

CODE OF ETHICS

POLON-ALFA S.A.



Table of Contents

1.	POLON-ALFA S.A. POLICY	4
2.	WHAT IS A CODE OF ETHICS AND TO WHOM THIS CODE APPLY?	4
3.	COMPANY VALUES	5
3.1.	Compliance with Laws and Internal Regulations	5
3.2.	Relationship with Employees, Customers, and Business Partners	5
3.3.	Fair Competition Practices	6
3.4.	Business Confidentiality and Data Protection	7
3.5.	Conflict of Interest	7
3.6.	Prevention of Corruption	8
3.7.	Environment	8
3.8.	Company's Property	8
3.9.	Wrongdoing Report	9
3.10.	Code of Ethics and Group Entities	9

Date and place of drawing the document:	18 December 2023, Bydgoszcz
Latest update:	Primary version
Page number:	9
Approved by:	President of the Management Board
Comes into force on:	1 January 2024

Dear Sir/Madam, Dear Employees,

Acting in accordance with the law and paying attention to the highest standards are crucial elements in our organizational culture. For years, we have emphasized that our activities are fair, ethical, and transparent.

Simultaneously, we are aware that continuous economic changes and rapidly developing world present not only new opportunities but also enormous challenges. It is important to be clear about the rules and goals in the face of possible difficulties.

In this regard, we have collected and summarized the values we share. We have created from these a set of standards that we want to be guided by in day-to-day business activities.

The Code of Ethics is to guide our actions in relationships with Customers, Co-operators, and Business Partners. We believe that acting in accordance with our principles contributes to strengthening our market position of Company and Group, as well as having a positive impact on our work environment.

A prerequisite for the successful implementation of the Code of Ethics is the involvement of all of us regardless of an occupied position or entrusted responsibilities. Joint action and mutual trust are our greatest strength.

We hope that each of us will make an effort to be guided by the principles included in the Code of Ethics.

POLON-ALFA S.A.

Management Board

1. POLON-ALFA S.A. POLICY

- Compliance with laws and internal rules,
- Building positive relationships with Customers, Co-operators, and Business Partners
- Fair competition practices,
- Mutual respect,
- Equal treatment and respect of human rights,
- Data protection and business confidentiality,
- Avoidance and prevention of conflict of interest
- Prevention of corruption,
- Environmental protection,
- Protection of Company's property

2. WHAT IS A CODE OF ETHICS AND TO WHOM THIS CODE APPLIES?

The Code of Ethics articulates ethical standards to be followed in our daily activities, especially in relation to Employees, Co-operators, Customers, Business Partners, and the other stakeholders.

It is not only the achievement of goals that is important, but also the way in which we pursue them. The Code is meant to be a guideline for us that facilitates making ethically sound choices. We believe that over time, ethical action is the greatest and the most enduring value of any business.

The Code of Ethics is a document applicable to POLON-ALFA S.A. (Company), as well as to all subsidiaries and affiliates (Group).

The Code obligates all of us- regardless of an occupied position or employment form.

It is also extremely important that our Business Partners share similar values, and our cooperation is transparent, as well as based on mutual respect and trust.

We expect from all of our Employees and Co-operators to:

- familiarize themselves with the Code of Ethics and to be guided in their daily work by the values it describes,
- report comments and concerns as regards the Code of Ethics,
- report a behavior that is inconsistent with the values expressed in this Code of Ethics,
- build the organization's culture together that is based on values described in the Code of Ethics.

We expect from our Management Staff:

- leading by example through actions in line with espoused values,
- managing in harmony with values described in the Code of Ethics,
- building an atmosphere of mutual respect and trust,
- clarifying of concerns as regards the Code of Ethics and if necessary, enabling the discussion about it with the supervisor or Company authorities,
- responding to any irregularities.

The areas mentioned in this Code, or others contained herein may be subject to more detailed internal regulations. It depends on i.e. regulatory requirements and other needs identified by the Company or individual Group companies.

The provisions of this Code shall not prejudice any possible individual regulations resulting from agreements concluded by Employees or Co-operators.

3. COMPANY VALUES

3.1. Compliance with Laws and Internal Regulations

Key to our activities is compliance with applicable laws and internal regulations.

Each of us is obligated to show interest of the Company, as well as to act reliably, fairly, and transparently in accordance with the law.

We do not take part in projects, and we do not establish business relationships if it may involve breaking the law, as well as threatening the Company's reputation.

Notice!

Each Employee and Co-operator has access to the content of the policies and procedures that apply in the Company. Not being aware of them does not absolve anyone of their duty to apply them, hence, taking the responsibility.

3.2. Relationships with Employees, Customers, and Business Partners

Internal relationships

We believe that we build our values, reputation, and market position together and that our Employees are our greatest strength.

Our common goal is to maintain a friendly and healthy work environment. We believe that a good atmosphere at a workplace contributes positively to personal and company-wide development.

Everyone has equal opportunities for employment, development, and promotion regardless of race, nationality, religion, or worldview. Thanks to our diversity and ideas, we can create innovative products and build a strong Company brand.

We do not tolerate any signs of discrimination and unequal treatment, as well as we do not accept racist, discriminatory, or vulgar content in any form of communication.

We value mutual respect and open communication. We would like everyone to openly report concerns and any violations.

Activities and behavior of employees outside the workplace, should not violate a good reputation of POLON-ALFA S.A and Group. It is important that Employees are aware that they are representing the Company and Group in external contacts both during working hours and in various social situations, including their private time.

Together we are building the good reputation of the Company/Group.

Remember!

If you have any doubts on how to act in a particular situation or you are witnessing irregularities, you can turn with it to your supervisor, Management Staff or report it via whistleblower channels that are applied in the Company.

Note important!

