

Dear Employees,

our business activity is the result of cooperation between the whole team and each employee separately. It is impossible to forget that the basic principles of social coexistence, honest and reliable cooperation with partners and our own behaviour in relation to the natural environment are of great importance. This obliges all of us to follow both the legal regulations and the principles of ethical conduct recognized as basic in our activities - fair operation and environmental protection. In short it is necessary for each of us to act responsibly in our daily work.

This Code of Conduct is designed to help us fulfill this duty properly. The basic principles set out in the Code of Conduct are clear guidelines for achieving this. They provide the right direction in our daily work. Everyone who performs work, services or benefits for the company Walcownie Ostrowieckie WOST S.A. (Employees) - starting from the Management Board, through the management staff and ending with every single employee - are obliged to act properly in accordance with accepted principles. We strongly believe that the joint effort put in to adapt to the following rules will bring the desired effect.

Therefore, please read the following code of conduct and obey its rules while performing your daily duties.

Walcownie Ostrowieckie
WOST S.A.
PROCURER

Lukasz Brózda



GENERAL RULES

BASIC RULES FOR OUR PROCEDURE

„The Global Compact asks companies to embrace universal principles and to partner with the United Nations. It has grown to become a critical platform for the UN to engage effectively with enlightened global business.”

Ban Ki-moon,
former UN Secretary General

The basis of our conduct are the principles accepted by the United Nations Global Compact as part of activities of the United Nations, and they include¹:

1. Respect for human rights.
2. Taking action to eliminate noticed violations of human rights.
3. Ensuring freedom of association.
4. Eliminating all forms of forced labor.
5. Contributing to the actual abolition of child labor.
6. Taking action to eliminate discrimination in terms of employment and work.
7. Support for a preventive approach to environmental problems.
8. Promoting responsible actions in relation to the environment.
9. Supporting the development and dissemination of environmentally friendly technologies.
10. Counteracting all forms of corruption, including extortion and bribery.

Walcownia Ostrowieckie
WOST S.A.
PROKURENT
Łukasz Brózda

¹ <https://ungc.org.pl/o-nas/obszary-dzialan/>



HUMAN RIGHTS AND EMPLOYEE RIGHTS

We respect the human rights adopted in the global community (including the right to freedom, the right of association, the right to dignity²), furthermore, Walcownie Ostrowieckie WOST S.A. in their activities fully reject all manifestations of forced labor or the use of child labor. In our activity, we respect the rights of all employees to associate and appoint employee representatives. We support a policy of fair and reasonable salaries for all employees.

COMPLIANCE WITH LAWS

Proceeding in accordance with the provisions of generally applicable law and internal rules adopted in the relevant regulations³, is a manifestation of the boundaries set, under which employees of Walcownie Ostrowieckie WOST S.A. can develop their own professional path. This applies to both members of the Management Board, management staff and all employees. The company does not tolerate violation of law - any such case will impose appropriate sanctions on those responsible. Each employee is individually obliged to familiarize themselves with applicable legal regulations, including internal regulations and workplace regulations. The employee can always seek legal advice in the appropriate department of the Company.

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² See: Universal Declaration of Human Rights: <https://www.un.org/en/universal-declaration-human-rights/>

³ <https://wostsa.pl/en/regulamin/>



PROCEEDINGS UNDER THE COMPANY

RELATIONSHIP WITH EMPLOYEES

Walcownie Ostrowieckie WOST S.A company does not tolerate any form of harassment or discrimination in the work environment, whether due to race, ethnicity, gender, religion or ideology, disability, age or sexual identity. In relations with employees as well as third parties, the Company also requires the performance of its duties in a reliable, friendly and honest manner. The company supports open and honest interaction between employees.

OCCUPATIONAL HEALTH AND SAFETY

The safety and health of all employees is highest value for the Company. They constitute the basic element of each operational procedure and comply with the standards accepted in the world. The management is obliged to control compliance of the subordinate employees with health and safety at work regulations.

HANDLING OF INTEGRITY PRINCIPLES AND AVOIDANCE OF CONFLICTS OF INTEREST

Every employee is obliged to behave honestly in a work environment, in accordance with the principles of social coexistence. At the same time, employees are obliged to avoid any conflicts that may arise between their private interests and those of the Company. If in doubt, an Employee can always seek advice from the appropriate department of the Company.

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ATTITUDE TO BUSINESS PARTNERS AND THIRD PARTIES

FAIR COMPETITION

Walcownie Ostrowieckie WOST S.A. operating on a global market are guided by the principle of competitiveness. Implementing the principle of competitiveness, we rely on our efficiency, reliability, customer orientation, as well as the quality of our products and services.

For the Company, the principles of fair competition are an obvious value, based on regulations in the national and international law. Failure to comply with these rules, in addition to obvious sanctions that may affect both the Company and individuals, also affects the Company's image that could be compromised. Therefore, everyone is required to avoid any action that may be considered to threaten or violate the principles of fair competition.

CORRUPTION

Walcownie Ostrowieckie WOST S.A strongly rejects all forms of corruption or bribery. In connection with their operations on the global market, the Company's employees may not promise or grant personal benefits in exchange for preferential treatment.

Employees of the Company may not derive personal benefits from the activities performed, and in addition they definitely cannot:

<ul style="list-style-type: none"> • Provide financial benefits, • Make promises, 	with the intention to make the other party	<ul style="list-style-type: none"> • do something he/she should not do • do something faster that she/she would have to do anyway.
<ul style="list-style-type: none"> • Force payment for themselves, • Enforce any activities for themselves • Enforce any promise for themselves 	,to make something themselves	<ul style="list-style-type: none"> • that should not be done • faster than they would have to do anyway.



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RECEIVING GIFTS

Employees of the Company may receive gifts or souvenirs from their business partners only as part of general business habits and only if it is certain that this does not affect the employee or his business decisions.

In the same way, employees of the Company may not give gifts or any other benefits to employees of third parties except for normal business practices.

ENVIRONMENT PROTECTION AND SUSTAINABLE MANAGEMENT

The issue of environmental protection has a high priority in conducting business for Walcownie Ostrowieckie WOST S.A. We strive to minimize emissions and energy consumption as part of activities that are economically and competitively justified. When undertaking activities aimed at creating new products or implementing new production processes, we always have in mind their impact on the natural environment and the need to counteract and minimize any negative impacts. Being aware of the limited level of natural resources, we make sure that raw materials are used effectively.

CONFIDENTIALITY AND COMMUNICATION

Employees of Walcownie Ostrowieckich WOST SA are obliged to treat as confidential and protect all data, information and messages, regardless of their form, which regard the broadly understood operations of the Company, its business partners and clients, in particular those which have been explicitly or implicitly indicated as a confidential company data. The obligation to maintain confidentiality and protection of data, information and messages exists during the employment or performance of services for the Company, as well as after the termination of cooperation until the loss by the above-mentioned economic value, however, not less than for five full years.

PROTECTION OF PERSONAL DATA AND OWNERSHIP RIGHTS

Personal data may be collected, processed or used as part of the Company's business only to the extent which is necessary to comply with applicable law. Data storage is carried out in accordance with the highest standards that allow you to avoid access to this data by unauthorized persons in accordance with applicable law. The right of access to the collected data and other rights resulting from applicable law have been ensured.



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IMPLEMENTATION AND MONITORING

The principles contained in the presented Code of Conduct constitute the basis of the organizational culture and functioning of Walcownie Ostrowieckie WOST S.A. Each employee is obliged to follow them.

Walcownie Ostrowieckie WOST S.A ensures the implementation of this code of conduct and monitors compliance with the resulting rules.

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