



CODE OF CONDUCT FOR SUPPLIERS

Members of the Board:

Przemysław Olejnik
The President of the Board

Krystyna Olejnik-Szymańska
The Member of the Board

Adam Olejnik
The Member of the Board

Table of contents

- I. Introduction
- II. Compliance with the general rules of the Code of Conduct
- III. Human rights and working conditions
 - 1. Consistence with the law
 - 2. Child labour prohibition and young workers
 - 3. Prohibition of forced labour (modern slavery)
 - 4. Wages and benefits for workers- remuneration
 - 5. Working hours
 - 6. Ethical recruitment
 - 7. Freedom of association and collective negotiations
 - 8. Non-discrimination and prohibition of harassment
 - 9. Women's rights
 - 10. Diversity, equality and social inclusion
 - 11. Rights of minorities and indigenous peoples
 - 12. Right to land, forests, and waters. Forced evictions.
 - 13. Use of public or private security forces
 - 14. Occupational health and safety of workers
- IV. Environment
 - 1. Energy efficiency and greenhouse gas emissions
 - 2. Carbon neutrality (decarbonisation)
 - 3. Sustainable resources management, waste reduction, reuse and recycling
 - 4. Water quality and consumption
 - 5. Air quality
 - 6. Responsible chemicals management
 - 7. Animal welfare
 - 8. Maintaining biodiversity, sustainable use of land, and minimizing deforestation
 - 9. Monitoring soil quality
 - 10. Monitoring noise emissions:
- V. BUSINESS ETHICS

1. Responsible sourcing of raw materials
2. Preventing corruption and money laundering
3. Data protection and security
4. Financial responsibility/ accurate registers
5. Information disclosure
6. Fair competition/ antitrust activities
7. Conflict of interest
8. Counterfeit products
9. Intellectual property
10. Export controls and economic sanctions
11. Grievance mechanism and non-retaliation policy

VI. SUMMARY

I. INTRODUCTION

This Code of Conduct for Suppliers of OSOtech Sp. z o. o. sets out the rules of conduct for suppliers. The purpose of the Code is to help suppliers understand the expectations of OSOtech Sp. z o. o. regarding their behaviour on the market and appropriate cooperation with OSOtech Sp. z o. o.

It is required that the Supplier is familiar with the rules of the Code of Conduct for Suppliers and fully complies with them.

II. COMPLIANCE WITH THE GENERAL RULES OF THE CODE OF CONDUCT

All suppliers must strictly comply with the general rules of the Code of Conduct ('General Rules of the Code of Conduct'), which are obligatory standards of conduct and ethical standards, defined in strict accordance with the law, human rights, civil liberties and fundamental rights, the principles of equal treatment and non-discrimination, protection against the use of child labour, and any other principles included in the Universal Declaration of Human Rights and the United Nations Global Covenant on Human Rights, labour, environmental and anti-corruption laws.

The supplier hereby declares that it complies with the following requirements.

III. HUMAN RIGHTS AND WORKING CONDITIONS

Suppliers should ensure respect for all internationally proclaimed human rights by avoiding causes and complicity in all human rights violations.

1. Consistence with the law

Complying with the laws and regulations of applicable legal systems.

2. Child labour prohibition and young workers

Suppliers must comply with the minimum age for employment in their business activities and throughout the supply chain in accordance with the ILO Convention on the Minimum Age for Admission to Employment

and ensure that child labour is not tolerated in any form.

3. Prohibition of forced labour (modern slavery)

Suppliers must comply with the prohibition of using and contributing to slavery, forced or compulsory labour, and human trafficking.

4. Wages and benefits for workers- remuneration

Suppliers must ensure that their workers are compensated in accordance with applicable laws

and industry practices. Such remuneration should enable the workers and their families to cover their basic needs and to ensure them a decent standard of living. This includes respect for minimum wages, overtime pay, sick leave, and government-established benefits.