We respect each other, as well as our views, even if we do not agree with them. Regardless of personal convictions, we value sincerity and freedom to express them.

Customers

We endeavor to offer solutions of the highest quality.

We are trying to understand and anticipate the needs of our Customers. We only use the information that we receive from them to offer the best possible products and services.

In relations with Customers, we act fairly, as well as in accordance with laws.

We provide reliable information about our products and services.

Business Partners

Business partnership is a key to success of every company. Therefore, we are trying to build long-term relationships with Business Partners who share similar values.

We exercise due diligence in the selection of Business Partners. We take particular care to ensure that the choice is based on clear and transparent principles and the establishment of cooperation does not contribute to breaking the law or threatening the Company's reputation.

We treat fairly our Business Partners– clear communication is important for us, especially, when it comes to expectations and conditions of cooperation.

Discrimination/ Unequal treatment- a situation in which a person is treated less favorably because of gender, race, ethnicity, nationality, religion, belief, disability, age, or sexual orientation than another person would be treated in a similar situation.

Mobbing – actions or behavior concerning the employee or that is directed against the employee consisting of persistent and prolonged harassment or intimidation by causing the employee to have a low opinion of their professional suitability that are intended to humiliate, isolate, or exclude them from the team.

3.3. Fair Competition Practices

We value fair competition, thanks to which we are constantly improving ourselves, as well as our offered products and services.

We do not tolerate unfair and unlawful market practices.

By promoting our products, we do not undermine the competition of our competitors and features of their offered products.

We avoid i.e.:

- unlawful agreements or joint practices with competitors,
- conversations with competitors about Customers, products, services, business terms and conditions, which are our or their business secrets,
- acting with the aim of fraudulently obtaining or using information about our competitors in our possession which has not been made public.

3.4. Business Confidentiality and Data Protection

Each of us is obligated to preserve business confidentiality and to take all possible measures to safeguard it.

The success of the Company/Group depends above all on the quality and innovation of our products. Therefore, we make every effort to ensure that information which constitutes business confidentiality is not disclosed.

Preservation of business confidentiality means a prohibition on disclosure and use of confidential information in any other way than for the performance of a contract. Employees and Cooperators are obligated not to obtain or collect internal information that is not intended for them.

It should be also remembered that obligations relating to the protection of business secrets do not cease upon termination of the contract entered with the company.

We protect not only confidential information but also data of our Employees, Customers, or Business Partners.

Business confidentiality- any data which may be of an enterprise value, especially, technical, organizational information e.g. terms and conditions of cooperation with Business Partners, Employees, and Cooperators, prices, costs, financial data, as well as information as regards intended or implemented projects.

To prevent disclosure of business secrets and sensitive data *:

- we do not process data in public places,
- we do not leave entrusted equipment in public places (e.g. in a car, train, or at the restaurant table),
- we do not use public Internet networks,
- we set the password-protect access to the computer,
- we do not pass on information that constitutes company secrets when discussing work matters.

*described in more detail in the individual regulations related to this area

3.5. Conflict of Interest

Conflict of interest – a situation in which, while acting for our own benefit or for the benefit of a particular entity to which we owe an obligation, we simultaneously act against the interest of the Company.

Each of us is obligated to make decisions and perform actions guided by the Company's interest and to avoid conflict of interest and so the situations which could lead to their occurrence.

Any situation which may constitute a conflict of interests, should be reported immediately to the supervisor. Conflict of interest should not be resolved alone.

The conflict of interest occurs when our own personal interests and those of the company are not the same.

3.6. Prevention of Corruption

Any corrupt practices are forbidden. We do not expect, accept, or suggest any benefits in return for any preferences. It applies both to relations with business partners, as well as public institutions.

We can only give and receive gifts from Customers and Business Partners if these gifts are symbolic and occasional.

We are cautious about invitations to trips, parties, events, and training organized by our Business Partners. We may accept them when the occasion and kind of invitation warrant it.

We do not donate to a profit-oriented organization.

If you have any doubts whether the gift is symbolically agreed, contact your supervisor or the management staff.

3.7. Environment

We are responsible for the impact of our actions on the environment. As an organization, we care to meet requirements as regards environmental protection. With increasing awareness, sensitivity, and technical possibilities, we are trying more specifically to take environmental issues into account when making business decisions.

We are acting towards responsible and sustainable practices as regards our products.

Even through small acts, each of us can contribute to sustainability and effective environmental protection. So, let's take care to use environmental resources sparingly, both in our company and in our private life.

Actions we can take on our own:

- reducing the amount of waste generated
- avoiding the waste of water, energy, gas– optimization of media consumption,
- using reusable bottles and packages,
- following proper waste segregation rules,
- implementing and using digital workflow that eliminates the need to print and use up the paper.

3.8. Company's Property

We always treat Company's Property with due care. We are responsible for the equipment entrusted to us and how it is used.

We use as intended any tools and materials provided by the Company.

Employees and Cooperators use the equipment entrusted to them by the Company in accordance with the rules described in the internal regulations.

We are obligated to protect entrusted property against theft and unauthorized access.

When representing the Company at meetings and on business trips, we are responsible for ensuring that the costs of our activities are appropriate to the business objectives pursued.

3.9. Wrongdoing Report

We are committed to building an open work environment. Therefore, if you see any wrongdoing practice, react. This enables the company to operate more efficiently and effectively in the event of any problems.

We guarantee that no one will face the consequences of making a report in good faith of wrongdoing practice.

Based on separate regulations, whistleblowing system is implemented at the level of particular companies, as well as the entire Group.

3.10. Code of Ethics and Group Entities

The Code of Ethics applies to all entities in the Group.

Group entities may establish additional regulations, but these may not conflict with the provisions of this Code.