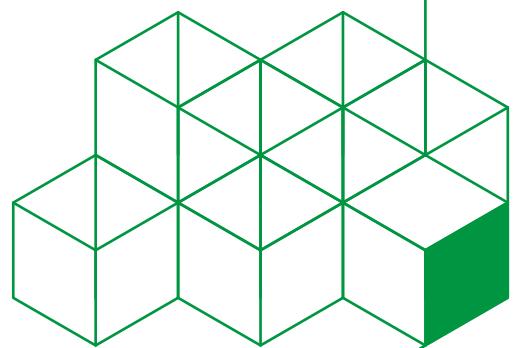




# SUPPLIER CODE OF CONDUCT

## WERNER KENKEL





## PREAMBLE

*Werner Kenkel's business activities are based on five fundamental values: modernity, responsibility, partnership, transparency and family. That is why Werner Kenkel is fully committed to the highest ethical, legal, social and environmental standards throughout its supply chain. This Supplier Code of Conduct is intended to affirm our commitment to the values of responsible and sustainable business and to set uniform rules for working with our suppliers and business partners.*

*Our aim is for our business partners to share our principles and work with us to achieve our mission of creating a responsible, modern and sustainable supply chain. We expect our suppliers to operate in compliance with the highest ethical standards, taking care of quality, safety and the environment, and building relationships based on mutual respect and integrity.*

*This Code demonstrates our commitment to building lasting and ethical partnerships that contribute to mutual success and positive changes in the world around us..*

## 1. PURPOSE AND SCOPE

The purpose of this Werner Kenkel's Supplier Code of Conduct is to establish common ethical, social, environmental and business standards for relationships with suppliers, to ensure that business partners act in accordance with Werner Kenkel's values and principles, and to promote responsible and sustainable practices throughout the supply chain.

The Code of Conduct applies to all Werner Kenkel suppliers, subcontractors and business partners, regardless of their location, legal form or size.

It applies to all aspects of cooperation, including production, delivery, services, logistics and support processes.

It covers, among other things, such areas as human rights, working conditions, combating corruption, environmental protection, fair competition and ethical business conduct.

## 2. RULES OF CONDUCT

### 2.1. COMPLIANCE WITH THE LAW

We comply with all applicable local and international laws. We act in accordance with the UN Universal Declaration of Human Rights and strive to achieve the United Nations' Sustainable Development Goals under Agenda 2030, the UN Global Compact and the Paris Agreement.

We expect and require all our suppliers to comply with the applicable local and international laws.

We require respect for the principles included in international documents, such as:

- UN Universal Declaration of Human Rights,
- International Labour Organisation (ILO) Conventions,
- UN Global Compact,
- UN's Sustainable Development Goals (SDGs),
- Paris Agreement,
- ETI (Ethical Trading Initiative Base Code).





## **2.2. COUNTERING CORRUPTION AND PROMOTING FAIR MARKET PRACTICES**

We expect our suppliers to act in accordance with the applicable laws and in the spirit of the principles set forth in Werner Kenkel's Anti-Corruption Policy, available at: [www.wernerkenkel.com.pl](http://www.wernerkenkel.com.pl) under the "policies" tab.

We do not accept any form of corruption, including bribes, bribery attempts, financial frauds or conflicts of interest. We expect our suppliers to adhere to these principles and ensure that their employees, collaborators and third parties acting on their behalf are aware of and apply them.

In their relationship with Werner Kenkel, the suppliers should actively prevent and avoid situations that may lead to a conflict of interest or be perceived as such.

The suppliers are required to conduct their business activities in a transparent and fair manner, respecting the principles of fair competition and applicable national and international laws.

## **2.3. DATA PROTECTION AND CONFIDENTIALITY**

The suppliers are obliged to comply with all applicable laws on the protection of personal data and the rules for their processing, including the assurance of security and confidentiality of such data.

In particular, we require that the data be processed in a manner compliant with applicable regulations (e.g. GDPR) and that those with access to the data be properly trained and bound to confidentiality. In addition, we require the protection of confidential information regarding clients, partners and employees, both their own and Werner Kenkel's.

## **2.4. UNDERAGE AND FORCED LABOUR**

Werner Kenkel's suppliers comply with the rules of not employing minors, in any form, contrary to the laws applicable in the Supplier's country. In particular, it is forbidden to employ minors in hazardous work bearing risks to their health and safety.

The use of forced labour, slave labour and all forms of human trafficking is not accepted. The hired employees engage in work at their own will and have the opportunity to terminate their cooperation with the observance of rules and deadlines compliant with the law.

## **2.5. WORKING HOURS, SALARY**

We require the performance time to be in accordance with the national regulations of the Supplier's place of business. Overtime work should be performed voluntarily. Salaries should be adequate for the work performed and meet national requirements for at least the minimum wage. We also require timely payment of salaries and transparency in terms of employment conditions.

## **2.6. FREEDOM OF ASSOCIATION**

A Werner Kenkel's supplier should ensure that its employees may communicate freely with their supervisors without fear of retaliation, discrimination or humiliation. The employees have the right to form and join trade unions, participate in the creation of safe working conditions in accordance with national legislation.

