

**SOSNOWSKI**

SOSNOWSKI Code of Conduct

Introduction The

SOSNOWSKI Code of Conduct ("Code of Conduct") sets out the basic standards of behavior and conduct of all directors, officers and employees of SOSNOWSKI sp. z o.o. and its subsidiaries ("Employees").

In line with SOSNOWSKI's philosophy of "Reliability and Creativity", the implementation of the Code of Conduct by Employees supports the promotion of corporate social responsibility and SOSNOWSKI's contribution to the sustainable development of society. All Company Employees must strive to conduct themselves appropriately, with complete honesty and professionalism. However, please remember that the Code of Conduct is a set of guidelines and as such may not apply to every possible situation.

The Code of Conduct is intended to help employees make the right decisions while performing their professional duties.

Scope

The Code of Conduct applies to all SOSNOWSKI employees.

The term "SOSNOWSKI company" appearing in the Code of Conduct refers to SOSNOWSKI sp. z o.o. and its subsidiaries. The pronoun "we" or "our/ours" refers to all SOSNOWSKI Employees.

1. Responsibility 1. We

are responsible for complying with the Code of Conduct and all rules of behavior and actions established in the SOSNOWSKI company where we work. At the same time, when conducting business activities and acting on behalf of SOSNOWSKI, we are obliged to comply with applicable legal provisions. We must undertake all activities related to the business activities of SOSNOWSKI in compliance with ethical standards and with full care for its interests.

2. Each director, manager and supervisor at SOSNOWSKI is responsible for performing his or her job objectively and honestly. In this way

actively promotes communication at all levels in the company and sets a positive example and encourages other SOSNOWSKI employees to act in accordance with the Code of Conduct. Each director, manager and supervisor at SOSNOWSKI is also obliged to help employees understand the provisions of the Code of Conduct.

2. Respect for human rights

1. We recognize international standards of conduct on human rights. We make every effort not to engage in activities that could in any way limit or violate human rights.
2. We respect the character and individualism of every person and will not join in any actions that would be aimed at the dignity of an individual.
3. We do not use slave or child labor and expect all SOSNOWSKI suppliers and business partners to maintain the same attitude.

3. Healthy work environment 1.

SOSNOWSKI respects the basic rights of Employees regarding freedom of association in accordance with applicable laws and regulations in force in the countries where it operates.

2. We support a diverse and supportive work environment. We accept differences in opinions and values, provided they do not unlawfully restrict the rights of others; Together, we strive to create a work environment conducive to achieving the best possible results, in which there is no place for any form of bullying or harassment.
3. We comply with applicable laws and regulations regarding the working conditions of Employees working for SOSNOWSKI, and we promote the health and safety philosophy to ensure a healthy and safe working environment for all Employees.



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4. SOSNOWSKI makes every effort to provide employees with a healthy work-life balance.
5. SOSNOWSKI provides equal employment opportunities, therefore it does not allow discrimination on the basis of race, skin color, ethnic origin, gender, nationality, age, religion, limitations and other sensitive features defined by applicable law.

4. Protection of the natural environment

1. SOSNOWSKI increases the ecological awareness of employees to contribute to building a sustainable model of society. We conduct business activities with respect for the natural environment.
2. We strive to reduce the burden on the natural environment at all stages of our business activities - from procurement through design, production, logistics, sales, use, to service and disposal of products - and to provide our customers with environmentally friendly products and services.
3. We comply with applicable environmental protection laws and regulations and actively work to control and appropriately use chemicals, reduce waste, etc. We also make efforts to reduce CO2 emissions, for example by implementing energy-saving solutions and installations that reduce energy consumption in production plants. .
4. We strive to save natural resources, use them efficiently, reuse and recycle them to ensure sustainable use of limited resources.

5. Operational

practices (1) Anti-bribery and anti-corruption

- practices 1. SOSNOWSKI has a zero-tolerance policy towards bribery and makes every effort to prevent it.
2. We avoid any behavior that may raise suspicions of bribery.

3. SOSNOWSKI wants to be a responsible member of society wherever it operates or does business, therefore it maintains healthy and honest relations with authorities and officials, complying with applicable laws and regulations and avoiding corruption.

