relations with Suppliers, based on honesty and mutual respect,
2. supporting our Suppliers in building awareness and developing sustainable business, in terms of principles and conduct resulting from:
 - ZAMET Group Code of Ethics,
 - provisions of generally applicable law,
 - the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the principles and rights set out in the eight core conventions identified in the Declaration of International Labour Organization on Fundamental Principles and Rights at Work, and the principles and rights set out in the International Charter of Human Rights,
3. not cooperating with Suppliers who do not recognize the values or reject the principles resulting from the above documents, standards and guidelines,
4. exercising due diligence by:
 - adopting and promulgating the ZAMET Group Code of Ethics,
 - adopting and promulgating the ZAMET Group Code of Ethics for Suppliers,
 - defining general criteria for qualification and audit of Suppliers,

This ZAMET Group Code of Ethics for Suppliers aims to support our Suppliers in building awareness and developing ethical practices. It is a set of rules and guidelines that our Suppliers should follow when cooperating with us and participants in their own supply chains.

We want to build relationships with partners who are aware of our values, are guided by the principles of honest cooperation and focus on mutual respect and transparency. We expect our Suppliers to ensure that the adopted rules of conduct by ZAMET Group and the principles indicated in this Code will be respected and applied by them. We believe that an approach based on ethical cooperation and trust will benefit us and our Suppliers as well as the social and business environment.

GENERAL SELECTION CRITERION

The general criterion for the eligibility of Suppliers of ZAMET Group is their conduct of business in compliance with legal provisions, recognized national and international standards, including the OECD Guidelines for Multinational Enterprises¹ and the UN Guiding Principles on Business and Human Rights², the principles and rights set out in the eight basic conventions indicated in the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work³ and the principles and rights set out in the International Charter of Human Rights, in relation to all relevant aspects relevant to sustainable development, including: human rights, work environment, employment and relations with employees, climate and environment, fighting corruption, preventing conflicts of interest, protecting clients' interests, science, technology and innovation, protecting fair competition, lawful taxation, counteracting money laundering and terrorist financing.

¹[OECD guidelines for multinational enterprises](#)

²[UN-guidelines.pdf](#)

³[ILO Declaration](#)

HUMAN RIGHTS

As a SUPPLIER of ZAMET Group, we comply with applicable laws and respect universally recognized human rights, in particular those expressed in the International Charter of Human Rights and the principles of fundamental rights set out in the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work.

1. We avoid violating the human rights of others and respond to negative effects on human rights that may arise as a result of our activities.
2. We avoid causing or contributing to negative effects on human rights and respond to these negative effects when they occur.
3. We seek ways to prevent or mitigate adverse human rights impacts that arise directly from our business activities or are directly related to our products or services through business relationships.

WORKING ENVIRONMENT

As a SUPPLIER of ZAMET Group, within the framework of applicable laws, regulations and existing labour relations, employment practices and applicable international labour standards, avoiding all unlawful employment and employee relations practices and exercising due diligence, we undertake to:

1. respect the right of employees to form or join trade unions and representative organisations of their choice, by avoiding interference with employees' decisions to establish or join trade unions or representative organisations of their choice;
The Supplier complies with applicable law regarding the possibility of associating or not associating employees and the activities of trade unions. Employees have the opportunity to join or form a trade union in accordance with applicable law. Suppliers do not take any negative actions or decisions in relation to persons who belong to or are representatives of trade unions. Councils and employee unions are treated with due respect.
2. respect the right of workers to have trade unions and representative organisations of their choice for the purposes of collective bargaining and to engage in constructive negotiations, either individually or through employers' associations, with such representatives with a view to reaching agreements on terms and conditions of employment;
3. contribute to the effective abolition of child labour and take immediate and effective action to ensure the immediate elimination of the worst forms of child labour;
Employment of juveniles is allowed only on the basis of the provisions of labour law in the field of vocational training or in the performance of light work. The Supplier ensures that children or minors do not work in the production and distribution process in violation of the provisions of the Labor Code. The Suppliers treat the provisions provided for in the Polish Labour Code as standard. Therefore, the use of children for work is also prohibited in those cases where such practices are allowed by the applicable laws of another jurisdiction.
4. contribute to eliminate all forms of forced or compulsory labour and take immediate and effective action to immediately eliminate forced or compulsory labour;
All forms of slave, forced or compulsory labour are unacceptable. The Supplier's employees perform their work only voluntarily. The Supplier does not participate and does not derive any profits or benefits in the practice of human trafficking. It is unacceptable that the Supplier's employees perform work in the form of working off debts or other work that does not constitute a voluntary act on their part. The condition of employment may not be the retention of any original documents, including identity document.
5. be guided by the principle of equal opportunities and equal treatment in employment and not discriminate against its employees in the context of employment or occupation on grounds such as race, colour, gender, age, religion, political opinions, national or social origin, disability or other status, unless selectivity regarding the characteristics of the employees favours an established government policy that, in particular, promotes greater equality of employment opportunities or is related to specific requirements related to the work performed;

