



ETP ELEKTRO

ETP ELEKTRO SP Z O.O.
CODE OF BUSINESS CONDUCT



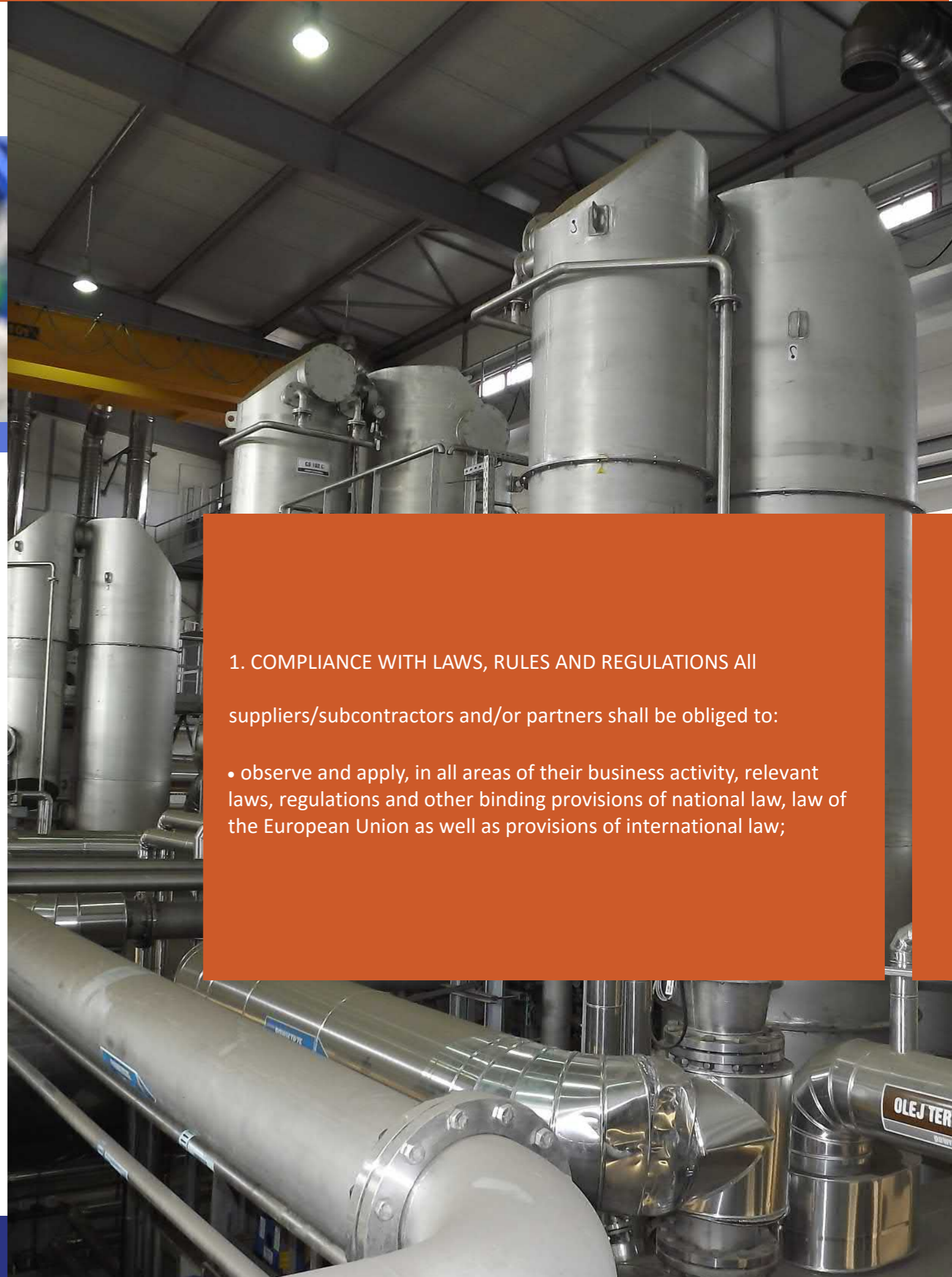
Conducting business in a responsible and ethical manner - in accordance with the rules of sustainable development and social responsibility - is the core element of business activity as well as corporate strategy of ETP ELEKTRO.

Code of Business Conduct of ETP ELEKTRO is a demonstration of the Company's commitment to follow the highest level of ethical standards, integrity and sustainable development based on the rules of social responsibility in business practices as well as in cooperation with suppliers/ subcontractors and/or business partners.

Code of Business Conduct of ETP ELEKTRO shall establish minimum standards of work and business activity, which should be followed by all suppliers/subcontractors and/or business partners of ETP ELEKTRO, at the same time being in compliance with all laws and regulations related to the business activity conducted by the Company, and providing guidance on how to achieve the best business practices

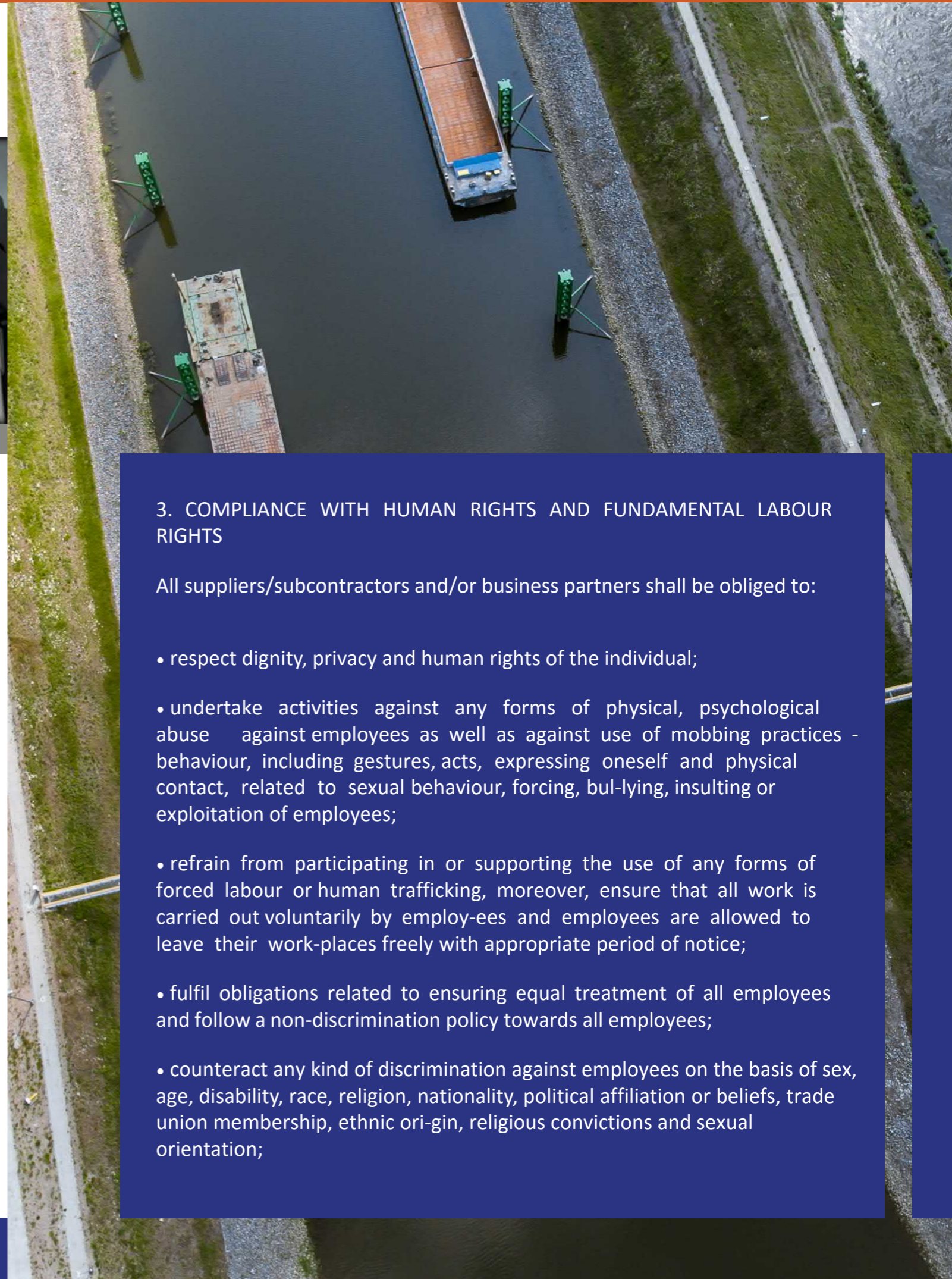
We expect that our potential suppliers/subcontractors and/or business partners will follow the standards of this Code of Business Conduct of ETP ELEKTRO while conducting their business as well as in relationships with their sub-suppliers and/or subcontractors.

This Code of Business Conduct of ETP ELEKTRO defines the basic rules and requirements providing the guidance for all our suppliers/subcontractors and business partners to base their business activity on



1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS All suppliers/subcontractors and/or partners shall be obliged to:

- observe and apply, in all areas of their business activity, relevant laws, regulations and other binding provisions of national law, law of the European Union as well as provisions of international law;



2. ANTI-CORRUPTION AND BRIBERY POLICY, RELATIONSHIPS WITH STAKEHOLDERS

All suppliers/subcontractors and/or business partners shall be obliged to:

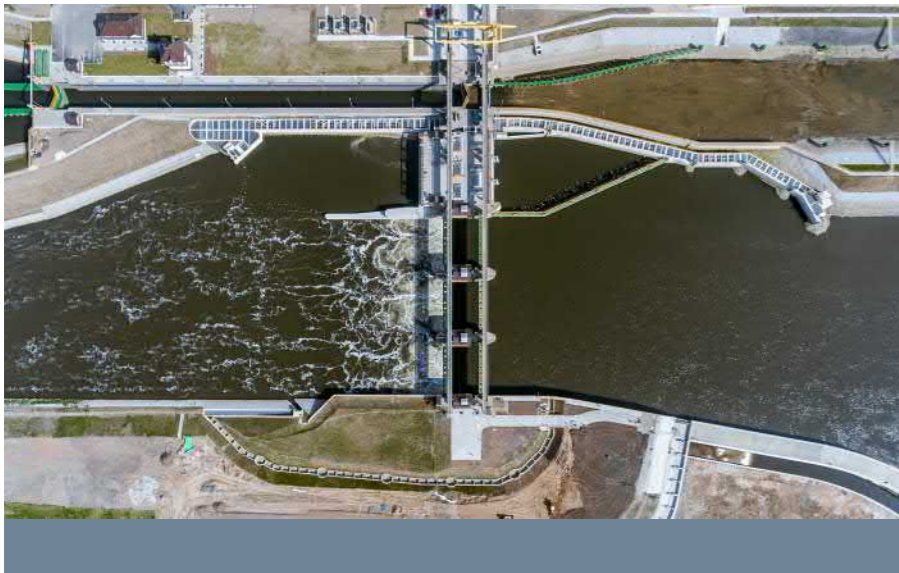
- never offer, give or promise directly or indirectly any financial or other advantage or services to any persons or entities in order to influence business-related decisions taken by such persons or entities or in order to induce such persons or entities to act contrary to their prescribed duties in order to obtain, retain or direct business or to ensure any other economic advantage;
- avoid any situations that may lead to the occurrence of a conflict of interests or a potential occurrence of such conflict of interests;
- always act in compliance with applicable provisions of competition law;
- absolutely never use practices, like: corporate espionage, theft or concealing the identity in order to obtain access to confidential information on competitors;

3. COMPLIANCE WITH HUMAN RIGHTS AND FUNDAMENTAL LABOUR RIGHTS

All suppliers/subcontractors and/or business partners shall be obliged to:

- respect dignity, privacy and human rights of the individual;
- undertake activities against any forms of physical, psychological abuse against employees as well as against use of mobbing practices - behaviour, including gestures, acts, expressing oneself and physical contact, related to sexual behaviour, forcing, bullying, insulting or exploitation of employees;
- refrain from participating in or supporting the use of any forms of forced labour or human trafficking, moreover, ensure that all work is carried out voluntarily by employees and employees are allowed to leave their work-places freely with appropriate period of notice;
- fulfil obligations related to ensuring equal treatment of all employees and follow a non-discrimination policy towards all employees;
- counteract any kind of discrimination against employees on the basis of sex, age, disability, race, religion, nationality, political affiliation or beliefs, trade union membership, ethnic origin, religious convictions and sexual orientation;

- ensure the right to decent wage for the work performed in an amount not less than statutory minimum wage rate or minimum wage rate for an industry, paid out in accordance with relevant provisions of law;
- ensure timely payment of wages to employees or other benefits that employees and subcontractors are entitled to;
- comply with applicable laws and industry standards regarding working time, including rules and standards concerning working overtime



4. PROHIBITION OF CHILD LABOUR

All suppliers/subcontractors and/or partners shall be obliged to:

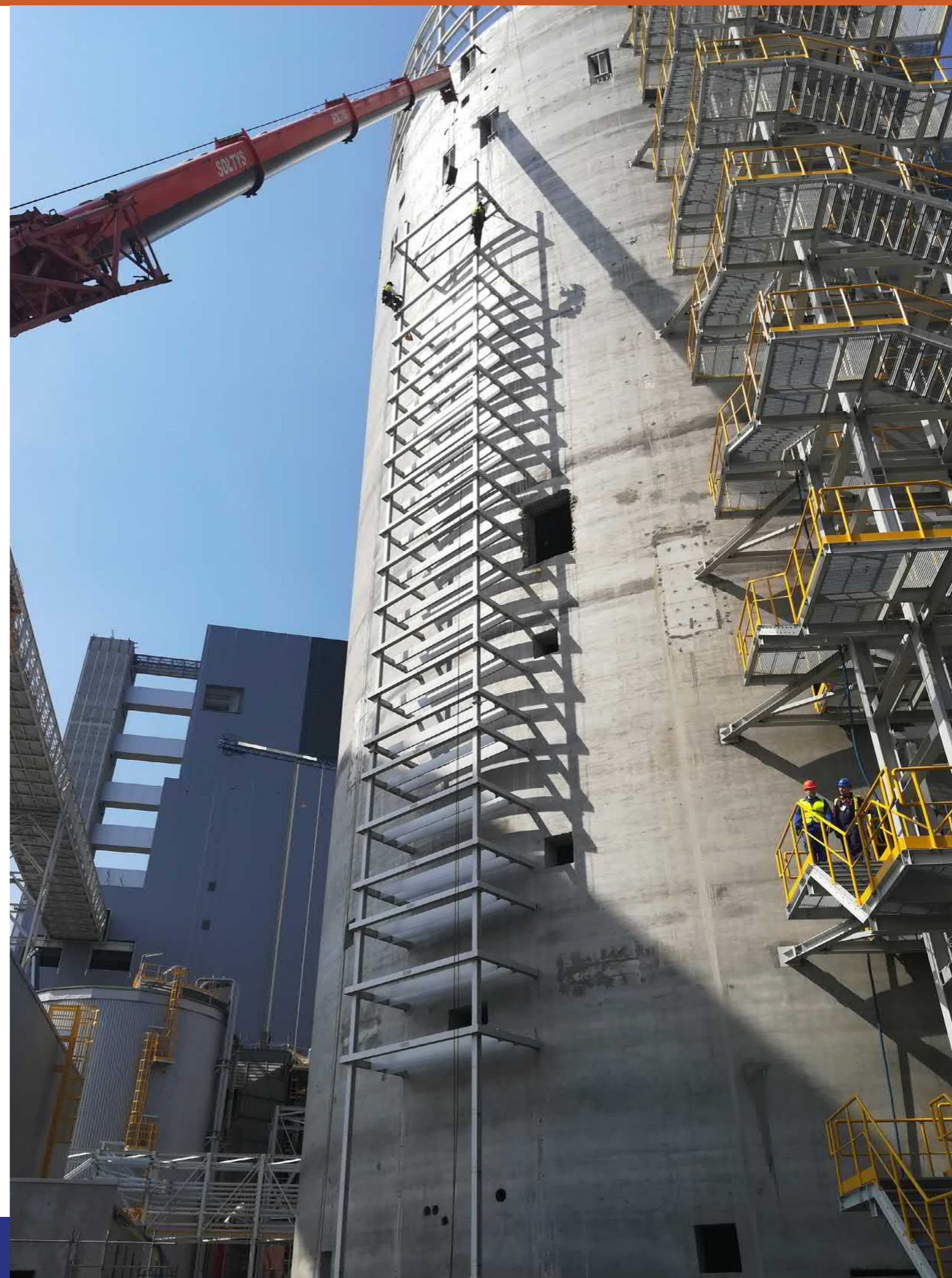
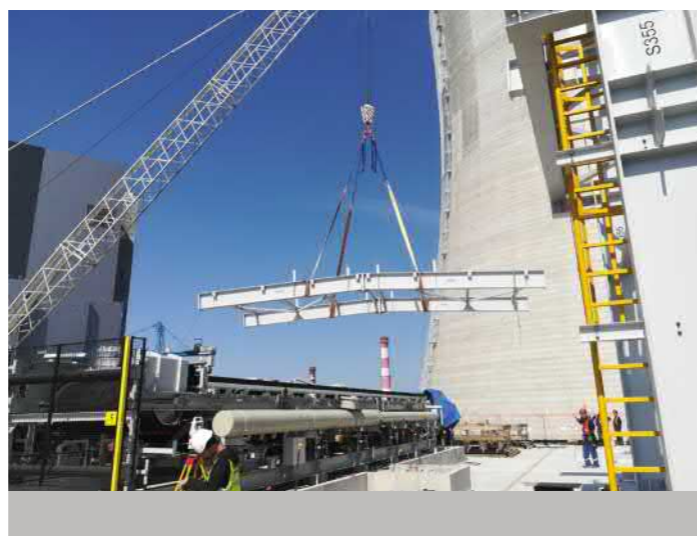
- take actions against any forms of child labour in accordance with the European Convention on the Rights of the Child;
- never employ persons under the age of 15 or below the minimum age for admission to employment according to provisions of law applicable in a particular country;



5. OCCUPATIONAL SAFETY AND HEALTH

All suppliers/subcontractors and/or partners shall be obliged to:

- fulfil, at least to a minimum extent, requirements resulting from legislation on occupational safety and health;



- ensure a healthy and safe workplace (including in particular: working clothes, personal protective equipment etc.), ensure proper hygienic and sanitary conditions
- ensure taking appropriate actions to prevent work-related accidents and to minimise risks to health and safety of the employees;
- ensure regular and effective occupational health and safety trainings, use mechanisms aimed at detecting, analysing and eliminating potential threats to the health and safety of employees;
- comply with safety procedures of ETP S.A. while visiting workplace or working in ETP ELEKTRO facilities

6. ENVIRONMENTAL PROTECTION

All suppliers/subcontractors and/or partners shall be obliged to:

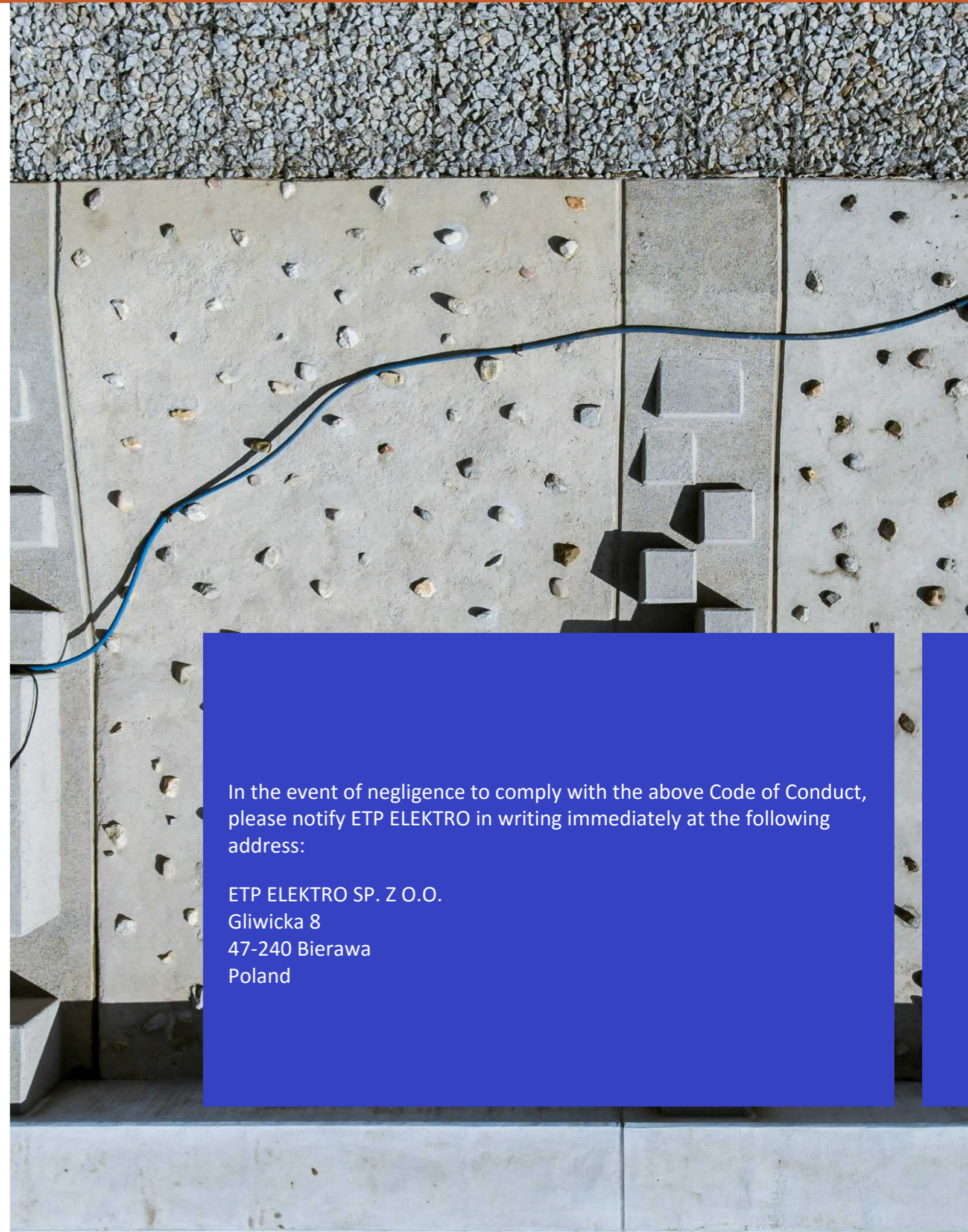
- comply with current applicable environmental legislative requirements regarding environment protection
- establish and implement environmental management system according to ISO 14001 or its equivalent;
- conduct analysis of potential environmental threats resulting from conducting a particular business activity and undertake preventive action where reasonably necessary;
- try to apply environmentally-friendly technologies and production solutions



7. NETWORK OF SUPPLIERS

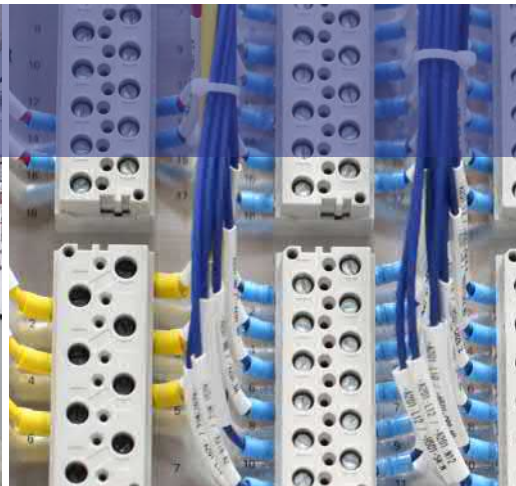
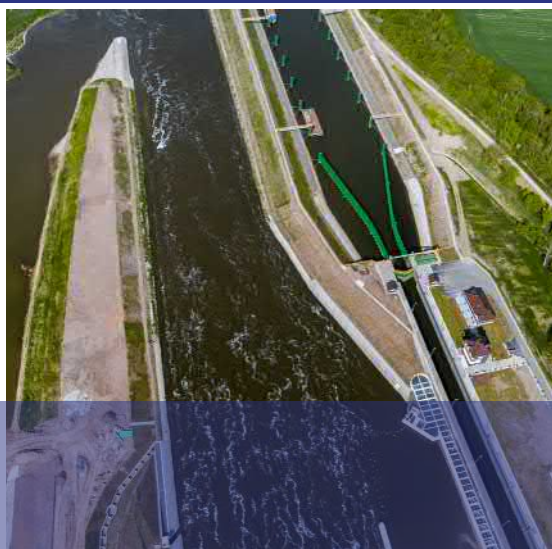
All suppliers/subcontractors and/or partners shall be obliged to:

- use all reasonable endeavours to promote taking actions in compliance with principles of this Code of Business Conduct by suppliers/subcontractors and/or business partners.
- select suppliers/subcontractors and/or business partners in compliance with laws as well as with applicable regulations and rules of free market, at the same time ensuring full transparency of conducted activities
- evaluate suppliers/subcontractors and/or business partners only taking into account the merits and business reasons;
- solve problems through dialogue in case of difficult or conflict situations



In the event of negligence to comply with the above Code of Conduct, please notify ETP ELEKTRO in writing immediately at the following address:

ETP ELEKTRO SP. Z O.O.
Gliwicka 8
47-240 Bierawa
Poland



ETP ELEKTRO



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phone: +48 77 480 22 00
e-mail: biuro.elektro@etp-group.com