

CODE OF CONDUCT FOR BUSINESS PARTNERS

OF POLIMEX MOSTOSTAL CAPITAL GROUP



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2025

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Background

Polimex Mostostal Capital Group (hereinafter: '**PxM CG**') conducts and develops its activities by striving for a balance between economics, ethics and respect for the environment.

PxM CG's business activities are guided by legal standards, high ethical standards, building partnership relations with customers, employees and the social and economic environment.

This Code of Conduct for Business Partners (hereinafter: **the 'Code'**) was created based on the core values and principles of the PxM CG.

The purpose of the Code is to apply uniform rules and standards applicable in the PxM CG to all Business Partners, both those establishing business relations and those cooperating on a permanent basis (hereinafter: '**Business Partner**') with the PxM CG.

The Business Partner undertakes to pursue its economic objectives with respect for the rule of law, ethics and human rights, in particular by applying the basic principles of conduct set out in this Code.



Scope of application

This Code applies regardless of the type of agreement concluded with a company from the PxM CG, in particular agreements with suppliers and subcontractors, service agreements, consultancy agreements, as well as brokerage and agency agreements, both at the stage of their conclusion and performance.



General principles

The PxM CG conducts its business with respect for ethics, social responsibility, legal regulations and care for the environment.

The PxM CG builds long-term relationships with its Business Partners, Employees and Stakeholders based on trust, transparency and integrity.

This Code sets out the fundamental principles that we expect our Business Partners to comply with, both when establishing cooperation and during its course.

The Code applies to all PxM CG Contractors, regardless of the nature of the agreement entered into, including suppliers, subcontractors, service providers, advisers, intermediaries and agents.

The Business Partner undertakes to conduct their business in an ethical manner and in compliance with applicable laws, in particular by adherence to the principles set out below.



Compliance with the law

The Business Partner

- carries out its activities in accordance with the law, both in Poland and in other countries in which it operates;
- is obliged to comply with applicable national laws, industry regulations and international standards for responsible business conduct;
- respects the principles deriving from the Universal Declaration of Human Rights, the Conventions International Labour Organisation (ILO) conventions, UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises;
- ensures that its activities comply with current legal requirements and good practice in terms of ethics, human rights, environmental protection and anti-corruption.



Fair competition

The Business Partner:

- complies with competition law;
- does not participate in price fixing, arrangements of delivery conditions or other practices that restrict competition;
- does not enter into cartel agreements and does not use competitively sensitive information.

Conflict of interest

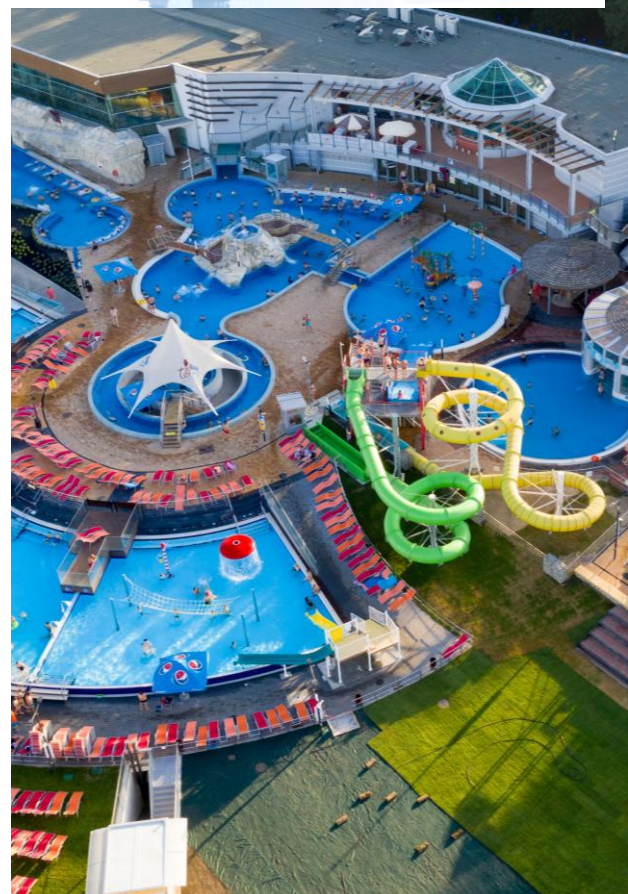
The Business Partner:

- avoids situations that may lead to conflicts of interest;
- immediately informs the PxM CG of any existing or potential conflict of interest situation,
- does not take any action that might call into question the impartiality of business decisions or damage trust in business relationships;
- ensures that its employees, associates and subcontractors act independently of personal, family or property interests that could interfere with the interests of the PxM CG.