The Supplier shall provide its employees with an open and supportive working environment. Every employee has the right to equal treatment, respect and respect for diversity. Discrimination and harassment in any form: physical, verbal and non-verbal are unacceptable. Employees and associates have the opportunity to report any violations and incidents related to inappropriate behaviour or treatment. The Supplier shall exercise due diligence to investigate all complaints and signals related to discrimination or harassment and take appropriate action. The Supplier ensures equal opportunities for its employees regardless of their ethnic origin, race, gender, age, disability, religion, sexual orientation, appearance, gender identity, gender expression or trade union membership. Suppliers do not accept and counteract any retaliation that would be directed against a person reporting violations or expressing a different opinion or feature.

6. ensure a safe and healthy working environment in accordance with the provisions of national law and the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work,

Each employee of the Supplier shall be provided with safe and hygienic working conditions. The Supplier complies with all applicable employee safety regulations, taking into account the specifics of the industry in which it operates. Employees are protected against chemical, physical and biological hazards. The Supplier's employees are properly prepared to perform their duties. The Supplier identifies potentially hazardous situations, takes appropriate measures and prepares action plans. The Supplier shall provide its employees with the health and safety training required by law, which is properly documented and takes place on a regular basis. Ongoing control in terms of safe workplace conditions is maintained. Appropriate safety procedures and instructions as well as protective measures are applied. Suppliers correctly apply the required OHS markings (emergency exits, fire extinguishers placement). If specific permits or licenses are necessary for the Supplier to conduct its business, the Supplier meets all the requirements, which shall be properly documented.

7. provide employees' representatives with such facilities as may be necessary for the development of effective collective agreements;
8. provide employees' representatives with the information necessary to conduct constructive negotiations on employment conditions in a timely manner;
9. provide employees and their representatives with information enabling them to obtain a true and fair view of the performance of the entity or, where applicable, the enterprise as a whole;
10. promote consultation and cooperation between employers and employees and their representatives within the framework of lawful procedures, structures or mechanisms on matters of common interest;
11. comply with employment standards, contractual arrangements and employment relationships;
12. observe the highest standards of occupational health and safety;
13. hire local employees and provide training to improve their skills;
14. when considering changes in the activity that would have a serious impact on employment, in particular in the event of the liquidation of the entity involving collective redundancies, notify such changes to the representatives of the employees concerned, their organizations and, where appropriate, the relevant government bodies, and cooperate with the representatives of the employees and the relevant government bodies in order to mitigate the adverse effects of such changes to the maximum extent possible;
15. to enable authorised representatives of employees to negotiate collective agreements or issues relating to the relationship between employees and management and to enable the parties to consult on matters of mutual interest with representatives of management authorised to take decisions on those matters.

CLIMATE AND ENVIRONMENT

As a SUPPLIER of ZAMET Group, we undertake to conduct our business in a manner that takes due account of the need to protect the environment and, consequently, the employees, communities and the wider society, and in a way that allows us to avoid or mitigate negative effects on the environment and respond to such negative effects if they arise. We are aware of the impact of production activities on local communities and the environment. We operate on the basis of the principles of sustainable development. We responsibly shape the relationship between economic growth and care for the natural environment. As part of our business, we undertake to conduct business in accordance with applicable laws and standards regarding the environmental protection and prevention of environmental degradation. In addition, we set our own internal standards, thanks to which we reduce our impact on the environment. We strive to monitor our production processes on an ongoing basis to support environmental sustainability. We adhere to the principles of rational management of raw materials, including water, electricity and heat, and minimize the amount of production waste. We identify the impact we have on the environment on an ongoing basis and actively manage possible risks. In addition, we undertake to:

1. enable engagement with relevant stakeholders who have been harmed as a result of negative environmental impacts related to our business, products or services.
2. in accordance with the scientific and technical understanding of risk, in the event of a threat of serious or irreversible damage to the environment, also taking into account human health and safety, we do not invoke scientific uncertainty or pathways as reasons for delaying actions to prevent or minimize such damage.
3. create, in justified circumstances, emergency action plans to prevent, mitigate and control serious damage to the environment and health resulting from the company's activities, including accidents and emergency situations, and have mechanisms to immediately report such situations to the competent authorities.
4. strive to improve efficiency in the area of environmental protection by:
 - a) implementing technologies to improve environmental performance
 - b) providing products or services compliant with standards and regulatory requirements,
 - c) promoting a higher level of awareness in the supply chain,
5. provide employees with appropriate education and training on environmental issues, occupational health and safety, including the management of hazardous and non-hazardous materials and waste, as well as the prevention of environmental accidents, etc.
6. provide support, including capacity building for the management of environmental issues, to Suppliers and other entities within its business relationships, in particular to small and medium-sized enterprises and smallholders, where appropriate and feasible.
7. contribute to the development and implementation of environmentally responsible and economically efficient public policies, for example by participating in partnerships or initiatives aimed at raising awareness and protecting the environment.

