

## POLENERGIA GROUP CODE OF CONDUCT FOR BUSINESS PARTNERS

22 June 2023

### 1. INTRODUCTION

Polenergia S.A. capital group (hereinafter **we**, **Polenergia** or the **Group**) is guided by the principles of social responsibility and adheres to the highest ethical standards. That is why we have created this Code (hereinafter the **Code**) addressed to our suppliers and subcontractors and other business partners (hereinafter **Partners**). We expect that they will undertake to apply it in their activity or ensure comparable ethical standards based on their own arrangements and policies. Partners should place similar requirements on their suppliers and subcontractors. This will help maintain the highest standards throughout the supply chain. We apply the Code, to the extent possible, to entities we support as part of our social and charitable activities.

The aim of the Code is to provide Partners with sound legal, social, environmental and ethical standards with which we expect them to comply. The Code is based on core principles, which stem from, inter alia, *Polenergia's Code of Ethics* and the *OECD Guidelines for Multinational Enterprises*. We trust that compliance with them will strengthen our market position as well as that of our Partners.

When selecting and periodically assessing Partners we are guided by their compliance with the Code and their willingness to develop the idea of social responsibility.

#### 1.1. Compliance with the law, industry standards and ethical principles

We expect Partners to comply with applicable national and international laws, while being guided by good commercial practices, corporate governance rules and ethical principles. Partners also undertake to comply with the laws of third countries applicable to them.

#### 1.2. Respect for human rights

We require Partners to apply universally recognised human rights, particularly those set out in the *Universal Declaration of Human Rights*, *UN Guiding Principles on Business and Human Rights*, *UN Sustainable Development Goals*, *European Commission Recommendations* and the *Ten Principles of the United Nations Global Compact*. Partners must reject all forms of discrimination in, inter alia, hiring, promotion, remuneration, training, termination and retirement. We expect Partners not to tolerate the use of corporal punishment or other manifestations of mental or physical abuse, exploitation, mobbing or sexual harassment or discrimination in their organizations.

#### 1.3. Respect for workers' rights

We expect Partners to comply with all labour laws and applicable conventions of the *International Labour Organisation*, particularly provisions on the amount of remuneration of all types, minimum wage, working time and overtime, and the prohibition on the use of child labour. Any form of forced or slave labour is unacceptable to us. We expect Partners to treat all their employees without prejudice on the grounds of gender, age, religion, disability, political opinion, ethnic origin and sexual orientation. We trust that they will act in good faith and allow their employees to associate and to form or join trade unions or other workers' organisations. We want Partners to be committed to dialogue and cooperation in their relations with employees.

#### 1.4. Compliance with occupational health and safety rules

We expect Partners to ensure safe and healthy working conditions for their employees in accordance with occupational health and safety regulations, permits and standards. We trust that they will take steps to eliminate dangers arising in their companies, plants and other workplaces under their authority. They are obliged to comply with health and safety regulations and standards and to exercise the utmost care in order to eliminate accidents occurring in the workplace or related to job performance. Partners should, as a minimum, ensure adequate access to sanitary facilities, drinking water, fire exits and adequate lighting and ventilation, and any living quarters provided by Partners

#### **Polenergia S.A.**

ul. Krucza 24/26, 00-526 Warszawa

Sąd Rejonowy dla m.st. Warszawy w Warszawie XII Wydział Gospodarczy Krajowego Rejestru Sądowego

KRS 0000026545 | NIP 5261888932 | Kapitał zakładowy: 133 604 492,00 zł, wpłacony w całości

Tel.: +48 22 522 39 00 | Fax: +48 22 522 31 61

must be hygienic and safe. We expect Partners to work constantly to improve working conditions and to reduce the risk of accidents by, inter alia, implementing all preventive measures and providing appropriate training and adequate protective equipment. If a given position so requires, they should ensure that their employees are provided with appropriate equipment. We require Partners to report all accidents and incidents affecting safety that occur during the performance of work (provision of services) for the Group (e.g. on construction sites or at facilities where we conduct our business).

#### 1.5. Combating corruption and conflicts of interests

Polenergia has a zero-tolerance approach to bribery and corruption. We require Partners to comply with all anti-corruption laws that apply to them and to abstain from all corrupt practices, including the provision of benefits in exchange for a favourable outcome, contract performance, purchase of services or other actions. Partners declare that they do not work and undertakes not to work with entities that do not provide an appropriate anti-corruption standard. We trust that they will familiarise their employees with the anti-corruption provisions that arise from the regulations applicable to the Partner and Polenergia. We expect that, if a Partner becomes aware that activities of a corrupt nature have taken place – will take appropriate actions provided for by law – and, if these activities could in any way relate to the area of the cooperation with Polenergia, it will notify us immediately. Partners also undertake to act in good faith and to avoid or appropriately manage any conflict of interests and to report all cases of conflicts of interests that could have an adverse effect on the cooperation with Polenergia. Partners understand that there is a *Code of Ethics* and an *Anti-Corruption Policy* in place at Polenergia and undertake to develop and maintain their own policies in accordance with Polenergia's standards.