Gifts and invitations

The Business Partner:

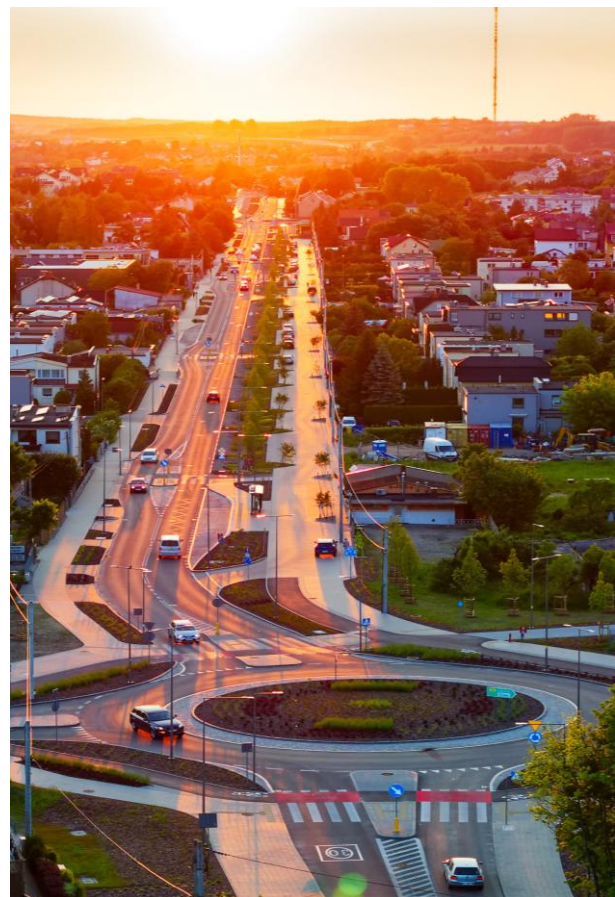
- adheres to the PxM Group's policy on gifts and invitations and does not offer or accept any benefits that may influence or appear to influence business decisions;
- reports any attempt to offer or receive prohibited benefits to the relevant persons within the PxM CG.



Environmental protection and biodiversity

The Business Partner:

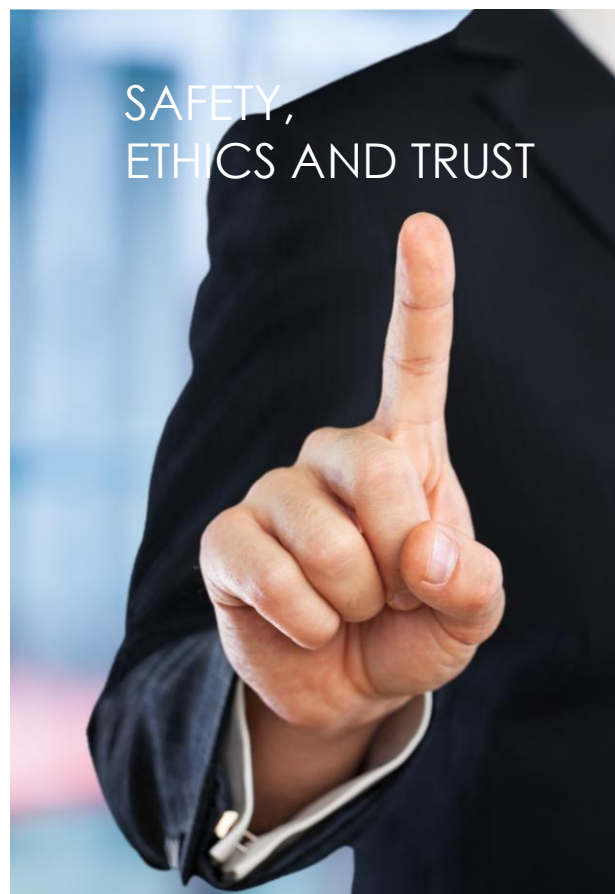
- complies with environmental legislation,
- provides access to the knowledge and means necessary to act in an environmentally sound manner;
- supports the environmental performance of its employees through training, procedures and available technical solutions;
- commits to measures that reduce emissions, energy consumption, water consumption and waste generation;
- favours solutions based on renewable raw materials, recycling and a circular economy;
- uses environmentally friendly forms of transport and supply chain optimisation;
- promotes environmentally friendly attitudes among its employees and partners,
- informs on any event that may have a negative impact on the environment;
- takes actions to protect biodiversity, including preventing the degradation of natural habitats and endangered species;
- does not contribute to the destruction of forests or their conversion into industrial crops,
- cooperates in ensuring compliance with European Union legislation on the protection forests and the environment.



Health and safety

The Business Partner:

- complies with applicable health and safety legislation and internal customer standards;
- ensures safe working conditions to protect the health and lives of employees and third parties;
- uses appropriate personal protective equipment and ensures their availability;
- ensures that its employees are trained in the hazards of their work;
- reports accidents and near misses;
- does not allow the presence of alcohol and other substances affecting fitness for work;
- actively promotes occupational safety.



ESG and sustainability

The Business Partner:

- supports the implementation of the PxM CG sustainable development goals, particularly in the areas of environmental protection, social responsibility and business ethics, acting in accordance with the assumptions of the PxM CG's ESG Strategy;
- undertakes to apply the principles of this Code also to its subcontractors and suppliers. It should take due diligence measures to mitigate social and environmental risks in the supply chain.
- works with the PxM CG on transparency, reporting and improving ESG performance in a partnership based on accountability and trust.

Human rights and labour law

The Business Partner:

- respects human rights and ensures decent working conditions;
- in the case of employment of minors or persons with disabilities, it applies the relevant labour regulations;
- does not allow forced labour, human trafficking or restrictions on workers' freedom;
- does not accept any form of slavery or child labour, regardless of local legal or cultural conditions.

Equal treatment and anti-violence

The Business Partner:

- creates a working environment that is free of discrimination, bullying, harassment and violence;
- fosters a culture of mutual respect and equal treatment;
- provides equal opportunities in employment and career development, irrespective of sex, age, origin, disability, religion, sexual orientation or other protected characteristics;
- promotes diversity and inclusion in the workplace, responds to any violations of employee dignity, regardless of their source, and takes corrective and preventive action.



Anti-corruption activities

PxM CG does not tolerate any form of corruption, bribery, embezzlement, money laundering, fraud or favouritism of individuals or entities.

The Business Partner:

- conducts its business with integrity, in accordance in accordance with ethical and legal principles;
- does not offer, accept or solicit pecuniary or non-pecuniary benefits in exchange for influencing business decisions;
- ensures the accuracy of documents, reports and invoices;
- does not violate economic sanctions imposed by national and international law.

Confidentiality and protection of personal data

The Business Partner:

- protects confidential information and personal data provided in the course of cooperation;
- operates in compliance with data protection and privacy legislation;
- uses data only to the extent necessary for the performance of the contract and in accordance with the purpose for which it was provided, takes appropriate technical and organisational measures to protect data against unauthorised access, disclosure, loss or destruction.

Local communities

The Business Partner:

- takes into account and understands the consequences of the impact of its activities on local community;
- operates safely and responsibly, taking into account the needs of local communities and their members;
- takes care to minimise negative impacts on the environment and, in the event of alterations, ensures that the previous state of affairs is restored;
- maintains a high level of personal culture in relations with the communities.



Sanctions

1. In the event of violations of the rules of conduct contained in this Code and the law provisions, appropriate organisational mechanisms and contractual and other legal measures will be activated to respond to such behaviour.
2. PxM CG reserves the right to take appropriate legal measures against Business Partners who violate the Code, bearing in mind the applicable rules at the PxM CG resulting from the Code.

Reporting violations

The Business Partner and its employees are obliged to report violations of the law, the Code or other regulations.

Reports can be addressed to the PxM CG Ethics Committee:

1. By post to:

Polimex Mostostal S.A.
Komisja Etyki GK PxM
al. Jana Pawła II 12, 00-124 Warsaw, Poland

2. Via the form available at

<https://polimex-mostostal.pl/whistleblowing>

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