

CODE OF CONDUCT
WEMAX POLSKA sp. z o.o. sp. k.

The Code of Conduct presents our standards for conducting business activity, including the standards of professional behaviour that lead us in everyday contacts with each other, our clients and business partners, and it shall apply to all the company's personnel, i.e. every man and woman employed directly by the company under an employment contract or as contract employees, including directors, executives, managers, supervisors and ordinary employees.

The purpose of introducing this document is to provide added value for all stakeholders - ensuring our partners with the highest business standards, building and strengthening the trust of the customers and the local community to our activities, creating a transparent and desirable working environment for the personnel.

The Code of Conduct is communicated to the stakeholders via our website and through brochures available in the company headquarters.

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A. Environment.

1. Environmental policy.

We commit to conduct production activities in a manner that complies with the principles of sustainable development and environmental protection. We strive to minimise our impact on the natural environment, and we are committed to the constant improvement of our environmental practices.

Improving the Environmental Management System in accordance with the requirements of the ISO 14001 standard is one of the main goals of our company.

1.1. Areas covered by the policy.

The key areas covered by our Environmental Policy are presented below.

1.1.1. Greenhouse Gas Emissions.

We continuously monitor and take steps to reduce the greenhouse gas emissions by investing in low energy technologies and implementing environmentally friendly production processes. We assure conducting regular reviews and improving the production technology in order to minimise emissions of carbon dioxide and other harmful gases.

1.1.2. Energy Efficiency.

We ensure the constant improvement of the energy efficiency of our company by inspecting and modernizing installations and promoting energy savings among employees.

1.1.3. Renewable Energy Sources.

We strive to increase the share of energy from renewable sources in our energy mix. We invest in green energy installations (used to produce electricity, heating and cooling), such as solar power stations, in order to minimise our impact on the environment. When selecting energy suppliers, we pay close attention to the source of energy and we prefer companies with a Green Energy Certificates.

1.1.4. Protection of quality of water and reduction of water consumption (Water Resources Management).

Our aim is to manage water resources effectively by minimising water use in production processes and promoting water conservation in everyday practices. We employ rainwater retention system and use it for economic purposes by investing in specialized in-plant installations.

1.1.5. Air Quality Protection (Gas and Dust Emissions).

Measures are taken to control and minimise gas and dust emissions. In our production processes, we endeavour to utilize only the most modern devices, equipped with the effective filtration systems, while to heat buildings – we use low-emission heat sources. We commit to monitor and periodically report pollutants released into the air.

1.1.6. Responsible Chemicals Management.

We apply the principles of sustainable management of chemical substances, minimising negative effects on the environment and human health. We monitor and update our list of chemicals, preferring those with less harmful effects. We educate employees in the field of safe handling of chemical substances.

1.1.7. Sustainable Resource Management.

Our aim is to manage resources effectively, among others, by promoting Sustainable Supply Chain and minimising waste and material losses.

1.1.8. Reducing waste.

Limiting production of waste is possible due to implementation of effective production planning and technology that enables segregation and compacting.

1.1.9. Reuse and recycling.

Our company supports the recycling programs and promotes reusing materials in our technological operations. We recycle materials subjected to further processing and pass them on to the companies specialized in ecological waste management.

1.1.10. Biodiversity, land use and deforestation.

In our activities we put every effort to maintain the ecosystems, so that flora and fauna and natural habitats will not be irreversibly destroyed. In the event of necessary tree clearing we commit to make replacement planting.

1.1.11. Soil quality.

We are engaged in activities that protect soil quality and minimise erosion. Rainwater harvesting enables to reuse it for watering green areas.

1.1.12. Noise emission.

We monitor and control noise emissions related to our production activities. We implement measures to reduce noise impact on the surroundings. Along with new investments, we employ green insulation in order to minimise noise impact.

1.2. Training regarding to the policy.

We commit to communicate the company's Environmental Policy to our employees and raise their awareness in all its key areas.

1.3. Environmental Management System.

We undertake to maintain and continuously improve the Environmental Management System in accordance with the requirements of the ISO 14001 standard.

2. Energy policy.

Our company commits considering energy aspects in designing, planning and conducting manufacturing processes and investment ventures, as well as to purchase energy-efficient products and services resulting in positive company's energy performance.

Reducing energy consumption and constant improvement of the Energy Management System in accordance with the requirements of the ISO 50001 standard is an important aspect of the company's policy.

2.1. Areas covered by the policy.

The key areas covered by our Energy Policy are presented below.

2.1.1. Monitoring of efficient energy use.

We monitor energy consumption in strategic areas of our activities. In order to identify fields with the greatest potential for the energy efficiency improvement, we undertake real-time inspections and regular energy reviews.

