



CIECH Group

Code of the Business Partner

2021

CIECH Group companies (the “**CIECH Group**”) place special emphasis on sustainable development and responsible business issues. We have defined our goals for environmental (“**E**nviro**n**mental), social (“**S**ocial) and corporate governance (“**G**overnance) factors as part of our **ESG Strategy** <https://esgciech.com>.

We are aware of our role in the local environment and the impact we have on the activities and lives of our stakeholders. We are also aware of our impact on the natural environment. Products manufactured by the CIECH Group contribute to the implementation of the UN Sustainable Development Goals, and our objective is to focus on strengthening positive, and reducing negative, effects of our operations.

We strive towards the long-term, sustainable development of the CIECH Group, which will benefit all our stakeholders: employees, customers, suppliers, neighbours, owners, as well as future generations. We collaborate with people, institutions and organisations that share our approach to doing business.

Accordingly, we expect our business partners to help us achieve our sustainable development and responsible business conduct objectives and to identify with the values and principles we have adopted.



CODE OF THE BUSINESS PARTNER OF THE CIECH GROUP

CIECH Group's Values are at the very core of all our activities:



RESPONSIBILITY: We are not indifferent to our work, as we consider CIECH to be our own company. We care about how our company is dealing and how it is growing, how it is talked about and how our associates feel. Therefore, we take responsibility for what we say and do: for the outcomes of our work, for quality, reliability, customer and co-worker satisfaction, for their safety. We can look wider and farther, anticipating the consequences of our actions and decisions for others, and identifying risks and opportunities early enough to be able to take effective measures.



RELIABILITY: CIECH = reliability. We guarantee the quality and timeliness of everything we do. We do what we say we will do, keep our word and commitments. We are transparent in communication and provide reliable information; this has enabled us to build relationships based on trust. Thanks to this, we are a reliable partner for our employees, customers and investors.



TEAM: We are able to act reliably as the CIECH Group, since we operate as one team. We trust, and we share information and knowledge with, one another. We take care of and support each other on the way to achieving a common objective, using each person's strengths.



DEVELOPMENT: We know that standing still actually means stepping back. In order to build a stable future, we must continuously develop and move forward. Hence, we are proactively looking for opportunities to improve our processes, work methods and competences. We observe trends, expand and deepen our knowledge and develop our skills. We support the development of our associates. We implement modern tools and create a work environment that inspires development.

General part

The Code of the Business Partner of the CIECH Group (the “**Code**”) sets the minimum standards of conduct for:

- a. business partners of the CIECH Group companies (“**Business Partners**”), in particular: suppliers, contractors, distributors, recipients, sellers, service providers, other counterparties and
- b. entities with the help of which Business Partners perform business tasks in relation to the companies of the CIECH Group (“**Subcontractors**”).

Business Partners and Subcontractors shall be hereinafter collectively referred to as “Partners”.

The condition for starting and continuing the business relationship of a CIECH Group company with Partners is confirmation by the Partners and adoption of the principles set out in the Code. The provisions of the Code apply to the company, members of governing bodies, employees and associates of our Partners.



CIECH GROUP'S STANDARDS

1. Human rights and labour standards

Human rights

We expect our Partners to observe human rights, both in the context of working conditions of their employees and in business. All employees and associates of our Partners are treated in a fair, respectful and dignified manner.

Occupational Health and Safety

We expect our Partners to provide their employees and associates with a safe workplace and comply with all applicable occupational health and safety standards and regulations. All employees and associates receive the adequate workplace instructions, incl. information on the OHS conditions and requirements, protective measures, and they are provided with appropriate training. Our ultimate goal is zero accidents/injuries at work.

No discrimination

We expect our Partners not to discriminate, or tolerate any form of discrimination, against any person based on their gender, race, ethnicity, nationality, religion, beliefs, disability, age, sexual orientation, health, political beliefs, marital status or membership in organisations.

No mobbing

We expect our Partners not to use, or tolerate any forms of, mobbing, harassment, incl. sexual harassment, and to have implemented procedures preventing any type of unlawful behaviour.