FIGHTING CORRUPTION

Corruption is a complex and multidimensional phenomenon. Corrupt activities are identified primarily with giving and accepting bribes. Meanwhile, corruption is primarily an abuse of the granted powers in order to achieve one's own benefits and can occur in many forms such as bribes, illegal salaries/commissions, paid protection, trade in influence, undeserved rewards. Both legal entities and private persons or state officials may be involved in the corruption. Corruption is a threat to the organization, both financial and reputational. Any attempts at bribery are unacceptable. As a SUPPLIER of ZAMET Group, we undertake:

1. not to engage in any corrupt activities, including offering, promising or giving any undue pecuniary or other benefits to public officials or employees of persons or entities we have business relations with, or their relatives or associates,
2. not to demand or accept any undue monetary or other benefits from public officials or employees of persons or entities we have business relations with,
3. not to give or accept any financial benefits in relations with ZAMET Group in connection with cooperation, and in the case of customarily accepted, legal gifts of low value, generally acceptable

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- and not related to any obligation, to maintain transparency and enable their recording by ZAMET Group in accordance with the Anti-Corruption and Gift Policy of ZAMET Group,
4. to establish and maintain internal control measures to adequately prevent, detect and counter bribery and other forms of corruption,
 5. to ensure transparency in the fight against bribery and other forms of corruption and promote a culture of integrity,
 6. not to make illegal payments to candidates for official positions or members of political parties or other organizations associated with political parties or candidates for political positions.

PREVENTION OF CONFLICTS OF INTEREST

Conflicts of interest are potential situations where a private interest conflicts with the interest of the Group or interferes with the employee's ability to make the right decisions. The occurrence of a conflict of interest may adversely affect sustainable development. As a SUPPLIER of ZAMET Group, we undertake:

1. to maintain transparency, in situations of conflict of interest as well as in situations potentially exposed to the existence of a conflict of interest,
2. not to use the status or the position in the organization for our own purposes,
3. to avoid situations that expose to conflicts of interest,
4. to comply with the law and the principles resulting from good practices concerning us.

PROTECTION OF ZAMET GROUP INTERESTS

As a SUPPLIER of ZAMET Group, in relations with ZAMET Group and other clients, we act in accordance with honest business, marketing and advertising practices and take reasonable steps to ensure the quality and reliability of the products and services we offer. As Suppliers of ZAMET Group, we undertake:

1. to ensure that the products and services we offer meet the parameters agreed or required by standards or legal regulations, safety standards, and to ensure they do not pose an unreasonable risk to health or safety during their foreseeable use or foreseeable improper or illegal use,
2. to be a reliable business partner, fulfilling contractual obligations,
3. not to make statements or omissions, nor engage in any other practices that are deceptive, misleading, fraudulent, dishonest or otherwise affect customer choice in a way that is detrimental to clients or competition,
4. to respect privacy and protect information constituting clients' business secrets from unauthorized disclosure, dissemination or use,
5. to cooperate with public authorities in order to fight unfair market practices.

SCIENCE, TECHNOLOGY AND INNOVATION

Research and technological innovation have increased productivity in all sectors, as well as the ability of enterprises to implement due diligence procedures and contribute to sustainable development. As a SUPPLIER of ZAMET Group, we undertake to:

1. contribute to the development of local and national innovation potential,
2. cooperate with local higher education institutions and public research institutions and participate in joint research projects with representatives of local industry or with industry associations, including small and medium-sized enterprises and civil society organizations,
3. adopt, as far as possible, practices that enable the voluntary, secure and effective transfer of technology and know-how on mutually agreed terms, and enhance access to and sharing of data to support scientific discovery and innovation with due regard to the protection of intellectual property

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- rights, confidentiality and privacy obligations, protection of personal data, export controls and non-discrimination principles,
4. recognise the value of open science and respect safeguards designed to protect academic freedom as well as research and scientific autonomy.

