### CODE OF CONDUCT FOR SUPPLIERS

Code of Conduct for the Suppliers of Przedsiębiorstwo Metali Nieżelaznych BOBREK Spółka Jawna (Non-ferrous Metals Company BOBREK) Dawid and Paweł Kleszcz, Bronisław Koźbiał of 14.02.2023

### Introduction

PMN BOBREK meets the sustainability requirements of its customers and addresses them to its suppliers in order to conduct its business in a manner that complies with the law, ethical business practices, respects human rights, and in accordance with health and safety and environmental standards, including those referring to climate protection.

Our Code of Conduct for Suppliers and Business Partners is based on legal requirements, international agreements, standards and principles, and reflects our own sustainability principles.

The following regulations are the minimum requirements that we expect our suppliers and business partners to comply with.

The Code of Conduct for Suppliers and Business Partners is an integral part of all contracts between PMN BOBREK Group and our suppliers or business partners.

Our suppliers, subcontractors and business partners agree to comply with the following principles and to relay them to their suppliers, subcontractors and business partners throughout the supply chain:

# 1. Compliance with laws, recognised standards and guidelines

Comply with applicable laws

# 2. Preventing corruption and conflicts of interest

- Consistently reject corrupt behaviours and unfair business practices
- Comply with applicable anti-corruption laws
- Do not abuse invitations and gifts to employees designed to influence them and do not demand undue benefits
- ➤ Maintain open, honest and reliable relationships with customers, suppliers and service providers
- Avoid conflicts of interest

### 3. Money laundering and terrorist financing

Comply with legal requirements for the prevention of money laundering and terrorist financing

### 4. Fair competition

- Act in accordance with national and international antitrust and competition laws
- Do not engage in price fixing, market or customer allocation, market collusion or bid rigging

Implement legal business practices with integrity, respect intellectual property and other industrial property rights, comply with contracts

# 5. Confidentiality and data protection

- Protect company secrets and trade secrets
- Comply with applicable data protection regulations

### 6. Import and export control

Comply with applicable foreign trade and customs regulations

### 7. Work safety and protection of health

- Ensure a safe, healthy and hygienic work environment to prevent occupational accidents and diseases
- > Comply with occupational health and safety legislation

### 8. Employee rights

- Comply with legal requirements and regulations regarding working hours, paid vacations and public holidays
- Ensure compliance of social benefits with applicable laws and company regulations
- Fully respect the personal dignity of each person
- Counter all forms of verbal intimidation, physical and/or sexual coercion, use of force and/or violence, as well as harassment
- Counter discrimination, unfavourable or preferential treatment of employees on the basis of gender, skin colour, nationality, disability, political opinion, ethnic or social origin, religion, age, trade union membership, sexual orientation or any other grounds

### 9. Human rights

- Respect internationally recognised human rights in its sphere of influence
- Respect the fundamental right to freedom of association and the right to collective bargaining under the law
- Reject all forms of child labour and forced labour The age limit for approved employment is not less than the age of compulsory education and in no case shall be less than 15 years of age
- Prevent discrimination and harassment
- Evaluate during the recruitment process according to ethical criteria, without discrimination or prejudice
- Strive towards gender equality
- Follow international standards, such as UN conventions
- Prevent unlawful eviction and unlawful deprivation of land, forests and water during the acquisition, construction or other use of land, forests and water used to provide a person's livelihood
- Protect employees' right to freedom of expression, personal rights and privacy

## 10. Indigenous peoples and local communities

- Respect the rights and interests of local communities in accordance with international standards
- Take appropriate measures to exclude the impact of its own activities on local communities

### 11. Geopolitical neutrality

- > Do not engage in any form of armed conflicts or human rights violations
- Respect the cultural and religious heritage of all persons

# 12. Minerals from conflict regions / prohibited substances

- Avoid knowingly obtaining and using materials from conflict regions
- If the product contains tin, tantalum, tungsten, cobalt, gold or corresponding ores, immediately ensure transparency in the supply chain
- Comply with the REACH regulation

## 13. Agreement on sustainable development / protection of the environment and climate

- Comply with applicable environmental (including climate) regulations to maintain the legal security of the company's operations and products
- ➤ Take appropriate measures at all stages of the supply chain to reduce the carbon footprint and thereby contribute to achieving the goals agreed upon at the UN Climate Change Conference in Paris
- ➤ Encourage suppliers to find cost-effective solutions to improve energy efficiency; monitor and minimise energy consumption and greenhouse gas emissions
- Work towards implementing an environmental management system.
- Communicate and track sustainability requirements within own supply chain
- Assess the impact of its activities on biodiversity, climate change and water scarcity, implement mitigation measures
- Take measures to prevent or reduce the effects of harmful soil amendments, water pollution, air pollution, noise emissions or excessive water consumption
- Comply with animal welfare and protection regulations within own supply chain

# Supplier name: undertakes to comply with the requirements set forth in this Code of Conduct for Suppliers in connection with the supply of products and performance of services for the benefit of Przedsiębiorstwo Metali Nieżelaznych BOBREK Spółka Jawna (Non-ferrous Metals Company BOBREK) Dawid i Paweł Kleszcz, Bronisław Koźbiał. Name and surname:

14.

Date and signature:

**Supplier confirmation**