5. Working hours

Suppliers must comply with local laws and collective agreements (if applicable) regarding working hours or should comply with ILO standards for working hours in the absence of relevant local regulations.

6. Ethical recruitment

Suppliers must not mislead potential workers about the nature of the work, demand recruitment fees from workers, confiscate, damage, or deny access to worker's passports and other identity documents. Workers must receive a written contract of employment or notice regarding employment at the beginning of the recruitment process in a language they can understand well, setting out in a true and clear manner their rights and obligations.

7. Freedom of association and collective negotiations

Suppliers should respect workers' rights to freely associate and form trade unions, and should allow workers to negotiate collectively without fear of retaliation, intimidation, or harassment.

8. Non-discrimination and prohibition of harassment

Suppliers should not tolerate any form of discrimination or harassment of employees. They should promote equal opportunities and treatment of workers, regardless of colour, race, nationality, ethnicity, political affiliation, social background, disability, gender, sexual identity and orientation, marital status, religious beliefs, or age.

9. Women's rights

Suppliers should respect the issues of equality and access to managerial positions for female employees, as well as ensure a safe work environment, including physical safety, as well as protection against mobbing and discrimination.

10. Diversity, equality and social inclusion

Suppliers should ensure equal opportunities and treatment of all employees regardless of their personal characteristics. In addition, suppliers should develop the organizational culture and practice of creating a work environment in which every employee – regardless of identity, gender, abilities, background and characteristics – is accepted and appreciated.

11. Rights of minorities and indigenous peoples

Suppliers should respect the rights of local communities to decent living conditions; education, employment, social activities; and the right to free, prior and informed consent (FPIC) to changes that affect them and the lands on which they live, with a particular focus on those belonging to the most vulnerable groups in society.

12. Right to land, forests, and waters. Forced evictions.

Suppliers should avoid forced evictions and deprivation of land, forests, and waters when acquiring, developing, or other use of land, forests, and waters.

13. Use of public or private security forces

Suppliers should not recommend or use private and public security forces to protect its business project if deployment of security forces, caused by lack of training or control from the supplier, may violate human rights.

14. Occupational health and safety of workers

Suppliers should ensure occupational health and safety according to applicable law.

IV. ENVIRONMENT

Suppliers are expected and required to ensure that they have all the permits, licenses, inspection and test reports required by law, and that they operate in accordance with the applicable statutory and international environmental standards.

1. Energy efficiency and greenhouse gas emissions:

Suppliers are expected and required to monitor and document energy consumption and greenhouse gas emissions at the facility and/or company level. Suppliers are expected to seek cost-effective ways to improve energy efficiency and reduce their energy consumption and greenhouse gas emissions.

2. Carbon neutrality (decarbonisation):

Suppliers should aim to set targets for greenhouse gas emissions reductions and objectives concerning renewable energy.

3. Sustainable resources management, waste reduction, reuse and recycling:

Suppliers are expected to specify waste reduction targets and define a hierarchy of waste management that takes into account the following priorities: waste prevention, minimising, reuse, recycling, recovery, neutralization.

4. Water quality and consumption:

Suppliers are expected and required to develop assessment of water consumption and streamline the water consumption for every project and location, set a benchmark, and define targets in order to reduce the consumption.

5. Air quality:

Suppliers are expected to regularly monitor emissions into the atmosphere, include regulatory emissions requirements in their business plan, and develop an emissions management plan that at least meets the regulatory requirements for each facility/process.

6. Responsible chemicals management:

Suppliers are expected to identify and manage chemicals to ensure that they are handled responsibly, safely moved, stored, used, recycled or reused, and disposed of.

7. Animal welfare:

Suppliers should comply with 'five freedoms' on animal welfare defined by the World Organisation for Animal Health (OIE).

8. Maintaining biodiversity, sustainable use of land, and minimizing deforestation:

Suppliers should respect the protection of ecosystem, especially the key areas of biodiversity affected by activities and illegal deforestation, according to international biodiversity legislation.

