

Code of Conduct Elektromontaż - Poznań S.A.

Code of Conduct Elektromontaż - Poznań S.A. allows for the presentation of a well-established organisational culture of the Company, providing guidelines for conduct and behaviour.

This Code sets out the **values and principles** that guide us in the implementation of our daily duties, both within the organisation and in contacts with our Collaborators/Contractors.

This document is intended for **all Employees and Associates** of our Company and clearly defines the requirements and expectations set for them.

Therefore, we are all committed to comply with the following principles and adhere to the values contained in the Code, remembering that together we care for the good name and business success of our Company.

1. RESPECT - THE FOUNDATION OF ALL RELATIONSHIPS

The principle of mutual respect for personal freedom, dignity and respect in the workplace is one of the basic values that create our organisational culture. We create a bias-free work environment in which all our colleagues can best perform their duties and pursue their career goals.

Therefore, we value and promote a fair workplace that does not exclude and that promotes respect for all associates, customers and business partners.

As Employees of Elektromontaż - Poznań S.A.:

- we treat ourselves fairly and respect each other regardless of gender, sexual orientation, age, religion, physical fitness, position or length of service;
- we follow the principles of: freedom of religion, freedom of political expression;
- we eliminate all forms of discrimination, mobbing, harassment; or violation of bodily integrity;
- in conversations and correspondence with Associates, we follow our personal culture and intuition that allows us to build partnership relations;
- we promote a decent and friendly work environment where individuality is appreciated and intimidation and harassment are not tolerated; we do not use any form of pressure or coercion against our colleagues;
- we provide equal opportunities for employment, promotion, development and professional development;
- we use our knowledge to build a team and create a positive image.

At Elektromontaż - Poznań S.A. we are committed to **establishing constructive relationships with our colleagues and we strive for an open work environment**. We conduct an open and transparent dialogue with employees or their representatives. We create an environment where there is **freedom of association** and the right to collective bargaining.

By respecting employees, we promote work-life balance.

We comply with the applicable regulations on working time standards.

We take steps to implement the fair employment and fair pay policy in accordance with applicable law.

All employees have equal opportunities in terms of pay and bonuses.

We do not accept child labour or any forced labour, and our employees are obliged to inform us about any situation that carries a risk of such practices, e.g. in subcontractors.

2. RESPONSIBILITY

We approach our duties responsibly and with commitment, and our Customers can always rely on us.

We communicate with our Collaborators in an honest and open manner, avoiding misleading the recipient. We always analyse the risk of implemented projects in detail and in depth.

We take all possible measures to create **a safe and healthy work environment** for both, our employees and the Contractors and Customers collaborating with us.

3. PROFESSIONALISM / QUALITY

Our employees are a team of professionals with many years of experience.

We care about the continuous development of our staff and constant improvement of competences, and our goal is to be an expert in our field.

The acquired skills combined with experience translate into **high quality of services and products offered**. We approach each task ambitiously, however, we respect our Customers and do not declare that we will perform works that are impossible to implement.

The highest quality standards of our services, products and our entire organisation are confirmed by the following **Integrated Management System** certificates:

- **Quality Management System PN - EN ISO 9001** - confirming the highest quality of company management and the products and services offered, meeting the growing requirements of our Customers;
- **AQAP 2110** - enabling us to participate in all public tenders for the defence sector announced in Poland and in tenders organised by NATO in the European Union;
- **Environmental Management System PN - EN ISO 14001**, which confirms environmentally friendly activities. Thanks to the ISO 14001 system, our company has a significant impact on reducing the causes of environmental pollution;
- **ISO 45001 Occupational Health and Safety Management System**, the essence of which is to manage activities to improve occupational safety and elimination of accident hazards at workplaces;
- **PN-EN ISO/IEC 27001 Information Security Management System**, the implementation of which allows for the protection of key information for the company, maintaining its confidentiality and improving the management of the company's knowledge.

4. INNOVATION

Care for the constant development of processes, products and our know-how allows us to flexibly adapt to changes taking place on the market.

We are constantly looking for new solutions using our experience, knowledge and skills.

Potential failures are always a valuable lesson for us, from which we draw conclusions for the future.

5. COOPERATION / CUSTOMERS

Satisfying our Customers' needs and maintaining their trust are at the heart of our daily work.

In dealing with **Customers**, we focus on **constant collaboration, building partner relations** - not - one-time profit. Satisfaction, trust, and hence - the loyalty of our Customers are invaluable to us.

We conduct an open dialogue with our Customers, **listening to their opinions and comments** to improve our products and services, while trying to meet their expectations.

Integrity and sincerity towards the Customer and honesty in fulfilling contracts is a priority for us. We never deliberately mislead our Contractors, we are always guided by good intentions.

We openly exchange information and experiences with our Customers, **while ensuring an appropriate level of confidentiality and discretion.**

Suppliers play a crucial role in increasing the Company's overall competitiveness.

When selecting suppliers, we follow the criteria of competitiveness, objectivity, honesty, impartiality, fair prices, quality of the goods and/or services offered, and social responsibility.

