

# CODE OF CONDUCT FOR BUSINESS PARTNERS OF MASPEX GROUP (hereinafter referred to as 'the Code of conduct')

## PREAMBLE

The Maspex Group's Code of conduct for business partners collects all the fundamental requirements and values that Maspex

Group companies (hereinafter collectively referred to as the Maspex Group) require from their business partners, including but not limited to suppliers and subcontractors. Maspex Group's relationship with business partners is based on trust, respect and mutual benefits of a business nature. The Maspex Group takes into account all local factors and challenges faced by its business partners in the different parts of the world in which they conduct their business.

The provisions of the Code of conduct are consistent with the provisions of the ETI (Ethical Trading Initiative) Base Code, as well as with other internationally recognized instruments, in particular the United Nations Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, including the core conventions of the International Labour Organization (ILO).

The Maspex Group obliges all business partners to comply with this Code of conduct. This Code of conduct supplements the provisions contained in the agreements concluded between business partners and the Maspex Group.

At the same time, the Maspex Group encourages business partners to take actions obliging entities that cooperate with them to comply with the Code of conduct.

Business partners are obliged to cooperate with the Maspex Group for the purpose of confirming compliance with the provisions of the Code of conduct, in particular by providing the necessary information and documentation or by submitting to an audit.

## I. HUMAN RIGHTS

The Maspex Group expects its business partners to respect human rights at the same time, especially in relation to their employees and associates, contained in, among others, the Universal Declaration of Human Rights, the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Additional Protocols.

## II. WORK ENVIRONMENT

### ► Non-discrimination

Decisions concerning, in particular, employment, working conditions, including, inter alia, pay, promotion, access to training, should be based on clear and objective criteria. Business partners should treat employees fairly and not discriminate against them, in particular on the basis of age, gender, nationality, race, sexual orientation, religion, disability, trade union membership, ethnic origin, social origin, political beliefs, family and health situation, including, in particular, pregnancy and the manner and form of employment.

### ► Child labour

Business partners are obliged to comply with local laws governing the employability of children. When employing children, where permitted by law, business partners should take steps to ensure that they are able to continue and develop their education.

### ► Safe working conditions

Business partners are obliged to ensure safe and hygienic working conditions for their employees and associates, among others, by actively monitoring the state of work safety and striving for continuous improvement of its conditions. To this end, they should, in particular, equip workers and colleagues with personal protective equipment and ensure that they are adequately trained and aware in this regard.

### ► Right to rest

Business partners guarantee their employees and associates the right to rest, both on a daily and weekly basis, and the right to paid annual leave in the amount resulting from the provisions of generally applicable law. In addition, they should respect the legal provisions regarding holidays.

### ► Freedom of association

Business partners should comply with and respect local laws regarding the possibility of associating or not associating employees, as well as the formation of trade unions by them.

### ► Forced labour

The Maspex Group obliges its business partners not to use any form of slavery or forced labour. Business partners must not engage in human trafficking or exploitation. Business partners are obliged to take all possible actions to eliminate any form of physical or mental violence in the workplace.

### ► Remuneration policy

Business partners are obliged to pay the remuneration for work on time, regularly and in full. In addition, they are obliged to settle all public legal burdens related to the provision of work. Deductions from remuneration are possible only on the terms set out in local law. Business partners should not engage in any practices aimed at eliminating or reducing the remuneration and/or other work-related benefits of employees.

## III. NATURAL ENVIRONMENT

The Maspex Group commits its business partners to comply with local environmental legislation, to reduce the amount of waste generated in connection with their activities, to raise the environmental awareness of employees and associates, to reduce emissions of pollutants into the air, to protect soil and groundwater from pollution, and to use water and energy rationally.

Business partners are obliged to act in accordance with the principles of sustainable development and to exercise due diligence throughout the supply chain, including compliance with the rules governing the placing on the market of, and export from, the European Union of certain

commodities and products associated with deforestation and forest degradation. Detailed obligations in this respect are set out in the EUDR Clause, available [here](#), which forms an integral part of this Code of Conduct.

## IV. BUSINESS ETHICS

### ► Compliance with the law

The Maspex Group's business partners, when conducting business, are obliged to comply with local and international laws, standards, certifications, as well as industrial codes to which they have committed themselves. Business partners are obliged to familiarise themselves with the principles set out in the Maspex Group's Code of Corporate Ethics, available [here](#).

### ► Anti-corruption laws

Business partners must not engage in any corruption activities and must conduct business in compliance with fair competition rules. Detailed obligations in this respect are set out in the Anti-Corruption Clause, available [here](#), which forms an integral part of this Code of Conduct.

### ► Sanctions

Business partners are obliged to comply with all applicable national, EU, and international regulations concerning legal measures of a sanctions-related nature. Detailed obligations in this respect are set out in the Sanctions Clause, available [here](#), which forms an integral part of this Code of Conduct.

### ► Confidentiality

Business partners are obliged to ensure the confidentiality of all information, including in particular personal, financial, commercial and economic data to which they have access in connection with their business cooperation with the Maspex Group. This requirement shall also apply after the termination of the cooperation.

### ► Partnership relation

Business partners undertake to implement cooperation with the Maspex Group based on mutual trust, loyalty and continuous development of partnership relations, as well as a transparent approach to ongoing projects and executed contracts.

## V. CODE OF CONDUCT VIOLATION

In the event of becoming aware of a breach of the principles set out in the Code of conduct, the Maspex Group is entitled to take all possible actions to verify the truthfulness of this information.

In the event of a material breach by Business partner of any obligation arising from the provisions of the Code of conduct, or in the event of failure to cooperate in remedying identified non-compliance, the Maspex Group shall be entitled to terminate the agreement with immediate effect.

Violations of the Code of Conduct can be reported using the form available on the website [www.maspex.com](http://www.maspex.com) — (*Reporting irregularities (whistleblower)*).

The Maspex Group encourages its business partners to implement tools to report potential Code of conduct violations by their employees and associates.

