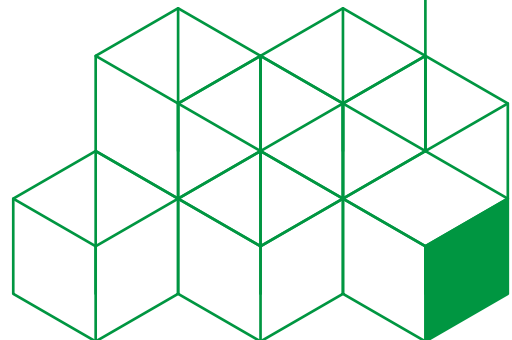




CODE OF ETHICS

WERNER KENKEL





Code of Ethics of Werner Kenkel Spółka z o.o. and Werner Kenkel Bochnia Spółka z o.o. (hereinafter: “Werner Kenkel”) is a document that defines the principles of conduct and values that the company adopts and implements in all aspects of its activities. It is an important element that helps Werner Kenkel maintain high ethical and moral standards and build trust among its employees and the society.

Werner Kenkel is guided by five key values that form the foundation of our activities:

Modernity: We strive for innovation, openness to new challenges and unconventional solutions. Although we draw on our rich tradition, we always look to the future in order to dynamically respond to changing market conditions.

Responsibility: Our actions are characterised by reliability and solidity, both towards our colleagues and the community and environment. We are responsible for the effects of our work and for the impact we have on the environment.

Transparency: Honesty and authenticity are the basis of our relationships. We act openly, and our intentions and actions are understandable and clear to all stakeholders.

Partnership: We focus on long-term relationships based on mutual respect, professionalism and trust. We work with our clients and partners to achieve common goals, striving for the highest quality and reliability.

Family spirit: We foster an atmosphere of cooperation, mutual support and friendliness. We work together, sharing knowledge and experience, which contributes to achieving common goals and building a strong, integrated community of employees.

These values not only shape our organisational culture, but also provide guidelines for our actions in all aspects of the company's activities.

The Code of Ethics aims to integrate the principles of sustainable development and corporate social responsibility with the company's long-term business strategy. This means that Werner Kenkel strives to achieve business success while taking into account the impact of its activities on the natural environment and society.

In addition, the Code of Ethics also takes into account statutory and legal requirements that define standards of conduct for companies. Werner Kenkel is obliged to comply with these regulations and actions in accordance with the law and expects its business partners to apply these principles.

The Code of Ethics also respects international standards for businesses, including the UN Global Compact guidelines on corporate social responsibility (Global Compact is an initiative that encourages companies to adopt and implement the principles of sustainable development and social responsibility).

The key elements of the Werner Kenkel Code of Ethics are as follows:

1. RESPECTING HUMAN RIGHTS:

Werner Kenkel declares that the most important role in the functioning of the company is played by employees. Their work significantly affects the quality of the products offered and the production process, therefore:

- we provide all employees with the opportunity to improve their qualifications and skills by participating in a number of training courses, we commit to and create conditions for employees for continuous personal development,
- we comply with the regulations contained in the UN Human Rights Charter,
- we do not use any form of forced or bonded labour,
- our employees have the right to terminate employment in the manner provided for in the Polish law,
- we do not require employees to make deposits or to deposit their identity documents with us,
- we do not employ children, i.e. persons who are under 15 years of age. However, young workers may be employed in accordance with local regulations regarding working conditions and hours,
- we comply with applicable standards related to working hours. Overtime work is carried out in accordance with the provisions of the Labor Code and is additionally remunerated,
- we provide employees with fair pay and benefits in accordance with applicable regulations,
- within the scope of employee discipline, the entire process is documented, and the employee has the right to respond to the allegations made. Disciplinary procedure is conducted in accordance with national regulations and is used only as a last resort if necessary,
- we counteract discrimination in relation to employment (in terms of: recruitment, pay, benefits, promotion, discipline, dismissal or retirement). Our employees are treated equally regardless of their gender, race, religion, age, disability, nationality, political affiliation, sexual orientation, social or ethnic origin,
- we treat all employees with respect. We do not accept any manifestations of harassment, physical, sexual or mental abuse. All forms of violence, corporal punishment, intimidation or inhumane treatment are prohibited,



- we support the freedom and right of our employees to associate, also taking into account the rights of employees to open dialogue and the negotiation of employment conditions,
- every day we take a number of actions to ensure safe and hygienic working conditions in order to prevent accidents and health hazards arising during or in connection with work, or as a result of the exploitation of the employer's resources. All employees have access to free personal protective equipment. In addition, employees have access to drinking water, clean toilets, changing rooms and canteens,
- we regularly conduct training for employees in the event of accidents and disasters that threaten health and life, including evacuation of employees in the event of emergency situations,
- we do not use prison labour, forced employment or work in exchange for maintenance.