Prohibition of forced and slave labour

We expect our Partners not to use any form of slave or forced labour, both in Poland and abroad. The work carried out by our Partners' employees is undertaken voluntarily and may be terminated by them on this basis.

No child labour

We expect our Partners not to use child labour in any form and to contribute to the actual abolition of any form of juvenile labour. When and if we employ any young people, their engagement with our companies complies with the law.

Right of association

We expect our Partners to recognise the employees' right to associate and organise, and respect this right.

No tolerance for alcohol and intoxicants in the workplace

We expect our Partners to not tolerate the presence of any alcohol and intoxicants in the workplace.

2. Respect for the natural environment

Counteracting climate changes caused by greenhouse gas emissions

We expect our Partners and their suppliers to counteract climate changes caused by greenhouse gas emissions, among others, by reducing these emissions and increasing the efficiency of energy use. We have adopted ambitious decarbonisation targets to slow down and ultimately stop the negative climate changes caused by the emission of greenhouse gases into the atmosphere – we intend to achieve carbon neutrality by 2040.

Minimising significant environmental risks

We expect our Partners to minimise other risks related to environmental and climate protection, among others, by reducing other harmful emissions, protecting water quality and resources, pursuing a policy of rational waste management and thus striving to ensure that their economic and social activity is environmentally and climate-friendly and contributes to the prevention and reduction of any negative phenomena in its functioning.

Compliance with environmental laws and regulations

We expect our Partners to comply with the provisions of environmental protection law, in particular, to have all permits and licences required by law and related to their operations, and to fulfil all operational and reporting obligations resulting therefrom.

3. Conducting economic activity

Ethical conduct of operations

We expect our Partners to apply the principles of ethical conduct in each area of their business and to strive to implement solutions that build awareness of ethical principles of conduct in the workplace among their employees and associates.

Compliance with law

We expect our partners to apply all applicable, local and international, laws. In cases where local law is less restrictive than this Code, we expect our Partners to follow the rules provided for in this Code.

Fair competition and antitrust laws

We expect our Partners to act in compliance with all applicable competition protection regulations, for example, by abstaining from dumping prices, price fixing or other unlawful arrangements.

Compliance with international sanctions

We expect our Partners to comply with international sanctions imposed on countries, economic operators or natural persons, and not to conduct any economic activity violating international restrictions.

Zero tolerance for fraud and corruption

We expect our Partners to apply a zero-tolerance policy to any fraud and corruption, regardless of its form. Our partners may not, directly or indirectly, offer or accept any undue advantage or promise thereof, including material, financial and personal benefits, unauthorised

gifts, etc., in exchange for a specific act or omission.

Honesty in commercial activities

We expect our Partners to show honesty in their business activities, and as part of their daily duties, in relations with their customers, counterparties, suppliers and associates.

Information security

We expect our Partners to implement and maintain high information security standards to enable us to effectively protect confidential information, including any trade/business secrets.

Counteracting conflicts of interest

We expect our Partners to avoid and counteract any conflict of interest that could weaken their credibility, or our trust, or the trust of third parties in the CIECH Group companies. We expect our Partners to report any situations that may indicate a conflict of interest and any cases in which employees or individuals representing the CIECH Group companies participate in the Partner's enterprise or are in any way related to them.

4. Collaboration for sustainable development

We encourage our Partners to work together in order to achieve the goals and strengthen the values described in the Code, in particular, in the area of exchanging experience, best practices and implementing joint activities and projects. We are convinced that the Sustainable Development Goals can only be attained if all interested parties actively collaborate with one another.

5. Audits

We reserve the right to verify compliance with the standards defined in the Code using internal or external control mechanisms and to request changes that have been identified during conducted audits.

6. Reporting violations

We expect our Partners to report any suspected violations of the Code. Please report any violations to a person designated by the CIECH Group or by using one of the available anonymous channels:

- (i) URL: <https://ciech.liniaetyki.com/signin/> - an anonymous channel for reporting violations,
- (ii) notification by telephone – by calling: 669 600 218,
- (iii) email notification to the following address: compliance@ciechgroup.com,
- (iv) personal or written/letter notification: Compliance Officer of the CIECH Group, 62 Wspólna St., 00-684 Warsaw.