(2) Relationships with suppliers and business partners

1. We carefully select suppliers and business partners, based solely on their advantages, reputation and quality of services provided. In relations with suppliers and business partners, SOSNOWSKI behaves with respect for the law, effectively and honestly.
2. In business relations, we do not use SOSNOWSKI's position to obtain personal benefits or force unethical or unfavorable conditions on suppliers and business partners by engaging in unfair activities.
3. SOSNOWSKI expects all of its suppliers and business partners to comply with the terms of applicable contracts and to comply with applicable laws and regulations in their countries of operation.

(3) Social responsibility in the supply chain To

promote responsible behavior within the supply chain, SOSNOWSKI expects its suppliers and business partners to meet SOSNOWSKI standards and conduct in accordance with the provisions of the Code of Conduct. We also expect our suppliers and business partners to comply with the standards described in this Code of Conduct, including SOSNOWSKI's policies regarding compliance with applicable laws, respect for human rights, the working environment, protection of the natural environment and ensuring the safety of products and services.



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(4) Entertainment and

Gifts 1. When conducting business on SOSNOWSKI's behalf, we comply with applicable laws, regulations and company policies regarding giving and/or receiving gifts or entertainment to customers, suppliers, business partners or persons seeking to do business with SOSNOWSKI. We only participate in entertainment activities related to our business and we give and accept gifts to the extent justified by the applicable business culture. If we have any doubts about the appropriateness of a given behavior, we contact our superiors.

2. We do not provide gifts and/or entertainment to clients or other persons doing business with SOSNOWSKI or interested in doing so in exchange for assistance or proceeds, or after obtaining information about the provision of similar assistance or proceeds in connection with any business transaction involving the company SOSNOWSKI. We do not accept offers of entertainment activities and/or gifts from suppliers, business partners or others who do business with or are interested in doing business with SOSNOWSKI under circumstances that could be construed as potentially influencing business decisions regarding transactions involving SOSNOWSKI.

3. We report all gifts and/or entertainment given and received in accordance with the standards of conduct established in SOSNOWSKI policies applicable to the branch that employs us.

(5) Lobbying and political donations

SOSNOWSKI complies with applicable laws regarding lobbying and political donations in the countries in which it operates.

(6) Fair Competition and Business

Transactions 1. When competing in the marketplace, we take vigorous action but conduct ourselves in a spirit of fair and open competition. Therefore, wherever SOSNOWSKI conducts its business, we comply with antitrust and other competition regulations.

2. We do not enter into any formal or informal written or oral agreements with competing companies that engage in price fixing on products or services, allocate markets or customers, eliminate competition or otherwise impermissibly restrict trade.

3. We honor SOSNOWSKI's contracts with its customers, suppliers and business partners and always follow their letter.

4. We avoid practices that may lead to a conflict of interest or give the impression of a conflict of interest. We do not participate in any activities that may harm the image or interests of SOSNOWSKI in order to achieve personal benefits or bring them to third parties. We avoid situations in which our own good or the interests of the family could compete with the interests of SOSNOWSKI.

(7) Import and Export Controls

In international transactions, whether they involve hardware or software (for example, our products, their parts or technical information), we comply with applicable export, re-export and import control laws and regulations, and we also submit true declarations to the appropriate offices.



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(8) Taxation As a

responsible tax entity, SOSNOWSKI operates in accordance with applicable tax laws and regulations. We are supporters of an open and honest dialogue between tax authorities and enterprises and we actively strive for it. We try to solve all problems arising from different interpretations of regulations by us and the tax authorities.

(9) Preventing trading in shares based on confidential information We do not

engage in trading in securities based on confidential information not available to the public.

(10) Proper Use and Management of SOSNOWSKI Property We are responsible

for the proper use and management of SOSNOWSKI assets, including its facilities, equipment, funds, inventory, products, information, intellectual property and software. We will also take all necessary steps to protect SOSNOWSKI's resources against loss, destruction, theft, damage or misuse. We do not use SOSNOWSKI's resources for private or illegal purposes.

(11) Protection of intellectual property rights 1. We

understand that SOSNOWSKI's intellectual property, such as its patents, industrial design protection rights, trademarks, copyrights and trade secrets, constitute invaluable company assets that should always be protected. We are committed to establishing, protecting and upholding rights with respect to all SOSNOWSKI intellectual property resources. We will not allow any third party to use SOSNOWSKI's intellectual property without obtaining appropriate

permits and licenses.