2. COMMITMENT TO ENVIRONMENTAL PROTECTION

Werner Kenkel places great emphasis on a preventive approach to the natural environment.

Our main priorities are:

- monitoring and taking into account the impact of the conducted activities on the environment and developing the awareness of the management and employees in this area. In order to implement this approach, Werner Kenkel undertakes various initiatives, such as promoting ecologically responsible attitudes and using and promoting environmentally friendly technologies,
- taking actions aimed at continuously and planned reduction of the negative impact on the environment through appropriate process management and continuous modernisation of production,
- having and regularly renewing the required environmental protection permits and following the recommendations contained therein to ensure compliance with the law,
- manufacturing products containing significant amounts of recycled materials in an energy-efficient manner,
- protecting natural resources by reducing the consumption of water, electricity and fuels. Werner Kenkel also conducts rational waste management, based on continuous analysis of its structure and segregation, including used consumables, devices and packaging for its proper disposal.

3. COMPLIANCE WITH ETHICAL STANDARDS

Werner Kenkel takes compliance with ethical and business standards very seriously. All of our activities are based on ethical principles and best business practices, in particular:

- we take action to counteract corruption in all its forms,
- we do not accept or give binding gifts or other financial benefits,
- we keep transparent documentation that allows us to document compliance with applicable materials, services and statutory and industry regulations,
- we take care to protect confidential and proprietary information about our business partners,
- we have implemented a system that allows both internal and external complaints to be reported and managed confidentially.

This allows employees and external parties to report potential violations of ethics and business standards in a trustful and confidential atmosphere.

All these activities are aimed at ensuring that Werner Kenkel operates in accordance with the highest ethical and business standards, which contributes to building trust among our employees and business partners.

COMMITMENT

Werner Kenkel Managers are committed to maintaining and continuously improving work standards and ensuring their appropriate level for employees, stakeholders and the environment. In order to fulfil this commitment, our Managers provide the necessary means and resources needed to implement and operate the Code of Ethics.

REPORTING VIOLATIONS:

Reporting a violation of the principles of this Code or another disturbing situation can be done via e-mail:

- naruszenia.wkk@wernerkenkel.com.pl in the case of Werner Kenkel Spółka z o.o.,
- naruszenia.wkb@wernerkenkel.com.pl in the case of Werner Kenkel Bochnia Spółka z o.o.

It is possible to anonymously report a violation or a disturbing situation via traditional mail, by sending the report by letter to the address of the relevant Company.





COMPLIANCE

The Code of Ethics is communicated to all persons working for or on behalf of Werner Kenkel. All employees are responsible for its implementation. Sustainability is one of Werner Kenkel's key priorities, and all suppliers and business partners are expected to work towards its implementation. Werner Kenkel expects and requires its suppliers to comply with all applicable laws and regulations, in particular, the guidelines and requirements contained in the Code of Ethics. In addition, Werner Kenkel expects its suppliers to strive to adopt international and industry standards and best business practices. Our suppliers express their commitment to comply with these requirements and standards by signing this document or presenting a code that is identical to the Werner Kenkel code.

In this way, Werner Kenkel prioritises creating and maintaining fair and ethical business relationships, both internally and externally. Werner Kenkel's activities are focused on building trust, sustainable development and compliance with the law and industry standards. The Code of Ethics has been communicated and is publicly available.

This Code of Ethics enters into force on 2 September 2024.

On the date of entry into force of this Code of Ethics, the Ethics Policy of 9 August 2023 ceases to apply.

President of the Management Board

Adam Kenkel

Vice-President of the Management Board

Damian Kenkel

