

SIRO-BIELSKO

SUPPLIER CODE OF CONDUCT



SIRO-BIELSKO SP. Z O.O.
STRAŻACKA 80 43-382 BIELSKO-BIAŁA
VERSION No 1/15 DECEMBER 2019

TABLE OF CONTENTS

1. INTRODUCTION 3

- a. Basis of the Code of Conduct 3
- b. To whom does the Code apply? 4
- c. Compliance with laws 4
- d. Reporting disturbing situations 4
- e. Prohibition of retaliation 5
- f. Audits 5
 - Health, safety and well-being 6
 - Decent working conditions 6
 - Prevention of discrimination and bullying 7
 - Environment 7
 - Company assets 8
 - Personal data protection (data protection) 8
 - Confidentiality 9
 - Conflicts of interest 9
 - Hospitality and gifts 10
 - Counteracting corruption and bribery 10
 - Sanctions 11
 - Fair competition 11

2. HOW TO REPORT AN ALARMING SITUATION 12

3. SUPPLIER'S DECLARATION 12

1. INTRODUCTION

SIRO-Bielsko strives to build mutually beneficial relationships with suppliers based on common values and appropriate behaviours.

Our Code of Conduct is a guide written for our employees to help them understand our values and present our expectations regarding their daily behaviour towards colleagues and external partners.

3

This document, called the Supplier Code of Conduct, contains specific sections of our Code of Conduct that apply to you, the supplier. You are an important part of our reality and we want you to comply with our ethical principles. We don't want to work with someone who perceives the world not in conformity with our ethical standards. We also encourage you to actively talk about this document if you have any comments or observations.

a. Basis of the Supplier Code of Conduct

The Supplier Code of Conduct is based on faith in people and also on the values that we believe in and which guide us in everyday life. These values obligate us to act in accordance with the highest ethical standards. We believe that people are good and have good intentions.

Our Code of Conduct is based on responsible and sustainable values that respect the diversity that surrounds us. Caring for everyone is the key to understanding our values.

We work safely or not at all. We never ignore dangerous behaviour. We support care for health and well-being.

We care not only for people but also for the environment. We promote green, environmentally friendly solutions and conduct our business in a manner consistent with nature. In this area, we have a responsibility towards future generations.

We conduct business in a fair and transparent manner. We operate according to the Code of Conduct and do not accept shortcuts. **We support the creation of an open work atmosphere where everyone can express their opinion.**

Individually as employees, as teams and as a whole company, we always strive to be better in everything we do. We are an organisation that is learning and we openly share our knowledge. We are proud of our quality and innovation. Together with our clients, partners and communities we are building a better world. **We are open and honest, showing mutual trust and respect.**

We help our clients succeed in their business. We try to understand their needs and the needs of their clients. **We help our clients transform their vision into reality.**



4

b. To whom does the Code apply?

All suppliers of materials or services for SIRO-Bielsko must comply with the principles described in this Code of Conduct and meet the requirements contained therein. This applies to you and your employees as well as your entire supply chain. You have a special responsibility. You must lead by example and act in accordance with this Code of Conduct and applicable laws.

c. Compliance with law

It is your responsibility to meet all legal requirements related to your business. What's more, you are obligated to apply our Code of Conduct even when our standards, e.g. regarding the minimum age of employees, are stricter than legal requirements. Habits or practices generally accepted by the community never take precedence over legal requirements.

d. Reporting disturbing situations

SIRO-Bielsko conducts business with a high degree of honesty and transparency. One of the elementary assumptions of such activity is the atmosphere in which everyone feels authorised to report cases of non-compliance with our Code of Conduct, including suspected unlawful or unethical behaviour.

The same applies to you and your employees as well as your entire supply chain. You are required to report suspicious or known inappropriate behaviour directly to SIRO-Bielsko employees or, if you prefer, anonymously to the email address: komisjaetyki@siro.com.pl

e. Prohibition of retaliation

SIRO-Bielsko does not tolerate retaliation against anyone who has reported suspected misconduct in good faith. "Good faith" means that, to your best knowledge and belief, everything you report is truthful, and no information has been intentionally distorted. **Any supplier who engages in retaliation will be subject to disciplinary action up to and including termination of cooperation.** If you experience retaliation by our employees, report it as suspected misconduct.

5

f. Audits

SIRO-Bielsko reserves the right to monitor and carry out audits of individual suppliers' compliance with the Supplier Code of Conduct. If you want to work with us, you are required to cooperate with us by providing relevant information and enabling us to access individual persons, which will allow us to carry out a constructive audit.