While we guarantee fairness and impartiality, we also take into account the reliability of suppliers and possible previous relationships based on trust.

We refuse to cooperate with suppliers who violate international labour law and child labour laws. In addition, it is important for us that our suppliers apply the principles of economic, social and environmental sustainable development in their activities.

We support **fair competition.**

As a Company, we believe in free markets and fair competition, because for our Customers it is an assurance that they will receive the best product and the best service under the best possible conditions.

Violations of antitrust and competition laws are never in the interest of Elektromontaż - Poznań S.A. and we do not tolerate them.

6. CONFLICT OF INTEREST

We avoid situations where the personal, professional or financial interests of employees conflict (or appear to conflict) with the best interests of our Company.

Business activities carried out on behalf of the Company may not be taken under the influence of the employee's personal opinions or the relationships in which the employee remains.

As Employees of Elektromontaż - Poznań S.A.:

- We are free to make personal investments and maintain professional business relationships, but must not get involved in any matters that are contrary to the interests of Elektromontaż - Poznań S.A.;

- We do not run a business or work for a company other than Elektromontaż - Poznań S.A. that competes or intends to compete with Elektromontaż - Poznań S.A.,
- We avoid situations in which we or close friends or family members have financial ties with Elektromontaż - Poznań S.A. with a person who does business with Elektromontaż - Poznań S.A. (or has any other impact on the activities of our Company);
- In the recruitment process, we are guided by the qualifications and competences of candidates; we do not allow a situation in which the employee is the superior of his or her immediate family members or family members report directly to him or her - unless the situation has been analysed and approved by the Human Resource Management Office;
- We do not use any information or business opportunities obtained from working for Elektromontaż - Poznań S.A for personal gain; nor is any other person allowed to use such information for the personal gain;
- We remember that during specific working hours we perform only official duties and we do not abuse the equipment or the Internet (including access to e-mail) for private purposes and for personal gain.

IMPORTANT! The appearance of an actual or potential conflict of interest does not necessarily constitute a violation of the Code of Conduct. However, failure to disclose this fact *is* a violation.

7. ANTI-CORRUPTION POLICY

Elektromontaż - Poznań S.A. does not participate in and does not tolerate corruption in any form, regardless of whether it occurs in the private or public sector and regardless of its scale.

In our business, we are guided by the principle that none of the employees offers, promises or transfers any improper material and non-material benefits to contractors, their employees and attorneys and does not demand such benefits from these entities. Only gifts of the so-called 'negligible material value', customarily adopted in business relations (advertising, corporate gifts), officially presented and not influencing the decisions made.

The issues related to, among others, the anti-corruption policy have been described in detail in the procedure **Protection of the Company's Interests, Annex No. 1 - Catalogue of Prohibited Activities**, along with all related documents (*Rules of conduct in the event of a proposal to accept a financial benefit and in the event of attempts to intimidate an employee; Rules for participation in sponsored events and other activities involving a conflict of interest; Giving and receiving gifts; Managing crisis situations*).

8. ENVIRONMENT

We implement the environmental policy based on the **PN-EN ISO 14001 standard that has been put in place**. We strive to ensure that employees' commitment to environmental protection is a continuous process and in our daily activities we focus on the implementation

of the Annual Environmental Action Plan aimed at gaining benefits from

- energy saving;
- reduction of gas emissions;
- water saving;
- protection of natural resources;
- reduction of outlays by segregating raw materials and materials and an increase in the degree of waste recycling;
- reducing the risk of environmental pollution by monitoring potential sources of oil and coolant leakage.

We raise employees' awareness of environmental protection through regular training, during which we encourage everyone to support the sustainable use of natural resources not only at work, but also in everyday life.

9. OCCUPATIONAL HEALTH AND SAFETY

We attach great importance to occupational health and safety and we have adopted the provisions of the **PN-EN ISO 45001** standard as the basis of our Management System in this area.

We make every effort to create a healthy and safe environment for our Employees, Contractors and Customers. We do this by, among other things, the proper organisation of workplaces, equipping employees with the necessary protective equipment, conducting work environment research, conducting regular training, as well as implementing the annual health and safety and fire protection conditions improvement plan.

In the performance of all duties, we value the involvement of employees who can submit any suggestions directly to the employer or to the OHS Committee cooperating with the employer.

10. PROTECTION OF INFORMATION

The security of information and the systems in which it is processed is one of the key elements of the quality we offer to our Customers. It is also a condition for the continuous development of the Company and thus one of the key company values.

By introducing the **Information Security Policy**, we declare that the Information Security Management System that has been put in place will be subject to continuous improvement in accordance with the provisions of the **PN-EN ISO/IEC 27001** standard.

Information security management covers all aspects of the company as well as own information and information entrusted by the Company's Customers.

In our activity, we follow the rule of information confidentiality, information integrity and its availability.

We guarantee our employees the respect for the principle of confidentiality and proper use of **personal data**, as well as data and information collected during the performance of their work. We make every effort to ensure that the collection and processing of personal data respects fundamental rights and freedoms and complies with applicable legal provisions; That is why we collect and record only the information required for specific, clearly specified and legitimate purposes and we only store it only for the time necessary.