2.1.2. Reducing energy consumption and losses.

Implementing energy control and management systems is necessary to minimise energy consumption and eliminate energy losses in both production and administrative processes. We take measures to optimize technological processes to increase energy efficiency.

2.1.3. Implementing solutions using renewable energy sources.

Our company seek for implementing solutions using green energy. We invest in installations based on renewable energy sources, such as solar power stations. When selecting energy suppliers, we take into account the source of energy and we prefer companies with a Green Energy Certificate.

2.1.4. Employing energy efficiency improvement projects.

We are committed to constant development and enforcing projects which are aimed at increasing energy efficiency of our processes and devices. We invest in modern technologies and solutions that have potential to improve our energy efficiency. We introduce manufacturing process automation, which increases efficiency and minimises energy losses.

2.2. Trainings regarding to the policy.

We commit communicating the company's Energy Policy to our employees and raise their awareness in all its key areas. We encourage employees to introduce their ideas for improving energy efficiency in their workplaces.

2.3. Energy Management System.

We undertake to maintain and continuously improve the Energy Management System in accordance with the requirements of the ISO 50001 standard.

B. Social Accountability.

3. Social Accountability Policy.

We commit to treating the company's personnel and other stakeholders with dignity, honesty and respect and to comply with the law, norms, industry standards and social requirements in all areas of our activities, in particular: the right to a safe working environment, the right to a fair salary and equal pay for equal work, the right to express one's views and participate in consultations, and the right to be protected against forced labour.

3.1. Areas covered by the policy.

The key areas covered by our Social Accountability Policy are presented below.

3.1.1. Child and adolescent labour.

We do not support and we are not engaged in the use of child labour, i.e. people under the age of 16. We do not employ minors, i.e. people over 16 and under the age of 18 - with the exception of vocational school students' internships realised on the basis of tripartite professional internship contracts and in accordance with national law and international standards.

3.1.2. Forced labour and modern slavery.

We do not tolerate any form of modern slavery – we do not support and we do not use forced labour and human trafficking.

3.1.3. Salaries and employee benefits.

We aim to guarantee fair and competitive pay conditions and access to employee benefits. We provide the employment based on clear and transparent contracts and an appropriate salary structure enabling the satisfaction of basic needs and maintaining a decent standard of living for all our employees.

3.1.4. Worktime.

We comply with the legal regulations and industry standards regarding working hours and public holidays. We allow overtime work only in particular cases, such as: the need to conduct an emergency action, to protect property, in the event of breakdown issues, sickness absence of employees or the urgent need to carry out specific work on time and in case of the special needs of the employer. We apply the principles of a healthy balance between work and private life (according to the work-life balance directive).

3.1.5. Ethical recruitment.

We apply ethical employment practices, avoiding discrimination and providing fair and transparent application processes. We ensure equal opportunities for all applicants. Each future employee is informed in a clear, detailed manner about the employment conditions offered.

3.1.6. Freedom of association.

We respect the rights of employees to express their views and participate in the organizations and associations. We respect the right to freedom of assembly and association at all levels. We provide employee representatives with the opportunity to participate in consultations regarding working conditions in the company.

3.1.7. Prohibition of discrimination and preventing harassment.

We are strongly opposed to discrimination with regard to employment, salary, access to trainings and promotion chances, offboarding or retirement, as well as harassment of any person or group, in particular due to their special features. We respect the rights of minorities, respecting their culture, tradition and heritage.

3.1.8. Disciplinary practices.

We do not tolerate and we do not follow corporal punishment, physical and mental constraints or verbal abuse of the personnel. We counteract all forms of mobbing in the workplace. Inhumane and degrading treatment is prohibited.

3.1.9. Woman's rights.

We ensure that men and women are treated equally. We guarantee the right to maternity leave and other breaks related to the pregnancy and motherhood. Pregnant and breastfeeding women are protected from heavy, dangerous and harmful work which may lead to an adverse influence on the course of pregnancy or breastfeeding.

3.1.10. Local community and minorities.

We attempt to make an active contribution to the development of the local community by creating new workplaces. As a consequence of constant expanding of our plant, we increase the demand for subcontracted services. We also support financially educational and art projects organised by local schools and cultural institutions. We help the associations of people with disabilities in our district. We take part in programs aimed at helping the poorest.

3.1.11. Land, forest, water rights and forced eviction.

We strongly oppose the forced eviction and deprivation people of their rights to the land, forests and water.

3.1.12. Private and public security forces.

We do not make use of private or public security forces.

3.2. Trainings regarding to the policy.

We commit communicating the company's Social Accountability Policy to our employees and to raise their awareness of all its key areas.

3.3. Social Accountability Management System.

We undertake the implementation and constant improvement of the Social Accountability Management System in accordance with the requirements of the SA8000 standard.