2. We respect the intellectual property rights of third parties (patents, industrial design protection rights, trademarks, property rights and others), and we do not violate them or use them inappropriately. We obtain intellectual property information from third parties using appropriate, lawful methods.

(12) Solid communication

1. We make every effort to ensure that SOSNOWSKI's communications, i.e. all published documents, advertisements and marketing or promotional information and materials, are always accurate, true and free from false or misleading statements, and do not violate the rights of third parties.
2. We also make every effort to avoid advertising in media that publish content that may disturb public order, constitute an offense to morality or have an adverse impact on society.

(13) Proper management of information 1. We

- take all reasonable precautions to ensure the confidentiality of information requiring such protection. The obligation to protect confidential information does not cease at the end of employment at SOSNOWSKI. We do not use this type of confidential information for our own purposes.
2. We process personal data fairly and in accordance with their intended purpose, and in accordance with applicable regulations.
 3. We manage business information, including personal data, in a manner appropriate to its level of confidentiality in order to prevent its loss or unauthorized disclosure.



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6. Objective information and disclosure

1. We strive to disclose accurate information in a timely manner information.
2. SOSNOWSKI makes every effort to report accurate data regarding its operations. We act on the basis of actual data, in accordance with applicable accounting regulations, in order to submit appropriate information on time and fulfill tax and other legal obligations of SOSNOWSKI. We do not engage in improper accounting practices intended to achieve profits, meet sales targets, meet expense budgets, or for any other reason.

7. Offering valuable products and services

1. SOSNOWSKI strives to provide society with useful products and services that meet customer expectations and needs.
2. We strive to respond clearly and quickly to questions and requests, and to provide customers with accurate information in an understandable form to help them make sound decisions.
3. We strive to offer the highest quality and safety of products and SOSNOWSKI services.
4. We take care to provide user-friendly instructions and other information enabling the proper and safe use of our products and services.
5. If safety problems occur, SOSNOWSKI complies with applicable rules and immediately takes appropriate actions, such as withdrawing products from sale.
We make every effort to prevent such a problem from occurring in the future.

8. Relations with society 1.

- We strive to understand and respect the culture, values and customs of each community in which SOSNOWSKI does business.
2. SOSNOWSKI actively promotes participation in activities that contribute to the development of local communities and serve public interests. SOSNOWSKI complies with applicable regulations regarding the granting of donations for charitable purposes in force in the countries in which it operates.
 3. We cooperate to maintain social order and do not engage in any anti-social, harmful activities.



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Consequences of violation, reporting/consultation

system We are responsible for reporting violations or potential violations of the Code of Conduct.

1. Reporting/consultation system

An employee aware of a violation or potential violation of the Code of Conduct is obliged to immediately report such incidents or consult them with their direct superiors and/or with the reporting/consultation office or with the department/employee of the SOSNOWSKI department in which they are employed. If any questions arise, the Employee is obliged to consult their superior and/or the reporting/consultation office or a designated department/employee at the SOSNOWSKI company where they are employed.

2. Principle of non-retaliatory action

Persons reporting a violation or potential violation of the Code of Conduct will not experience inferior treatment or retaliation as a result of their reporting.

3. If SOSNOWSKI is notified of a violation or potential violation of the Code of Conduct, the appropriate Employee within the company will take appropriate steps to investigate the matter, develop a solution and prevent similar situations in the future.

4. Consequences of violating the Code of Conduct

Violation of the Code of Conduct may result in SOSNOWSKI taking disciplinary actions, including termination of the employment contract, and in the event of violation of the law, also in civil and/or legal liability.

Managing the Code of Conduct

1. Establishment, update and withdrawal

SOSNOWSKI may establish, update or withdraw the Code of Conduct at any time. Such actions are preceded by the chairman of the SOSNOWSKI Compliance Committee submitting a proposal to the SOSNOWSKI Executive Committee, which makes the final decision.

Decisions on minor changes are made personally by the chairman of the SOSNOWSKI Compliance Committee.

In the event of discrepancies between the provisions of the Code of Conduct and local regulations, SOSNOWSKI must always comply with higher standards.

In case of doubt, the Employee should seek advice from their superiors and consult the appropriate course of action with the department/employee responsible for compliance at the SOSNOWSKI company where they are employed.



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