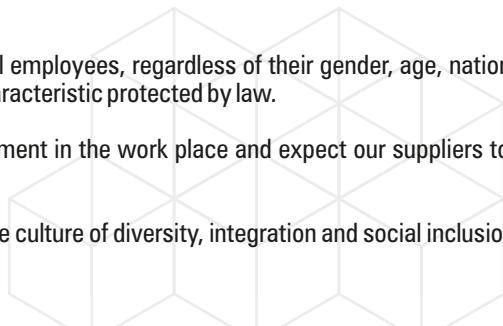
We also expect the suppliers to foster constructive social dialogue and create a work environment open to cooperation and respect for employee rights.

## **2.7. EQUALITY AND DIVERSITY, NO DISCRIMINATION**

We require that Werner Kenkel's suppliers provide equal opportunities to all employees, regardless of their gender, age, nationality, ethnicity, religion, health status, disability, sexual orientation or any other characteristic protected by law.

We do not accept any form of discrimination, unequal treatment or harassment in the work place and expect our suppliers to take active measures to respect dignity and human rights.

We also expect the suppliers to create a work environment that is open to the culture of diversity, integration and social inclusion, fair and respectful of people's differences.





## 2.8. OCCUPATIONAL HEALTH AND SAFETY

We require Werner Kenkel's suppliers to provide their employees with safe and hygienic working conditions that comply with the applicable laws and best practices in occupational health and safety. Special attention should be paid to identification and minimisation of biological, chemical and other relevant occupational risks.

The suppliers are required to regularly assess the risks associated with their work and implement effective preventive measures. They should also provide access to appropriate personal protective equipment (PPE), provide occupational health and safety training, and organise a first-aid management system, including the availability of trained persons and appropriate equipment.

We also expect the suppliers to guarantee their employees the right to refuse to perform work when they believe it poses a direct threat to their health or life, without risking negative consequences.

## 2.9 COMMITMENT TO ENVIRONMENTAL PROTECTION

We require Werner Kenkel's suppliers to conduct their business activities in an environmentally responsible manner, minimising negative impact on the natural environment in accordance with the environmental protection regulations applicable in their country.

The suppliers should actively strive to reduce water, raw material and energy consumption, reduce waste and harmful emissions, and conserve natural resources.

The suppliers should take specific measures to reduce greenhouse gas emissions, particularly carbon dioxide (CO<sub>2</sub>) emissions, both directly in the production processes and indirectly, for example, by choosing low-carbon technologies, energy-efficient solutions and sustainable forms of transport.

We recommend that our suppliers use energy and raw materials from renewable or sustainable sources, whenever possible, and implement innovative technologies to support environmental efficiency.

These activities should comply with the rules of sustainable development and contribute to the global climate goals.

## 3. REPORTING IRREGULARITIES

We expect our suppliers to continuously improve in achieving compliance with this Code. We encourage you to report any violations of the Code. We guarantee anonymity and no retaliation. Any cases of violations or irregularities should be reported to Werner Kenkel using the following communication channels:

- through the use of an internal ICT system dedicated to the receipt of reports (electronic mailbox) that ensures the security of the report, including anonymity and confidentiality. Reports can be made via email at: naruszenia.wkk@wernerkenkel.com.pl, naruszenia.wkb@wernerkenkel.com.pl.
- by sending a written report to the address of the relevant Company.

Werner Kenkel expects its suppliers to continuously improve their compliance with the principles set forth in this Code. The suppliers are also required to respond to any irregularities and proactively report any violations of the Code.

The reports may be made anonymously. Werner Kenkel guarantees full confidentiality and no retaliation against bona fide reporters.

## 4. ACCOUNTABILITY AND ENFORCEMENT

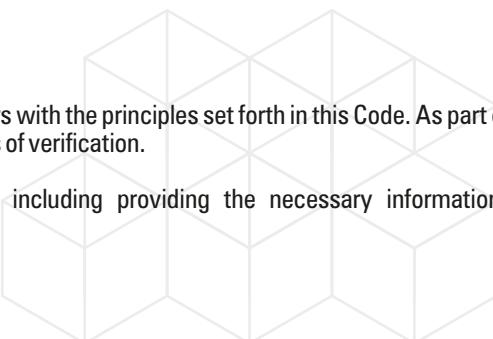
Every employee of the Supplier and other business partners are required to comply with all provisions of the Code. Any violations may result in disciplinary sanctions and/or termination of the cooperation.

### 4.1. MONITORING AND EVALUATION OF SUPPLIER COMPLIANCE

Werner Kenkel regularly monitors the compliance of the actions of its suppliers with the principles set forth in this Code. As part of this process, we reserve the right to conduct audits, assessments and other forms of verification.

We expect the suppliers to actively cooperate during such activities, including providing the necessary information and documentation to confirm compliance with the provisions of the Code.

The Supplier Code of Conduct will take effect as of August 1, 2025.



**President of the Management Board**

**Rafał Grochowczak**

**Vice President Finance**

**Krzysztof Giera**



We hereby accept the contents of this Werner Kenkel's Supplier Code of Conduct and undertake to comply with it.

.....  
Date and signature of the Supplier