4. Occupational Health and Safety Policy.

We commit to prioritise issues concerning the safety and work comfort of our personnel. Our Health and Safety Policy covers a range of areas and it is aimed at ensuring safe and healthy workplaces by preventing work-related injuries and health problems, as well as by proactive approach to the improvement of health and safety performance. We undertake to create a friendly working environment. We attempt to minimise risk and handle emergency situations effectively.

4.1. Areas covered by the policy.

The key areas covered by our Occupational Health and Safety Policy are presented below.

4.1.1. Personal Protective Equipment .

We provide our employees with constant and unlimited access to the personal protective equipment. We monitor their condition and effectiveness, adjusting them to the particular workplace specification as well as current needs.

4.1.2. Machine safety.

We undertake to comply with all the regulations, standards and manufacturers' instructions regarding the safe use of machines, including regular technical reviews and maintenance. Only trained and appropriately qualified people are allowed to work on the particular machines. All the workplaces are equipped with job instructions and safety hazard signs.

4.1.3. Emergency procedure.

We implement procedure for handling and responding to emergency situations, including first aid. We provide trainings in order to ensure personnel's effective reaction to various possibilities. We communicate and supply the personnel with significant information about their duties and responsibilities.

4.1.4. Accident management.

We establish procedures for reporting and documenting all the work-related incidents that could lead to an injury and health problems. We conduct a comprehensive analysis of each incident, identifying the causes and implementing corrective actions in order to eliminate the causes and nonconformities and to prevent their reoccurrence. We keep a work accidents record, we assess occupational risk and inform personnel in this area.

4.1.5. Workplace ergonomics.

We implement ergonomic solutions while creating new workplaces or modifying existing ones in order to minimise risk of injuries associated with abnormal posturing and movements. Employees are provided with trainings on proper ergonomics and adapting working environment to their needs.

4.1.6. Handling chemical and/or biological substances.

We identify and classify potential threats connected with exploitation of chemical and biological substances. We provide an access to appropriate protective equipment. We keep our employees informed about the threats and we train them in safe handling of these substances which are stored in separate, specially adapted places.

4.1.7. Fire protection system.

We provide fire protection measures and devices to minimise fire risk and to maintain the security of people staying on the plant premises. We carry out regular inspections of firefighting equipment and fire extinguishing systems. Trainings on fire procedure including evacuation and the use of fire suppression systems are organised.

4.2. Trainings regarding to the policy.

We undertake to communicate the company's Occupational Health and Safety Policy to our employees and to raise their awareness of all its key areas. We implement consultation procedures and employee participation in reference to all relevant functions, including employee representative, in developing, planning, implementing, evaluating the effects of performance and improving the Occupational Health and Safety Policy.

4.3. Occupational Health and Safety Management System.

We undertake the implementation and maintenance of the Occupational Health and Safety Management System in accordance with the requirements of the ISO 45001 standard.

5. Responsible Supply Chain Management.

We handle a responsible procurement policy, focused on building long-term relationships with suppliers, service providers and contractors. All decisions in this regard are based on objective business criteria. Responsible purchasing allows us to reduce risk while simultaneously making optimum employment of resources.

C. Corporate governance.

6. Management responsibility.

The management commits to implementing the provisions presented in this document, promoting behaviour in accordance with its principles and ensuring that the achievement of the business goals does not come at the expense of the standards set out therein. Each member of the management personnel will inform his or her employees about their rights and obligations and will ensure that the subordinate organizational units act in accordance with the content of the Code. He will also ensure that his subordinates have the opportunity to pose questions and express doubts without fear of retaliation and will ensure that they are processed professionally and on time.

6.1. Specific responsibility areas.

Below we present areas particularly taken into account while business decision making and managing our resources.

6.1.1. Sustainable development.

The management personnel put every effort into ensuring that the regulations regarding sustainable development are respected, including requirements regarding social responsibility, occupational health and safety as well as environmental protection.

6.1.2. Compliance with regulations and business ethics.

The management commits to respecting and promoting ethical standards and legal provisions in business relations with both external and internal stakeholders. Each member of the management team should set an example in terms of honesty, be respectful for others, support openness and compliance with legal and social standards.

6.1.3. Eco-development.

The management takes the responsibility for the condition of the natural environment by nature protection and its resources, as well as reducing influence of production processes, manufactured products and delivered services (throughout the entire life cycle) on natural environment.

6.1.4. Sustainability Risk Management

One of the management's aims is engaging into the Sustainability Risk Management within the company by gathering and spreading of knowledge in order to prevent workplace accidents, as well as implementing (where possible) new work and technologies practices.

6.2. Complaints and Grievances.

The management team commits to introducing a transparent and effective mechanism for handling complaints and grievances for the company's personnel and external stakeholders who may have been negatively affected by our activities and operations. The purpose of introducing the procedure is enabling an effective response to current needs and problems and ensuring an efficient compensation procedure and damage redress.