PROTECTION OF FAIR COMPETITION

The principle of fair competition is the rule of doing business. It consists in maintaining the principles of transparent business with respect for good manners and the interests of all participants in business transactions. Acts of unfair competition are, in particular, actions that mislead the marking of an enterprise, marking of goods or services, violation of trade secrets, imitation of products, impeding access to the market, organizing avalanche sales or unfair or prohibited advertising. As a SUPPLIER of ZAMET Group, we undertake:

1. to conduct business in compliance with the rules of fair competition, in particular in accordance with the law,
2. not to take any actions contrary to the law, contrary to fair competition, in particular those that bear the hallmarks of an act of unfair competition,
3. to take care of the business secret of ZAMET Group and other business partners by acting to protect and secure against unauthorized disclosure, dissemination or use of information constituting a business secret,
4. to refrain from concluding or implementing anti-competitive agreements between competitors, including agreements aimed at:
 - pricing,
 - submission of falsified offers (tender collusion),
 - setting production limits or quotas,
 - joint or individual use of markets as a result of allocation of clients, suppliers, territories or product lines,
5. to cooperate with competition investigation authorities, and subject to applicable law and appropriate safeguards,
6. to promote awareness of the importance of complying with applicable competition laws.

FAIR TAXATION

We are aware of the impact on the social and economic development of the country in which we operate by contributing to public finances and paying our tax liabilities in a timely manner. As a SUPPLIER of ZAMET Group, we undertake:

1. to comply with legal provisions regarding taxation,
2. not to avoid taxation, not to conduct transactions in a way that causes tax consequences inconsistent with the economic consequences underlying the transaction,
3. to make efforts to maintain tax transparency,
4. to apply transfer pricing practices in accordance with the arm's length principle,
5. to treat tax management and tax compliance as important elements of supervision and risk management.

COUNTERACTING MONEY LAUNDERING AND TERRORIST FINANCING

Money laundering includes activities aimed at introducing money or other assets obtained from illegal sources into legal circulation. Money laundering also includes money that is also used to finance illegal activities, most often: terrorist financing, drug crime and other criminal acts. Money laundering is a process that conceals the existence of an illegal source or illegal use of income to give the impression of obtaining it legally. This is a process used by criminals to make "dirty" money appear "clean", so the profits from criminal activity are to give the impression of their legitimate origin.

Manifestations of money laundering and terrorist financing are global and often involve organized criminal groups. Terrorist financing is the financing of terrorist acts, terrorists and terrorist organizations. Money allocated to finance terrorist activities flows through the global financial system through various personal and company accounts. Funds to finance terrorist activities may be held in the illegal accounts or in the accounts of legally operating charities. This could be buying and selling securities and other goods, or buying and disbursing insurance policies.

Lack of awareness of being a participant in the money laundering procedure does not exclude the liability of such an entity. Bearing in mind the above, as a SUPPLIER of ZAMET Group, we undertake:

1. to comply with the provisions of generally applicable law, including the Act on Counteracting Money Laundering and Terrorist Financing in force in Poland,
2. to shape the awareness of employees and co-workers in terms of counteracting money laundering and terrorist financing,
3. not to execute cash transactions related in any way to the activities of ZAMET Group with a value equal to or exceeding EUR 10,000, subject to the provisions of law,
4. to verify contractors using legally approved tools,
5. to verify the actual beneficiaries of contractors using legally approved tools,
6. in the case of justified and impossible to remove doubts in the aspect of money laundering or terrorist financing - not to cooperate with suspicious entities,
7. to cooperate with national and international bodies established to fight crime and terrorism.

DILIGENCE

Suppliers shall, as far as possible, provide their employees and other persons with the opportunity to report any irregularities and violations through appropriate channels, while maintaining the confidentiality of the notifiers. Any retaliation that would be directed against people who report violations is unacceptable. It is forbidden to take any actions that would be hostile towards persons providing information about violations of the law or other applicable regulations.

In the event of becoming aware of a violation of this Code or in the event of doubts or questions, Suppliers may use the following communication channels:

- zamet@zametsa.com (in the title of the e-mail it should be indicated that it concerns the Code of Ethics for Suppliers of Zamet Group)
- 44 648 9181
- in writing to the address of the company with a note (the Management Board Office – Code of Ethics for Suppliers)

Suppliers are obliged to comply with applicable contract laws (national as well as international), generally applicable standards and industry codes. Suppliers are obliged to observe and respect the ethical values indicated in this Code. Suppliers are required to communicate this Code to their employees and subcontractors in order to familiarize them with the applicable rules and standards.

Suppliers should have the resources to monitor the risks in their organization on an ongoing basis and to make appropriate responses and recovery plans. SUPPLIER due diligence in the aspects provided for in this

Code of Ethics for Suppliers of ZAMET Group should be in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct.

SUPPLIER STATEMENT

Entering into cooperation with ZAMET Group is tantamount to accepting the Code of Ethics for Suppliers of ZAMET Group, provided that ZAMET Group has provided public access to it on its website or in the cooperation documentation.

As a SUPPLIER of ZAMET Group, I declare that I have read the Code of Ethics of ZAMET Group and I declare that I recognize the principles and standards resulting from it and I undertake to comply with them.

This Code of Ethics for Suppliers of ZAMET Group has been adopted by the Management Board of ZAMET SPÓŁKA AKCYJNA

first update
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ZAMET Spółka Akcyjna

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