You also have to evaluate your supply chain to ensure compliance with our Supplier Code of Conduct, and to carry out audits of your supply chain at our request. Any non-compliance on your part or by your supply chain must be effectively repaired in a timely manner and without additional costs to us or our clients

Violations of the Supplier Code of Conduct may have a negative impact on your business relationship with SIRO-Bielsko. Potential consequences may include termination of the contract. This provision regarding audits does not release the supplier from liability or obligations, nor does it limit them.

Health, safety and well-being

Occupational health and safety focus on preventing accidents and promoting a healthy and safe work environment for all employees, colleagues and all those who work with us. This is a priority for SIRO-Bielsko. We strive to reach this goal through continuous improvement. We expect the same from you. If you have any doubts regarding safety and accident prevention at your plant, please contact us with questions.

6

OUR EXPECTATIONS FROM SUPPLIERS

- You will ensure the safety of your employees and make sure that companies in your supply chain also provide such safety to their employees.
- You must make sure that your employees are properly trained in occupational health and safety as well as fire safety so that they can safely carry out their work.
- You recognize the employee's right to stop performing a dangerous job.
- You must provide your employees with appropriate breaks at work and adequate social facilities.

Decent working conditions

A tolerant and fair environment is the basis of our perception of the world. Our standards are based on our values, as well as the UN Universal Declaration of Human Rights, the conventions of the UN International Labour Organization (ILO) and the UN Guiding Principles on Business and Human Rights. You must strictly follow these rules.

OUR EXPECTATIONS FROM SUPPLIERS

- You may not tolerate any forms of forced or compulsory child labour, including practices such as unlawful or forbidden deductions from pay. You must recognise any person under the age of 15 or below the age specified by local law as a child.
- You may not allow practices that would limit the freedom of movement of employees, such as taking their identity documents or work permits as a condition of employment.
- You recognise the special needs of employees under the age of 18 and our obligation to provide them with special care.
- You must only allow working hours, salaries and allowances that comply with national and local laws and applicable ILO conventions.
- You must recognise and respect collective agreements and the right of your employees to associate and conduct collective negotiations where permitted by law.

Prevention of discrimination and bullying

Diversity is everything that makes us different as individuals, e.g. age, gender, sexual orientation, ethnicity, belonging to a particular generation, religion, beliefs, language, education, marital status, etc.

7

We treat everyone equally. We work on making communication respectful of other people. Everyone has the right to do the same regardless of diversity. We do not tolerate any form of bullying.

OUR EXPECTATIONS FROM SUPPLIERS

- You must treat everyone equally, providing everyone with equal development opportunities, regardless of appearance, origin, religion, beliefs, gender, sexual orientation, gender identity or manner of its expression, age, disability, marital or family status, or anything that might be used by someone to treat another person in a worse manner.
- You may not agree to any form of disrespect, harassment, discrimination, bullying or unwanted sexual propositions.
- You may not participate in any form of bullying, harassment or discrimination and must respond to such behaviour.
- You may not engage in inappropriate, illegal, sexually explicit or otherwise offensive conduct.

Environment

The natural environment includes the impact of our activities and processes, as well as the long-term environmental performance of the products and services we provide. We strive to protect the environment and believe that we can make a significant contribution to sustainable global development.

OUR EXPECTATIONS FROM SUPPLIERS

- You must actively work to improve the environmental performance of your operations, products and services throughout their entire life cycle.
- You must comply with the requirements and procedures for the use, storage, labelling, transportation and disposal of chemicals and hazardous materials.
- When making investment decisions, you must consider the future impact of the investment on the environment.

Company assets

SIRO-Bielsko possesses both tangible and intangible assets. Examples of tangible assets are: products, materials, money, computers, real estate, machinery and equipment. Examples of intangible assets are: our brand, patents, trademarks, know-how, trade secrets and copyrights.

8

OUR EXPECTATIONS FROM SUPPLIERS

- If you use our assets, you must do it responsibly.
- You must protect SIRO-Bielsko's assets against damage, theft, loss and misuse because they are crucial to our business.
- You may not use SIRO-Bielsko's assets when performing work for other entities.
- You may not use SIRO-Bielsko's assets or your assets improperly, including through abuse, breach of data security, fraud or the use of content that is offensive or obscene in sexual or ethnic terms.

Personal data protection (data protection)

We ensure that all activities performed involving personal data, e.g. their collection, recording, comparison, storage and deletion, take place in accordance with applicable regulations. We respect everyone's right to the protection of personal data.

OUR EXPECTATIONS FROM SUPPLIERS

- You must ensure that all activities performed involving personal data, i.e. their collection, recording, comparison, storage and deletion, or a combination of the above, take place in accordance with applicable laws and regulations.

Confidentiality

Protecting our calculations, ideas, processes and business information is important to our competitiveness. For this reason, some information constitutes the company's protected property and is considered confidential.

9

Confidential information includes business secrets, know-how and proprietary information. It also includes business plans, financial records, customer information, pricing information, employee files, prosecutions and investigations of reported misconduct, financial and accounting data, as well as other business-related issues and methods.