6.2.1. Procedure.

Complaints and grievances handling mechanism and rules.

- Complaints and grievances can be submitted by e-mail: complaints@wemax-polska.com, by phone or in person at the company's headquarters;
- complaints can be submitted anonymously;
- the person submitting the complaint receives complaint acknowledgement;

- each complaint should include complete contact information and a detailed description of the problem;
- all complaints will be treated confidentially and handled in a professional manner;
- all complaints will be dealt without undue delay, but no later than within one month from the date of their receipt;
- there is a strict prohibition (resulting in initiation of disciplinary proceedings) of discrimination and retaliation against persons who report irregularities in good faith
- persons or companies who report false or malicious allegations must take into account the possibility of taking a legal action against them
- the effectiveness of the complaint procedure is evaluated on an ongoing basis and once every 12 months.

6.2.2. Types of complaints.

Types of applications accepted:

- environmental complaints;
- complaints regarding social responsibility;
- complaints regarding unethical business practices.

6.2.3. Access to complaints.

Complaints can be submitted by both internal stakeholders (company's personnel, direct suppliers, service providers, etc.) and external stakeholders (contractors, indirect suppliers, local communities, etc.).

6.2.4. Availability optimization.

We make sure that the complaint submission mechanism is understandable and accessible to the people with various needs, including disabilities. If necessary, we provide explanations of materials regarding the procedure. We regularly review the documentation, striving to its optimization and improvement.

7. Code of Business Conduct and Ethics.

We are committed to conducting our business activities in accordance with the highest ethical standards. Our values constitute the foundation of our business and shape our organizational culture. We believe in honesty, transparency and respect in relationships with employees, business partners, customers and the community.

7.1. Areas covered by the policy.

The key areas covered by our Code of Business Conduct and Ethics are presented below.

7.1.1. Prevention of corruption and money laundering.

All employees and company representatives are obliged to avoid all forms of abuse in order to obtain private benefits, from little use of influence to institutional organization of bribery. We do not tolerate giving or accepting bribes, gifts exceeding ethical standards or other forms of lenient business procedures. It is the responsibility of each employee to report any cases of corruption or suspected money laundering.

7.1.2. Data protection and security.

We maintain complete confidentiality and data protection of the customers, business partners and employees against unauthorized access and damage throughout their life cycle, using the latest technologies and security procedures.

All information is stored and processed in accordance with applicable data protection regulations.

7.1.3. Financial responsibility and company assets.

The management personnel commit to managing finances honestly and transparently, in accordance with applicable accounting and reporting regulations. Company personnel are responsible for recording data accurately and on a timely basis, complying with the company's internal accounting control system, and ensuring that the company's accounting records do not contain any false or misleading entries.

Personnel ensure that company assets are protected (against theft, loss, waste or damage) and assure that they are processed in the most efficient and sustainable manner possible. It is prohibited to use company assets for personal benefits.

7.1.4. Information disclosure.

We commit to sharing reliable information about our activity, financial results and other important business aspects. All data that may influence stakeholder decisions will be disclosed in accordance with the principles of transparency and legal provisions.

7.1.5. Unfair competition prevention and cartel collusion.

We avoid any activities that could lead to cartel collusion or other types of market manipulation.

We comply with the standards of fair business and competition by not using illegal practices that restrict competition, exchanging information about competitors in an unauthorized manner and price fixing, bid rigging or illegal market division.

7.1.6. Conflict of interest.

We are guided by the principles of equal treatment of the parties, neutrality and objectivity, and disinterestedness when making decisions. Company personnel are obliged to avoid situations in which their personal financial, economic or other interests may conflict

with the interests of the company. We do not tolerate using our professional knowledge or position in any way for the personal benefits.

7.1.7. Countering Counterfeits.

Strict control over the order process is followed in order to minimise the risk of purchasing counterfeit raw materials, components or software. We only cooperate with trusted suppliers.

7.1.8. Intellectual property.

We respect the intellectual property rights of others and expect the same from our personnel. We introduce intellectual property protection clauses in all external contracts, including contracts with suppliers, business partners and counterparties.

7.1.9. Export restrictions and economic sanctions.

We commit to complying with the international trade restrictions on the export or re-export of goods, software, services or technology that result from a prohibition on trading with certain countries, regions, legal entities or individuals.

7.1.10. Retaliation.

We do not tolerate retaliatory actions against employees, business partners or competitors. Any case of retaliation will be treated seriously and those responsible will face the consequences.

7.2. Trainings regarding to the policy.

We commit communicating the Code of Business Conduct and Ethics to the stakeholders, and to our employees and raise their awareness in all its key areas.

Krasnystaw, 1st of January 2024