

PAKFORM GROUP BUSINESS ETHICS POLICY

SCOPE

At Pakform Group we are committed to conducting our business in a legal and ethical manner. We shall behave appropriately towards all stakeholders and this Business ethics policy is our Code of conduct. This Business ethics policy is applicable to all employees and shall provide guidance to aspects that are related to:

- How we respect the human rights both inside and outside our company
- How we ensure we operate in an environmentally responsible way
- How we maintain sound business ethics

BUSINESS INTEGRITY

Legal compliance

Pakform Group complies with the applicable laws, standards and other legal provisions of the countries in which it operates. We are aware of the continuous development of International Regulations and social standards and adopt those that are relevant to our business.

Competition

Pakform Group is committed to fair competition. Laws protecting competition, especially anti-trust law and other regulations regulating competition, shall be observed. Companies and employees must never engage in any anti-competition activity such as illegal fixing of prices or the sharing of markets.

Anti-corruption and -bribery

Pakform Group is committed to working against corruption in all its forms, including extortion and bribery. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability. The company shall comply with the applicable criminal law on corruption.

Confidentiality

Confidentiality is maintained by the Pakform Group and its employees with regard to its business partners' commercial secrets. The communication of confidential information to third parties or the public is prohibited. The obligation to observe secrecy continues to apply after the end of employment for all employees in line with applicable legislation.



SOCIAL

Human rights

Pakform Group supports and respects the protection of internationally proclaimed human rights, and makes sure that company activities do not complicit in human rights abuses, for example, in the relations with our suppliers. In practice this means that:

- We follow applicable legal requirements relating to human rights.
- We identify, prevent and address actual, or potential, human rights impacts.

Discrimination

Pakform Group rejects discrimination in hiring and employment. No employee should be discriminated against because of, for example, race, colour, gender, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, disability, age or union membership.

The company disapproves of psychological, physical or sexual violence and verbal harassment or abuse. Integrity, privacy and freedom of expression are guaranteed.

Forced labour

Pakform Group will not use any form of forced or compulsory labour.

Child labour

Child labour and any form of exploitation of children and adolescents will not be tolerated. The corresponding laws must be observed.

Health and Safety

Domestic and international regulations to ensure occupational health and safety at workplaces are to be observed. By supporting risk analyses, training programs and other precautionary measures, we ensure that our employees can perform their work in a safe and healthy way.

ENVIRONMENT

Pakform Group recognizes that environmental responsibility is a precondition for the survival and prosperity of human beings.

Environmental protection

Pakform Group fulfills the requirements and the standards for environmental protection and acts in an environmentally conscious way in all locations where it is in operation. In this context, it strives for environmentally compatible production methods and a considerate use of resources.

Operations

The overall aim is to minimise impacts on the environment, which are related to our activities, products and services. We therefore support a precautionary and careful approach to environmental challenges.

SUPPLIERS

We expect that our Business ethics policy and other policies apply to suppliers and their group entities, as well as others with whom they do business, including employees, subcontractors and other third parties. We expect that our suppliers will establish and maintain appropriate management systems and that they will actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this policy.

IMPLEMENTATION

All employees should have a good knowledge of our Business ethics policy and other policies relevant to their jobs and apply them in their work. Managing directors and plant managers of subsidiary companies have the responsibility to translate the policy and associated policies into local rules and procedures, in addition to those required for compliance with local legislation. They have the responsibility to ensure that their employees are aware of this policy. All white collar employees should in addition sign off that they



have understood and will apply the policy. External audits will support the monitoring of compliance with this policy.

REPORT OF VIOLATIONS

All employees and other stakeholders who suspect breach of this policy shall report the matter to relevant supervisors, plant managers or Human resources representative. If necessary they can use the Pakform Group whistle blowing procedure. Contact information is posted at every local facility and is available online (www.pakform.com.pl). Reporters may remain anonymous. All communications will be investigated as appropriate and kept as confidential as possible. No employee acting in good faith will be subject to disciplinary measures for providing information concerning suspected violations of law or company policy.

PAKFORM GROUP Management:

Piotr Wrona

Za KOMPLEMENTARIUSZA


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