#### 1.6. Care for the environment, public health and safety and local communities

We are counting on Partners to comply with all regulations, international, regional and national standards and industry guidelines applicable to them regarding environmental protection and public health and safety. We trust that they will make every effort to minimise the negative environmental impact of their business, particularly in terms of their carbon footprint. We want Partners to prioritise sustainability and to see it as the most important criterion for social responsibility and to strive to apply the highest standards in environmental and health protection, including the preservation and restoration of biodiversity. We encourage Partners to have appropriate policies, programmes and strategies for reducing negative environmental impacts, using resources responsibly and maintaining good relations with local communities. The Group has ambitions for environmental and community impact studies and this is not possible without suppliers reporting on, inter alia, environmental and community impact indicators. We therefore expect Partners to cooperate in reporting for the purpose of these studies. We want Partners to proactively assess and take into account the foreseeable impacts of processes, goods and services on the environment, health, safety and local communities in order to prevent or, if that is not possible, reduce the negative impacts of their activity.

#### 1.7. Attention to product and service quality

Partners undertake that the products and services provided by him will comply with the offer presented to us, the provisions of the agreement concluded with us, the terms of the order and the arrangements made in the course of cooperation. We expect the services provided and products supplied to meet the required quality standards. We expect the services provided and products supplied to meet the required quality standards. Partners declare that they hold and will maintain any permits, licences, concessions and other authorisations to supply Polenergia with specified products and services and that their employees have the required qualifications and are appropriately trained to perform the tasks assigned to them.

#### 1.8. Fair competition and reliable cooperation

Partners will act in a manner consistent with the principles of fair competition. We expect that, in their relations with Polenergia, Partners will communicate in a businesslike and transparent manner and provide us with all relevant information regarding our cooperation. They will act honestly and transparently and the relationship between Polenergia and Partners will be based on mutual respect and trust. When dealing with consumers, Partners should act in accordance with good commercial, marketing and advertising practices and should take all reasonable steps to ensure the quality and reliability of the goods offered and services provided. We expect Partners to cooperate proactively with Polenergia in investigating complaints and grievances and during public proceedings concerning Polenergia.

#### 1.9. Protection of confidential information and personal data

Partners undertakes to maintain the strict confidentiality of any information or data obtained, made available or received in the course of or in connection with cooperation with us and to protect any confidential data or information that will be in its possession. We expect Partners to ensure that this information will be stored in a manner that ensures its security and in accordance with applicable law, for a period not longer than required by law or the contract between us. Partner will always provide appropriate measures to maintain the security of information or data of a confidential nature. Partners particularly undertake to specifically protect personal data and special category data and to ensure the security of any media containing such data. Partners will notify Polenergia immediately of any breach of privacy or security concerning Polenergia or its employees or the loss of Polenergia's confidential data.

#### 1.10. Compliance with international sanctions

Partners are strictly obliged to comply with international sanctions in their business activity, particularly those arising from regulations of UN, EU, United States of America, United Kingdom of Great Britain and Northern Ireland and Polish law. It is important not only to verify suppliers but also to monitor day-to-day purchases and payments.

#### 1.11. Compliance with tax regulations

Partners should pay tax dues on time and act in accordance with the letter of the law and the tax regulations in force in the countries where it operates. Tax compliance also covers cooperating with the tax authorities and providing them with the data required to ensure the fair application of tax law.

#### 1.12. Responsibility for supervising employees and subcontractors

We expect Partners to exercise due diligence in the selection and supervision of its employees, associates and subcontractors. This also means that Partners duly vet these entities and require them to comply with a standard at least equal to that under the Code. Partners should enable their employees, associates and business partners to report irregularities in a way that ensures the security, confidentiality and fair handling of their reports e.g. by promoting the [polenergia.zglaszam.to](mailto:polenergia.zglaszam.to) system.

### 2. REPORTING IRREGULARITIES

Polenergia has a system for reporting irregularities, which guarantees security, confidentiality of reports and protection of whistleblower's identity. In the event of suspicion of any irregularities, we expect Partners or persons representing and cooperating with the Partners to:

- seek advice or information from the Group Compliance Officer by writing to the following e-mail address: [compliance@polenergia.pl](mailto:compliance@polenergia.pl) or by calling: +48 507 550 119
- file a report at: [polenergia.zglaszam.to](mailto:polenergia.zglaszam.to)

### 3. FINAL PROVISIONS

The Compliance Officer will oversee implementation of the Code, and while fulfilling the reporting obligation resulting from Polenergia internal regulations, takes into account issues arising from the application of the Code.

The Compliance Officer will regularly monitor that the Code provisions are up to date and review and possible update is carried out at least once a year. If new risks and issues are identified that need to be addressed in the Code, it should be revised more frequently – in response to an identified need.