9. Monitoring soil quality:

When appropriate, suppliers should monitor their impact on the quality of soil in order to prevent soil erosion, nutrient degradation, landslides and contamination.

10. Monitoring noise emissions:

Where appropriate, suppliers should monitor industrial noise levels to avoid noise hazards.

V. BUSINESS ETHICS

It is expected and required from suppliers that they apply the highest standards of integrity and act in a fair and reliable manner throughout the supply chain in accordance with local regulations.

1. Responsibility sourcing of raw materials:

Suppliers are expected to responsibly source the raw materials used in order to manufacture their products. Suppliers which products containing minerals such as iron ore, aluminum and copper are expected to source them from approved, conflict-free smelters.

2. Preventing corruption and money laundering:

Suppliers are expected to act against corruption in all its manifestations, including extortion

and bribery.

3. Data protection and security:

Suppliers are expected to take appropriate measures to respect privacy, protect personal information from loss and unauthorized access or use, and comply with applicable laws and regulations regarding privacy and information security.

4. Financial responsibility / accurate registers:

All business transactions are expected to be conducted in an openly and registered in a reliable manner in the financial statements and official documents.

5. Information disclosure:

Suppliers are expected to disclose financial and non-financial information in accordance with applicable laws and industry practices.

6. Fair competition/ antitrust activities:

Suppliers are expected to maintain standards of integrity in their business operations and conduct business pursuant to all applicable antitrust and competition protection laws and regulations.

7. Conflict of interest:

Suppliers are expected to conduct business with the avoidance of any appearance of inappropriate behaviour.

8. Counterfeit products:

Suppliers are expected to minimize introducing counterfeit parts and materials to supplied products. This also applies to parts and materials introduced to market illegally.

9. Intellectual property:

Suppliers are expected to respect applicable intellectual property rights and use commercially sound practices to protect the transfer of confidential technology and know-how.

10. Export controls and economic sanctions:

Suppliers are expected to comply with applicable export and re-export restrictions on goods, software, services, and technology, as well as applicable trade restrictions on selected countries, regions, companies or entities, and natural persons.

11. Grievance mechanism and non-retaliation policy:

Suppliers are expected to develop mechanisms that enable filing anonymous grievance in a confidential manner and without the risk of retaliation.

12. Implementation of similar standards towards own tier 1 suppliers:

Suppliers are expected to set sustainability standards towards own tier 1 supplier throughout the supply chain.

VI. SUMMARY

OSOtech Sp. z o. o. reserves the right to carry out a check on compliance with this Code of Conduct, in the form of a self-audit or an audit of the other party.

Supplier hereby acknowledges that it has received the Code and agrees that all of its current or future workers, subsidiaries and workers of its subsidiaries will be informed about the provisions of the Code and will comply with all of its terms and conditions.

The supplier acknowledges that its failure to comply with one or more of the rules set out in the Code will constitute a breach of the supplier's main obligations as part of its commercial/business relationship with OSOtech Sp. z o. o., which may force OSOtech Sp. z o. o. to terminate the agreement of said commercial/business relationship and, where applicable, notify the competent authorities.

If the supplier is aware of or witnesses actions performed by one of its workers that could be contrary to the principles set out in the Code, it undertakes to take all appropriate measures to stop these actions and behaviours.

If the supplier is aware of or witnesses actions performed by one of OSOtech Sp. z o. o. workers that could be contrary to the principles set out in the Code, it is the supplier who undertakes to inform the Board of Management of OSOtech Sp. z o. o. about this situation in such a way as to enable taking all appropriate measures to stop these actions and behaviours.

The supplier acknowledges that its obligation to comply with the Code does not in any way oblige OSOtech Sp. z o. o. to conclude contracts or place orders with the supplier.

Acceptance of an order from OSOtech Sp. z o. o. is equivalent to acceptance of the terms and conditions of this Code