OUR EXPECTATIONS FROM SUPPLIERS

- You must ensure the protection of confidential information shared with you by SIRO-Bielsko and our clients.
- If you receive confidential information by mistake, regardless of whether it comes from an external business partner, colleague, client, employee of a competitive company or from anyone else, you may not use it to obtain a benefit.

Conflicts of interest

Conflicts of interest arise when there is a conflict between our personal interests and the interests of SIRO-Bielsko.

Conflicts of interest may have a source in hospitality and entertainment, gifts, charitable and political contributions, sponsorship and close relationships, or in other forms of engagement with an entity competing or cooperating with SIRO-Bielsko.

OUR EXPECTATIONS FROM SUPPLIERS

- You may not engage in activities that cause actual or alleged conflict between your personal interests and the interests of SIRO-Bielsko.
- You must avoid situations where there may be a conflict of interest or which may appear to cause a conflict of interest.
- In the event of a potential conflict of interest, it is your responsibility to report it to the President of the Management Board of SIRO-Bielsko.

Hospitality and gifts

To promote their business, companies show hospitality to their clients and partners in the form of meals, travels or events. A gift is something given voluntarily without expecting anything in return. Improper forms of hospitality or giving gifts can create conflicts of interest or appearances of bribery. We do not request, accept or offer any forms of hospitality or gifts that may influence or appear to influence our business decisions or those of our partners.

10

OUR EXPECTATIONS FROM **SUPPLIERS**

- The gifts you give cannot create an obligation on the part of the receiving party to you or the appearance of such an obligation. They must serve an actual business purpose. They cannot be immoral or violate the dignity of others. Hospitality may be shown only in moderation.
- You should never offer or accept any gifts in the form of money or a cash equivalent.
- Gift can only be given in an official manner.

Counteracting corruption and bribery

SIRO-Bielsko conducts its activities in a highly honest manner and does not tolerate any forms of bribery or corruption, including embezzlement, money laundering, collection of fraudulent commissions, scams or fraud. We avoid situations that could even give the appearance of bribery, corruption or other forms of inappropriate behaviour.

OUR EXPECTATIONS FROM **SUPPLIERS**

- You may not request, accept, give or offer bribes, either directly or through external parties acting on your behalf.
- Regardless of the circumstances, you should never demand or accept bribes; you may not give bribes, offer them or accept the fact of them being given - neither directly nor indirectly. This means, among other things, that you may never try to bribe a public official, including a foreign public official, or any person or entity, or improperly influence them.
- You must never try to influence the way a public official performs their job by proposing, promising, delivering or approving any undue advantage. The above rule applies regardless of whether the benefit is offered directly or by another person.

Sanctions

Sanctions are legal instruments used by governments and international bodies to influence foreign policy by prohibiting transactions with specific countries, persons, entities or sectors. Lists of sanctions are provided by, among others, the UN, EU and the United States.

11

OUR EXPECTATIONS FROM SUPPLIERS

- You must not engage, directly or indirectly, in cooperation with any person or entity listed as prohibited on the sanctions list.
- You may not do business, directly or indirectly, with any sanctioned country or region.

Fair competition

Competition and anti-monopoly laws promote free and fair competition. These laws are designed to combat practices such as price collusion, market sharing, bid collusion, as well as other practices that are designed to restrict or have the effect of restricting competition. We believe that fair and open competition best serves our company, our shareholders, clients, employees and the whole society. It affects efficiency and innovation, which is the basis of a well-functioning market economy.

OUR EXPECTATIONS FROM SUPPLIERS

- You must comply with the rules of fair competition.
- You may not enter into any agreements with competitors to restrict competition.

2. HOW TO REPORT AN ALARMING SITUATION?

You can report suspicious or known cases of misconduct to the President of the Management Board of SIRO-Bielsko and the Ethics Committee. If you feel uncomfortable contacting a particular person directly, you can report suspected or known violation of the Code of Conduct:

By phone (+48 33 818 34 82)

or via email (komisjaetyki@siro.com.pl).

12

Your reports can be confidential and anonymous. You don't have to identify yourself.

We will promptly investigate any suspicions and problems reported and take appropriate action based on the results of our investigation.

The Ethics Committee consists of employee representatives.

3. SUPPLIER'S DECLARATION

By signing this document, you declare that you understand and will comply with all the provisions contained in this SIRO-Bielsko Supplier Code of Conduct.

You also declare awareness that if a breach of these provisions is found, this may lead to SIRO-Bielsko's decision to cease cooperation with you.

You accept SIRO-Bielsko's right to conduct an ethical audit at your company at any time.

SUPPLIER'S STAMP (COMPANY DATA):

Signature:

Position:

Place:

Date: