

SOCIAL COMPLIANCE POLICY

In ETP ELEKTRO SP. Z O.O. we believe that our success is built on the foundation of personal and professional integrity. We understand the challenge of ensuring high social, ethical and environmental standards in our field of work and throughout the whole supply chain. We are committed to work with our suppliers to ensure that these standards are continuously improved. To achieve this, ETP ELEKTRO SP. Z O.O. has developed this social compliance policy.

This policy defines the minimum standards along with basic principles we expect from our suppliers and customers. We are committed to ensure that the standards set are effectively implemented and monitored throughout our global supply chain, and we need the support of our suppliers to achieve this goal.

1. Range

Management of ETP ELEKTRO SP. Z O.O. defines this policy as applicable to the subcontractors, suppliers and other parties involved in the supply chain as well as the company itself.

2. General provisions

Business partners must fully comply with all legal requirements governing the conduct of their business. This policy conveys our values and expectations and emphasizes the importance of responsible workplace policies and practices that generally comply with applicable health, safety, environmental and labor laws and regulations. The standards set out below reflect the values we uphold in our own policies and we expect our suppliers to adhere to these standards and requirements:

A. Employment is freely chosen

- There is no forced, bonded or involuntary prison labour;
- Employees are not required to pay fees or make „deposits” or identification documents with the employer and may leave the work place after a mutually agreed period of notice;

B. Freedom of association

- Freedom of association and the right to collective bargaining is respected;
- The employer adopts an open attitude towards the activities of both trade unions and employee organizations;
- Employee representatives are not discriminated and have access to perform representative functions in the workplace;
- Where the right to freedom of association and collective bargaining is restricted by law, the employer facilitates, not hinders, the development of parallel measures for independent and free association and bargaining;

C. Working conditions

- A safe and healthy working environment is provided, bearing in mind the prevailing knowledge in the industry and any specific hazards;
- Appropriate steps are taken to prevent accidents and injuries arising from, related to or occurring in the course of work by minimizing, as far as reasonably practicable, the causes of hazards inherent in the working environment. Applicable occupational health and safety regulations will be complied with and the working environment is safe and conducive to good health;

- Employees should receive regular and documented health and safety training, and such training should be repeated for new or transferred employees;
- Access to clean toilets and potable water and, where appropriate, sanitary facilities for food storage should be provided;
- Accommodation, where provided, should be clean, safe and meet workers' basic needs;
- Responsibility for health and safety must be assigned to a senior management representative;

D. Child labor

- ETP ELEKTRO SP. Z O.O. does not engage in or support the use of child labour. Suppliers and contractors must not employ child labor. ("Child labour" defined in MOP conventions as workers under the age of 15 or 14 in some developing countries. No hazardous work may be performed by persons under the age of 18);
- Suppliers and Contractors must maintain formal records that verify the age of each employee;
- Persons under the age of 18 may not be employed at night or in hazardous conditions;

E. Fair wages are paid

- Wages and benefits paid for a standard month of work and meet at least national legal or industry standards;
- All workers will be provided with written and understandable information about their terms and conditions of employment in relation to wages prior to commencement of employment and details of their wages for the relevant pay period each time they receive wages;
- Wages will be paid directly to employees at agreed intervals and in full;
- Overtime must be paid at an increased rate, at least in accordance with national regulations;
- Deductions from wages as a disciplinary measure are not allowed, and any deductions from wages not provided for in national law are not allowed without the express consent of the employee concerned. All disciplinary measures should be recorded;

F. Working hours

- Hours of operation comply with national laws and industry benchmarks, whichever provides greater protection;
- We comply with applicable laws regarding working hours and benefits related to the industry and/or local labor market;

G. There is no discrimination

- Suppliers and contractors must fully comply with local equal employment opportunity laws;
- There is no discrimination in employment, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, ancestry, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation;

H. Regular employment is assured

- To the possible extent, work must be based on a recognized employment relationship established by national law and practice;
- Obligations to employees under employment or social security laws arising out of a normal employment relationship cannot be avoided by the use of employment contracts, subcontracting or working from home, or through apprenticeship schemes where there is no real intention of transferring skills or providing permanent employment ; nor can such obligations be avoided by the excessive use of fixed-term employment contracts;
- Migrant, contract, part-time and home workers must be given the same rights, benefits and opportunities as other workers in similar activities.

I. No harsh or inhumane treatment is allowed

- Physical violence or discipline, threats of physical, sexual or other abuse, verbal abuse or other forms of intimidation are prohibited;
- All disciplinary actions must be recorded and fair, proportionate and fully compliant;
- Suppliers and contractors shall provide access to confidential ways to report inhumane treatment and complaints in the workplace;

J. Environmental protection

- Operations are conducted in accordance with all applicable environmental laws, rules and regulations;
- Waste is minimized and items recycled wherever practicable;
- Effective waste controls for soil, air and water contamination are adopted;
- Emergency response plans exist for hazardous materials;
- For packaging and paper, unjustified and unnecessary use of materials is avoided and recycled materials are used where appropriate;

K. Business integrity

- We are committed to providing a bribery and corruption-free workplace by complying with all applicable bribery, money laundering and/or corruption laws and prohibiting the exchange of money or anything else of value to influence actions or obtain an improper advantage;

3. Implementation of social compliance policy

ETP ELEKTRO SP. Z O.O. undertakes not only to comply with this Policy as part of its own operations, but also to work with its Suppliers and Customers to ensure compliance throughout the entire supply chain. We will support our Suppliers and Customers in achieving this goal and we will adhere to the following principles.

ETP ELEKTRO SP. Z O.O. undertakes to:

- Allocating the required resources to fully implement the Policy, including an internal system to record and monitor compliance of deliveries with this Policy;
- Assign responsibility for the implementation of this Policy to a properly trained management representative who will provide the Board, suppliers and other stakeholders with updates on the results of implementing this Policy;
- Work with our suppliers to support them in improving social, ethical and environmental standards where required and appropriate;
- Full compliance with this Policy within our own operations and ensuring that all relevant employees are aware of the Social Compliance Policy;
- Recognition of specific national, regional and cultural challenges that may affect compliance;
- Disseminate this Policy to all suppliers and contractors and obtain formal acceptance and commitment to its implementation;
- Periodically informing employees, management about progress in complying with this Policy;
- Periodically review this policy for continuous improvement, taking into account regulatory changes and any other requirements to which the Company subscribes, and to ensure the policy's relevance, relevance and continued effectiveness;
- Stop trading with suppliers who show continued disregard for this Policy, with due regard to the impact this may have on the supplier and the community in which they operate;

ETP ELEKTRO SP. Z O.O. requires from its suppliers:

- Comply with this Policy and all applicable laws in the countries in which they operate. Where standards differ, the standard that provides workers with a greater degree of protection applies;
- Allocate adequate resources to fully implement the Social Compliance Policy;
- Pass down the Policy to all employees, suppliers, subcontractors, domestic workers and temporary and contract workers involved in their supply chain;
- Communicating openly and honestly with ETP ELEKTRO SP. Z O.O. and allow access to documentation to confirm compliance with this policy;
- The conduct of our suppliers should not violate the fundamental rights of ETP ELEKTRO SP. Z O.O. Our suppliers should not engage in:
 - Weapon manufacturing;
 - Selling arms to governments that systematically violate the human rights of their citizens or when the sale of arms could threaten peace and security in the region;

4. Continuous improvement

The Company undertakes to periodically review this policy for continuous improvement, taking into account regulatory changes and any other requirements to which the Company agrees, and to ensure the adequacy, usefulness and continued effectiveness of the policy. In particular, the policy will be routinely reviewed at Company Management Reviews.